

INDIVIDUALS

IND846 – Anne Petrie Dobbs Brown

20161222-5299 FERC PDF (Unofficial) 12/22/2016 1:58:12 PM



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846-6

The DEIS states that more than ¼ of the counties along the proposed route have poverty rates above their respective statewide averages. These are the places where the environmental impacts will occur. Yet instead of addressing how the environmental impacts will be mitigated, the DEIS states that short-term employment and local spending during construction will somehow offset community impacts. A short term bump in local spending does nothing to reduce the risks to public health and safety endured by these communities for countless years after the construction is completed.

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I would also like to comment on the Amendments to the USFS Land Management Plan Amendments as proposed by the NOAI contacted as part of the DEIS for the MVP, regarding the MVP DEIS Section 4.8.2.6 (proposed amendments 1 through 4 to the Jefferson National Forest Plan): I am opposed to the granting of the ROW changes to the Land Resource Management Plan (LRMP), as requested in the NOIA. For MVP to construct and operate a pipeline across federal lands managed by the U.S. Forest Service (USFS) and the United States Army Corps of Engineers, a designation of a "utility corridor" in the JNF would be required if the application is to be approved.

The National Forest Service land is **for ALL Americans**. Preservation of our heritage, our rights, our water and our natural resources provided by the Forest is a privilege of all citizens and not something that should be given away to a corporation for financial profit. I urge that you consider the amendments with due caution for how they will impact the future of the Jefferson National Forest. Public input is essential, and should not be ignored by the Bureau of Land Management, the Army Corp of Engineers, or the USFS.

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

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The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD.

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IND 846-7 cont'd The JNF and the BLM proposed amendments are disturbing and great care and deliberations should be taken for how they will impact the future of the Jefferson National Forest (JNF) and generations to come. The mission of the USFS is to “sustain the health, diversity, and productivity of the nation’s forests and grasslands to meet the needs of present and future generations” it should be a servant of the people. Allowing the pipeline to be constructed within the Jefferson National Forest (JNF) would violate the trust citizens have placed in our government to protect and steward a national treasure. This proposed pipeline crosses numerous delicate ecosystems, karst regions, and mountainsides and private properties. Decisions made by the USFS concerning the land they oversee will also impact communities in the area.

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

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

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

While each amendment is individually and separately without merit, Proposed Amendment 1 is the most egregious and constitutes a serious violation of the trust we should have between FERC and us, the citizens.

I strongly oppose the proposed 500 ft Designated Utility Corridor across Peters mountain and the JNF. A 500-foot ROW would be like building a 26 lane high way across the JNF and the entire area.



A 26 lane superhighway in Texas OK, Through the JNF not OK

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This corridor would insure that future expansion, with the potential for more pipelines, electrical lines, water lines, etc., would be constructed. The impact of the entire width of the designated corridor and whether that conflicts with the forest use plan must be evaluated, as well as the impacts to private landowners within and at each end of the corridor.

This proposed amendment would not only create a "Utility Corridor" across the JNF, but would also create a "Pipeline/Utility Corridor Access Alley" in Monroe, Summers, and Greenbrier Counties, WV and Montgomery, Craig, Alleghany and Roanoke Counties, VA. The damage done by this "Access Alley" across these counties would be severe, but the greatest impacts would be to private landowners in counties on each end of this corridor, as all future projects would have to traverse these areas to enter and leave the corridor across the National Forest Lands. Many landowners in these adjacent counties could become nothing more than custodians of the utilities; i.e., they can only house pipelines in their land, making their land useless for anything else.

I oppose **amendment 2** because the proposal would permit exceptions to the soil and riparian corridor conditions. I believe that Peters Mountain Wilderness Area, The Appalachian National Trail, Mystery Ridge, Brush Mountain Wilderness the old growth Forest, Roadless Areas, as well as other sensitive areas in the forest could suffer substantial damage with the construction. I find it objectionable to allow the construction of the MVP pipeline to exceed restrictions on soil conditions. These exceptions in the fragile forest should not be allowed. MVP should comply with the current restrictions in place regarding soil and riparian corridor conditions and not be allowed to exceed them. Furthermore, I firmly believe that if soil conditions are exceeded, both ascending and descending Peters Mountain and Brush Mountain, it will cause siltation of the water bodies below, damaging critical habitats and drinking water sources. ... Peters Mountain also has numerous endangered and rare species in its confines.

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

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

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impacted resource, not the proposed project. In ascribing an arbitrary geographic scope for this DEIS of 100 miles..."

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

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

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

Since the Mountain Valley Pipeline project has not yet been approved, I find it hard to believe the proposed amendments which would vastly expand the amount of infrastructure, transporting who knows what, would even be considered by the FERC. These amendments are irresponsible from every standpoint conceivable. Given the obvious lack of correct information and data, there is a need for a new environmental impact statement to address changes of this magnitude. In spite of the insistence on the part of FERC and Mountain Valley Pipeline that any disruptions to local communities would only be temporary and limited to the construction phase, Proposed Amendment 1 effectively guarantees disruptions in perpetuity for our communities.

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

I strongly condemn the utter disregard for basic science and human health concerns evident in the four proposed amendments. Enacting these amendments will threaten not just the health of our soil and streams, but poses a lasting threat to our groundwater aquifers and human health. Once contaminated, our aquifers will *never* return to their original quality, depriving my generation as well as future generations of this resource. It also poses a threat to many endangered and rare species found in and near the JNF. I, therefore, implore the United States Forest Service, the Army Corp of Engineers and the Bureau of Land Management not to grant a right-of-way in response to the MVP application.

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Finally, on a personal level, I can't say for sure that I could stay and watch this beautiful land torn apart. Building pipelines, etc., is very much akin to Mountaintop Removal, which destroys what God has made and given to His kids for their use (NOT for its destruction). The pain of watching and listening to the construction of the MVP would be severe, not to mention being severely inconvenient. And to think that this would happen with the permission and approval of our Government is mind-boggling. Is the United States Government that corrupt? "Big Business" has always had its way with Appalachia, but, as I understand it, agencies like FERC were created partially to prevent "ignorant hillbillies" from falling into more of those seducing traps, courteously provided by the "slicks" of the world. Wait, do I have that backwards? Was the purpose actually just to make it LEGAL for philanderers to continue to rape and pillage? (Now, I am the ignorant one.) Nevertheless, the MVP is not proposed as even "a good cause." Is the land of our forefathers and mothers to be sacrificed for modern man's greed? I remind you:

- 1) This pipeline is not necessary, as there are others already in place;
- 2) this pipeline does nothing worthwhile for the people, land, and animals that would be affected;
- 3) This pipeline will be harmful for the ecology of, no less than, the Earth, contributing greatly to climate change and increasing the melting of the Polar Ice Cap.

Aren't these enough reasons for the Government's FERC to step in and protect the Earth and its people? Perhaps it would make little difference in the demise of Earth, as we know it, but that is certainly a step in the right direction. If enough "baby steps" are made, the world may grow up to be responsible adults yet. Also, consider our future generations: what will they do with a hotter Earth? We are told that technology cannot remedy the damage already done.

As I said, I don't know whether I could stand to remain on Hans Creek if the MVP goes through my peaceful valley. I'm in my 70's, so perhaps I wouldn't have to make that choice. But some of my ancestors, who settled here on Hans Creek in the 1700's (one great-great grandfather was in the Revolutionary War!) lived into their 90's, so it's hard to say. I'm in good health, but could be run over by an 18-wheeler delivering a bull-dozer or new pipe. Picture-perfect!

You can call this emotional digression or old-age hysteria, but to me and thousands of others it is constant concern for our well-being and that of the Earth.

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

Sincerely,

Anne Petrie Dobbs Brown
1019 Hans Creek Road
Greenville, WV 24945

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See the response to comment FA11-12 regarding need. See the response to comment CO2-1 regarding benefits. Section 3.3 of the EIS provides an assessment of using existing systems as an alternative.

INDIVIDUALS

IND847 – Mode Johnson

20161222-5305 FERC PDF (Unofficial) 12/22/2016 12:53:38 PM

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

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

Date: December 20, 2016

Re: CP16-10-000 Mountain Valley Pipeline (MVP) Project **LiDAR Not Used for Fracture Trace Analysis on the Mount Tabor Variation Route in Montgomery County, Virginia**

Background

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847-1

This letter was initiated by the responses of Mountain Valley Pipeline (MVP) to requests from FERC and stakeholders to utilize LiDAR technology for fracture trace/lineament analyses of the Mount Tabor Variation route.

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

FERC had requested MVP on three occasions to conduct analyses utilizing remote sensing technologies, including LiDAR imagery, to correlate surficial karst features.^{1,2,3} A summary of FERC's three requests and MVP's responses are in a previous submittal to FERC.⁴ On the March 31, 2016, FERC requested MVP to "file the results of a fracture trace/lineament analysis utilizing remote sensing platforms (aerial photography and LiDAR)."² It should be noted that stakeholders also requested MVP to utilize LiDAR technology to assess karst terrain.^{5,6}

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

"There is no publicly-available remote sensing data, including LiDAR, for the karst areas of the October 2016 Proposed (Mount Tabor Variation) Route."⁷

LiDAR for the Mount Tabor Variation pipeline area was publicly available. Montgomery County (2005) and the Town of Blacksburg (2015) had LiDAR surveys performed for their respective jurisdictions and the author was able to easily obtain the

¹ FERC submittal 20151224-3000

² FERC submittal 20160331-4008

³ FERC submittal 20160712-5188

⁴ FERC submittal 20161219-5056

⁵ FERC submittal 20160714-5027 (Gay)

⁶ FERC submittal 20160915-5084 (Johnson)

⁷ FERC submittal 20161014-5022 (pg. 15/93)

IND847-1 See the response to comment IND498-1 regarding LiDAR.

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IND847 – Mode Johnson

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IND 847-1 cont'd | processed bare earth point cloud tiles necessary for LiDAR analysis. There is no reason MVP could not have obtained the publicly available LiDAR data.

IND 847-2 | Concerned citizens have also requested MVP to conduct dye-trace studies in the area to delineate the groundwater flow. MVP declined this request. Subsequently, **a local stakeholder acquired funding for both LiDAR technology and dye-trace studies** to better understanding of the karst terrane and aquifer in Mount Tabor sinkhole area. Water supply for thousands of citizens is at risk and we need all the information possible to protect the aquifer in the area.

Fracture Trace/Lineament Review

IND 847-3 | Major fractures are often identified by sinkholes aligned in a karst landscape and “in such cases, zones of enhanced recharge may consist of linear swaths at the surface-subsurface interface”.⁸ “Disruption of these linear sinkholes (lineament) with its potential for additional subsurface voids places the pipeline’s construction stability at risk.”⁹

The five fracture trace/lineaments segments reported by MVP¹⁰ (Figure 1 in Attachments) were reviewed by James Spotila, Ph.D.¹¹ He then transferred the MVP fracture trace and lineament segments onto the corresponding area on a LiDAR image. According to Dr. Spotila, an independent geologist, some of the segments drawn on the MVP map did not appear to line up with any features on the LiDAR or Google satellite images. It is unclear what criteria MVP used to determine the placement of these fracture/lineaments.

Dr. Spotila identified the fracture trace/lineaments features on the LiDAR and Google satellite images based on the following:

- Lineaments (e.g., hillshade shadows, vegetation lines, color change, linear color bands, etc.);
- Linear depressions or elongated sinkholes;
- Aligned drainages;
- Aligned sinkholes.

Based on the recon of the publicly available LiDAR and the Google satellite images of the Mount Tabor Variation route, ~20 fracture trace/lineament features (Figure 2 in Attachments) were identified compared to the five that were reported by MVP. This is four times more than MVP noted using non-LiDAR sources. Some of Dr. Spotila’s

⁸ Kastning, E.H., The Surface-Subsurface Interface and the Influence of Geologic Structure in Karst, Proceedings of the Symposium held February 24-27, 1999 Charlottesville, VA

⁹ FERC submittal 20160106-5113 (Gay)

¹⁰ FERC submittal 20161014-5022 (31736356), Figure Number 1, Faults and Fractures, p. 134

¹¹ James A. Spotila, Ph.D., professor of Geology in the Department of Geosciences at Virginia Tech. Dr. Spotila completed this review pro bono using his own resources and on his personal time.

IND847-2 | Section 4.1 discusses dye trace studies used in our analysis.

IND847-3 | Section 4.1 of the final EIS has been revised to provide updated information regarding fracture trace/lineament studies.

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IND847 – Mode Johnson

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segments do agree with MVP segments but there are many more that were missed by MVP. LiDAR has a better data set, higher resolution and is more detailed than aerial photography and topographical maps. If better technologies were used by MVP many more fractures would have been evident. **LiDAR technology would have proved very useful when assessing fracture trace and lineament analyses as requested by FERC.**

MVP stated they used LiDAR for selective routing aspects of the pipeline project⁷, however, the LiDAR information was not provided for proper evaluation. **Recent EPA filing with FERC addresses the lack of public access to information related to the MVP project.**¹²

Conclusion

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847-4

A detailed fracture trace analysis using the best available dataset has not yet been completed by MVP in the Mount Tabor region. MVP should have used LiDAR as requested by FERC to correlate fracture trace and lineament features throughout the project area. If this had been done on the alternative Mount Tabor Variation route, a detailed, careful, fracture trace analysis would have been accomplished.

Selection of the 2016 Proposed Route raises serious issues related to MVP's not using LiDAR:

1. MVP didn't use LiDAR for fracture trace/lineament analyses as requested by FERC three times;
2. FERC should insist LiDAR technology be utilized for fracture trace/lineament features for the entire Mount Tabor sinkhole plain and other areas where there is karst terrane;
3. FERC should insist LiDAR data be reviewed by independent, qualified geologists and results be made available to the public in time for a review and comment.

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847-5

NEPA regulations have not been fulfilled related to this project. Referencing CEQ NEPA regulation: "Agencies are obligated to evaluate all reasonable alternatives in enough detail so that a reader can compare and contrast the environmental effects of the various alternatives."¹³ The Mount Tabor Variation route has not been evaluated "in enough detail" and stakeholders are unable to "compare and contrast the environmental effects" of the pipeline routes. **Public access to information related to the MVP pipeline project and routing has not been provided.**¹²

The DEIS comment period is coming to a close and yet it is obvious MVP has not collected and distributed all necessary data in order for a thorough evaluation of the 2016 Proposed Route that includes the Mount Tabor Variation route be performed properly. FERC is responsible for the scope and accuracy of the data presented in the

¹² FERC submittal 20161221-5087 (EPA)

¹³ FERC submittal 20161114-5194, (Gay)

IND847-4

See the response to comment IND498-1 regarding LiDAR.

IND847-5

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

INDIVIDUALS

IND847 – Mode Johnson

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DEIS. With the new information provided in the LiDAR study⁴, it is evident that the DEIS was released prematurely. **The 2016 Proposed Route including the Mount Tabor Variation route was not adequately assessed based upon empirical data provided and not provided. FERC has been remiss in its duty and woefully negligent to NEPA regulations.**

Attachments:

Figure 1. Section of MVP faults and fractures map
Figure 2. Fracture trace/lineament by independent geologist using LiDAR

Cc:

U.S. Forest Service
Bureau of Land Management
Rep. Morgan Griffith
Senator Tim Kaine
Senator John Warner
Montgomery County Board of Supervisors
Gov. Terry McAuliffe

INDIVIDUALS

IND847 – Mode Johnson

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Figure 1. Section of the MYP map showing faults and fractures¹⁰ along the Mount Tabor Variation route (red line). Apparent fracture trace (yellow lines), fault lines (black lines), karst area (pink) and wells (white circles) are depicted.

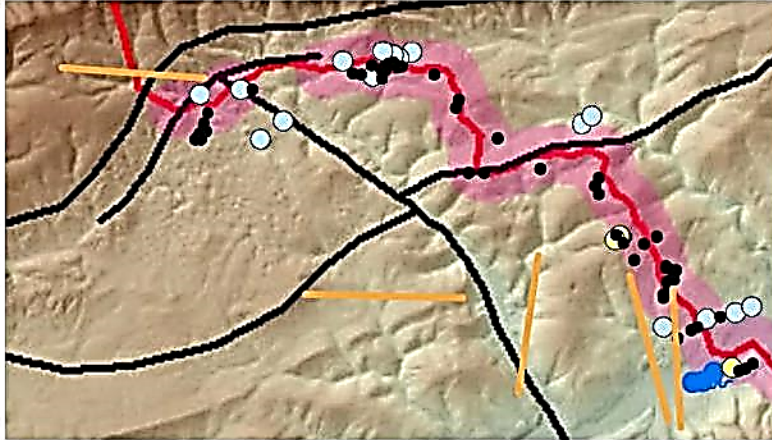
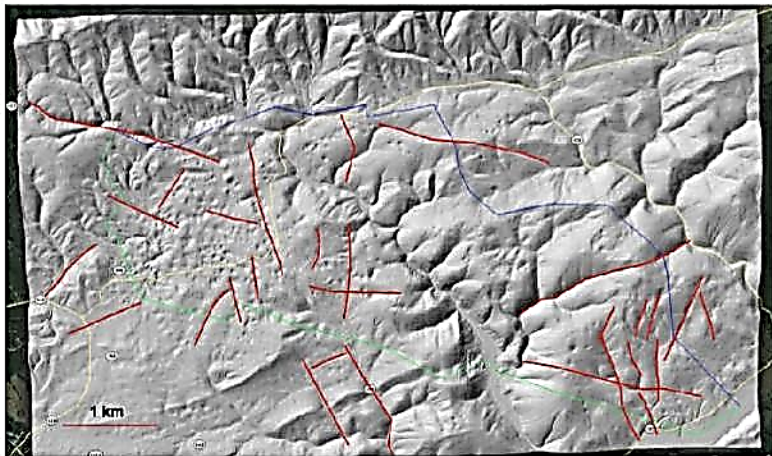


Figure 2. LIDAR image of the same area as Figure 1. Fracture trace/lineament segments (red lines) are marked by an independent geologist. The Mount Tabor Variation portion of the 2016 Proposed Route (blue line) and the 2015 Proposed Route (green line) are depicted.



INDIVIDUALS

IND848 – Individual

20161222-5306(3185919)

IND 848-1 | I oppose MVP because of the unnecessary & irreparable harm it will cause, & because it can't be implemented according to Jefferson Forest Management Plan. Accommodating MVP when energy needs can be met by existing infrastructure is a massive waste.

IND848-1

The Commission would decide if the projects are necessary. The EIS concluded that the project would not cause significant long-term harm (except for the clearing of forest). Section 3.3 of the EIS provides an assessment of using existing systems as an alternative.

INDIVIDUALS

IND849 – Tyler Williams

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

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

Ms. Bose,

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849-1

I grew up in Franklin county Virginia and went to college at Virginia Tech. I have spent most of my life in southwestern Virginia and spent many days hunting and hiking in the Jefferson National Forest. Currently I am working for Louisiana State University studying the lasting impacts of the Deep Water Horizon oil spill. I have seen firsthand the lasting damage any size oil or gas spill can cause on the environment and how that damage impacts tourists, recreationists, and the harvesting of natural resources like seafood. I am deeply concerned about the proposed Mountain Valley Pipeline and would like to comment in **opposition** to its construction. This proposal would do serious and unavoidable damage to sections of the Jefferson National Forest and the Appalachian Trail. The main reasons why the Federal Energy Regulatory Commission (FERC) should not allow the Mountain Valley pipeline to be permitted include:

-This pipeline will be transporting natural gas that eventually will be shipped overseas. I cannot justify building such a dangerous and costly structure in order to ship our natural resources to foreign countries. Countries that will **not** be bearing the **danger** of environmental catastrophe but will be reaping the benefits of our natural gas. This project will disproportionately benefit other countries and not American energy.

-I do not believe that investing in this pipeline will return profits. Natural gas, though cleaner than coal, will inevitably be replaced by more renewable energy sources within several decades. This pipeline may provide a necessary resource today but given the cost of such a pipeline it is unlikely that the advantages will outweigh the dangers and costs of this project when you account for its inevitably short operational lifespan.

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-The Jefferson National Forest is one of North Americas leading biodiversity hotspots, especially when considering species of salamanders, fish, and mussels. A degradation of this fragile and ancient landscape would strain an untold number of species and further reduce their habitat. This biodiversity hotspot is an area to be respected and not marred or imperiled. A small spill of any quantity will **severely** impact the environment, especially the water, for decades. Even the tiniest danger of a leak is unacceptable.

- The location of the proposed crossing is a scenic and unbroken forested landscape with an immediately adjacent federally designated Wilderness area. The proposed project would significantly degrade the views visible from up to 100 miles of the Appalachian Trail, including some of Virginia's most iconic vistas — Angels Rest, Rice Fields and potentially McAfee Knob.

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849-3

- The pipeline will travel through a designated seismic zone and over terrain that is considered extremely unstable. As the pipeline will run over multiple fragile natural resources — including multiple fresh water sources and protected forest areas — and near several communities, this presents a completely unnecessary and avoidable safety risk to people and the environment.

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849-4

- This project could have significant economic impacts on nearby communities, decreasing property values and depriving businesses of tourism dollars generated by Appalachian Trail hikers and visitors,

IND849-1

MVP would transport natural gas; not oil. See the response to comment CO14-3 regarding spills. Impacts on the ANST and Jefferson National Forest are discussed in section 4.8 of the EIS. See the response to comment IND2-3 regarding export. See the response to comment IND2-1 regarding safety. See the response to comment CO2-1 regarding benefits. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

IND849-2

See the response to comment CO14-3 regarding spills. An updated visual analysis is provided in section 4.8 of the final EIS.

IND849-3

The EIS provides a discussion of karst and seismicity in section 4.1. See the response to comment IND3-1 regarding drinking water.

IND849-4

See the response to comment IND12-1 regarding property values. The EIS provides a discussion of tourism in section 4.9. Water resources area addressed in section 4.3 of the EIS.

INDIVIDUALS

IND849 – Tyler Williams

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IND 849-4 cont'd who seek sections of the Trail unmarred by the impacts of energy infrastructure and other signs of construction. Further, any degradation of water quality in this area of the Appalachian Trail will greatly discourage hikers and tourists because they will no longer have access to clean drinking water while on scenic hikes.

IND 849-5 Overall, it is clear that the proposed pipeline has been poorly planned and ignores environmental and social impacts, thus it is unacceptable to approve this highly flawed plan especially in its current condition. I am in opposition to this project and I urge FERC to protect the Jefferson National Forest and its surrounding landscape and communities. Please evaluate the need for a pipeline, its operational lifespan, its advantages to the American people, its disadvantages to southwest Virginia, and the danger it poses to people in Virginia who will trade a minimal reduction in energy cost with a massive threat of environmental calamity.

Sincerely,
Tyler Williams

IND849-5 See the response to comment FA11-12 regarding need.

November 2, 2016,

Summersville WV DEIS Comment Session

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850-1

First I would like to say that this pretend "listening session" is a farce as is the recently issue DEIS for the MVP, which I prefer to call "GREAT WORKS OF FICTION BY FERC". Many issues and data that have been provided to FERC is not included or simply ignored. To list zero springs and swallets (page 4-73 Table 4.3 1-2) in Monroe County, when dozens upon dozens of springs and/or swallets in or near the MVP Corridor has been report is such an example.

Recently it came to my attention that on page 2-12: Table 2.1-5 Above ground Facilities for the Mountain Valley Project, the one and only Mainline Valve (MLV) #22 (aka known as the Emergency Manual Shutoff Valve) , is located at Mile Post 185.2 which is near my house. The MLV is located on Wild Water Farm Road (notice the word FARM in this road name), which is a dead end spur to the Ellison's Ridge Road (CR23/9) and is a very inaccessible area of the county in the best of times and totally inaccessible in severe or inclement weather.

Due to time constraints I will elaborate on my concern in more depth and will submit the results of the "test" in comments to be submitted later. But to summarize my concerns:

This proposed MVP—MLV (aka Emergency Manual Shutoff Valve) is to be located near the end of a dead end road, which is extremely narrow and winding.

The Ellison's Ridge Road and especially the Wild Water Farm Road can become impassable for days or even more than a week in heavy snow. The Greenville side of the Ellison's Ridge Road becomes very icy often in the winter time due to its northern exposure. There is also the issue of the dirt road section of the Ellison's Ridge and Wild Water Farm Road becoming very muddy and rutted in the spring thaw and becoming almost impassable (I have actually seen it impassable by even 4 wheel drive vehicles)

Hans Creek Road is among the last paved roads in Monroe County to be cleared during winter snow storms.

Let me stress again the Ellison's Ridge and Wild Water Farm Road are both very narrow mostly dirt mountain roads, impassable many time during severe winter weather. Not a good road even in the best of times to put a MLV or emergency manual shutoff valve at the end of this road is simply crazy, no actually insane and inept.

This is the MLV (Emergency Manual Shutoff Valve) that would affect the Peters Mountain and Jefferson National Forest and Appalachian Trail in Monroe County WV and Giles County Va.

The nearest MLV's to the only MLV in Monroe County are the MLV's is at MP 198.5 in Giles County Va. and the one at MP 171.0 in Summers County, WV. I wonder if these are located in remote locations as well.

Maury Johnson
Maury Johnson
3227 Ellison Rds Rd
Greenville WV 24945

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Wells and springs are discussed in section 4.3 of the EIS; also see the response to comment LA15-14 regarding information pending about water wells. See the response to comment IND334-3 regarding remote closing of MLVs.

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

From: Thomas Bouldin, Pence Springs, West Virginia

Date: September 22, 2016

Re: Docket No. CP16-10-000 Mountain Valley Pipeline
Draft Environmental Impact Statement

Comment: **Providing a Serious Review of Public Concerns for the Mountain Valley Pipeline**

IND
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If we want to know more thoroughly and directly how to characterize the public interest in relation to the Mountain Valley Pipeline application currently being considered by the FERC, we must *ask* the public. In a democracy, that seems like a not unreasonable way to proceed. NEPA §1506.6 insists that all Federal agencies under its jurisdiction and guidance establish effective ways for the public to participate in procedures throughout the periods of data collection and evaluation. Public assessment of proposed projects is crucial, supplying important local information to supplement more generalized public sources, providing important warnings and alternatives that the 'experts' hired by an applicant may have missed, directing agency attention to issues of importance.

The DEIS for the Mountain Valley Pipeline devotes a good deal of space to documenting FERC's attention to the *procedural* aspects of all these requirements, including public gatherings (e.g., MVP's open house meetings, the FERC's scoping sessions, and subsequently *private* 'pubic meetings' to discuss the DEIS, records of the application materials), and the extensive electronic dockets for the pre-filing and post-application phases of the process. Ex-chairperson LaFleur has stated publicly that the final decision will be based only on materials contained in the docket¹ -- and yet there is absolutely nothing I can find in FERC documentation of procedures that says how or where any of the input from these public contacts **MUST** be utilized in the final decision. Perhaps, then, the decision is intended to reflect only those application materials submitted to the Docket by MVP?

As shown below, there are numerous flaws in the existing DEIS treatment of the *public* concerns expressed in Dockets PF15-3 and Docket CP16-10. **Far more systematic means of analysis are possible – and are *needed* – if the DEIS is to meet even the most basic requirements for a scientifically-acceptable knowledge of the ideas expressed by affected citizens. Without such knowledge, principled consideration cannot inform the decision.**

¹ This claim is made in the previous chairperson's speech about FERC to the Washington Press Club in January 2016. Like a number of other claims in that presentation, it is extremely doubtful that it is meant to be literally true—although it serves obviously useful strategic purposes for warding off counter-arguments posed in legal contexts after a decision is announced. There are no doubt thousands of specific propositions that are claimed to be included in the record only 'by reference'—especially, for example, legal clauses and official documents limiting liabilities and commitments for applicant action.

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Here is how our democratic system works in relation to federal independent regulatory agencies, like the FERC. Voters elect the President and Congress. The President selects the Commissioners at FERC, who are confirmed by the Senate. Congress passed the NGA, which guides the actions of the Commission in the review of natural gas applications. How the Commission arrives at decisions is summarized in section 1.2.3 of the EIS.

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The Official Venues of Public Expression – and FERC's Response

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In keeping with the requirements of NEPA, the MVP application process has provided a number of official channels for the public's expressions of concern. In addition to voluminous materials submitted by the applicant, the public dockets for the pre-filing and filing stages of the MVP application are filled with thousands of comments from individual members of the public directly-affected by the proposed actions; materials submitted by various organizations concerned with relevant issues; legal and governmental representatives of individuals, companies, and organizations wishing to submit information or statements of evaluation and/or concern. The dockets for the application play a central role in the evolving judgment of the application because, as noted above, the decision will be made on the basis only of materials appearing in the docket. As a result, the electronic materials include written comments submitted by stakeholders and the public, transcripts of oral comments delivered during FERC-sponsored meetings, as well as images of hand-written comments, and photographs, maps and other images presenting visual information unlikely to be conveyed clearly by mere verbal means.

It seems, then, that there is a considerable record of the concerns of the public available to FERC in conceptualizing the 'public interest' affecting the proposal. A large percentage of the comments submitted to the dockets convey opinions and observations voiced by individual citizens identifying concern for negative impacts on themselves and their communities. These vary greatly in the degree of descriptive precision and detail included, as well as in the breadth of focus and the number of issues of concern developed. Among these comments are included a relatively small number of 'form letters' circulated with greater or lesser degrees of individualization made possible by the groups of concerned citizens sponsoring their submission.

But the docket also contains thousands of pages of materials submitted by the MVP—in the most chaotic form imaginable, I would note²—offering their version of the projects' effects. While there have been letters expressing support for the MVP, interestingly, many of the public comments submitted individually in support of the proposal have been echoes of the Applicant's promises of increased numbers of jobs and other economic developments—almost as un-individualized as form letters, with few people stating other sorts of benefits of the project or making concrete statements about the need for more energy.

In addition to the statements from members of the "general public", the dockets also contain more extended and formal statements of relevant research and opinion from people with formal specialized training in relevant academic fields. Some of these comments are from affected citizens: for example, stakeholders directly affected by the route who happen also to be trained specialists,³ or have

² This has been a significant point of contention; see Docket CP16-10, Documents # 20160509—5043 for an example of the concerns that have appeared in many other comments as well.

³ See for example among many others, Docket CP16-10, Document# 20161121—5051 by a professor of Crop and Soils Environmental Science; Document #20161207—5186 by a professional soils scientist in private consultation practice; Document #20160630—5208 by a teacher in Plant and Animal Sciences with training in molecular and microbiology; Document #20151127—5175, which critiques errors in MVP karst surveys and assessments by a

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Public participation in the FERC's environmental review process for the projects is summarized in section 1.4 of the EIS. The FERC staff took into consideration all relevant environmental comments filed in the docket, during the preparation of the final EIS. The EIS also summarizes data filed by Mountain Valley.

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broad experience in relevant fields.⁴ Other specialist contributions come from experts sponsored by interested organizations to analyze potential impacts concerning subjects of their expertise.⁵

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In an appearance before Congress in 2015, FERC staff complained that organized interest groups had made it increasingly difficult for the Commission to rely on contacts with actual landowners and members of the public.⁶ This seems an extremely odd assertion, given the dockets' vast accumulation of direct statements from individual stakeholders. Moreover, the 'organized interest groups' to which staff objected typically reflect the concerns of their membership—that is, affected members of the public who have come together in part to afford the manpower needed to process the unrealistic requirements for review and comment set up by FERC itself. **It is a troubling suggestion of agency bias that FERC would object to the organized voices of the public expressing opposition to the project, while the agency is deeply dependent on the organizational voice of the applicant corporations to supply both the data and the arguments in support of the proposal.**

And, unfortunately, this hint of bias is to a large degree confirmed by other evidence. For example, there is no indication of any systematic, disciplined treatment of the huge corpus of public opinion. While FERC claims to base its judgments in "law, fact, and science" there is no evidence that the preparation of the DEIS involved a great deal of the latter—and nowhere is this more obvious than in the treatment of the public's expressions of concerns. **The DEIS provides no discussion of the procedures by which the contents of Dockets PF15-3 and CP16-10 have been processed and made available to the authors of the document or to the decision-makers and the public.** Some stakeholders have questioned whether the comments are being read by FERC. It has been stated in the public record that processing comments is left up to a third party contractor, perhaps even one recommended and paid for by the applicant.⁷ It is not clear whether such a procedure of third-party readers applies to the processing of written comments submitted to FERC, but I have seen no discussion from the agency as to how the comments *are* processed, how any such readers are trained or otherwise prepared to report significant findings to the Commissioners. However, based on some of the problems I have observed, there seems to have been little formal training or planning involved that would meet the standards of the most basic form of social science research.

Professor of Agronomy, Soils and Minerology. All these authors are affected more or less directly by the pipeline route.

⁴ See, for example, the comments by local realtors on local market responses to the presence of the MVP, Docket 16-10, Documents # 20150406—0070, # 20150604—0046, and #20160921—5132. Other examples are the numerous comments submitted by local farmers explaining specific problems the pipeline will create in terms of access to water, fields, and woodlots, or by opening agricultural lands to invasive species.

⁵ See—among many others in Docket CP16-10—the Research report on Karst Geology by Dr. Kastning in Document #20160713—5029, and #20161212—5032; the Hydrogeological assessment report of Dr. Pamela Dodds in Document #20160815—5135, and the reports of the economist, Dr. Spencer Phillips, in Docket PF15-3, Document #20151019—5187 and Docket CP16-10, #20160531-5236, #20161221-5068.

⁶ See story by Jeremiah Shelor in *NGI Daily Gas Price Index*, for Dec. 1, 2015. Commissioners charged that advocacy groups opposed infrastructure as “a matter of ideology” and were making it difficult for staff “to gather project specific input from landowners and those directly affected.” The Commissioners clearly were not in attendance at the Lindsie Scoping Session which was heavily dominated by very articulate individual landowners.

⁷ See <http://www.ppekskillpost.net/peeksills.nancy.vann.dragged.ferc.hearing.security/> which quotes a citizen to this effect. Certainly, the description of third-party contractor arrangements is documented by FERC's own handbook for such employees.

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This is not true. FERC staff have many ways to communicate with affected landowners, including open houses, public meetings, sessions to take comments on the draft EIS, site visits, and letters filed in the docket. The fact that the EIS cites many letters and reports filed by the public and addresses issues raised is evidence that all filed comments are read and considered by staff.

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The discussions of the docket contained in the DEIS are thin on content and typically fail to reveal the depths of concern commonly expressed in the comments themselves. Nor do these reports reflect what would be expected of a genuinely 'scientific' treatment of the comments as data revealing public attitudes. Consider the amateurish presentation of summary data supposedly representing the issues identified during the scoping sessions (Table 1.4-1 (page 1—26-27). The DEIS text explains the general contents of the dockets: prior to scoping there were 597 "comments" submitted about the MVP; during official scoping 964 "comments" (although there is no indication how many of these may have been oral statements at scoping sessions), these included letters from classified constituencies including 'affected landowners' and "the general public," and an additional 393 "form letters" (there is no explanation of whether these included individualizing comments possible as well). Between the end of the scoping period and publication of the DEIS the agency received an additional 428 "comment letters."

There are some impressive numbers here, surely, but from the point of view of meaningful social science, a lot of key information is missing—and sloppy description undermines anything like accuracy: does the class of 'comment' include 'oral' comment (subsequently transcribed)? Is a 'comment' the same thing as a 'comment letter', or does the latter category include form letters (which were ruled out of the earlier general count)? How was FERC able to distinguish between "affected landowners" and "the general public?" Were the formal reports and extended comments by scientific specialists presenting general conclusions treated separately from the observations of specific problem areas offered by affected landowners? For purposes of understanding the results of the summary, a reader needs a great deal more precision.

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The DEIS text then provides no effective guidance to reading the results that are presented in the Table 1.4—1. A footnote at the end of the table states that the figures are based on 'non-form letters' filed during the formal scoping periods for the MVP and the EEP combined. For purposes of judging public concern, there is no obvious reason to eliminate form letters—especially since many I saw included the individual filer's expression of specific concerns (We certainly do not discount votes during an election on the grounds that all those for a given candidate look the same!) **Moreover, combining the data from both projects (even though response to the EEP involved very small numbers) makes it impossible to begin the process of associating the concerns expressed with the appropriate project, much less any particular segment of the route.** And there is no indication of where the concerns originate in geographical terms along the route: it is as though public concerns float in some abstract ether, devoid of any real-world context. To further confuse matters, the second column of the table is headed "Percentage" but includes a footnote that makes nonsense of the designation: the footnote states that the percentages will not sum to 100% because most letters include more than one category-- **so we have no idea whatsoever what the percentage is a percentage of. If the study of public comments was not going to make use of an accurate propositional analysis⁸, a simple count would have been more useful.** Clearly, FERC staff have not brought to the public's expression of concerns **any of the serious attention provided by social science methodology—which of course spares FERC from any serious evaluation of their conclusions about public concerns.**

⁸ This is a method of breaking down a complicated sentence into the actual claims predicated in its various clauses. This and other technical methods of analysis were among the tools referred for FERC's use in my earlier comment on "Taking the Public's Comments Seriously" (Docket PF15-3, Document # 20150417—5026) which was made available to FERC on April 16, 2015 – and has been successfully ignored since then.

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Letters filed during scoping, or in response to our draft EIS, that raised legitimate environmental issue guided the direction of the FERC's analysis for the final EIS. Reports filed by outside parties were not ignored; see for example our evaluation of Dr. Kastning's report on karst in section 4.1 of the final EIS.

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The Dockets for the application contain evidence of other serious breaches of the most basic scientific principles governing social science research. **FERC personnel seem to have had almost no training in how to encourage people to articulate their thoughts and concerns, or to respect those who make an effort to do.** At the Linside Scoping Session, my own comments were interrupted by the FERC facilitator who reminded me that my raising questions was essentially futile since answers would not be provided until the EIS was published. The transcript of the Linside session also reveals the FERC representative warning presenters against testifying to a "untrue rumor" when they speculated about overseas sale of MVP gas. **(The DEIS on page 1--7 subsequently reinforces this attempt to shut down a discussion important to some members of the public, labelling the idea contemptuously as the false "secret purpose" of the MVP, and naming affected citizens who discussed this possibility, which remains entirely plausible despite what FERC has been willing to state.)** Much later in the application process, the same FERC employee repeated this procedural mistake while taking testimony during the 'public hearings' on the DEIS, repeatedly interrupting a commenter and contradicting her testimony, seemingly in an attempt to prevent the record from containing the charges she was formulating. "We had not understood we were coming to a debate session."⁹ the commenter noted wryly in introducing the transcript of the exchange. **There can be no more obvious violation of ethnographic research methodology possible than essentially forbidding a commenter to talk to the researcher honestly about his/her actual perceptions. These incidents suggest that FERC is not nearly so interested in stakeholders' perceptions as the agency asserted itself to be in the testimony to Congress referred to above.**

Far from trying to cultivate an unbiased and 'objective' attitude toward the data being developed in the DEIS, FERC staff appear more obviously as combative spokespersons for the proposal. The DEIS contains numerous instances where potentially valid concerns are 'put down' with pat objections: "Unfortunately" the text says snidely, the writer "did not provide facts or data to support the claim." **In a truly petty illustration of the vindictive character of FERC's 'science,' the DEIS names specific offenders whose comments challenging FERC's counter-intuitive views are the subject of mockery or rejection: realtors whose knowledge of the rural market challenges FERC's counter-intuitive view, trained analysts whose reasoned opinions about gas markets happen not to coincide with that of the project manager and/or the Commission. If you want to encourage people to talk honestly with you about their views, the best way to encourage this to happen is to expose them name-by-name to public ridicule for being 'wrong' and foolish.**

Concern for the truth should have motivated FERC staff to reflect on some means to obtain a data-based resolution of the issue being raised, rather than attempting to escape a potentially embarrassing subject. Even more offensive are the occasions where expert contributions to the Docket are simply dismissed without any apparent review or investigation of the actual content of the materials submitted. Examples include the Kastning Report on issues related to Karst—a detailed examination of a crucial geological issue that poses significant safety issues for the pipeline. The report is given passing acknowledgment in a technical discussion of groundwater geology and no analytic attention whatsoever on page 4—72 —and is never referenced again except in the bibliography. Similarly, a detailed analysis of important hydrogeological issues involving groundwater movement and headwater streams by a

⁹ See Docket CP16-10, Document #20161201-0013.

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highly experienced Ph.D. geologist is dismissed in passing as an anonymous 'comment' (page 4—112) whose concerns can be ignored on the basis of undisclosed mitigations.

All of these basic violations of social science methodology and accepted intellectual practice suggest that FERC staff are ill-equipped to honor their commitment to engage the public in a meaningful assessment of the proposed pipeline. **FERC gives the impression that they would rather not be bothered with public opinions and concerns, and that the Agency has every intention of ignoring those concerns if doing so suits their agenda. As a result, one wonders whether the agency has any realistic notion about the public interest at all.**

DEVELOPING ANALYTIC DATA ON LANDOWNER CONCERNS EXPRESSED IN THE DOCKETS

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851-5

The failure of the DEIS to process the public comments in some objective and scientifically acceptable way threatens to invalidate many central claims for FERC's evaluation of the proposal. It calls into question FERC's knowledge of the public interest, and it undermines the few efforts made to avoid or minimize negative impacts on landowners and communities.¹⁰ **For example, in an effort to demonstrate the Agency's responsiveness to the public, the DEIS Table already discussed (Table 1.4-1) lists sections of the DEIS related to each generalized statement of concern (e.g., 6% [of which commenters?] commented on "wildlife...compliance with Migratory Bird Act" which is discussed in DEIS section 4.5.3.) But the discussion of the comments remains on such a generalized level that no one could tell from the table whether anything in the text is actually responsive to the concerns expressed by the public.**

Given these issues with the present treatment of the Dockets in the DEIS, I want to follow up on a request I originally filed with the Commission on April 16, 2015.¹¹ I request the formal analysis of the contents of those dockets, and I request that the results of this analysis be filed in Docket CP16-10-000 to become part of the public record of the MVP application per Ms. LaFleur's directive that states that decisions will be made solely on the basis of information appearing in the docket.

- (1) What are the twenty (20) most common concerns expressed by landowners and other groups of respondents in the course of the pre-filing and filing discussions as represented in Docket PF15-3-000 and Docket 16-10? (If there is significant variation between Dockets in the most-commonly expressed concerns, treat of each docket separately.) Include— at least— the following groups: 'affected landowners,' concerned members of the 'general public,' 'trained specialists affected,' 'trained specialists submitting technical documents.' 'Form Letters' concerns should be analyzed and numbers of responses tallied for each category of concern. What is the numerical frequency of the expression of concern for each topic across all groups? As noted in the preceding text, **percentages of occurrence will be less valuable than numbers of incidences of mention.****

¹⁰ See FERC's 1999 procedural document referred to earlier.

¹¹ Docket PF15-3, document #21050417—5026. I would note that some of the procedures I am proposing here are closely associated with the methods of research and analysis described in "The Proposed Mountain Valley Pipeline Jefferson National Forest Segment Cultural Attachment Report" by Ginny Bengston and Rebecca Austin, January 25, 2016, which was submitted to the FERC by Tetra Tech. This report, of course, limited the focus of research to documents likely to contain locally significant data for the examination of a single issue, while what is needed for the present study is a much wider and complete examination of public concerns.

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The draft EIS addressed all relevant environmental issues raised by the public during scoping; although mostly in a generalized manner under resource topics in section 4. Table 1.4-1 in the draft EIS clearly showed that FERC received the most comments on socioeconomic issues during scoping; representing 12 percent of the comments received.

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- (2) **What is the geographical distribution of these concerns along the proposed route** of the MVP on a county-by-county basis? What is the numerical frequency of their occurrence in each county? (A purely fictional illustration: “concerns involving karst geology in Monroe (27), Craig (33), Giles (52) and Montgomery counties (21), plus 2 references in Summers County concerning the Greenbrier River floodplain”). This will not be completely accurate, obviously, since many commenters do not mention their location by county or close-by town--however internal evidence (e.g., references to local landmarks, etc.) may help narrow the range somewhat.
- (3) **What is the range of variation found in the expression of significance** landowners attach to each concern (e.g., ‘Failure to address this issue will ruin our view of Peters Mountain.’ Or ‘If this issue is permitted to occur, it will make it quite expensive for me to build new access to my hay fields” or “If this issue is not addressed, my son’s family will be unable to build their planned home and our family’s four generation stewardship of this land will end.”) Ideally, staff would develop a detailed rubric by which statements could be reliably categorized by variation (For instance, in the preceding example we have presented ‘aesthetic,’ ‘pragmatic,’ and ‘cultural’ issues respectively), and numerical tabulations should be provided, thus indicating in more detail how severely a given issue impacted the population.
- (4) **What specific recommendations and/or requirements has the FERC imposed on the Applicant to respond to each group of these concerns as articulated by affected members of the public?** Where exactly in the public record of the application (i.e., on-going correspondence, requests for information, and the DEIS) are these requests, recommendations, or requirements articulated and documented?
- (5) **What evidence exists in the public communications of the applicant that these concerns have been acknowledged and that the company is committed to specific actions which will effectively address each issue put forth by affected citizens?** Where exactly can this evidence be reviewed in the resource reports, correspondence, or other public statements of the applicant?
- (6) Should the application be approved, **what specific measures will be undertaken by FERC (or officially charged to specific other agencies) to oversee and evaluate the work of the applicant and/or their subcontractors to ensure that each of these twenty (20) areas of concern is effectively addressed in the actual performance of work for the Project?**

RATIONALE FOR THE REQUEST

If the FERC hopes to make a persuasive case that the application meets the Commission’s own standards for addressing and minimizing concerns for damage to landowner and public resources, the first requirement is to prove that the Commission can identify what those concerns are. Once that has been shown, however, then is the need for the requested additional information in 2 through 6 above clearly follows.

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Environmental issues raised by the public, both during scoping, and in comments on the draft EIS, are classified in section 1.4 of the final EIS.

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While the selection of 20 concerns is admittedly arbitrary, it provides a useful means to initiate what seems to be the crucial piece of research demonstrating the extent to which the application and the Commission's responses address issues of the public interest. In a much earlier posting,¹² I suggested resources by which the staff could develop a study acceptable to Social Science standards providing the sort of information requested here, so there was time for the Commission to develop the means to pursue this data prior to the drafting of the DEIS. Ideally the staff will perform a more thorough analysis, providing a complete catalog of the themes articulated in each Docket, together with their numerical frequency, and selecting a meaningful proportion of these themes for the complete presentation required. (Often in such research there will be obvious breaks or gaps in the frequencies of occurrence which make possible more natural divisions of the data, rather than having to rely on the imposition of an arbitrary 'top ten.')

The suggested methods go far beyond the current report in the DEIS, which appears to have been produced from a computer word-frequency program. A somewhat more effective illustration of the usefulness of this strategy is provided in a comment from Professor Zipper, *et al*¹³ in which the authors use a related method to demonstrate quite powerfully the widespread concern for water resources in karst-intensive areas of the pipeline route. What is proposed here, however, involves a more elaborate propositional analysis to reveal in greater detail both the character of particular concerns and the variation and frequency with which particular concerns are asserted. Such argument could provide an excellent, concrete illustration of FERC's work to reassure the public that its concerns are being heard, which seems especially appropriate given the ways the FERC process has drawn in the participation of the public, demanding a huge investment of energy, insight, and commitment on the part of large numbers of citizens.

OTHER DATA MISSING FROM THE DEIS

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851-7

In addition to the inadequate representation of public comments on the project, the DEIS lacks data on other aspects of the public interest. I have previously suggested a range of data needed to characterize more concretely and accurately the public interest concerns of *beneficiaries* of the proposal. I reproduce here with (slight editorial changes of punctuation) that section of my earlier comments:¹⁴ [Docket PF15-3-000, document#20150616-5168]:

FERC's draft EIS should provide us with the following materials:

EQT/MVP's full discussion of proposed benefits and costs, including a detailed identification of the markets for MVP gas: these markets should be identified, carefully analyzed, and surveyed by an independent contractor as to expectations and needs for the product (e.g., are the markets already requesting additional energy—or does the corporation intend to generate interest and need through advertising and other marketing strategies? What degree of benefit in lower prices would be required to make purchase of new service attractive?) A carefully contextualized survey (explaining the impositions and dangers for American citizens of the pipeline, and asking for measures of customer needs, perceived benefits, losses should the project be denied, and so

¹² Docket PF15-3, document #20150417—5026, April 16, 2015.

¹³ FERC Docket CP16-10-000, document # 20151125—5156.

¹⁴ Docket PF15-3-000, document#20150616-5168.

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Mountain Valley's discussion of project benefits and costs can be found in its application to the FERC. The Commission may further discuss markets for the project in its Order. These are not environmental issues to be addressed in the EIS. Real estate values are addressed in section 4.9 of the EIS. That analysis was based on a review of independent scholarship, with citations provided.

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forth) could be quite useful as a comparison to the property value survey discussed elsewhere in this document.

In another comment submitted during the pre-filing period,¹⁵ I proposed the general structure of a survey-based evaluation of local realtors' and buyers' attitudes toward the presence of gas transmission pipeline in the context of rural real estate. The present treatment of this issue in the DEIS is entirely unsatisfactory, failing to demonstrate that existing studies provide sufficient contextual relevance to resolve the major questions raised. Given that the claim of non-effect is entirely counter-intuitive, I request that FERC conduct the sort of study proposed in the 2015 comment. One assumes that the EIS is meant to provide the best information available of relevant topics, and that this is one reason why FERC maintains a research staff of more than 1000 employees to help develop the needed information. It is therefore puzzling that FERC staff seem to prefer rejecting ideas for lack of evidence rather than exploring the truth of these ideas by developing that evidence.,

Some of the weaknesses in the DEIS reflect the failure of FERC staff to use available methods of research to more fully characterize the public's concerns. That is, FERC could have accessed a trove of valuable, quantitative data on the public interest, **data which met the Commission's stated requirement for quantitative, non-speculative evidence as the basis for decision-making.** This is the function of the proposed analysis of the existing Dockets: to provide useful, measurably reliable evidence of the concerns and opinions of the public. As noted previously, such commitment to accurate scientifically-acceptable evidence is also a keystone of the NEPA processes to which the FERC presumably subscribes. If the proposal for these research studies has in fact been ignored or rejected (as I suspect is the case), the FERC has opened itself to **serious charges of procedural inadequacies, and a failure to consider available evidence relevant to the decision on the MVP application.**

The two additional studies proposed here would have helped provide data—in a form required by FERC—to **base some of the Commission's estimates of public concerns on a direct measure of those concerns,** rather than identifying the public interest with an arbitrarily-selected economic projection that is not in itself adequately documented in public records of the proceedings. **Without any more accurate sense of how the public sees its own interests, FERC really must issue a No Action Decision, suspending any further work on the MVP, because there can be no demonstration that the proposal is in the public interest, and thereby warrants a Certificate of Convenience and Necessity.** Note that I am not arguing these pieces of research would entirely resolve the question of the public interest—just that they would place the discussion on valid empirical grounds, which would seem to be the point of the Commission's claim that their decisions will be "based on law, fact and science." **The requested materials would more fully allow the public to speak for itself, rather than relying on corporate planners or bureaucrats to speak for us.**

CONCLUSION: NEPA's EMPHASIS ON PUBLIC PARTICIPATION

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NEPA requirements are firm about the crucial role played by public involvement. Section 1500.1 (b) states: "Accurate scientific analysis, expert agency comments, and *public scrutiny* are *essential* to implementing NEPA." In relation to the MVP, public comments have illuminated many failings of MVP research, many shortcomings of FERC procedures, and have testified eloquently to aspects of the project that would otherwise never be articulated. As has been pointed out, these public

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Our public participation program, outlined in section 1.4 of the EIS, meets the requirements of NEPA.

¹⁵ Docket PF15-3, Document #20150526—5069.

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comments have varied widely in the depth of description and detailed facts conveyed, in many cases surpassing whatever 'scientific' observations MVP's employees and sub-contractors have identified. Therefore, both as an ethical obligation to honor the discipline and devotion of the public in supporting NEPA processes—and in the best interests of producing complete and accurate scientific knowledge of the proposed project and its impacts—FERC staff should be compelled to deal with the contents of the Dockets PF15-3 and CP16-10 in systematic detailed ways that accurately present the actual content of public concerns.

Respectfully submitted,

Thomas Bouldin, Intervenor
Pence Springs, West Virginia

Cc: Jeffrey Lapp, Associate Director, Office of Environmental Programs
Ted Boling, Associate Director for NEPA, Council for Environmental Quality
Barbara Rudnick, NEPA Team Leader, EPA Region 3
Ben Lockett, Staff Attorney, Appalachian Mountain Advocates

INDIVIDUALS

IND852 – Robert Massengale

20161222-5336 FERC PDF (Unofficial) 12/22/2016 2:16:29 PM

Robert Massengale, Blacksburg, VA.
Kim Bose, Secretary, Federal Energy Regulatory Commission

Neil Kornze, Director, ELM Washington Office

Joby Timm, Supervisor, George Washington and Jefferson National Forests

Dear Secretary Bose, Director Kornze and Supervisor Timm,

IND
852-1

My deep appreciation and heartfelt thanks goes to the employees involved in supporting the planning and land management work for our public lands, especially those who are stewards of America's natural resources and wildlife populations. Thank you for your service.

I work as a site planner and designer with training as a landscape architect. I've been involved in land management planning as a conservation planning assistant in Alaskan Wildlife Refuges (Togiak and Izembek) and have a bit of familiarity with what amendments can do to policy and management decisions in important resource rich areas. I also have professional experience in mitigating stream fragmentation from infrastructural impacts and have first hand knowledge of how industry infrastructure can impair forest and stream function.

I oppose allowing the amendments 1,2,3 and 4 from docket CP16-10-000 (MVP). That will allow a 500 foot MVP gas line right of way, old growth timbering, relaxation of riparian protections, and permit crossings along wilderness and through the Appalachian Trail in the Jefferson National Forest LRMP.

My largest concerns are the amendment to allow the 500-foot construction right of way (amendment 1) to take place in National Forest lands that will permit future infrastructure projects with less stringent review, and on tracks that will require cutting old growth forest elements (amendment 3). Having such a large corridor, and its requisite support infrastructure (access roads, pull outs, pumps, etc), will have a huge impact on a forest that is now impacted by large transmission lines, roadways and parcels of private landownership within it.

These types of occurrences introduce massive invasive species problems that lower the productivity, function and fiscal value of timber stands and forest health. Construction projects compact soils, create significant erosion and can drastically alter existing conditions of work sites. The current infrastructure of small rural road systems and forest roads within Jefferson National Forest cannot support large equipment necessary for construction without modification and greater impacts to job sites and the routes to those locations.

IND
852-2

As a person who spends a great amount of time hiking, exploring and participating in citizen science projects in many areas in and around Jefferson National Forest, I value the access to and health of these lands. Having a sense of and connection to healthy and wild landscapes is important for our sense of self and wellbeing. This is critical during a

IND852-1

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

IND852-2

Section 4.8 of the EIS provides a visual assessment for the Jefferson National Forest. Socioeconomic issues, including tourism, is addressed in section 4.9.

INDIVIDUALS

IND852 – Robert Massengale

20161222-5336 FERC PDF (Unofficial) 12/22/2016 2:16:29 PM

IND 852-2 cont'd | time of increased social and personal pressures when the eastern United States is rapidly urbanizing, and forestlands like the Jefferson National Forest and George Washington National Forest are rare occurrences.

Large power lines and other previously mentioned infrastructure seriously diminish view-shed corridors, hiking, hunting and other types of recreational use for forest users. The huge and important economic benefit from these pastimes cannot be understated for our local economy, as well as to associated economies at regional and national levels. It is critical to have spaces people can build relationships with and get to understand to ensure support/appreciation for good management and ensure accountability for improper management.

IND 852-3 | Thirdly, I am extremely concerned about the potential for catastrophic danger from fires and from ground water pollution that a gas pipeline poses to forests.

This fall witnessed the tragedy of several fires that broke out in Western North Carolina public lands. Forests that have stood for generations were obliterated, as well as the needless deaths of forest neighbors and destruction of private homes. How would we make this pipeline safe without seriously altering the entire areas of forest they are going through? Even then, a pipeline cannot be 100% secure from unforeseen actions or natural events. Keeping an explosive element in a highly flammable landscape is not worth the risk.

Furthermore the National Forest protects the headwaters of numerous tributaries to our region's watersheds. Having a porous karst landscape that is subject to subsidence and unpredictable water drainage patterns is a poor fit for any object transporting harmful elements like gas, surfactants used to maintain the pipes integrity or other elements involved in the process.

This pipeline potentially puts people's health, safety and welfare at risk and impacts the health of forestlands it goes through. The project needs an alternate location not through important public lands, a redesign, or an otherwise a different transportation approach must be considered. It is not a compatible use for our forest management and will merely open the forest and adjacent lands of all types to more pipeline development that will be less monitored if amendment 1 is approved.

Please reject all of the proposed amendments (1,2,3 and 4) in CP16-10-000. Our forests and forested watersheds are too valuable to impact further.

Thank you very much for the listening to and recording this position. Thank you also for protecting our communities well being and the health of our public lands.

Best regards,

Robert Massengale
307 Lee Street,
Blacksburg VA

IND852-3

See the response to comment IND2-1 regarding safety. The EIS provides a discussion of groundwater in section 4.3 and karst in section 4.1. See the response to comment IND277-11 regarding chemicals.

INDIVIDUALS

IND853 – S. Gordon

20161222-5337 FERC PDF (Unofficial) 12/22/2016 1:37:32 PM

IND 853-1 Constructing this pipeline will be a mistake for many reasons. The Forest Management Plan has stated that this terrain is not suitable for such a pipeline, and the current standards must not be weakened to allow for its construction. The current standards were created for a good reason—to preserve and maintain the scenic integrity of the Jefferson National Forest both for the people who live in this region and the many Americans who travel here to enjoy its beauty. This pipeline is not needed to meet our current energy demands. This pipeline will cause a negative environmental impact when it is not even needed in the first place. You also seem to be ignoring the NEPA process concerning how this pipeline will impact climate change. And even if MVP follows the best management practices possible, that will still not be enough to prevent erosion and landslides in this mountainous landscape. Historic Preservation is also more important than this unnecessary pipeline. At present the pipeline is set to destroy the historic town of Newport, including the Mt Olivet Church and the Newport Rec Center. The National Historical Preservation Act protects districts like Newport. Threats to historic places are simply not mitagatable. My family has lived in this area for over two hundred years, and I fear the irreparable harm this pipeline will cause to this area.

IND 853-2

IND853-1 Section 4.8 of the final EIS has been revised to provide an updated visual impacts analysis. The EIS provides a discussion of karst terrain in section 4.1. See the response to comment FA11-12 regarding need.

IND853-2 Climate change is addressed in sections 4.11 and 4.13 of the EIS. Landslides are addressed in section 4.1, and cultural resources (including Historic Districts) in section 4.10 of the EIS. The MVP would not destroy the Mount Olivet Methodist Church, which is 430 feet away from the pipeline, or the Newport Recreation Center that is 945 feet away. Impacts on historic properties can be mitigated, in accordance with the regulations for implementing Section 106 of the NHPA at 36 CFR 800. See the response to comment IND70-1 regarding erosion.

INDIVIDUALS

IND854 – Jessica Scott

20161222-5362 FERC PDF (Unofficial) 12/22/2016 2:36:57 PM

IND
854-1 Jessica Scott, Montrose, WV.
Please do not allow the Mountain Valley Pipeline project to continue. The proposed pipeline would cross the Appalachian Trail and cross several states. This is a serious detriment to one of America's most loved recreation areas, and impediment to the natural beauty for which this region is known, and a serious risk to the health and well-being of human and animal life in the area surrounding the proposed pipeline.

Water is the most precious resource we have. We know that pipelines spill, and when they do, the reach of their contamination is unpredictable. However, we also know that there are devastating effects that accompany the infrastructure failures of pipelines and other extraction processes.

The damage to wetlands and the lack of solutions to problems of landslides and the inadequate neglect of identifying wells within the pipelines reach within the Draft Environmental Impact Statement leave serious environmental and health concerns unaddressed.

West Virginia has suffered enough environmental degradation for the energy needs of this country. It is time to transition to renewable energy sources, and discontinuing our reliance on fossil fuel-based energy systems is key to transitioning into a future that is healthier for all of the citizens of the United States.

Thank you for your consideration,
Jessica Scott
Montrose, WV

IND854-1

The ANST would be crossed by a bore, to reduce impacts, as discussed in section 4.8 of the EIS. A revised visual analysis of the ANST can be found in section 4.8 of the EIS. See the response to comment IND3-1 regarding drinking water. See the response to comment CO14-3 regarding spills. The EIS provides a discussion of wetlands in section 4.3 and landslides in section 4.1. See the response to comment LA15-14 regarding water wells. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

INDIVIDUALS

IND855 – William Limpert

20161222-5349 FERC PDF (Unofficial) 12/22/2016 2:22:53 PM

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

Re: Docket No. CP16-10-000
The Mountain Valley Pipeline

December 22, 2016

Dear Secretary Bose:

IND
855-1

I am opposed to the construction of the Mountain Valley Pipeline (MVP). I believe that it is not in the public interest. I hereby state in the strongest terms that you should not approve this project.

I disagree strongly with the draft environmental impact statement in which FERC repeatedly finds that major impacts from this project can be mitigated. I believe they cannot be mitigated. Approval of this project would cause long lasting harm to citizens and communities in the path of the MVP. This includes public safety concerns from placing this dangerous pipeline through steep slopes and karst terrain. It includes public health concerns from possible loss of potable water due to karst terrain. It includes concerns about greatly decreased property values. It includes concerns over loss of scenic values, which are specifically prohibited under the Natural Gas Act. It includes negative impacts to our natural resources, including our waters, our forests, our wildlife, and our air cannot be mitigated. This project would lock in decades of continued greenhouse gas emissions into our already heavily polluted atmosphere, and further delay our much needed implementation of renewable energy sources. That cannot be mitigated.

The Mountain Valley Pipeline will not benefit the public. It will only benefit the corporate owners and their shareholders. The public will suffer if this project is approved.

The Mountain Valley Pipeline is not needed.

IND
855-2

There is no urgent need for additional energy in Virginia, North Carolina, or our country in general. Virginia and North Carolina have reduced energy consumption over the past decade, and over the next several decades energy use is expected to rise only 0.4% per year, according to the United States Energy Information Administration (USEIA). In fact, our country has a glut of energy at this time, with more oil than in the past 90 years. Furthermore, clean, affordable, and available renewable energy systems, along with energy conservation, can easily assure an ample supply of energy for our country well into the future. The same holds true for other countries.

Existing underutilized pipelines are in place that could carry more gas than the ACP. This includes the vast Transco system of pipelines that

IND855-1

We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources. Safety is addressed in section 4.12 of the EIS. Steep slopes and karst are discussed in section 4.1. See the response to comment IND3-1 regarding drinking water. Property values are discussed in section 4.9. Visual resources are discussed in section 4.8. GHG are discussed in sections 4.11 and 4.13. Renewable energy alternatives are discussed in section 3. See the response to comment CO2-1 regarding benefits.

IND855-2

See the response to comment IND277-13 regarding gas usage and customers. See also the response to comment IND40-1 regarding renewable energy.

INDIVIDUALS

IND855 – William Limpert

20161222-5349 FERC PDF (Unofficial) 12/22/2016 2:22:53 PM

IND
855-2
cont'd

span the entire east coast, and other pipelines currently in place, or already approved, and will be completed prior to the MVP. This information is also confirmed by the USEIA.

Energy prices are currently low, and the cost of renewable energy sources is now comparable, or lower than natural gas. Further, renewable energy costs are expected to continue to drop in the future, while natural gas prices are expected to rise. Please note that these cost comparisons do not include the very large negative health and climate change costs from extracting, transporting, storing, and burning natural gas. The MVP will not save money, or stabilize energy costs. It will cost more than renewable energy now, and into the future. Once again, this is confirmed by the USEIA.

Numerous polls and public opinion surveys have shown that the public opposes this project. That alone shows it is not in the public interest. A statewide poll earlier this year showed that Virginians are overwhelmingly opposed to the Virginia Governor's plans for the Mountain Valley Pipeline and the Atlantic Coast Pipeline. The poll demonstrated opposition across all political parties, sexes, age groups, ethnic and racial groups, and socioeconomic levels. I am sure that comments received at scoping meetings and in writing for the docket showed strong opposition as well.

These arguments clearly show that this project is not in the public interest.

INDIVIDUALS

IND856 – Sharon Smith

20161222-5351 FERC PDF (Unofficial) 12/22/2016 2:26:09 PM

IND 856-1 | Sharon Smith, Dayton, OH.
I am opposed to the Mountain Valley Pipeline that will cut through the Appalachian Trail for reasons of the health and welfare of the region and the people and animals who live there.

IND856-1 The ANST would be crossed by a bore as discussed in section 4.8 of the EIS. A revised visual analysis of the ANST can be found in section 4.8 of the final EIS.

INDIVIDUALS

IND857 – William Limpert

20161222-5353 FERC PDF (Unofficial) 12/22/2016 2:31:43 PM

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

Re: Docket No. CP16-10-000
The Mountain Valley Pipeline

December 22, 2016

Dear Secretary Bose:

- | | | | |
|----------|---|----------|--|
| IND857-1 | I will summarize the many negative impacts from this proposed project below.

Approval of this project would allow a for-profit private company to take private property through eminent domain for a project that is not in the public interest. . | IND857-1 | See the response to comment IND1-3 regarding eminent domain. The Commission would decide if the projects are in the public interest. |
| IND857-2 | It would be a severe safety risk to anyone within the large blast zone and evacuation zone, especially in the remote, steep, unstable, and unsecured areas where installation would be difficult and risky, and sabotage a possibility. It has the explosive potential of a very large bomb that is 300 miles long. | IND857-2 | See the response to comment IND2-1 regarding safety. |
| IND857-3 | It would threaten the drinking water springs and wells of persons near the line with very little liability to the pipeline company if they residents are left with polluted water, less water, or no water at all. This is especially true in the many karst areas along the route of the pipeline. | IND857-3 | See the response to comment IND3-1 regarding drinking water. |
| IND857-4 | It would and already has substantially reduced property values, especially for those directly impacted, in the blast zone, or in the evacuation zone. It would also reduce property values for any property nearby, or impacted by a compressor station, an access road, a microwave tower, a storage yard, and impoundment, or within view. | IND857-4 | See the response to comment IND12-1 regarding property values. |
| IND857-5 | It would hurt the economy of the area through loss of tourism, increased need for emergency services, loss of real estate business, and loss of revenue from property taxes. | IND857-5 | Section 4.9 of the EIS provides a discussion of tourism. |
| IND857-6 | It has already caused, and would continue to cause our government agencies to use our taxpayer dollars to review plans, meet with the MVP, and otherwise prepare for all the contingencies this project would bring.

It has already caused and would continue to cause economic loss, and personal loss for individuals and families who are fighting to save their properties, and are forced to spend their hard earned money and take time away from the normal enjoyment of life | IND857-6 | See the response to comment CO2-1 regarding economic benefits. |

INDIVIDUALS

IND857 – William Limpert

20161222-5353 FERC PDF (Unofficial) 12/22/2016 2:31:43 PM

IND857-6 cont'd	It has already caused and would continue to cause severe heartache, stress and, and ongoing worry for impacted property owners.	
IND857-7	It would take away from the natural beauty of the area, and especially for property owners who are directly impacted. The Natural Gas Act specifically requires that gas pipelines avoid scenic areas or minimize impacts to scenic values. The areas of West Virginia and Virginia that would be traversed by this pipeline are of high quality scenic value. The negative impacts on these scenic values could not be minimized.	IND857-7 A revised visual assessment is provided in section 4.8 of the final EIS.
IND857-8	It would cut down large areas of forest, and fragment forest and wildlife habitat. It would encourage non native invasive species to gain a foothold in the areas disturbed by construction and spread into the adjoining areas.	IND857-8 See the response to comment FA15-5 regarding forests. See the response to comment IND343-1 regarding invasive species.
IND857-9	It would cause tremendous soil erosion and landslides on steep mountain slopes.	IND857-9 See the response to comment IND70-1 regarding erosion. Landslides and steep slopes are addressed in section 4.1 of the EIS.
IND857-10	It would cause large scale sediment and oil pollution to waterways resulting in fish kills and the loss of aquatic species.	IND856-10 A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS and in the response to comment FA11-15. The project would not transport oil. See the response to comment CO14-3 regarding spills.
IND857-11	It would cause air pollution both during construction from dust and diesel fumes, and after, from methane leaks.	IND857-11 Section 4.11.1 of the EIS provides a discussion of air quality, dust, and fugitive emissions.
IND857-12	It would cause large scale noise pollution from blasting, other construction activities, and possibly even the operation of the pipeline itself.	IND857-12 Section 4.11.2 of the EIS provides a discussion of noise. See the response to comment CO14-1 regarding blasting.
IND857-13	It would encourage fracking with all of its negative consequences, including negative health impacts and possible earthquakes, in nearby West Virginia, and possibly into Marcellus areas of Western Virginia.	IND857-13 See the response to comment IND2-3 regarding hydraulic fracturing.
IND857-14	It would add more greenhouse gases into our already heavily polluted atmosphere, and they would persist for many years into the future. It could very well add as much or more greenhouse gases to our atmosphere than coal, due to methane losses in addition to combustion. It would contribute significantly to climate change with increased storm severity, rising sea levels, and hotter temperatures beyond any conditions that mankind has ever seen in our recorded history. Climate change will also have unprecedented and longstanding impacts on our economy if it is not kept in check. It would continue to cause negative health impacts from burning fossil fuels. Two hundred thousand Americans suffer premature deaths each year from breathing air polluted from the burning of fossil fuels, according to a 2013 MIT study. The World Health Organization has determined that 6.5 million people die worldwide each year from the same fossil fuel polluted air. Burning natural gas creates unhealthy air pollution, including smog.	IND857-14 GHG emissions and climate change are addressed in sections 4.11 and 4.13.
IND857-15	It would not secure our energy future. It would lock in years of dependence on dirty fossil fuels that are expected to increase in cost.	IND857-15 Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

INDIVIDUALS

IND857 – William Limpert

20161222-5353 FERC PDF (Unofficial) 12/22/2016 2:31:43 PM

IND857-15

cont'd

It would be a grave injustice to impacted and nearby property owners.

Renewable energy sources like solar, off shore wind, geothermal, and retrofit hydroelectric energy are available and affordable now, and will become even more affordable in the future, while fossil fuels will become more expensive as supplies drop the costs of climate change are added.

Once renewable energy systems are in place, and except for minor maintenance costs, the energy they produce is abundant, free, unlimited, and does not contribute to unhealthy air, or greenhouse gases in our atmosphere.

Renewable energy, especially local renewable energy, is a much preferred alternative to the Mountain Valley Pipeline.

IND857-16

In summary, the draft environmental impact statement for the Mountain Valley Pipeline is substantially incorrect regarding mitigation of the many major negative impacts that this project would bring. The final environmental statement impact must correct these major deficiencies, or it too will be fundamentally flawed and unacceptable.

As I have earlier stated, this project is not in the public interest, and should not be approved.

Thank you for the opportunity to comment.

William F. Limpert
wflimpert@gmail.com

250 Fern Gully Lane
Warm Springs, MD 21783
540-839-3202

4102B Garfield Road
Smithsburg, MD 21783
301-416-0571

IND857-16

The draft EIS is correct. In accordance with NEPA, environmental impacts can be mitigated.

INDIVIDUALS

IND858 – David Splitt

20161222-5361 FERC PDF (Unofficial) 12/22/2016 2:36:11 PM

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

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

Ms. Bose,

IND
858-1

I am a property owner in Montgomery County, Virginia, and a long-time user of the Appalachian Trail and other parks and recreational facilities in Southwest Virginia. I have noted many changes to the environment of the area over the past 50-plus years since I first arrived in Blacksburg, VA. Perhaps the most notable and positive is the fact that we no longer burn coal to heat our homes. There have been other advances, such as the adoption of recycling, encouragement of alternative forms of transportation like bicycles, and increased awareness of the fragility of the ecosystems that we share with the other inhabitants of the mountains and valleys.

I am concerned about the proposed Mountain Valley Pipeline for a number of reasons. First and most important, the pipeline would be perilously close to several communities and present an unnecessary and avoidable safety risk to people and endanger the environment.

The risk to the environment is also severe and unnecessary. As a student of the geology of the area (and former spelunker), as well as geological phenomena in general (and part of an ongoing project to advance the science of earthquake prediction), I am concerned that the pipeline would travel through a designated seismic zone and over terrain that is considered extremely unstable. This presents a clear and present threat to the many fragile natural resources (fresh water sources and protected forest areas are salient examples) that would be damaged or destroyed when the inevitable pipeline leak or breach occurs – and the statistics from Alaska and other pipeline-impacted areas of the county bear this out.

IND
858-2

I am also convinced that the proposed project would do serious and unavoidable damage to the Appalachian Trail, which is a major source of recreation and rejuvenation for millions of Americans each year. The Federal Energy Regulatory Commission should not allow the Mountain Valley Pipeline to cross the scenic and unbroken forested landscape adjacent to a federally designated Wilderness area. The proposed project would significantly degrade the views visible for dozens of miles from the Appalachian Trail, including some of Virginia's most iconic vistas – Angels Rest, Rice Fields and potentially McAfee Knob.

I understand that in order to allow the admitted visual and environmental damage that would be caused by the Pipeline to occur in violation of current guidelines, the U.S. Forest Service agreed to lower the Jefferson National Forest Management Plan standards for water quality, visual

IND858-1

The ANST and visual impacts are discussed in section 4.8 of the EIS. See the response to comment IND2-1 regarding safety. The EIS provides a discussion of seismicity in section 4.1, water resources in section 4.3, and forest in 4.4.

IND858-2

A revised visual analysis of the ANST can be found in section 4.8 of the final EIS. As discussed in section 4.8 of the EIS, the pipeline would be bored beneath the ANST. Tourism is addressed in section 4.9 of the EIS. See the response to comment FA11-12 regarding need. The EIS analyzes impacts to forest, including old growth and core/interior forest in detail in sections 3, 4.4, and 4.8.

INDIVIDUALS

IND858 – David Splitt

20161222-5361 FERC PDF (Unofficial) 12/22/2016 2:36:11 PM

IND
858-2
cont'd

impacts, the removal of old-growth forest, and the number of simultaneous projects passing through the borders of federally protected land. This is simply unacceptable and careless approach to management of our resources and would violates the charter and core principles of the organization charged protecting some of our most precious and dwindling natural resources.

I urge FERC to perform a comprehensive evaluation of the need for pipeline development to transport natural gas a create a single Programmatic Environmental Impact Statement for the whole project so that impacts can be to our National Parks, National Forests, and private lands can be understood and that any truly necessary infrastructure can be appropriately sited before moving forward.

Sincerely,

David A. Splitt

INDIVIDUALS

IND859 – Russell Chisholm

20161222-5395 FERC PDF (Unofficial) 12/22/2016 2:36:28 PM

Federal Energy Regulatory Commission

Kimberly D. Bose, Secretary

888 First St. N.E. Room 1A

Washington, DC 20426

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

Ms. Bose,

IND 859-1 As a resident of Newport, Virginia and a regular visitor to the Appalachian National Scenic Trail (ANST) I am steadfastly opposed to the proposed construction of the Mountain Valley Pipeline. This proposal would do serious and unavoidable damage to the Appalachian Trail and to the growing ecotourism economy in Giles County. The ANST is a source of peaceful rejuvenation for millions of Americans each year — to permit the Mountain Valley Pipeline to sully this national landmark would be a tragedy and an embarrassment to our country and reverse years of job-creating growth here in Giles and across Southwest Virginia. The main reasons why the Federal Energy Regulatory Commission (FERC) should not allow the Mountain Valley pipeline to be permitted include:

- The location of the proposed crossing is a scenic and unbroken forested landscape with an immediately adjacent federally designated Wilderness area. The proposed project would significantly degrade the views visible from up to 100 miles of the Appalachian Trail, including some of Virginia’s most iconic vistas — Kelly Knob, Angels Rest, Rice Fields and potentially McAfee Knob.
- The pipeline will travel through a designated seismic zone and over terrain that is considered extremely unstable. As the pipeline will run over multiple fragile natural resources — including multiple fresh water sources and protected forest areas — and near several communities, this presents a completely unnecessary and avoidable safety risk to people and the environment, including my own spring-fed water source which I constructed with my bare hands. **(See attached: *Geologic Hazards in the Karst Regions of Virginia and West Virginia.*)**
- In order to accommodate the visual and environmental damage that would be caused by the Mountain Valley Pipeline, the U.S. Forest Service agreed to lower the Jefferson National Forest Management Plan standards for water quality, visual impacts, the removal of old-growth forest, and the number of simultaneous projects passing through the borders of federally protected land. This unprecedented change is extremely reckless, as it would open the gates for future infrastructure projects to cause similar destruction.

IND 859-2

IND 859-3

IND859-1

A revised visual analysis of the ANST can be found in section 4.8 of the final EIS. As discussed in section 4.8 of the EIS, the pipeline would be bored beneath the ANST. Tourism is addressed in section 4.9 of the EIS.

IND859-2

The EIS provides a discussion of seismicity in section 4.1 and water resources in section 4.3. See the response to comment IND3-1 regarding drinking water.

IND859-3

See the response to comments FA8-1 and FA10-1 regarding the LRMP.

INDIVIDUALS

IND859 – Russell Chisholm

20161222-5395 FERC PDF (Unofficial) 12/22/2016 2:36:28 PM

IND 859-4

- This project could have significant economic impacts on nearby communities, decreasing property values and depriving businesses of tourism dollars generated by Appalachian Trail hikers and visitors, who seek sections of the Trail unmarred by the impacts of energy infrastructure and other signs of construction. **(See attached: *Synapse Energy Economics Report.*)**

IND 859-5

- The Draft Environmental Impact Statement for Mountain Valley Pipeline is deeply flawed and disastrously incomplete. The public has been denied a genuine opportunity to comment on the MVP application and the DEIS and in fact has been interfered with and obstructed by FERC personnel. **(See attached: *Stripping the "Public" Out of Public Comment Sessions for the MVP.*)**

IND 859-6

- Damage to deep cultural attachment to the land, the community and the traditions in and around Newport cannot be mitigated. As United States Army Veterans who were only able to secure purchase of our home in Clover Hollow through a loan guarantee from Veterans Affairs, my wife and I are immeasurably fortunate to call this area home. We participate in and financially support traditional music and heritage events. We draw our water from the purest mountain source. We marvel at the wildlife and pastoral beauty within this landscape. We served and we sacrificed to live here. No amount of vague promises or assurances from FERC or MVP will assuage the fear that the land, the people and the heritage we love will be subject to ruination for the unnecessary industrialization of rare and rural places.

I urge FERC to protect Newport, the Appalachian Trail and its surrounding landscape and communities. Protect our neighbors across Virginia and West Virginia from needless pipeline overbuilding. Mountain Valley Pipeline, through their incomplete and flawed application, has failed to establish that they are qualified to build this project which carries enormous public risk and is devoid of public benefit. It is FERC's responsibility to do the right thing — the alternative will be a turning point for the worse in an area that offers recreation and inspiration for millions of people.

Sincerely,

Russell Chisholm

2395 Clover Hollow Rd

Newport, VA 24128

IND859-4 See the response to comment IND12-1 regarding property values. Tourism is addressed in section 4.9 of the EIS.

IND859-5 See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS.

IND859-6 Cultural attachment is addressed in section 4.10 of the EIS.

INDIVIDUALS

IND860 – Jesse Paris

20161222-5402 FERC PDF (Unofficial) 12/22/2016 2:54:20 PM

Jesse Paris, Virginia Beach, VA.

To whom it may concern,

IND
860-1

As a Virginia resident my entire life, I am strongly against the Mountain Valley Pipeline. As we have seen in recent events regarding the DAPL standoff, our country is sick and tired of pipelines which constantly leak or rupture. We should be investing our time and resources on alternative energies such as solar, and other ways to bring money to this part of Virginia such as tourism and the wine industry. Please do not allow the construction of the Mountain Valley Pipeline, which would put a permanent scar on our beautiful state for generations to come.

Regards,

Jesse Paris

IND860-1

See the response to comment IND92-1 regarding leaks. Renewable energy alternatives are discussed in section 3 of the EIS.

INDIVIDUALS

IND861 – Anita Puckett

20161222-5403 FERC PDF (Unofficial) 12/22/2016 2:42:30 PM

December 19, 2016

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

Re: Draft Environmental Impact Statement (DEIS-DO272)
Docket No. CP16-10-000
Mountain Valley Pipeline proposal
Temporary Access Road Issue, Montgomery County, Virginia

Dear Ms. Bose and Members of the Commission:

IND
861-1

Pursuant to the routing of proposed temporary access roads for the Mountain Valley Pipeline as stipulated in FERC's Draft Environmental Impact Statement (DEIS) issued September 2016, the following case represents an unmitigated construction error for modifying Yellow Finch Road, a private, one-lane dirt/gravel road in Montgomery County, Virginia.

Information regarding this issue includes:

- Location of road: Eastern Montgomery County, Virginia (DEIS Appendix B, p. 34). Road in question is indicated by a dashed line between mile marker MP 235 and MP 236.
- MVP ID: 278.0-1 (DEIS Appendix E1-58)
- Mile Post: MP 235.5 (DEIS Appendix E1-58)
- Length: approximately .7 miles (DEIS Appendix E1-58)
- Current composition and width of road: dirt/gravel 8'-12' wide
- Road ownership and management: Private (DESI Appendix 31-58); owned and maintained by three landowners.
- Impacted landowners' parcels' IDs and names:

Cletus W. and Beverly A. Bohon
6210 Yellow Finch Lane
Elliston, VA 24087
Parcel ID 030271
(montva.com; GIS portal <http://54.225.90.98/MapServer/DoGis> and abutting parcels)

Randall Keith and Joanne Alice Epperly
6110 Yellow Finch Lane
Elliston, VA 24087
Parcel ID: 082.00-01-17.00-0000 (Roanoke County; for online viewing:
<http://gisweb.roanokecountyva.gov/pipeline/>)

James C. and Carolyn D. Law
6175 Yellow Finch Lane

IND861-1

Comments noted. Yellow Finch Lane would be used by Mountain Valley as a temporary access road (see appendix E). The temporary access road which would be restored following construction.

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IND861 – Anita Puckett

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Elliston, VA 24087

Parcel ID 032431 (two homes; one occupied by landowner James Law and a second by his stepson Tim Aker)

(Montva.com; GIS portal <http://54.225.90.98/MapServer/DoGis>)

Parcel ID 002833 (home occupied by Anthony Aker, Mr. Law's stepson, and his family)

(Montva.com; GIS portal <http://54.225.90.98/MapServer/DoGis>)

- The location of Yellow Finch Lane conforms to typical Appalachian hollow geography. It is a very narrow valley that contains a creek that runs between two steep slopes, the eastern one of which rises to the top of Poor Mountain, elevation 3,928 ft. Poor Mountain is the tallest mountain in this subarea of the Appalachian Valley and Ridge Province. (https://en.wikipedia.org/wiki/Poor_Mountain). Yellow Finch Lane runs parallel to the creek on a narrow stretch of relatively flat bottomland. This particular hollow is especially narrow. Almost no additional bottomland exists that is not part of the existing road. Very little flat land exists on the eastern side of the creek as well.
- Because of the narrowness of the hollow and the steepness of the abutting slopes, mudslides and rockslides have occurred several times on the western side of the lane, blocking it, and requiring immediate maintenance to re-open the road.
- The lane is currently too narrow for two cars to pass, much less trucks or construction equipment.

Expansion of the road to meet the 40 ft. width of the proposed easement and the 25 ft. width of "driveway" (DEIS Appendix E1-58) is therefore impossible without running a culvert through the creek and then covering over it with fill dirt for almost one mile, or cutting more steeply into the hillside on the western side, which would require major construction including building of retaining walls. Larger and more frequent mud/rock slides would be nearly impossible to avoid.

Trying to build a *new road* on the east side of the creek would also require major construction because of the steep slopes going to the top of Poor Mountain. Bringing in fill dirt and possibly building retaining walls would be required to reduce frequent large mud slides.

In addition, power poles would have to be moved to locations on slopes, which would be less stable. Telephone lines buried under the lane would have to be relocated. Also, the road crosses the creek in two places through culverts that would need to be replaced and structurally enhanced to support large construction equipment.

Furthermore, road expansion through bank modifications on the west side of the existing road would bring the road dangerously close to the Bohon and Aker homes, exposing them to potential destruction from hillside erosion and mudslides. The Aker home is currently within 20 ft. of the existing road due to bank erosion. The Bohon home is approximately 25 ft. from the road, 15 ft. of which is steep slopes before leveling out somewhat in front of the house. Moreover, new driveways to the landowners' homes would have to be constructed.

Finally, Yellow Finch Lane does not permit two-way traffic. Should MVP attempt lane expansion for temporary access purposes, landowners would experience road blockage such that

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IND861 – Anita Puckett

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they would not have ingress or egress to their properties. Nor would any emergency service vehicles be able to gain access. *There is no extra space to construct pulloffs or pullovers to grant such access along the nearly one mile length of Yellow Finch Lane.* Yet, the December 24, 2015 MVP Supplemental Response (Item K) stipulates that "Access will not be restricted to any residence. Mountain Valley will work with all affected landowners to ensure adequate access is maintained to their property as specified in landowner agreements." Existing geographic and geologic conditions for Yellow Finch do not suggest this statement can be enforced for this particular proposed temporary access road.

We, the undersigned landowners and/or occupants of homes on Yellow Finch Lane, therefore submit that the proposed use of this road as a temporary access road for the construction of the Mountain Valley Pipeline is one that will induce unanticipated construction costs for MVP; create hardship for us, Yellow Finch Lane landowners, in terms of ingress and egress to our properties and use of electric and telephone services, to the point of making our homes unlivable during or after construction; create permanent problems in terms of road and home maintenance due to mud and rock slides; and inflict permanent environmental damage to Yellow Finch Creek, a feeder creek for the Roanoke River.

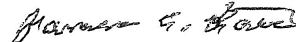
Therefore, we strongly request that FERC require MVP to relocate this access road to a more geographically reasonable location.

Respectfully,

Anthony Aker



James Law




Timothy Aker

Tim AKER



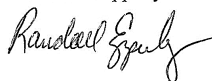
Cletus Bohon

Submitted by



Anita Puckett, Intervener
Preserve Montgomery County Virginia
Blacksburg, VA 24060

Randell Epperly



INDIVIDUALS

IND862 – Anita Puckett

20161222-5406 FERC PDF (Unofficial) 12/22/2016 2:49:07 PM

December 21, 2016

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

Re: Draft Environmental Impact Statement (DEIS-DO272)
Docket No. CP16-10-000
Mountain Valley Pipeline (MVP) proposal
Pipeline Corridor Modification, Montgomery County, VA

IND
862-1

As stated in the Draft Environmental Impact Statement for the proposed MVP, the pipeline construction corridor is to be a 125-foot-wide construction right-of-way, with a 50-foot-wide permanent right-of-way once in operation (DEIS 2-24-25). In addition, permanent access roads require up to 40-foot-wide permanent right-of-way (DEIS E1-57). These locations for the actual pipeline and a permanent access road rights-of-way pose problems of property access to two Montgomery County, Virginia, properties described as follows:

- Location: MP 232 to 233 (DEIS Appendix B, Page 34)
- Parcels ID, owner, and size:
 - ID 120001; P.I. Apgar Estate (Donald Apgar, Agent certified to represent all heirs) approximately 242 acres (Montgomery County GIS and Mapping Services. <http://54.225.90.98/MapServer/DoGis>)
 - ID 000837; Gregory and Angela H. Apgar; approximately 12 acres (Montgomery County GIS and Mapping Services. <http://54.225.90.98/MapServer/DoGis>)

Pipeline Corridor Issues

A portion of the proposed pipeline construction area crosses the P. I. Apgar Estates property along a private trail currently suitable only for four-wheel vehicles. A portion of the proposed pipeline route would locate the pipeline directly in this trail, thus removing it from any and all vehicle usage by the Apgar heirs and their families per easement usage requirements (see enlarged satellite view of parcel at <http://54.225.90.98/MapServer/DoGis>).

This area of the Apgar property is steep, culminating near the top of Fort Lewis Mountain (elevation approximately 3,000 ft.), and the trail is located along the only possible route of access to the upper slopes. It is needed for access to hunting, gathering of forest products, and other Apgar heirs' uses that result in the procurement of livelihood items from this remote northeastern section of the property rich in game (deer, bear, wildcats, raccoon, opossum, squirrel, falcon, eagle, hawk species, turkey, and other bird species, etc.) and plant and tree products (various berries, nuts,

IND862-1

Cultural attachment is addressed in section 4.10 of the EIS. The commentor has not provided evidence that the property would represent a "traditional cultural property."

INDIVIDUALS

IND862 – Anita Puckett

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hardwood and conifer trees etc.). The items that are usually collected cannot easily be carried on foot down the steep slopes of the mountain. Motorized vehicles are required.

Loss of this trail will mean that owners will not be able to continue to use this property in a manner that augments their modest financial incomes through the harvesting of animal and plant produce and is in accord with the cultural attachment they have developed as a viable community of kin over six generations.

The concept of cultural attachment, as quoted in the DEIS (4-366-367), “is the cumulative effect over time of a collection of traditions, attitudes, practices, and stories that tie a person to the land, to physical place, and to kinship patterns” (from Kent et al., June 1996; see also Kent and Preister 2016). Implied by this definition, and relevant to the proposed MVP corridor through the Apgar Estate property, is that cultural attachment is closely linked to land uses that provide cultural economic assets and capital. That is, in the case of this property, family heirs and numerous kin who have unimpeded access to the property (approximately 75 total) have developed attitudes, traditional experiential knowledge and practices transmitted through narratives (stories) over generations, that enable them to maintain and sustain their natural assets for their domestic use in a manner that enhances their quality of life and provide them with a nearly sacred and inalienable attachment to place. In so doing, they have constituted a distinct cultural orientation that is similar to one type of Traditional Cultural Properties covered under NHPA, described as follows: “a location where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity” (Parker and King 1998:1). That cultural attachment can be covered under NHPA is currently being investigated as a change in NEPA policy (Kent and Preister 2016). Therefore, the Apgar Estate heirs assert that, while not currently eligible for NHPA Section 106 protection, access to their property north and east of the existing trail nevertheless warrants the kinds of protections available to Traditional Cultural Properties such that access to this parcel for purposes of constructing the MVP must be mitigated.

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862-2

Permanent Access Road Issues

The proposed permanent access road is MVP-MN 277. It is proposed to transverse both the Gregory Apgar and P.I. Apgar Estate properties on an existing dirt road (DEIS B, page 34) at MP 232.4 (DEIS E-1-57). This access road has a proposed width of 25 to 40 ft., increasing the width of the existing road by about 12 to 28 ft. This widening will require substantial construction and bank removal, necessitating retaining walls and other ways of stabilizing the bank.

Furthermore, MVP’s statement in its February 26, 2016 response to the FERC Environmental Information Request says, “Access will not be restricted to any residence. Mountain Valley will work with all affected landowners to ensure adequate access is maintained to their property as specified in landowner agreements.” Given that a hunting cabin occupied by Apgar family heirs for major portions of the year exists at the end of a spur off of the proposed access road on the Gregory and Angela Apgar

IND862-2

See section 3.5 regarding this parcel.

INDIVIDUALS

IND862 – Anita Puckett

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property, MVP must provide access to this cabin during construction and after. The P. I. Apgar heirs and Gregory Apgar family members, many of whom are also P. I. Apgar heirs, must be able to access the hunting cabin during construction and at any time after.

Finally, the disruption of the forested ecology by both the pipeline easement/construction area and the permanent access road will be significant because of deforestation and permanent use of the access road by heavy equipment and other motorized vehicles. Therefore the overarching stance of the impacted Apgar owners is that they will suffer undue hardship from loss of forested wildlife and plant life that they have relied upon for two centuries as sources of their livelihood and place-based, way of life consistent with all criteria for cultural attachment.

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862-3

Requests for DEIS Modifications

Therefore we request the FERC to require MVP to, first and preferably, move the current corridor off this property or, secondly, mitigate its placement such that

- 1) Adequate access to the northeastern section of the property is maintained by MVP's construction of a new lane that motorized four wheel drive vehicles can use;
- 2) That appropriate bridges or causeways are constructed over the pipeline easement at MVP's expense to provide access to this new lane;
- 3) That replanting of flora on the construction right-of-way portion after construction be in accord with the surrounding ecology and subject to the approval of the Apgar Estate heirs;
- 4) That maintenance of this easement be done without the use of herbicides or other chemicals that would endanger the surrounding forest and its wildlife, as well as the health of those traversing the property to, hopefully, continue to obtain forest products that contribute to their livelihood. Also to be protected by non-use of herbicides are those occupying the cabin, often for extended periods.
- 5) That the permanent access road be open and available to those having authorized property access so they can have ingress and egress to the cabin.
- 6) Details of these demands are to be determined by the Apgar Estate heirs through its legal representative, Mr. Donald Apgar, Mr. Gregory Apgar, and any attorney or attorneys they retain for legal counsel.

As legal agent authorized to speak on behalf of the P. I. Apgar Estate heirs, I, Donald Apgar, approve and support the statements offered above as representative of the wishes of the P. I. Apgar heirs. As a legal owner of the Gregory and Angela H. Apgar property, I also support the statements offered above

Respectfully,

IND862-3

Section 3.5 provides an updated discussion of this parcel.

INDIVIDUALS

IND862 – Anita Puckett

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Donald Apgar
Legal Agent, P.I. Apgar Estate Heirs
5575 Lafayette Road
Ellison, VA 24087



Gregory Apgar (for himself and representing his wife, Angela H. Apgar)
2335 Green Hill Lane
Elliston, VA 24087

Submitted by



Anita Puckett, Intervener
Preserve Montgomery County Virginia
Blacksburg, VA 24060

References (Non-DEIS)

Kent, J., J. Ryan, C. Hunka, and R. Schultz. June 1996. Appendix M: Cultural Attachment: Assessment of Impacts to Living Culture. In APCo 765 kV Transmission Line Draft Environmental Impact Statement. U.S. Forest Service, George Washington and Jefferson National Forests, Roanoke, Virginia.

Kent, J. and K. Preister. November/December 2016. Beyond the Permitting. *Right of Way Magazine: The Voice of the Right of Way Profession*. 63(6): 16-20.

Montgomery County GIS and Mapping Services. December 2016. Available at: <http://54.225.90.98/MapServer/DoGis>. Accessed December 20, 2016.

Parker, P. L. and T. F. King. 1998. Guidelines for Evaluating and Documenting Traditional Cultural Properties. National Register Bulletin. Washington, DC: U.S. Department of the Interior, National Register of Historic Places. Available at: <https://www.nps.gov/nr/publications/bulletins/nrb38/>. Accessed December 19, 2016.

INDIVIDUALS

IND863 – Cynthia Cook

20161222-5407 FERC PDF (Unofficial) 12/22/2016 2:53:41 PM

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

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

Dear Ms. Bose,

IND
863-1

I am a resident of Eggleston, Virginia in Giles County, and have lived in this community for 40 years. I am deeply concerned about the proposed Mountain Valley Pipeline. I feel the proposed pipeline will do irreparable harm to the Appalachian Trail, the Jefferson National Forest and the historic districts of our county, and that our unique geography with its Karst topography could cause excessive environmental damage that the company cannot mitigate. I attended a meeting early in the MVP process, and was somewhat alarmed by the level of experience that the representatives exhibited in dealing with the issues they will face with this proposed pipeline in our particular mountainous area.

I consider one of the most important attributes of my county to be its wild and scenic areas, notably the Appalachian Trail and various other trails and overlooks, and the Jefferson National Forest. The United States Forest Service would need to amend the current Land and Resource Management Plan, which I consider unacceptable. I oppose any amendments to the plan that will weaken the existing protections on our public land. These protections are what make the Appalachian Trail and other scenic areas so attractive to visitors. The pipeline would impact tourism and thus the economy of our community severely. It would open the gate for future projects causing similar destruction.

IND
863-2

I am also concerned that other factors are not being addressed in this proposal. The EPA has recommended FERC to address climate change and its cumulative impacts. Studies show that existing infrastructure already meets the current energy demand. A thorough evaluation of the need for this pipeline development is crucial. Property owners could face decreased value of their homes and private land, compromised drinking water, an economic downturn, all with no benefit to the general public.

IND
863-3

The pipeline route is also proposed through the historic town of Newport. The National Historical Preservation Act protects districts like Newport. For many years I have been a part of the community effort to restore and protect the Newport Recreation Center. The threat of the pipeline to historic places like this are not mitigatable.

I urge FERC to recognize the impacts to our private and public land, and to all the people in and outside of our community that depend on its protection.

Sincerely,

Cynthia Cook

IND863-1

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). A revised visual analysis of the ANST can be found in section 4.8 of the final EIS. As discussed in section 4.8 of the EIS, the pipeline would be bored beneath the ANST. Tourism is addressed in section 4.9 of the EIS. Historic Districts are addressed in section 4.10 of the EIS. Karst is discussed in section 4.1 of the EIS. See the response to comment IND241-1 regarding induced development.

The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD.

IND863-2

Climate change is addressed in sections 4.11 and 4.13 of the EIS; cumulative impacts in section 4.13. See the response to comment IND12-1 regarding property values. See the response to comment IND3-1 regarding drinking water.

IND863-3

Historic Districts are discussed in section 4.10 of the EIS. The Newport Recreation Center is about 945 feet away from the pipeline and should not be affected by the MVP.

INDIVIDUALS

IND864 – Rory Mullenex

20161222-5408 FERC PDF (Unofficial) 12/22/2016 2:59:22 PM

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room1A
Washington, DC 20426

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

Ms. Bose,

IND 864-1 I am a resident of Giles County, Virginia. Giles County is one of the many counties along the proposed route of the Mountain Valley Pipeline (MVP). Construction of the MVP would cause irreparable harm to many of the ecosystems and economies located along its route. I am writing this letter to ask FERC to deny approval of the MVP.

Irreparable Harm to Unique and Sensitive Habitats and Species

The regions of the central Appalachian and Blue Ridge Mountains that will be impacted by the MVP contain important resources that cannot be created elsewhere, nor re-created once they have been degraded. These regions contain unique and sensitive habitats and plant and animal species. The people of this region have learned (in large part) to live in balance with these resources and, in fact, to rely even financially on them in sustainable ways. A significant source of income in Giles county comes from tourism centered around our outdoor resources, including the Appalachian Trail, the New River and its many steep, fragile, high-quality tributaries, and the Jefferson National Forest. The harm that construction of the MVP would cause to these environments, species, and economies is not mitigable.

IND 864-2 **Jefferson National Forest Management Plan**

In order to construct the MVP in accordance with the Jefferson National Forest Management Plan, the Management Plan would have to be modified! The proposed amendments to the USFS Land and Resource Management Plan include:

- Re-zoning part of the Jefferson National Forest to create a 500-foot wide "Utility Corridor";
- Permitting the MVP corridor to exceed existing restrictions on soil and riparian conditions;
- Permitting the removal of preserved old-growth forest habitat within the construction corridor;
- Permitting the MVP to cross the Appalachian Trail (AT) (thereby degrading the Scenic Integrity Objective for the AT from "high" to "moderate" in perpetuity); and
- Allowing vegetation restoration to take up to 10 year following construction.

Old-growth forest habitats are those in which the timber has never been harvested. Removal of old-growth forest habitat is, by definition, a destruction that is not mitigable.

Degrading a natural resource such as the AT in perpetuity is a form of irreparable harm.

I believe that if a regulation or standard must be changed in order to make a proposal meet the requirements of the regulation or standard, the proposal does not meet the requirements of the regulation or standard. I oppose amendment of the Management Plan.

IND 864-3 **Existing Infrastructure and Public Need**

My understanding is that energy demands can be met using the natural gas infrastructure that already exists, and that the MVP is not needed in order to meet demands. I also understand that FERC has

IND864-1 Habitats and wildlife are discussed in sections 4.4 and 4.5 of the EIS. The ANST and Jefferson National Forest are discussed in section 4.8 Tourism is addressed in section 4.9 of the EIS. While the MVP pipeline would not cross the New River, potential temporary impacts on tributary streams are discussed in section 4.3. Impacts on environmental resources can be mitigated, in accordance with NEPA.

IND864-2 The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD.

IND864-3 Section 3.3 of the EIS provides an assessment of existing systems as an alternative. See the response to comment FA11-12 regarding need.

INDIVIDUALS

IND864 – Rory Mullenex

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refused to assess the need for the MVP. This is a violation of the National Environmental Policy Act (NEPA).

Regardless of energy demands, the end-use markets for the natural gas that will flow through the MVP are not located along the route of the pipeline. The natural gas flowing through the MVP will not be used by the people in the communities that will be harmed by the project. This is a social injustice.

Conclusion

Construction of the MVP would cause irreparable harm to unique and sensitive habitats and species, and ultimately to local economies that will not be allowed to use the gas that flows through the MVP. Additionally, amendment of the Jefferson National Forest Management Plan would allow actions that would otherwise not meet the requirements of the Plan and would cause damage to critical, unique, and irreplaceable habitats such as old-growth forests that is not mitigable.

For these and many other reasons, please deny approval for the MVP.

Kindest regards,

Rory Mullenex, P.E.
1626 Cascade Drive
Pembroke, Virginia 24136

IND864-4

See the response to comment CO2-1 regarding benefits.

INDIVIDUALS

IND865 – Nick Lasky

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Nick Lasky, Roanoke, VA.
To whom it may concern,

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865-1

Please help me. As a resident of Roanoke County, I wish to voice my strong support against the Mountain Valley Pipeline and the Draft Environmental Impact Statement associated with the pipeline.

IND865-1

See the response to comment IND2-1 regarding safety. See the response to comment IND92-1 regarding leaks.

Firstly, creating a new pipeline in our community would unjustifiably create risks for our people, land, and climate. It has been proven that it is not a matter of IF a pipeline will leak, but WHEN. Do you want our community to become the next Corpus Christi, Shelby County, Alabama, or the countless other communities that have had a pipeline leak or explosion cause a catastrophe for the community and environment?

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865-2

Secondly, this proposed pipeline will use fracked oil which we now know CAUSES MORE EARTHQUAKES, as confirmed by the EPA (<http://www.the-american-interest.com/2016/08/24/epa-acknowledges-frackings-earthquake-problem/>). In addition, the Earth is at a crossroads right now when it comes to climate change. The temperature is rising. This oil-based energy infrastructure is going in the wrong direction and will cause sea levels to rise further, threatening our coastal Virginia communities on the Chesapeake Bay. Methane will also leak into the atmosphere as a result of this pipeline. No thank you!

IND865-2

The proposed pipelines would transport vaporized natural gas, not oil. See the response to comment IND2-3 regarding hydraulic fracturing. Climate change is addressed in sections 4.11 and 4.13 of the EIS.

IND
865-3

Thirdly, studies have clearly shown that our current energy demand can be met by existing pipeline infrastructure. This pipeline is supposed to economically benefit our community, but the oil will certainly go elsewhere, while harming our community. How in the world can we support that? Certainly there will be some select corporations and individuals who will make a lot of money from this pipeline, but the community at large will not benefit and will in fact be harmed. This is alarming.

IND865-3

Section 3.3 of the EIS provides an assessment of existing systems as an alternative. See the response to comment CO2-1 regarding benefits.

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865-4

Finally, the pipeline is planned to pass through the Jefferson National Forest, the Appalachian Trail, and the Blue Ridge Parkway. This is a travesty! These are treasures to be preserved, not piped oil through! The community does not approve of or support this by a LONG SHOT! You conceded that there will be PERMANENT adverse impacts to our forests. There will also be measurable harm to the scenic integrity. The US Forest Service has raised several of these forest impact issues, but they remain unaddressed.

IND865-4

Section 4.8 provides an assessment of the Jefferson National Forest, ANST, and BRP. A revised visual analysis of the ANST can be found in section 4.8 of the final EIS. See the response to comment FA15-5 regarding forests.

Please help me and the rest of the many local communities that have already expressed their desire for this pipeline project to be shut down.

Thank you,

Nick Lasky

INDIVIDUALS

IND866 – Michelle McAlpin

20161222-5413 FERC PDF (Unofficial) 12/22/2016 3:12:59 PM

IND 866-1 Michelle McAlpin, Asheville, NC.
As a former Conservation Commission er Rehoboth, MA, I saw many cases where home owners, utility companies, and developers attempted to work in the wetlands and then to restore or replicate wetlands. Generally speaking, even when the parties involved were willing and had the best of intentions, wetland repair or replication did not work. It is therefore imperative that FERC require plans that absolutely minimize the destruction of wetlands.

In particular, in section 4.3.3 the DEIS indicates that MVP has supplied no information on 44 wetlands to be filled to permit construction of access roads. As a minimum, the DEIS should include the size and type of each of these wetlands and a decent study of the effects in the surrounding areas of filling these wetlands. Will amphibian breeding grounds be lost? Will the capacity of the wetlands to hold water be lost, thereby potentially increasing the threat of flooding in the adjacent areas and reducing water stored to help plants survive drought? Silt and organic debris run downstream and can collect in wetlands adjacent to streams. Stream crossings need to be very carefully planned, and implementation closely monitored. Yet in section 4.3.2 of the DEIS, MVP says nothing about how it will minimize downstream effects of open cut stream crossings. FERC must ask for revisions including comprehensive plans to best practice standards and techniques to minimize the extent of disruption to stream banks and beds.

Wetlands act as filters, helping keep groundwater clean and healthy for all creatures. How close to the wetland fills and disruptions and to other activities like blasting are the drinking water wells that serve the area. From Section 4.3.1, it appears that neither MVP or FERC have yet located private and public drinking water wells.

IND 866-2 Finally, I want to comment on FERC's responsibility to issue a Certificate of Public Convenience and Necessity. What does this mean? Who will benefit from the construction of the MVP? Has the developer demonstrated with a preponderance of the evidence that the MVP is necessary for the public convenience? In a time of climate change with carbon dioxide in the atmosphere as one of the drivers, should FERC be permitting pipelines that subsidize the costs of moving fossil fuels about the country? The developer clearly expects this to be a profit opportunity, but that does not make the MVP either a convenience or a necessity to the public--only to a corporation. Consider the possibility of speaking for the planet and future generations and denying any Certificate of Public Convenience and Necessity and Related Authorizations.
Thank you.

IND866-1 See the response to comment IND209-1 regarding the permanent fill of wetlands. A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS. See the response to comment LA15-14 regarding pending water wells.

IND866-2 See the response to comment FA11-12 regarding need. See the response to comment CO2-1 regarding benefits.

INDIVIDUALS

IND867 – Robin Morris

20161222-5414 FERC PDF (Unofficial) 12/22/2016 2:55:58 PM

Federal Energy Regulatory Commission

Kimberly D. Bose, Secretary

888 First St. N.E. Room 1A

Washington, DC 20426

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

IND
867-1

The proposed Mountain Valley Pipeline project is a threat to public health and is not in the public interest. It threatens the watersheds and ecosystems of West Virginia and Virginia, and would contribute irreparably to the dangers of global climate change. I strongly oppose this project, and add my opposition to the proposed changes to the Forsest Service's Management Plan. The "Utility Corridor" idea is an egregious departure from existing protections on soil, riparian zones, steep slope erosion control, and scenic and wilderness areas, which must be upheld, not undermined for gas and electric lines. I oppose FERC's neglect of required NEPA process assessment of the need for this project- and oppose the un-mitigatable impact on the climate of overbuilding fossil fuel infrastructure. This pipeline is not needed, and the FERC process should investigate and acknowledge that. The only responsible outcome is for FERC to deny the permit applications for the MVP and protect the water, environment, public health, and ecosystem services of this region.

Robin Morris
16 Delta Loop
Asheville, NC 28806

IND867-1

Climate change is addressed in sections 4.11 and 4.13 of the EIS. See the response to comments FA8-1 and FA10-1 regarding the LRMP. See the response to comment FA8-1 regarding the 500-foot-wide utility corridor in the Jefferson National Forest. See the response to comment FA11-12 regarding need. Water resources are addressed in section 4.3. See the response to comment IND2-1 regarding safety.

INDIVIDUALS

IND868 – George Jones

20161222-5419 FERC PDF (Unofficial) 12/22/2016 3:07:45 PM

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

Reference: Docket Number CP16-10-000

Dear Ms. Bose and Members of the Commission

IND
868-1

Prior to May, 2016, I was an extremely healthy 86 year old man who walked 2 miles a day and maintained my entire life on my own abilities.

In May, 2016, I had a stroke that I blame 100 percent on the stress that I was forced to endure with the process of the Mountain Valley Pipeline Project surveying my family farm land.

I am extremely upset about the entire process of certified letters that were not processed legally, the surveyors who came onto my land by the "back door" instead of arriving at my front gate as any respectable business person would, the MVP land men who continuously thwarted my attempts to accompany the surveyors throughout the survey process (as per our written record), the MVP land men who continuously lied to me about surveys and survey reports, and certified letters for surveys that did not come to pass because of inefficient scheduling or surveys that I was told would not be performed but were performed in my absence.

As a child of this farm land in an era of non-mechanized farming, I have an intense relationship with every single atom of life contained within the 700 acres I farmed while growing up in Newport Virginia. I feel that all of my elected officials, every governmental agency involved in this process and all involved energy companies in the project have negated and simply brushed away my emotional attachment to this land in order for "them" to get what they want from this process.

This is my land! This is my country! This is not what I fought for in the Korean War! I have been stripped of my legal rights! All for the greed of a few! And the duplicity of millions by the persons entrusted to uphold the democratic process for all citizens of the United States of America!

At this point in time, I still am not able to live my life on my own. I have had to hire a nurse maid 24 hours a day 7 days a week for even the simplest things. I cannot even go to the sink and run a glass of water for myself. It must be thickened, just so I can drink it.

I humbly ask that you do not approve any further access to MVP for this project.

Your servant,

George Lee Jones
Generation 6

IND868-1

The Commission has not yet made a decision about the projects.
Comments noted.

INDIVIDUALS

IND869 – Kimberley Homer

20161222-5423 FERC PDF (Unofficial) 12/22/2016 3:19:54 PM

IND
869-1

Kimberley Homer, Blacksburg, VA.
Honorable Commissioners,

I would like to request that you deny the application to build the Mountain Valley pipeline for the following reasons:

We don't need this pipeline.
We have sufficient energy from other sources, especially with Solarize Blacksburg and similar projects across the state. It will be all harm and no good.

Jefferson National Forest
This steep and beautiful forest, with its caves, ancient rocks, rhododendrons, wild birds and streams, is a source of recreation and rejuvenation for New River Valley residents and tourists, greatly enhances the quality of life in the New River Valley, increases property values and real estate tax revenue near it, and serves as a recruitment asset to draw medical and academic professionals to the region. The views from Angel's Rest, Brush Mountain Wilderness, Rice Fields and Peters Mountain Wilderness, Dragon's Tooth and McAfee Knob will be irreparably harmed by the MVP, and the MVP cannot possibly be constructed within the Forest Management Plan. The Appalachian Trail, a draw for thousands of visitors every year and a sustaining source of revenue for Giles County, will suffer unmitigatable harm if this pipeline is built.

Bird migration
The New River Valley is the northern range for many southern birds, and the southern range for many northern birds. As large swaths of trees are destroyed for the pipeline, what measures are being taken to protect migrating and nesting birds?

Deer hunting
Deer hunting is a popular recreational activity and longstanding tradition in the New River Valley, enjoyed by residents and tourists. What measures will be taken to restore deer forage in disturbed areas along the pipeline path?

Trout fishing
Trout fishing is a popular recreational activity enjoyed by residents and tourists. What measures will be taken to protect streams that support trout, especially endangered brook trout, from contaminated runoff from slope erosion?

Biking
Giles, Craig, and Roanoke Counties host the Mountains of Misery Century and Double Metric ride in May, which starts in historic Newport, winds through

IND869-1

Section 3.3 of the EIS provides an assessment of existing systems as an alternative. See the response to comment FA11-12 regarding need. A revised visual analysis of the ANST can be found in section 4.8 of the final EIS. As discussed in section 4.8 of the EIS, the pipeline would be bored beneath the ANST. Migratory birds are discussed in section 4.4 of the EIS. Deer are addressed in section 4.5 of the EIS. Deer are often attracted to open grassy rights-of-ways. Recreational fishing is addressed in section 4.8 of the EIS. See the response to comment IND70-1 regarding erosion.

INDIVIDUALS

IND869 – Kimberley Homer

20161222-5423 FERC PDF (Unofficial) 12/22/2016 3:19:54 PM

- IND 869-1 cont'd | New Castle and the beautiful Maggie Valley and ends at Mountain Lake. Cyclists come from all over the world to participate in the event, generating tourist dollars for the region. A big draw is the beautiful scenery along the route, which is directly threatened by the deforestation and road runoff damage the pipeline will bring. Mountain biking and touring by bike are also popular recreational activities that enhance Virginia Tech's recruiting efforts for students and faculty. How will the pipeline's economic benefits to the New River Valley outweigh the recreational and tourist benefits of maintaining the landscape?
- IND 869-2 | Satellites and plastic. Building such an expensive pipeline will necessarily increase pressure to sell more fracked gas and exhaust whatever reserves remain sooner. Not only in increased consumption of gas causing irreversible damage to the air and water on our planet, but we need to save some fossil fuels for the future so we can still produce rocket fuel to maintain our satellite network and manufacture steel and plastic, especially for medical uses. There are many non-fossil alternatives for transportation, heating, cooling, and electricity. We should be developing these now, and saving the fossil fuels for what they are uniquely suited for, not burning them up as fast as we can.
- IND 869-3 | Air quality
The current MVP proposed route shows no compressor station in Montgomery County, but it seems unlikely that the piped gas could maintain its pressure over so many miles without being recompressed. Will there be a compressor station in Montgomery County? If so, where? And have the noise, light, vibration, and air pollution affects been addressed? If MVP adds the station in after they receive approval for a route that doesn't show it, what recourse will citizens have?
- IND 869-4 | Karst
Blacksburg High School's gym collapse, and the subsequent decision to construct a new high school five miles away, was blamed on the karst terrain in the region. What measures are being taken to protect the groundwater, wells, and foundations of buildings, roads and bridges near the pipeline?

Please consider and do what's right.
Thank you.

IND869-2 | See the response to comment IND2-3 regarding hydraulic fracturing. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

IND869-3 | See the response to comment LA15-5 regarding changes to the proposed MVP.

IND869-4 | Karst mitigation measures are addressed in section 4.1 of the EIS.

INDIVIDUALS

IND870 – Dianne Broussard

20161222-5426 FERC PDF (Unofficial) 12/22/2016 3:28:00 PM

DIANNE BROUSSARD, LINDSIDE, WV.
December 22, 2016

To: Thomas L.Tidwell, Chief, U.S. Forest Service, USDA
Joby Timm, Forest Supervisor, Jefferson National Forests
Jennifer Adams, Special Project Coordinator, Jefferson National Forests
Kimberly Bose, Secretary Federal Energy Regulatory Commission

Re: DENY Mountain Valley Pipeline Crossing Forest Lands, Docket CP 16-10-000
COMPLY with your USDA Forest Service Strategic Plan for FY2015 - 2020

IND
870-1

Following are excerpts from the USDA FOREST SERVICE STRATEGIC PLAN FY 2015-2020. Please note the general theme carried throughout the statements within the plan.

Strategic Plan Purpose:

"The Forest Service is accountable for sustaining the Nation's forest and grassland resources on behalf of the American people.... We are account-able for making progress on the goals and objec-tives set forth in this plan, in accordance with our statutory authorities, regulations, and mission."

Collaborate with other Federal agencies, State agencies, private landowners, communities, and American Indian tribes to improve the health and resilience of the land.

We will make sure that the actions we take, whether to use fire or control fire, are socially, economically, and ecologically sustainable. Our priority is to reduce the risk from wildfire to communities and natural resources. When fuels build up, especially in the wildland-urban interface-heavy vegetation, for example, or tangles of fallen trees and branches-the risk of a wildfire rises. We will work with partners to evaluate the risk and reduce it by removing the most hazardous fuels.

Protecting water resources by sustaining healthy, resilient forests and grasslands is generally more cost effective than investing in new or improved infrastructure, such as water purification plants and flood-control structures. The Forest Service will lead in managing the forests' and grasslands' contribution to delivering plenty of pure, clean water for people to enjoy.

Illustrate the importance of the link between forests and faucets from both surface and groundwater sources through educational programs.

Working with State and local partners across ownership boundaries, we will focus on sustaining the benefits that people receive from these natural areas-maintaining local cultures and traditions, connecting people to the land, and contributing to a higher quality of life.

IND870-1

Comment noted. The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources on NFS lands. These mitigation measures and monitoring procedures are described in the POD.

INDIVIDUALS

IND870 – Dianne Broussard

20161222-5426 FERC PDF (Unofficial) 12/22/2016 3:28:00 PM

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870-1
cont'd

As America's urban areas continue to grow, access to the natural environment and nature-based activities is becoming increasingly important to a community's overall health and well-being.

These lands offer a place to escape from daily routines and experience the serenity of nature, the mystery of wild places, the history of past cultures, and the excitement of engaging in the greatest variety of outdoor activities

People of all ages and physical abilities visiting natural settings can enjoy beautiful scenery, engage in physical activities, socialize with friends and family, escape the sights and sounds of civilization, and learn about natural and cultural environments.

Use the 21st Century Conservation Service Corps programs to provide outdoor experiences for young people and returning veterans to build conservation ethics and future stewards of the Nation's public lands legacy.

The deep connection that our employees feel to our mission and conservation ethic motivates them to better serve our Nation.

In respect to "removing the most hazardous fuels", the Forest Service would not comply with this safeguard if it permitted a 42" high pressure natural gas pipeline to be embedded within forest land. The safeguard here lies in "preventing fire hazards" by denying access to any such intrusion that would place its forest land and surrounding communities in eminent danger.

In respect to "Illustrate the importance of the link between forests and faucets", the Forest Service would not adhere to this pledge if it permits a natural gas pipeline to cross National Forest land which lies surrounded by communities whose solo water supply comes from water that flows via karts conduit within a region that poses other potential hazards such as land instability, weak soils, and potential seismicity. Please refer to AN EXPERT REPORT ON GEOLOGIC HAZARDS IN THE KARST REGIONS OF VIRGINIA AND WEST VIRGINIA by Ernst H. Kastning, Ph.D., P.G., previously submitted to FERC and available to view at wp.vasierraclub.org/KastningReport.pdf.

In regards to other pledges within the Forest Service Plan that I have noted above, one could not very well experience the serenity of nature, escape the sights and sounds of civilization, maintain local culture and tradition, or experience overall health and well-being in a forest being subjected to bulldozing, trenching and blasting for an unnecessary and vastly offensive project that leads our nation away from environmental abuses and into the likelihood of ecocide. Ecocide: the destruction of the natural environment, especially when willfully done.

The photo on the cover of your USDA FOREST SERVICE STRATEGIC PLAN FY 2015-2020 - can you picture this same view with an extensive line of heavy construction equipment rupturing the scene? Can you hear what the forest inhabitants and human visitors will hear during this lengthy project? Will the aftermath improve the health and resilience of the

INDIVIDUALS

IND870 – Dianne Broussard

20161222-5426 FERC PDF (Unofficial) 12/22/2016 3:28:00 PM

IND 870-1 | land, or will it just remind us of yet another sight and sound of
cont'd | civilization that we should have never let happen ?

Respectfully,

Dianne Broussard

cc: The President, The White House
Gina McCarthy, EPA
Randy Huffman, WVDEP

INDIVIDUALS

IND871 – Leigh Anne Weitzenfeld

20161222-5425 FERC PDF (Unofficial) 12/22/2016 3:23:44 PM

Leigh Anne Weitzenfeld, Roanoke, VA.
Hydrostatic Pipe Testing

IND 871-1 | There is some concern about water extraction from one water source and discharging it into another water source. How will sediment be removed prior to discharging? Will the hydrostatic testing water pick up contaminants from the pipe? If so, what contaminants (like fusion bonded epoxy) will be present in the pipe as a result of manufacturing and how will these be removed prior to testing water discharge?

What biocide will be used? Will it effectively kill any invasive species, including plants that may be present from the water source? What dissipation mechanism will be used to avoid additional sedimentation from in-stream erosion? What is the discharging rate/time? Will localities be notified of the discharge, particularly those who have TMDL reduction mandates?

IND 871-2 | Ecological Core Areas

The natural resources, particularly those at the West Virginia/Virginia line and south, named VA Core-01 through VA Core-14 are described as Outstanding (3), Very High (3), and High (8). These areas are essential to the high biodiversity that is found in these mountains. Did the plan adequately address the merits of keeping these areas intact? There is a lot of research documenting the ill effects of habitat fragmentation, degradation, edge habitat and their effects on biodiversity and genetic flow. Why not send this pipeline through land that has already undergone land-use change? The plan doesn't properly address that if this pipeline goes through the area will truly never recover its original value.

IND 871-3 | Soils and Erosion

- If 67% of the MVP pipeline will cross areas that are susceptible to landslides, what will be done to protect water quality for the perennial and ephemeral mountain streams below? Reseeding with Rye Grass, Kentucky 31 along with 10-10-10 isn't going to be sufficient.

- In looking at the steep slopes chart in Appendix K from 229.4-243.3, the grades are so great, it's going to be an erosion, revegetation and water quality nightmare. Is there going to be adequate, meaning frequent and repetitive oversight on the revegetation establishment on these rocky slopes?

- "The clearing and grading of stream banks could expose soil to erosional forces and would reduce riparian vegetation along the cleared section of the waterbody. The use of heavy equipment for construction could cause compaction of near-surface soils, an effect that could result in increased runoff into surface waters in the immediate vicinity of the proposed construction right-of-way. Increased surface runoff could transport sediment into surface waters, resulting in increased turbidity levels and increased sedimentation rates in the receiving waterbody. Disturbances to

IND871-1 | As stated in section 4.3 of the EIS, the hydrostatic test water would typically be discharged in the same watershed as the source from which it was obtained. To minimize scour, erosion, and sediment transport, hydrostatic test water would be discharged over vegetated land surfaces through filter bags, or hay lined dewatering structures. Additionally, the discharge rate would be regulated using valves and energy dissipation devices. The hydrostatic test water would not pick up contaminants within the pipeline. The Applicants would obtain necessary permits from the states. Mountain Valley would use commercial biocide according to manufacturer instructions. The biocide treatment is not intended to treat invasive species.

IND871-2 | The Applicants considered forests when routing the pipeline.

IND871-3 | See the response to comment IND70-1 regarding erosion. See the response to comment IND152-1 regarding the FERC's third-party monitoring program. A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS and in the response to comment FA11-15. Bottom Creek is discussed in sections 4.3 and 4.6 of the EIS. See the response to comment CO107-26 regarding the Roanoke logperch. See the response to comment IND343-1 regarding invasive species. As stated in section 4.4.2 of the EIS, promptly reseeding disturbed areas with native seed mixes following final grading and restoration of the right-of-way.

INDIVIDUALS

IND871 – Leigh Anne Weitzenfeld

20161222-5425 FERC PDF (Unofficial) 12/22/2016 3:23:44 PM

IND
871-3
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stream channels and stream banks could also increase the likelihood of scour after construction." Bottom Creek, a tributary of the Roanoke River is an exceptional state water system. Just like the core ecological areas referenced above, these local assets should be conserved not subjected to degradation. The erosion resulting from steep hillsides as well as riparian buffer removal, blasting, grading and stream crossing construction will cause excessive sedimentation for these streams. I do commend the plan as mostly requiring stream pump arounds as turbidity curtains have little value in a moving stream. This will also be in conflict to the Water Quality TMDL Mandates that communities are under.

- Plans to protect the Roanoke Logperch were woefully inadequately addressed in the EIS, especially as table 4.7.1-1 determines that they are likely to be adversely affected.

Revegetation

- There are numerous highly invasive plant species as outlined on Table 4.4.1-4. These seeds will spread into the disturbed areas on equipment as it moves throughout the project. What is going to be done outside of the Jefferson National Forest to prevent invasive plant seed dispersal from equipment, especially in these high value core areas?
- What aren't native seed mixes being used in disturbed areas in conjunction with temporary seeding mixes?

IND
871-4

Karst

- There are 94 instances of karst features along the proposed pipeline. Many karst features are home to endangered bats and are recreational features. The pipeline should not go through any conservation sites, particularly those with Karst geology. The plan does not adequately address the threats to ground water in these numerous areas.

IND871-4

See the response to comment IND655-3 regarding karst features.

INDIVIDUALS

IND872 – Maury Johnson

20161222-5430 FERC PDF (Unofficial) 12/22/2016 3:21:34 PM

December 22, 2016

Ms. Kimberly Bose, Secretary of The FERC, Members of the Commission, The BLM, The USFS, The Army Corp of Engineers, The EPA, and others Whom It May Concern:

IND
872-1

Over the past 90 days, folks across the region have been trying to address all the incorrect data, inadequacies and out-right- untruths found in the DEIS for the Mountain Valley Pipeline. It appears that MVP could say anything and it would go into the DEIS as fact, they could say that the sky is green and it would either be accepted as truth or they would say they could “mitigate” that.

Unfortunately, this all goes to try to steamroll the citizens of the area, I assure you that we will not be steamrolled.

I have submitted several well researched comments in the past few weeks, but still have data to collect and submit; unfortunately I have not gotten all that data compiled by the “DEADLINE” Date. Therefore I will act just like EQT partners and MVP and will supply that Supplemental Data after the first of the year 2017. This data will include, but may not be limited to the baptismal sites on Hans Creek and Indian Creek in Monroe County. Both have been mentioned in my previous comments, but there is supplemental data to be collected.

Also, I am collecting more data concerning the historic and recreational significance of the Narrows of Hans Creek, which was also mentioned in several of my previous comments. The newly formed Friends of The Narrows will be supplying to me that supplemental data in the coming weeks.

IND
872-2

There was also a comment by Dr Zane Lawhorn in his submission # 20161220-5062 dated 12/20/2016 about the “historic road” across land owned by his and my ancestors. He spoke of that road being very visible on land owned by local resident Jim Gore. This road deserves protection under Chapter 106 of the National Historic Preservation Act. That road is also visible on top of Ellison’s Ridge and should also be protected. I know for a fact that MVP surveyors have surveyed the land on top of Ellison’s ridge but that road was not discussed anywhere I could find in the DEIS.

I, furthermore want to implore the FERC to STOP- go back and do a revised DEIS, or better yet just take a No Build position, as it has been clearly stated by the over 15,000 comments already received telling you that this is a really bad idea.

I certainly hope that FERC will not be complicit in destroying the Appalachian Trail, The National Wilderness areas, old growth forest, and Peters Mountain and it pristine

IND872-1

Comments noted.

IND872-2

See the responses to comment IND470 regarding Dr. Lawhorn’s letter. See the response to comment CO34-1 regarding a hydrogeological study.

INDIVIDUALS

IND872 – Maury Johnson

20161222-5430 FERC PDF (Unofficial) 12/22/2016 3:21:34 PM

IND 872-2
cont'd

waters. Many people of this area have a cultural and even spiritual attachment to these places.

Finally, I once again want to implore The FERC and the USFS to conduct a thorough Hydrogeological study of the Peters Mountain and Ellison's Ridge area in Monroe County and the Jefferson National Forest.

Sincerely,

Maury W Johnson

INDIVIDUALS

IND873 – Carl Zipper

20161222-5433 FERC PDF (Unofficial) 12/22/2016 3:27:50 PM

22 December 2016

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

Victoria Craft and Miriam Liberatore,
US Bureau of Land Management
vcraft@blm.gov
mliberat@blm.gov

Jennifer Adams
US Forest Service
Jefferson National Forest
comments-southern-georgewashington-jefferson@fs.fed.us
jenniferpadams@fs.fed.us

RE: FERC Docket CP 16-10
Mountain Valley Pipeline proposal
Four Proposed Amendments to Jefferson National Forest Plan Should be Rejected.

IND
873-1

Dear Ms. Bose, Members of the Commission, Ms. Adams, Ms. Craft, and Ms. Liberatore,

I am writing to comment on Proposed Amendments Number 1, 2, 3, and 4 to the Forest Plan for Jefferson National Forest (JNF)¹. These proposed amendments are described by the Mountain Valley Project and Equitrans Expansion Project Draft Environmental Impact Statement, as issued by FERC.² These amendments are also described in an 8-page document (Notice of Availability of the Draft Environmental Impact Statement for the Proposed Mountain Valley Pipeline Project and Equitrans Expansion Project).³

I urge the US Bureau of Land Management (BLM), US Federal Energy Regulatory Commission (FERC), and US Forest Service (USFS) to reject each of these four amendments. My reasoning is stated below.

Proposed Amendment No. 1, if approved, would establish a 500-foot wide “Designated Utility Corridor” through JNF lands.

This amendment should be rejected for several reasons. First, a 500-foot width corridor is well in excess of what would be required by Mountain Valley Pipeline (MVP) if approved by FERC. Also, the need to obtain federal permits to cross Jefferson National Forest is a significant hindrance to new pipeline construction across the Appalachians. Hence, establishment of a 500-foot designated utility corridor through the two Jefferson National Forest segments, which would reduce federal permitting requirements, would be likely to draw additional utility projects to the area, and those projects would have impacts – not only on Jefferson National Forest but also on areas outside of the Forest.

¹ Draft Environmental Impact Statement, pp. 4-259 through 4-267 (pp. 496 through 504 of 781) .

² FERC/DEIS-D0272. Submittal 20160916-4001 to FERC Docket CP16-10, pp. 4-259 through 4-267 (pp. 496 through 504 of 781)

³ Submittal 20160916-3014 to FERC Docket CP 16-10. Described hereafter as “Notice of Availability.”

IND873-1

See the response to comment FA8-1 regarding Amendment 1. See the response to comment FA10-1 regarding Amendment 4. Although there is no karst on NFS lands, the FS acknowledges the karst in surrounding areas and has worked with Mountain Valley to minimize the potential for soil movement and to ensure adequate restoration and revegetation. See the *Erosion and Sediment Control Plan* (POD, Appendix C), *Landslide Mitigation Plan* (POD, Appendix F), the *Site Specific Design of Stabilization Measures in High Hazard Portions of the Route* (POD, Appendix G), the *Restoration Plan* (POD, Appendix H), and the *Winter Construction Plan* (POD, Appendix L).

INDIVIDUALS

IND873 – Carl Zipper

IND
873-1
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FERC should urge BLM and USFS to reject the proposed amendment for the purpose of retaining consistency with prior FERC statements. Numerous commenters to FERC Dockets PF15-3 and CP16-10 have requested that FERC conduct a Programmatic Environmental Impact Statement that would address regional pipeline development. FERC routinely dismisses such requests, often using statements such as

"the Commission does not direct the development of the gas industry's infrastructure ... Nor does it engage in regional planning exercises that would result in the selection of one project over another."

The approval of a 500-foot Designated Utility Corridor through the Jefferson National Forest, which is unnecessary for the current proposed project, would be equivalent to regional planning, given the likelihood that it would draw additional utility projects including pipeline development.

BLM and USFS should also reject the proposed amendment for a simple reason: The amendment's approval would have significant impacts on the Jefferson National Forest and on adjacent non-JNF lands areas. The proposed amendment is not essential to the Mountain Valley Pipeline decision. If BLM and USFS are serious about this proposed amendment: Please establish an evaluation process that is independent of the FERC process, within which the proposed amendment can be evaluated on its own merits and independently of Mountain Valley Pipeline and FERC.

As I have stated, the proposed amendments approval would have significant ramifications, both within and beyond the Jefferson National Forest. Should the proposed amendment be approved and draw additional utility projects to the area; and should the Mountain Valley Pipeline proposal also be approved; and should those additional utility projects parallel the Mountain Valley Pipeline in the vicinity of and in between the two National Forest segments as is strongly incentivized by current FERC policies, numerous resources would be affected including those listed in Table 1.

Table 1. Sensitive resources that would suffer adverse effects, in addition to those described by the DEIS, if Designated Utility Corridors were to be established and attract additional pipelines through the project area. These resources occur along the proposed pipeline route and in the immediate vicinity of and/or in between the two Jefferson National Forest segments that would be directly impacted by the proposed Mountain Valley Pipeline, if approved by FERC.

Resource	Description, Significance
Peters Mountain	Peters Mountain serves as a water source for numerous residents and for public water systems in Monroe County.
Appalachian National Scenic Trail (ANST)	The proposed Mountain Valley Pipeline corridor would be visible at numerous points along the ANST. A wider deforested corridor through forested areas, as would occur if other utility projects were constructed in parallel, would increase visibility impacts. ⁴
Ecological Core Area	Forest resources designated as "Outstanding" Ecological Core Area occur along the pipeline route segments that are at issue.
Rural Historic Districts	The Greater Newport Rural Historic District, and the North Fork Valley Rural Historic District would both be impacted; both are listed in the National Register of Historic Places.

⁴ "In the opinion of the ATC, the proposed MVP pipeline would be visible to users from multiple locations along the ANST." Quote from DEIS, p.4-250 (p.487 of 781). ATC is Appalachian Trail Conservancy. See also submittals 20161213-5106 (C.E. Zipper) and 20161208-5043 (Appalachian Trail Conservancy) to FERC Docket CP16-10.

INDIVIDUALS

IND873 – Carl Zipper

20161222-5433 FERC PDF (Unofficial) 12/22/2016 3:27:50 PM

IND 873-1 cont'd	Scenic Byways	Big Stony Creek Road in Giles County, Bluegrass Trail in Giles County, and Catawba Road in Montgomery County, are all Virginia Scenic Byways.
	Catawba Valley Special Project Area	An area with "high concentration of conservation values warranting special consideration" as designated by Virginia Outdoors Foundation.
	Sensitive Karst Areas	The proposed pipeline's potential impacts in Karst areas are a major concern to many who have commented on the Mountain Valley Pipeline proposal. ⁵ Potential impacts of the proposed pipeline to karst terrain have been a major concern throughout the Mountain Valley Pipeline project, and the vast majority of Karst areas of primary concern occur immediately northwest of the potentially impacted Peters Mountain JNF segment, immediately southeast of the potentially impacted Sinking Creek - Brush Mountains JNF segment, or in between the two JNF segments.
	Caves	>20 occur within close proximity to the pipeline route segment of concern, including Canoe Cave, Slussers Chapel Cave, and Old Mill Caves. ⁶
	Cave Conservation Sites	The Canoe Cave, Slussers Chapel Cave, and Old Mill Cave Conservation Sites, and possibly others, all are potentially impacted directly.
	Fisheries of Special Concern	23 crossings of such water bodies are proposed for a 30-mile project segment (10% of the project's length) between and adjacent to the proposed JNF crossings, while 27 additional crossings of such water bodies occur for the other 90% of the project's proposed length. ⁷
	Craig Creek crossing	The Craig Creek – Johns Creek Stream Conservation Unit has been given a biodiversity ranking of B1 by the Virginia DCR, representing a site with outstanding natural resources significance. ⁸
	North Fork Roanoke River and Tributaries	Known habitat for a federally listed endangered species, Roanoke logperch (<i>Percina rex</i>) occurs at or shortly downstream of the proposed pipeline crossing. Mountain Valley proposes >25 crossings (both ROW and construction related) of the river and its tributaries within a ~7 mile segment. The DEIS states that Mountain Valley Pipeline is "Likely to Adversely Affect" Roanoke logperch. ⁹
	Brush Mountain Inventoried Roadless Area	Within Jefferson National Forest.
Wilderness Areas	Within Jefferson National Forest, both the Peters Mountain Wilderness Area and the Brush Mountain Wilderness Area occur adjacent to the proposed 500-foot utility corridor and would be impacted indirectly by buildout of utilities in such a corridor.	

⁵ See, for example, submittals 20160713-5029 ("Kastning Report") and 20151125-5156 to FERC Docket CP16-10.

⁶ Counts are summed from identifications in Karst Hazard Assessment, submittal 20160422-5012(31404057) Part 120 of 126; Attachment DR2 RR2-12; starts on p. 20 of 129.

⁷ DEIS, Appendix F-5.

⁸ DEIS, p.4-225 (p. 462 of 781).

⁹ Water body crossings are listed in DEIS Appendix F-1. The DEIS "adversely affect" finding is stated on pp. 4-181 and 4-182 (pp.422-423 of 781), DEIS..

INDIVIDUALS

IND873 – Carl Zipper

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If the BLM and USFS wish to establish a designated utility corridor through the JNF, a potential location for such corridor should be studied and selected carefully and with full knowledge of resources that would be impacted by the corridor's establishment, both within the JNF and on private lands that would be impacted by JNF-corridor approaches; and a range of alternatives should be evaluated. To select a corridor location as a sole and direct consequence of Mountain Valley Pipeline routing decisions would not be prudent. Mountain Valley routing decisions were based out-of-date geospatial data and failed to consider a range of environmental impacts that would result from that route selection.¹⁰ The inadequacies of Mountain Valley's routing decisions have been well documented, and are the subject of a Protest¹¹ that has yet to be heard by the courts. Mountain Valley's routing decisions are being evaluated by a DEIS process that is highly problematic on multiple levels, and provides a very poor basis for the wide-reaching and permanent environmental impacts that would occur of Proposed Amendment No. 1 were to be approved.

The BLM and USFS are themselves dealing consequences of Mountain Valley's failure to develop an initial proposed route properly. Despite numerous minor route alterations, the proposed corridor continues to pose threats to numerous sensitive resources – including its likely indirect effects to two wilderness areas. Where the proposed corridor exits the JNF at Brush Mountain in Montgomery County, the corridor is proposed to impact directly sensitive karst features. In fact, the initial DEIS-proposed route in this area has been modified in an effort to minimize such impacts that would occur due to the extensive karst features in this area.¹² That re-routing, however and despite a FERC-mandated intent to reduce karst-related hazards and impacts, still encounters multiple karst features.¹³ As a direct result, the USFS and BLM are dealing with multiple requests to re-route the proposed pipeline along an alternative corridor proposed by Virginia Department of Conservation and Recreation, known as the Slussers Conservation Site Avoidance Alternative.¹⁴ As USFS and BLM personnel are well aware, that alternative would reduce the proposed impacts to the Slussers Conservation Site, but at the expense of greater impacts to the JNF which would include a further-extended boundary of the proposed corridor along the Brush Mountain Wilderness.

The point is that Mountain Valley Pipeline's proposed was very poorly designed, with a routing-process analysis of potential environmental impacts was very crude; and that USFS, BLM, FERC, and area citizens continue to deal with the fallout from those poor and inadequate routing decisions even at this late stage of the FERC process.

If the USFS and BLM wish to establish a designated utility through the JNF, then that should be studied. But to place such corridor along the proposed Mountain Valley Pipeline route without any evaluation of alternatives would be highly imprudent and would not be consistent with USFS and BLM responsibilities under NEPA.

The proposed amendment no. 1 to the JNF Forest Plan should be rejected.

¹⁰ Submittal 20151125-5156 to FERC Docket CP16-10 by C.E. Zipper and multiple co-submitting parties, "Motion to Intervene and Protest".

¹¹ Ibid., Submittal 20151125-5156 to FERC Docket CP16-10.

¹² Mountain Valley post-DEIS issuance of the proposed rerouting is described in submittals 20161014-5022 and 20161020-5175.

¹³ See submittal 20161219-5056 to Docket CP16-10 (M. Johnson).

¹⁴ Submittal 20160909-5315 to Docket CP16-10, by Virginia Department of Conservation and Recreation .

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Proposed Amendment No. 2, if approved, would relax restrictions on soil and riparian conditions within the Jefferson National Forest

This proposed amendment should not be approved because the Mountain Valley Pipeline soil management and revegetation prescriptions are so inadequate. Mountain Valley Pipeline has failed to propose procedures that would ensure regeneration of forest vegetation within the project area; has failed to propose procedures that would exclude invasive exotic vegetation from construction and right-of-way areas, and has failed to state clearly how it would establish herbaceous vegetation in areas disturbed by construction.¹⁵

The DEIS prescriptions concerning vegetation re-establishment are so inadequate that they almost defy description. The DEIS

- fails to describe what plant species would be seeded;
- fails to describe measures for preparing soils, including those that would be compacted by construction equipment and those from which topsoil soil would be removed and subsoil exposed, for the "natural regeneration" of forest that it asserts will occur;
- fails to describe any procedures for monitoring vegetation so as to determine if the asserted "natural regeneration" would, in fact, be occurring;
- fails to describe remedial actions that would be instituted if the asserted "natural revegetation" does not occur;
- and fails to describe a plan for controlling invasive exotic plants that has any chance whatsoever of being successful.

Given these failures, why would the BLM and USFS approve a relaxation soil and riparian conditions? Why should BLM and USFS adjust the JNF Forest Plan to accommodate these inadequacies?

The DEIS inadequacies, as they concern vegetation re-establishment, are pervasive. For example, let us consider the applicant submittal 20161216-5171 to FERC Docket CP16-10, a mere 8 days prior to the DEIS commenting period's 22 December 2016 closing. Apparently, FERC considers such submissions by the applicant to be of direct relevance to the DEIS, despite the CFR statement that "agencies shall allow ***not less than 45 days*** for comments on draft statements"¹⁶, but that is a separate question. The applicant submittal 20161216-5171 describes procedures that would be applied to limit invasive exotic plant species from becoming established on JNF lands, and states

*"MVP will annually monitor the right-of-way and ancillary facilities that occur on federal land for weeds following construction and reclamation of the Project for a period of **two years**. Locations of infestations on federal land crossed by the Project, and extent of infestations, will be submitted to the USFS. If species or colonies of species are found, MVP will conduct spot eradication of those species."*

In other words, MVP will conduct two evaluations of potential "infestations" over two years, will apply herbicide in an effort to eliminate above-ground evidence of such "infestation", but will take no responsibility for ensuring successful eradication of the "infestation", and will take no responsibility for ensuring that proposed deforested corridor does not become a habitat for

¹⁵ See submittal 0161121-5051 (C.E. Zipper) for further details on all of these issues. See also submittal 20161221-5349 (Preserve Craig, Brian Murphy) for further detail on inadequacies of proposed invasive exotic plant controls. See also a 22 December 2016 submittal 20161222-5134 by C.E. Zipper.

¹⁶ 40 CFR 1506.10

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See the response to comment FA10-1 regarding Amendment 2. The POD contains an *Exotic and Invasive Species Control Plan* in appendix R.

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invasive plant species, and a vector for dispersion of such species within the JNF corridor and beyond the JNF corridor – including into non-JNF lands and into JNF forested lands.

The BLM and USFS should consider the DEIS plans for re-establishing vegetation to be totally unacceptable, generally. The proximity of the Peters Mountain and Brush Mountain Wilderness Areas to the proposed pipeline corridor – and the potential for invasive exotic plant species to become established in the corridor, and then to move from the corridor into the adjacent Wilderness Areas – should provide BLM and USFS with additional concern with deficiencies of the proposed plans.

The BLM and USFS should not approve the proposed amendment number 2.

Furthermore, the BLM and USFS should not approved the request for pipeline right-of-way and construction easement through JNF; and should insist that FERC and the applicant propose plans for re-establishing vegetation that will not impair forested ecosystems within JNF before any reconsideration of the proposed amendment or the proposed easement.

IND
873-3

Proposed Amendment No. 3, if approved, would allow the removal of old growth trees within the construction corridor of the MVP pipeline.

There are a multitude of reasons why the BLM and USFS should not approve of this amendment. I will state tow.

1. *The DEIS fails to describe clearly the significance of old-growth forest loss proposed by MVP.*

The DEIS does state that 9 of 69 acres (13%) of old-growth "Dry-Mesic Oak Forest" within the JNF would be taken by Mountain Valley Pipeline (if constructed). By virtue of its conclusion (which fails to recommend either the no-action alternative or alternative routings that would avoid or minimize old-growth forest takings) and by virtue of its failure to propose any meaningful compensatory mitigation for the proposed old-growth forest loss, the DEIS infers that a 13% loss would not be of great significance.

Such inference is in error, as old-growth forest is highly valued by the public and by JNF users. As stated by a US Forest Service Report:¹⁷ "

"Old-growth forests provide a variety of values, such as biological diversity, wildlife habitat, recreation, esthetics, soil productivity, water quality, aquatic habitat, cultural values, and high-value timber products. Old-growth communities are rare or largely absent in the southeastern forests of the United States."

The DEIS fails to state that old-growth forest areas are extremely rare in eastern US, and that such losses are essentially irreversible within multi-generational human time scales. The DEIS fails to describe any additional acreages of old-growth "Dry-Mesic Oak Forest" occurring outside of the JNF – and, hence, the regional significance of the proposed taking.

The Jefferson National Forest Land and Resource Management Plan¹⁸ (referenced by the DEIS as LRMP) states a Goal 13:

¹⁷ Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region Report of the Region 8 Old-Growth Team.
<http://www.fs.fed.us/outernet/r8/planning/R8%20Old%20Growth%20Report.pdf>

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

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"Provide a well-distributed and representative network of large, medium, and small old growth patches managed through restoration, protection, or maintenance activities to provide biological and social benefits."

Also, protection of old-growth forest are essential to Jefferson National Forest management goals:

*"The goals that are emphasized in the Jefferson Forest Plan are to ... (4) protect existing old growth ..."*¹⁸

The DEIS also fails to describe the significance of Appalachian forested ecosystems in a global context; the rarity of old-growth stands throughout the Appalachians; and, hence, the global significance of the old-growth forest that would be lost.

2. *The DEIS fails to propose, describe and evaluate alternative routings, either within the JNF or otherwise, that would reduce or avoid the proposed old-growth forest loss.*

The DEIS it fails to describe if alternative routings to avoid or minimize old-growth loss would be impracticable or impossible; and it fails to describe if an analysis of alternatives has been conducted and found the current proposed route to minimize old-growth forest loss.

3. *The DEIS fails to propose a plan for controlling exotic and invasive plants within disturbed areas that has any chance of being effective.*

Neither the DEIS/applicant's general "Exotic and Invasive Species Control Plan"²⁰ nor the JNF-specific invasive exotic plant species control plan²¹ are likely to be effective. Therefore, if the proposed pipeline were to be constructed, invasive exotic plant species are likely to become established within the proposed deforested corridor – and are likely to become established in the corridor segment adjacent to remaining old-growth forest. Hence, it is possible – and likely, unless JNF puts forth the resources that would be necessary to preclude the predicted outcome – that exotic invasive plant species, once becoming established in the proposed corridor, would then invade adjacent old-growth forest areas, thus causing fundamental change to and degradation of those areas.

Numerous invasive exotic plant species with potential to invade Appalachian forest areas occur in project areas close to the proposed JNF crossings. Within Montgomery County, for example, the invasive exotic species *Lespedeza cuneata*, *Microstegium vimineum*, *Elaeagnus umbellata*, *Ailanthus altissima*, *paulownia tomentosa* all occur; and all have potential to invade forested areas.²² Such invasions can occur multiple mechanisms, including exploitation of temporary gaps that occur in forested canopy due to canopy-tree mortality, storm damage, or damage by pests such as the exotic invasive *Lymantria dispar* (gypsy moth)²³ that occur in

¹⁸ Revised Land and Resource Management Plan Jefferson National Forest. United States Department of Agriculture, Forest Service, Southern Region. Management Bulletin R8-MB 115A January 2004. Quote from p. 2-24 (46 of 396).

¹⁹ US Department of Agriculture Southern Region. 2004. Summary Environmental Impact Statement Revised Land and Resource Management Plan Jefferson National Forest. Management Bulletin R8-MB 115D, p. 2.

²⁰ As per above, and as documented by submittal 20161121-5051 to FERC Docket CP16-10 (starts on p. 11).

²¹ Submittal 20161216-5171 to FERC Docket CP16-10.

²² See submittal 20161121-5051 to FERC Docket CP16-10 (C.E. Zipper, starts on p. 11), as well as the DEIS itself (Table 4.4.1-4), the so-called Exotic and Invasive Control Plan that is referenced by the DEIS, and Mountain Valley Pipeline's submittal 20161216-5171 to the FERC Docket CP16-10.

²³ <https://www.fs.fed.us/ne/morgantown/4557/gmoth/>

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close proximity to the proposed JNF crossings.²⁴ The age of old-growth forest communities, and the potential mortality of any given tree regardless of age, make it likely that canopy gaps would occur from time-to-time within the old growth forest that would remain adjacent to the deforested, and likely exotic-plant infested²⁵ corridor that is proposed by the DEIS.

To conclude: Proposed Amendment number 3 should be rejected. Mountain Valley Pipeline should not be permitted to remove old-growth forest based on plans and logic that have been communicated by the DEIS. The DEIS provides no analysis of alternatives to the proposed taking of old-growth forest; and it provides no plans for protection of the old-growth forest plant communities that would remain adjacent to deforested corridor if proposed taking were allowed to occur.

IND
873-4

Proposed Amendment No. 4, if approved, would allow reduction of the “Scenic Integrity Objective” (SIO) for a segment of the Appalachian Trail.

This amendment should be rejected as well.

First of all: The Appalachian National Scenic Trail (ANST) is a national treasure. Given its history and the nature of the forested ecosystem within which it occurs, there is nothing else like it in the US – and, perhaps, within the world. The ANST’s viewshed is essential to its character – as inferred by its name, Appalachian National Scenic Trail. The ANST’s viewshed should be preserved to the maximum extent possible.

Furthermore, options are available for constructing pipelines across the ANST that would have impacts less than that which is proposed, and would not require an SIO reduction. For example, the alternative routing known as Hybrid Alternative 1A, if implemented by FERC and the applicant, would reduce numerous adverse impacts, including adverse impacts to the ANST’s visual integrity relative to what is proposed by the DEIS.²⁶ – including visual impacts of the crossing to the ANST.²⁷ However, that alternative was not evaluated by the DEIS.

And furthermore, the DEIS routing as proposed would create numerous adverse effects to the ANST.²⁸ Yet, no routing alternatives have been evaluated by the DEIS for the purpose of reducing or mitigating those impacts. In fact, the DEIS does not even evaluate adequately potential visual impacts to the ANST. As stated by the Appalachian Trail Conservancy,²⁹ the DEIS

“... lacks even the most basic analysis of impacts to the Appalachian National Scenic Trail. Further, much of the information that is included is incorrect ... this is a fundamentally deficient NEPA in terms of analyzing impacts to the ANST.”

²⁴ Evidence of gypsy moth infestations to forest land on the northwestern slope of the extension of Sinking Creek mountain is clearly visible during leaf-on season as one is approaching Newport (Giles County) on US Route 460 from the west. This location is just a few miles from the DEIS proposal to construct a deforested corridor, with no effective control for invasive exotic plants, through old growth forest within the JNF.

²⁵ I state that the corridor is likely to become exotic-plant infested based on the ineffective exotic plant controls that are proposed by the DEIS, and the old-growth forest’s proximity to areas where invasive exotic plants occur. If the USFS is prepared to manage the corridor so as to prevent exotic plant invasions, such outcomes are not likely. But why the USFS (the taxpayer) be saddled with this responsibility?

²⁶ See submittals 20160509-5041 (L. Gay) and 20161121-5048 (C.E. Zipper) to CP16-10 for further details.

²⁷ See submittal 20161121-5048 to FERC Docket CP16-10.

²⁸ See submittals 20161213-5106 (C.E. Zipper) and 20161208-5043 (Appalachian Trail Conservancy) to FERC Docket CP16-10.

²⁹ Submittal 20161208-5043 to FERC Docket CP16-10 (Appalachian Trail Conservancy).

IND873-4

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

INDIVIDUALS

IND873 – Carl Zipper

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And still furthermore, the document fails to propose or evaluate a reasonable measure that would reduce visual impacts to the ANST by the pipeline (if constructed) relative what is proposed.³⁰ The DEIS fails to propose or require an active reforestation program that would include re-planting of trees in temporary workspaces.³¹ Unlike the current DEIS-proposed plans, such active reforestation would ensure narrowing of the deforested corridor and consequent reduction of the corridor's visual impacts; and would accelerate such visual impact reduction, relative to the natural regeneration that is proposed by the DEIS, even in locations where the natural regeneration would be successful.

IND
873-5

Public Need for Mountain Valley Pipeline Has Not Been Demonstrated

The DEIS has failed to demonstrate public need for the pipeline. Clearly, the operating company expects to profit if the pipeline is constructed. But please be aware that the contracted gas shippers and project owners are of the same entities.³²

Table 2. All of the shippers on the Mountain Valley Pipeline are affiliates of companies involved in developing the project.

Pipeline owner	Ownership interest	Shipper	Capacity contracted (dekatherms/day)	Capacity contracted (%)
EQT Midstream Partners, LP	45.5%	EQT Energy, LLC	1,290,000	64.5%
NextEra Energy US Gas Assets, LLC	31%	USG Properties Marcellus Holdings, LLC	250,000	12.5%
Con Edison Gas Midstream, LLC	12.5%	Consolidated Edison Company of New York	250,000	12.5%
WGL Midstream, Inc.	7%	WGL Midstream, Inc.	200,000	10%
Vega Midstream MVP LLC	3%			
RGC Midstream LLC	1%	Roanoke Gas Company	10,000	0.5%

As noted by the IEEFA report from which the above table has been copied:

“Pipelines out of the Marcellus and Utica region are being overbuilt”

“The Federal Energy Regulatory Commission facilitates overbuilding. The high rates of return on equity that FERC grants to pipeline companies (allowable rates of up to 14%), along with the lack of a comprehensive planning process for natural gas infrastructure, attracts more capital into pipeline development than is necessary.”

“FERC’s approach to assessing the need for such projects is insufficient.”

³⁰ For further detail, see submittal 20161121-5049 (C.E. Zipper) to FERC Docket CP16-10.

³¹ As described by submittal 20161121-5051 (C.E. Zipper) to FERC Docket CP16-10.

³² Table copied from Institute for Energy Economics and Financial Analysis (IEEFA), Risks Associated With Natural Gas Pipeline Expansion Across Appalachia (April 27, 2016). The report was cited and linked in the Virginia chapter of the Sierra Club’s May 12, 2016 filing (Submittal 20160512-5183).

IND873-5

See the response to comment FA11-12 regarding need.

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Another report that questions the public need for Mountain Valley Pipeline was prepared by Synapse Economics, and is entitled "Are the Atlantic Coast Pipeline and the Mountain Valley Pipeline Necessary?"³³ The result of investigations reported by Synapse

"raises significant questions about the need for additional investment in new interstate natural gas pipelines in the region and, more generally, the utility of pipeline subscription rates as justification for these projects."

FERC's analysis of "public need" is based primarily on the applicant's assertions that it has contracted for most or all of the gas transportation capacity that would be created if the pipeline is built. However, the fact that such capacity has been contracted to self-owned entities makes this criterion of "public need" highly question. No entity (including neither FERC nor the applicant) that any "public need" for natural gas would go unmet if the proposed Mountain Valley Pipeline is not constructed.

In comments posted to the FERC Docket CP16-10,³⁴ US Environmental Agency also questions the DEIS analysis of public need.

The public need for Mountain Valley Pipeline has not been demonstrated.

IND
873-6

Four Proposed Amendments to Jefferson National Forest Plan Should be Rejected.

I have recommended that four proposed amendments to Jefferson National Forest Plan, as proposed by the Mountain Valley Pipeline DEIS, should be rejected. To summarize:

Proposed Amendment Number 1 stands alone as an affront to logic, given how FERC's handling of the Mountain Valley Pipeline and related pipeline proposals. Despite multiple gas pipelines having been proposed for the same area, and with similar origins and delivery points, and despite multiple requests to conduct a Programmatic Environmental Impact Statement to evaluate public need, FERC consistently refuses to do so, and consistently states refusal to "engage in regional planning exercises" – yet, here, that is exactly what FERC is doing. A 500-foot designated utility corridor would clearly draw additional utilities, including additional pipelines, to the designated utility corridor area. Potential impacts of that action would be extensive and would extend well beyond the scope of the current DEIS. The Proposed Amendment No. 1 should be evaluated on that basis but the current DEIS fails to do so. Proposed Amendment No. 1 should be soundly and clearly rejected by BLM, USFS – and by FERC.

The other three proposed amendments should be rejected as well. I understand that, by statute, BLM and USFS must accommodate reasonable proposals for changes of the Forest Plan that are necessary to serve public need. However, the public need for Mountain Valley Pipeline has not been demonstrated. Also, FERC (through the DEIS) and applicant have requested that the Jefferson National Forest should relax its environmental protection standards – but without fully exploring alternatives that would avoid or reduce environmental impacts, and without proposing to apply the mitigation and environmental restoration measures that are

³³ This report was posted to FERC Docket CP15-554 (Atlantic Coast Pipeline) on 20 December 2016, as an attachment to submittal 20161220-5146 ("Notice of Filing of Need-Related Documents in support of Protest by Shenandoah Valley Network et al. under CP15-554, et al.") and is expected to be posted to FERC CP16-10 by Appalachian Mountain Advocates, perhaps on behalf of a client such as Sierra Club or other entity, on 22 December 2016. The report is available for public download at https://www.southernenvironment.org/uploads/words_docs/2016_09_12_Synapse_Report_-_Are_the_ACP_and_MVP_Necessary_FINAL.PDF and at http://www.abralliance.org/wp-content/uploads/2016/09/Synapse_Report_9-12-16.pdf

³⁴ Submittal 20161221-5087, 21 December 2016, US EPA Region 3.

IND873-6

Comments noted.

INDIVIDUALS

IND873 – Carl Zipper

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practicable and capable of reducing environmental impacts relative to what is proposed in the DEIS. The BLM and USFS should not relax JNF management and environmental standards on this basis.

The four proposed amendments to Jefferson National Forest Plan, as proposed by the Mountain Valley Pipeline DEIS, should be rejected.

With regards,



Carl E. Zipper, Blacksburg Virginia 24060

INDIVIDUALS

IND874 – Kristin Peckman

20161222-5440 FERC PDF (Unofficial) 12/22/2016 3:57:06 PM

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874-1

Kristin Peckman, Roanoke, VA.
There needs to be a thorough assessment of the greenhouse gas impacts of the project.

On page 4-390 , the DEIS states: "Impacts from GHG emissions (climate change) are discussed in more detail in section 4.13.6.14." This section does not seem to exist.

Any assessment of GHG impacts must include the loss of forest, especially old-growth forest.

The amount of forest which will be destroyed by this project is immense. Included in a GHG analysis must be not only the permanent pathway of the pipeline, but also the temporary construction width and work areas, since new trees do not absorb CO2, only older trees do.

IND874-1

Section 4.11.1 has been revised to correct the section reference. It should be section 4.13.2.7. Section 4.13.2.7 has been revised to include a discussion of loss annual carbon sequestration potential due to forest clearing.

INDIVIDUALS

IND875 – Allison Del Vecchio

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875-1

Allison Del Vecchio, Roanoke, VA.

I am opposed to the proposed Mountain Valley Pipeline Project and the proposed path it would follow. I have been a resident of Roanoke city for the past 11 years, and I became a first time home owner this year. I am very concerned about how this pipeline will affect property value, the environmental conditions of our area, and how a pipeline will affect tourism and our city's marketability for newcomers and new businesses.

Outdoor activities, including our many hiking trails are likely to be affected by the proposed path of this pipeline. People come from all over the country to hike out trails, and I believe having a pipeline visible from any of those vistas would have a negative impact on tourism to our area, and would also discourage some from choosing to move to our area. I also very concerned about how a leak or explosions in those rural spaces, should one happen, would affect those very trails that add so much value to this area. These trails and views are an integral part of our community and is very much part of the reason that companies, such as Deschutes Brewery are moving to this area. I mention the brewery specifically, as the extension of our walking Green Way is part of the contract for them moving part of their operations to our area. Also, speaking as an avid camper, I know I would never choose to camp in an area where a pipeline is visible, mostly due to the fact that I go camping to return to nature and remove myself from the fray human life. I would not camp next to a reminder of human expansion.

I personally believe that the danger of a possible leak or explosion, as has happened to a number of pipelines already in existence in this country, would directly impact the value of the home my husband and I just purchased. Not only would the overall value of the area be impacted, but as our home is very near the Roanoke River and is on land that once had a creek that ran from the underground aquifers involved with the river, any damage from the pipeline could affect our property in a more significant way than other surrounding areas. This is our first home, our starter home, and the thought of such a thing harming our chances of selling this home makes me heartsick. We are working very hard to restore this home that was built in 1925, because preservation is very important to us.

I am strongly opposed to the Mountain Valley pipeline because I believe it stands to make short term gains for a select few individuals, while setting up thousands of residents for long term negative impacts to our region's economy and potentially our environment. Please consider how much our mountains mean to the residents of this area.

IND875-1

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 IND12-1 regarding property values. Tourism is addressed in section 4.9 of the EIS. An updated visual analysis is provided in section 4.8 of the final EIS. See the response to comment IND92-1 regarding leaks. See the response to comment IND2-1 regarding safety.

INDIVIDUALS

IND876 – Nancy Evey

Date: 12/11/2016

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

ORIGINAL

FILED
SECRETARY OF THE
COMMISSION
JAN 12 P 4:30

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

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876-1

Dear Secretary Bose,

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

*I am a concerned citizen of these United States. Jefferson National Forest is open to all of us - it needs to be preserved in its original state. In my area we are concerned about maintaining the Gila River in its free flowing state. Once diminished - it cannot be brought back to the original health. Please consider these issues & take time & energy to alternative methods which already exist.
Thank you*

IND
876-2

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

Sincerely,
Name: Nancy Evey
Address: 909 W. 13th St.
City & State: Silver City, N. M.
Zip Code: 88061

IND876-1

See the response to FA15-5 regarding forest impacts.

INDIVIDUALS

IND877 – Georgianne Stinnett

20161222-5451 FERC PDF (Unofficial) 12/22/2016

Georgianne Stinnett, Richmond, VA.

Comment on EIS for Mountain Valley Pipeline

IND
877-1

This EIS is horribly inadequate to address the effects of the MVP. I hesitate to comment on this EIS as it has been prepared with a seemingly cursory glance at scant data that could describe the impact that the MVP would have on areas through which it would pass, the sites of extraction, and the worldwide impact that the greenhouse gasses such as leaked methane, would have on local, regional, and global environments. There is irrefutable evidence in the scientific community that human contribution to global warming is a reality.

First, the pipeline is unnecessary as need for natural gas is met with existing supplies. This industry is notorious for overbuilding natural gas infrastructure and the continued development of pipelines will tie us to fossil fuels and place a negative pressure on the development of renewables. Fracking devastates the environment where it occurs with noise, air, and water pollution and triggers earthquakes. Where are the true consequences of this described in the EIS since the pipeline will facilitate fracking?

IND
877-2

The pipeline will require the use of eminent domain to steal land from those who are opposed to having a dangerous incendiary device which could leak, explode or be the target of terrorist activities run through their properties. This will be done for corporate gain and not public use as eminent domain was intended to be applied.

The impact of compressor stations is grossly under rated as these facilities are proven, in peer reviewed studies by physicians, to have devastating effects to the health of those living near them. Also, these stations are obvious bull's eyes for terrorists. We are seeing a marked destabilization of our world following the election, the possibility of attack is eminent.

The pipeline will destroy the tax base of communities through which it passes. These areas are valuable because of their scenic and pristine nature which determine what localities can charge for real estate taxes. A huge gash through the pristine woods, punctuated by compressor stations will destroy this priceless resource and the basis for tax revenue. The EIS does not address this.

IND
877-3

The MVP would pass through topography loaded with karst features. There is scant mention of the effects on ground and surface water in the event of leaks. And leaks are inevitable.

Also, how will land owners be protected when these leaks happen? How will they be compensated?

IND877-1

See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS. Climate change is addressed in section 4.13. See the response to comment FA-12 regarding need. See the response to comment IND2-3 regarding hydraulic fracturing.

IND877-2

See the response to comment IND1-3 regarding eminent domain. As discussed in section 4.12 of the EIS, the primary health issue related to the proposed projects would be the risk associated with an unanticipated pipeline failure. As discussed in section 4.11.1 of the EIS, the proposed projects would not be expected to have a significant impact on local or regional air quality. Terrorism is addressed in section 4.12 of the EIS. Property values are addressed in section 4.8 of the EIS.

IND877-3

See the response to comment IND92-1 regarding leaks. See the response to comment IND2-1 regarding safety. See the response to comment IND18-3 regarding financial responsibility.

INDIVIDUALS

IND877 – Georgianne Stinnett

20161222-5451 FERC PDF (Unofficial) 12/22/2016

IND 877-4 | FERC needs to stop rubberstamping any requests made by the natural gas extraction and transmission industry and look at the real science that describes the effects of their actions.

IND877-4

See the response to comment IND196-5 regarding the FERC review process.

INDIVIDUALS

IND878 – Mark Jennings

Mark Jennings, Lewisburg, WV.

IND
878-1

I'm a seasonal resident of Summers County, WV. For weeks now, neighbors and acquaintances have been showing me a list of information omissions in the DEIS addressing the proposed Mountain Valley Pipeline route through Summers and other WV counties.

I'm disturbed that such an incomplete study has been released in this stage of the permitting process.

A neighbor who's family has lived here for many generations told me, "Summers County doesn't have anything but its rivers and forests and mountains". Consider that Go Mart, Kroger and Magic Mart are the biggest revenue sources and employers in the county. I think that a quarter to a half of these franchises' annual local business volume is the seasonal recreational visitor flow. As the county has experienced already, whatever imperils the physical integrity or the reputation of the county's marvelous fishing, hunting, hiking & biking, boating, birding and camping resources, and its second home and retirement home real estate business, also significantly and immediately imperils its economy.

Coal and related industries are almost gone, and the county has been working bravely to develop its outdoor recreation business. That industry is extremely sensitive to to perceptions in external markets. Possible construction and post-construction accidents and environmental problems, the impressions and inconveniences of a massive construction project itself, and the devaluation of a significant fraction of private property, all are looming risks for the county's nascent effort to create a better future.

It's the unfortunate way of the world that sometimes the lightest touch on the scale by big industry can forever set the fate of tiny and innocent communities. West Virginia is full of communities that one by one have been brought down in this way. Should a flawed DEIS be allowed to permanently burden Summers County?

IND878-1

See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS. 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 IND12-1 regarding property values. Tourism is addressed in section 4.9 of the EIS.

INDIVIDUALS

IND879 – Abigail Benjamin

20161222-5461 FERC PDF (Unofficial) 12/22/2016 4:25:42 PM

IND 879-1 Abigail R Benjamin, Martinsburg, WV.
As an Environmental Attorney inside the State of West Virginia, and a native of Central West Virginia, I am extremely concerned about the inadequate provisions of the Draft Environmental Impact Statement (DEIS) for the Mountaineer Valley Pipeline (MVP), Docket No. CP16-10-000. As it currently stands, the DEIS lacks critical data points about wetland loss, individual property damages, the potential for air and noise pollution. Additionally, the DEIS fails to adequately consider the increased danger to the MVP pipeline breakage due to the region's unique karst topography and increased risk of flooding damage. Additionally, the WV Supreme Court has released a new case in November 2016 regarding new eminent domain rights of land owners along the MVP pipeline pathway. Landowners in the pipeline right of way need more time to review their rights with attorneys under the Mountain Valley Pipeline vs. McCurdy case. Please delay the DEIS until more consideration can be given to these important subjects of public safety, environmental health, and individual property rights.

Sincerely,

Abigail Benjamin, Esq.
www.abigaillawoffice.com

IND879-1 See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS. See the response to comment IND209-1 regarding the permanent fill of wetlands. The EIS provides a discussion of property values in section 4.9, air quality in section 4.11.1, and noise in section 4.11.2. Karst is addressed in section 4.1. A revised discussion of flash flooding is provided in section 4.3.2 of the final EIS. See the response to comment IND1-3 regarding eminent domain. See the response to comment IND2-1 regarding safety. Landowner rights are discussed in section 4.9 of the EIS.

INDIVIDUALS

IND880 – Kristin Peckman

20161222-5462 FERC PDF (Unofficial) 12/22/2016 4:27:20 PM

IND
880-1

Kristin Peckman, Roanoke, VA.
The DEIS is full of recommendations and what sounds like wishes for mitigation and other measures that the MVP "may" take. But there is no mechanism to hold MVP's feet to the fire. The people of West Virginia and southwest Virginia will suffer the consequences, while MVP will walk away scot-free.

IND880-1

See the response to comment IND147-1 regarding recommendations. See also the response to comment IND152-1 regarding the FERC's third-party monitoring program.

INDIVIDUALS

IND881 – Adrienne Zofchak

20161222-5463 FERC PDF (Unofficial) 12/22/2016

IND 881-1 Adrienne Zofchak, Blacksburg, VA.
I am a citizen of Blacksburg, Virginia in the New River Valley. I am extremely concerned for the safety and integrity of the Jefferson National Forest, The Appalachian Trail, and all of our local waterways.

IND881-1 See the responses to comments FA8-1 and FA10-1 regarding Amendments to the LRMP.

I strongly object to the installation of the Mountain Valley Pipeline. In particular I oppose it because:
It does not legally comply with the current Forest Management Plan of the Jefferson National Forest. I object to amendments to the Forest Management Plan. Amendments that I object to are: rezoning part of the Jefferson National Forest to create a 500-ft wide Utility Corridor for future gas, electricity, and water lines, Exceeding current restrictions on soil and riparian conditions within that corridor, removing currently protected old growth forests within the construction corridor, and allowing the Mountain Valley Pipeline to cross the Appalachian National Scenic Trail on Peters Mountain. These amendments and more violate the letter and the spirit of the Jefferson National Forest's Forest Management Plan. I object to changes and amendments to the Forest Management Plan.

IND 881-2 It is an unnecessary pipeline. Studies show that current energy demand can be met by existing infrastructure. In any case the National Environmental Policy Act process requires that the Federal Energy Regulatory Commission's environmental impact statement first assess the need for the project and include reasonable alternatives to the project in addition to investigating environmental impacts.

IND881-2 See the response to comment FA11-12 regarding need. Section 3.3 of the EIS provides an assessment of using existing infrastructure as an alternative. Climate change is addressed in section 4.13 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..

The EPA recommends FERC address climate change and infrastructure needed to address cumulative impacts, such as climate change, is a required part of the NEPA process. Climate change is a clear and present danger. Our energy needs must be fulfilled in new, sustainable, ways as soon as possible. They must change in the future, and if we do not change them soon, there will be irreparable harm done to the planet, including the health of the people and the biome of the appalachian region. This must be considered and taken into account by FERC when giving permits for pipelines like the MVP.

IND 881-3 There is danger of erosion and landslides in the mountainous and wet landscape that the pipeline is intended to cross. Best management practices will not be enough to prevent that. The Jefferson National Forest Management plan addresses these concerns. The Karst Hydrology of the region is particularly susceptible to such irreparable harm.

IND881-3 Section 4.1 of the EIS provides a discussion of landslides, karst, and erosion. See also the response to comment IND70-1 regarding erosion. Historic Districts are discussed in section 4.10. A revised visual analysis of the ANST can be found in section 4.8 of the final EIS. As discussed in section 4.8 of the EIS, the pipeline would be bored beneath the ANST.

There are threats, not mitigable, to historic districts, in the town of Newport Virginia, which the pipeline route is designated to travel directly through. As laid out by the National Historic Preservation Act, historic districts are to be protected from non mitigatable threats such as this pipeline.

There will be not mitigatable harm done to scenic views, which would impact compliance with the Scenic Integrity Objective for the Appalachian National Scenic Trail. These views include the view from Angel's Rest, Dragon's Tooth, and McAfee Knob: all iconic points on the ANST, and a piece of national natural heritage to which all citizens now and in the future have a right to.

I urge FERC to comply with all required steps of the permitting process. As a citizen, I demand that EPA requirements be addressed

INDIVIDUALS

IND881 – Adrienne Zofchak

20161222-5463 FERC PDF (Unofficial) 12/22/2016

IND
881-3 | legally, that the Forest Plan be followed, and that the National
cont'd | Historical Preservation Act be followed in letter and spirit.

INDIVIDUALS

IND882 – Ryan Hoke

Ryan A Hoke, Christiansburg, VA.

IND 882-1 | I strongly oppose the proposed Mountain Valley Pipeline. The draft environmental impact statement fails to describe adequate protections for private landowners as well as public use land that will be directly impacted by the proposed pipeline. The project is also likely not even necessary, a 3.5 billion dollar project that isn't even needed. The already existing pipelines have been reviewed as adequate to meet customer demands and demand may very well drop as more renewable energy sources are used.

IND 882-2 | The portion of the pipeline that goes through Monroe County WV and Giles County VA karst regions is a geographically unstable region prone to sinkholes and cave-ins. The proposed path of the pipeline will also directly impact the Appalachian National Scenic Trail, especially the McAfee Knob overlook which is one of the most visited and most photographed spots on the 2,200 mile long trail. The US Forest Service has raised several issues with this project and its impact on the area and to my knowledge none of these issues have been addressed by FERC.

I've lived in Monroe Co WV and Montgomery CO VA all of my life and do not want to see this unnecessary pipeline impact the region in a negative manner.

IND882-1 | Mitigation measures are discussed throughout section 4 of the EIS. See the response to comment FA11-12 regarding need. Section 3.3 of the EIS provides an assessment of using existing infrastructure as an alternative.

IND882-2 | Section 4.1 of the EIS provides an assessment of karst and sinkholes. A revised visual analysis of the ANST can be found in section 4.8 of the final EIS. As discussed in section 4.8 of the EIS, the pipeline would be bored beneath the ANST.

INDIVIDUALS

IND883 – Millie Smith

20161222-5465 FERC PDF (Unofficial) 12/22/2016

Millie Smith, Blacksburg, VA.
December 22, 2016

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

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

IND
883-1

I am commenting on pages ES-4 through ES-5, as well as ES-13 of the Draft Environmental Impact Statement for the Proposed Mountain Valley Project and Equitrans Expansion Project (September 16, 2016), Docket No. CP16-10-000 and Docket No. CP16-13-000.

One of my primary concerns with the Mountain Valley Pipeline Project and Equitrans Expansion Project is the lack of information provided to outline mitigation for the cumulative impacts to bodies of water, mainly intermittent streams, ephemeral streams, wetlands, and wells or springs located within 150 feet of construction workspaces. These bodies of water are under-addressed within the Draft Environmental Impact Statement, if at all, and must be accounted for in the planning of this project. Intermittent and ephemeral streams are difficult to map and track, but are critical to the ecosystems that the proposed MVP and EEP would be disrupting. Wells and springs located within 150 feet of construction workspaces, however, require even more careful consideration as they are the direct source of drinking water for families without municipal water access. There must be a record and plan for mitigation should access to wells and springs get cut off during the construction of the proposed projects.

I am a student at Virginia Tech, and while I do not own property in the path of the proposed MVP and EEP, I have grave concerns for the projects and the threats they pose to the community in which I live and the future of the environment. If MVP and Equitrans intends to thoroughly study project areas and mitigate impact as stipulated by NEPA, then the FERC should resubmit a DEIS with information on these vital and valuable water bodies.

Because of the unaddressed concerns I have identified above, and other significant information gaps that have been noted by other commenters and cited within the DEIS document itself, I request that the FERC issue a new DEIS with complete and corrected information, so that the public has an opportunity to assess and comment on the potential impacts of the project prior to the issuance of the FEIS.

If the FERC does not issue a new DEIS, I request that the FERC choose the No Action Alternative.

Millie Smith
(703) 861 9619
acsmith3@vt.edu

IND883-1

All streams that would be impacted are provided in appendix F of the EIS. Wetlands are provided in appendix G. See the response to comment LA15-14 regarding pending water supply wells. The statements regarding the No Action Alternative are noted.

INDIVIDUALS

IND883 – Millie Smith

20161222-5465 FERC PDF (Unofficial) 12/22/2016

4701 25th Street N, Arlington, VA 22207

cc: US Environmental Protection Agency

INDIVIDUALS

IND884 – Paul Washburn

20161222-5467 FERC PDF (Unofficial) 12/22/2016 4:41:57 PM

IND
884-1

Paul Washburn, Newport, VA.
In the last hour of the DEIS comment period, the Applicant, Mountain Valley Pipeline, LLC, responds to multiple requests for information from individuals, agencies and the FERC. The fact that the Applicant chose to wait until nearly the end of the public comment period to upload 28 documents, likely consisting of hundreds of pages of material, demonstrates disregard for the value of the EIS process and public comment. A cursory review shows that not all of this information could have been completed on the last day for public comment. Rather it was withheld in an attempt to give MVP the last word on contentious issues. For this reason alone the FERC should suspend and restart the EIS process for Docket CP16-10 such that it can appropriately consider the body of information just released by the Applicant and public response.

IND884-1

See the response to comment FA15-4 regarding comment letters.

INDIVIDUALS

IND885 – Anna R. Ziegler

20161222-5469 FERC PDF (Unofficial) 12/22/2016 4:50:38 PM

Anna R. Ziegler, Hinton, WV.
Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE, Room 1A
Washington, D.C. 20426

Dear Ms. Bose,

IND
885-1

The Draft Environmental Impact Statement (DEIS) for the proposed Mountain Valley Pipeline (MVP) does not adequately address significant issues. In particular, the DEIS does not adequately address the impact to the water resources in southern West Virginia, the impact to scenic resources in our state, and the impact on flora and fauna, all of which collectively impact the economic development and growth to southern West Virginia.

The proposed MVP pipeline route (if one can even be identified as there seem to be many and MVP is elusive about which route it may ultimately select) transects the Greenbrier River watersheds multiple times. Though the route crosses the Greenbrier only once, it crosses many tributary streams to both the New River and the Greenbrier. Also, and perhaps most overlooked, the Greenbrier River is a tributary of the New which may only serve to compound the water quality and/or quantity issues for points downstream, including my hometown of Hinton, West Virginia. A pipeline route of this width will significantly increase sedimentation and runoff, both during construction and for as long as the pipeline corridor is maintained with limited vegetative growth and potential chemical applications for the life of the pipeline.

IND
885-2

The DEIS states that MVP plans to cross the Greenbrier River using the open-cut wet crossing method. This has the potential to drastically impact the water quality and quantity in this important watershed. This is of deep concern for the residents of Summers County. Decreasing the vegetation along the route of the pipeline in the Greenbrier River will increase runoff during rain events and decrease absorption into the water table, diminishing the quantity of water produced by wells. Furthermore, for many residents who live more directly on the route of the pipeline and whose homes are also served by well (and there are 100s of homes on wells in Summers County), an increase in sedimentation will likely impact the water quality, as well as quantity, for each of these residences. Please require a revised DEIS to address the specific impacts of water quality and quantity on the individual residences along the pipeline corridor and those directly downstream from the proposed pipeline who rely on the water table to replenish wells.

In addition to impacting many private wells, MVP proposes to cross the Greenbrier River immediately upstream from the intake for the Big Bend Public Service District, a public water supply. Big Bend PSD provides water to over 650 homes and as many as 1,300 individual residents of Summers County. An open trench across the Greenbrier River will have a significant impact on this vital public service by impacting both quantity and quality. Notably, the Big Bend PSD is hardly mentioned in the DEIS. Please require a revised DEIS to address the impact to the Big Bend PSD and its customers and consumers.

IND885-1

The EIS provides a discussion of water resources in section 4.3 and visual impacts in section 4.8. The October 2015 proposed route was illustrated in appendix B of the draft EIS. A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS. See the response to comment IND70-1 regarding erosion. See the response to comment LA1-7 regarding herbicides.

IND885-2

See the response to comment FA11-15 regarding waterbody crossings. Since Mountain Valley would cross all waterbodies using dry techniques, there would be a low potential for downstream sedimentation and turbidity. A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS. See the response to comment IND3-1 regarding drinking water. Section 4.3 has been revised as necessary to accurately depict the distance of intakes for the Big Bend PSD from the MVP.

INDIVIDUALS

IND885 – Anna R. Ziegler

20161222-5469 FERC PDF (Unofficial) 12/22/2016 4:50:38 PM

IND
885-3

Furthermore, it is noted that certain federal regulations, including those of FEMA, prohibit or discourage this type of development in floodplains. Notably, the proposed MVP transects the floodplains of both the Greenbrier and New Rivers. The Greenbrier River experienced a significant flood in June of 2016 (it also experienced one hundred year flooding events in 1986 and 1996) which destroyed property and took the lives of 23 people. Any development of this watershed which will increase the potential runoff due to decreased vegetative cover should be prohibited. Please require a revised DEIS to address significant flooding concerns on the Greenbrier River.

IND885-3

A revised discussion of flash flooding is provided in section 4.3.2 of the final EIS.

IND
885-4

In addition to directly crossing these watersheds, the pipeline is routed over some extremely steep terrain, especially in Summers County. The stabilization of these slopes has come about only after hundreds of millions of years of up-thrust and erosion. A trench cut through these mountains will disturb this very delicate natural slope stability. A much more thorough analysis should be conducted before a permit should be issued for this pipeline.

IND885-4

Steep slopes are addressed in section 4.1 of the EIS.

IND
885-5

The ecosystem in this region has evolved over a timeframe that humans can only imagine. MVP proposes to completely bisect this ecosystem by slashing a swath over a hundred feet in width for over three hundred miles. While one hundred feet may not seem like a significant or insurmountable distance to humans, there are many plants and animals which will be cut off from important habitat, including migration corridors, which will limit and isolate certain species from other members of the species and impact the bio-diversification of these species. Furthermore, the construction of the pipeline and the long term maintenance of the pipeline corridor will significantly and detrimentally impact the aquatic life of both the Greenbrier and New River watershed. The delicate ecosystem in this region is already strained by development and any further impact to the area will certainly create negative consequences for flora and fauna.

IND885-5

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). Forest fragmentation is discussed in section 4.4 of the EIS. Aquatic impacts are discussed in section 4.6 of the EIS. Recreation is discussed in section 4.8 and tourism is discussed in section 4.9.

As one of the oldest mountain chains in the world, this region is considered by many to be a scenic jewel of the eastern continental US. Each year, West Virginia and, in particular, Summers County, receives thousands of visitors who vacation here for the superb fishing, boating, birding, hunting, and sightseeing the region has to offer. The proposed MVP will literally cut a scar across this significant landscape, impacting the very livelihoods of many residents in Summers County which depend on tourism.

IND
885-6

Finally, there are alternatives to the construction of this pipeline. Specifically, there appear to be other, already constructed, pipelines which carry natural gas from the northern gas fields in WV into Virginia. I urge FERC to require a more comprehensive review of these issues and require a revised DEIS.

IND885-6

Section 3.3 of the EIS provides an assessment of using existing systems as an alternative.

Sincerely,
/s/ Anna R. Ziegler

INDIVIDUALS

IND886 – Andrew Klein

20161222-5470 FERC PDF (Unofficial) 12/22/2016 4:51:03 PM

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

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

Ms. Bose,

IND
886-1

I implore you not to allow the Mountain Valley Pipeline to be constructed, as it would render tremendous damage:

1. The pipeline will ruin views, which will adversely affect the tourism industry in the area.
2. The pipeline will contaminate the water sources it would pass over. This isn't a hypothetical. There are regions of seismic instability along the proposed route. To build upon these regions something as volatile as a pipeline is extremely dangerous and short-sighted.
3. In order to accommodate the visual and environmental damage that would be caused by the Mountain Valley Pipeline, the U.S. Forest Service agreed to lower the Jefferson National Forest Management Plan standards for water quality, visual impacts, the removal of old-growth forest, and the number of simultaneous projects passing through the borders of federally protected land. This unprecedented change is extremely reckless, as it would open the gates for future infrastructure projects to cause similar destruction.

I urge FERC to protect the Appalachian Trail – a national treasure if there ever was one – and its surrounding landscape and communities. Please evaluate the comprehensive need for pipeline development to transport natural gas from the same Marcellus shale plays in a single Programmatic Environmental Impact Statement so that this infrastructure can be appropriately sited and the cumulative impacts to our National Parks, National Forests, and private lands can be understood before moving forward. It is FERC's responsibility to do the right thing – the alternative will be a turning point for the worse in an area that offers recreation and inspiration for millions of people.

Sincerely,
Andrew Klein

IND886-1

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). A revised visual assessment has been provided in section 4.8 of the final EIS. Tourism is addressed in section 4.9. See the response to comment IND3-1 regarding drinking water. As discussed in section 4.8 of the EIS, the pipeline would be bored beneath the ANST. The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD.

INDIVIDUALS
IND887 – Jonathan Lee

20161222-5472 FERC PDF (Unofficial) 12/22/2016 4:53:16 PM

Jonathan Lee, New Castle, VA.

December 21, 2016

Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426
Attn: Kimberly D. Bose, Secretary
RE: Project Docket Number CP16-10-000

To Whom it May Concern:

IND
887-1

I would like to express my opposition to and concern with the proposed Mountain Valley Pipeline project. The proposed project, to be constructed through Virginia and West Virginia, will have a severe and direct negative impact on six Virginia counties. I am opposed to the entire project, and as a Virginia resident, I am particularly opposed to the route in Virginia, especially the route in Craig County, Virginia. (Project Docket Number CP16-10-000)

This proposed pipeline poses numerous threats to the overall well-being of the land, economy, and citizens of Craig County specifically and Virginia generally. As a landowner in and full-time resident of Craig County, I fully understand the negative impact such a pipeline would have on both public and private property in the county, and therefore I strongly oppose MVP's request. After reviewing the DEIS, I also have major concerns with that document and the procedure that led to its issuance. It does not adequately address the major problems that will come from this proposed pipeline project, and thus more information must be gathered by the FERC before any approvals can be given.

IND
887-2

My reasons for opposing the pipeline project are multi-faceted. If MVP's request were to be granted, Craig County's environmental, economic, and cultural foundations will be greatly harmed. Public and private land will be damaged. Pollution and sedimentation will severely damage water quality, and thus public health will be adversely impacted. This will occur for local residents of Craig County and surrounding counties. It will also negatively impact water resources for a large portion of Virginia residents, as Craig County's waterways are major tributaries to the Chesapeake Bay watershed and the New River.

IND
887-3

Economic tourism, a major building block for current and future economic growth, will be hurt. For example, the area's National Forest would be severely and negatively altered. The Appalachian Trail and viewsheds from the Trail would be damaged. These changes would curtail the planned and needed growth of ecotourism. Also, farm land and agribusiness operations, crucial elements to the Craig County economy, would also be

IND887-1

See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS.

IND887-2

We conclude that with mitigation, the project is not likely to have significant environmental impacts on most resources. The right-of-way would be restored and revegetated following construction (see section 2.4.2 of the EIS). A revised discussion of sedimentation and turbidity can be found in section 4.3 of the EIS. See the response to comment IND3-1 regarding drinking water.

IND887-3

Tourism is addressed in section 4.9 of the EIS. Impacts to the Jefferson National Forest are discussed in section 4.8. A revised visual analysis of the ANST can be found in section 4.8 of the final EIS. As discussed in section 4.8 of the EIS, the pipeline would be bored beneath the ANST. See the response to comment IND332-1 regarding farming.

INDIVIDUALS

IND887 – Jonathan Lee

20161222-5472 FERC PDF (Unofficial) 12/22/2016 4:53:16 PM

IND
887-3

damaged, and this would harm current economic conditions as well as future economic growth.

cont'd

IND
887-4

In order to sustain the health, diversity, and productivity of both private and public property, as well as to protect citizens, it is clear that MVP's request must be rejected. The FERC must properly take these issues into account. Unfortunately, the current DEIS does not address many of these issues. MVP's responses to the issues have been vague or completely lacking. Therefore, I ask that you reject the current proposal and ask for more detailed plans related to soil and water quality protection, public safety, overall environmental risks, and legitimate cultural and economic impact analysis.

Taking all of these elements into consideration, I strongly oppose the proposed Mountain Valley Pipeline project. I am also very concerned about the lack of information in the DEIS and the process which led to its creation. I posit that the current DEIS lacks the necessary information for FERC to make a reasonable and responsible decision. Therefore, I ask you, the Federal Energy Regulatory Commission, to reject the Mountain Valley Pipeline proposal (Docket Number CP16-10-000).

Thank you for your consideration, and I appreciate you taking your role so seriously.

Sincerely,

Jonathan E. Lee
4582 Craig Valley Drive
New Castle, VA 24127

IND887-4

See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS. The EIS provides a discussion of soil in section 4.2, water quality in section 4.3, public safety in section 4.12, cultural resources in section 4.10, and socioeconomics in section 4.9.

INDIVIDUALS

IND888 – William Sidebottom

20161222-5473 FERC PDF (Unofficial) 12/22/2016 4:57:30 PM

IND
888-1

William Sidebottom, Springfield, VA.

I am a 100% disabled Vietnam veteran, with serious PTSD. How does my health relate to a pipeline project, the Appalachian Trail is my escape. Time and place to unwind an for a few days leaving behind the horrors of violence and killing. My units motto was "Our business is killing...Business is good". The beauty of the trails is one of great importance to not only to Vietnam vets but I submit future vets...we need a place of calm to put/keep life in perspective.

Appreciate the need to move fossil fuels from production to consumption, but PLEASE male every effort to protect what little of our natural forrest remain. Rerouting may be a "longer pipeline" but once the splendor of the forrest is scared it can not be wished back.

Please protect the beauty of the place I escape to

Vietnam

1968 - 1969 11th Armored Cavalry Regiment
1971-1972 101st Airborne Division

IND888-1

The commentor's statements are noted. See the response to comment FA15-5 regarding forests. A revised visual analysis of the ANST can be found in section 4.8 of the final EIS. As discussed in section 4.8 of the EIS, the pipeline would be bored beneath the ANST.

INDIVIDUALS
IND889 – Irene E. Leech

20161222-5434 FERC PDF (Unofficial) 12/22/2016 3:31:50 PM

December 22, 2016

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE, Room 1A
Washington, DC 20426
RE: Draft Environmental Impact Statement, Docket No. CP16-10-000

Dear Secretary Bose,

IND 889-1 Eminent domain is a precious tool. It is to be used for public benefit, not to just benefit a few investors and company employees.

The Mountain Valley Pipeline (MVP) is not designed to benefit the public, especially in the areas of Virginia through which it is proposed to cross. Only .5% of the gas is expected to be purchased in Virginia. This is too little benefit within Virginia to claim the authority to use eminent domain.

Because the MVP developers claim that they will use most of the gas moved through this transmission pipeline but they serve very little of the area, the public can only assume that they plan to sell the gas to others. This does not meet the definition of public benefit. If these developers want to build a pipeline, they should do so without the benefit of eminent domain or of a FERC guaranteed rate of return on equity.

Many people and organizations have filed detailed and scientifically founded reports challenging aspects of the MVP proposal. Information has continuously been added to the filing and the developer has defined so many alternate routes that it is difficult for citizens to have any clarity about what the plans actually are.

IND 889-2 There are so many identified inaccuracies and information that is not provided that the Draft Environmental Impact Statement cannot be adequately adapted and finalized. The process needs to start over. The applicant needs to provide complete and accurate information to FERC so appropriate decisions can be made to protect the public and our environment.

FERC hosted public meetings in and around Montgomery County, Virginia have been poorly designed and implemented. At the Scoping Meeting participants were berated and threatened when some stood in the back of the room instead of sitting in the audience. At the DEIS Hearing participants were slowly taken to private rooms to give testimony, where others could not hear them and the FERC staff member interrupted and intimidated speakers. It was clear that there was no intention of allowing everyone who signed up to speak. The reports for both meetings fail to accurately represent the messages citizens delivered and are very misleading.

IND889-1 See the response to comment IND1-3 regarding eminent domain. The EIS clearly outlines the proposed route in section 2 and alternative routes in section 3.

IND889-2 See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS. See the response to comment LA2-1 regarding the draft EIS comment sessions. At each session, all people who wished to speak were given an opportunity. The transcripts were prepared by professional court stenographers. See the response to comment LA15-5 regarding changes to the proposed MVP.

INDIVIDUALS

IND889 – Irene E. Leech

20161222-5434 FERC PDF (Unofficial) 12/22/2016 3:31:50 PM

IND 889-2 cont'd | It appears that a sort of game is being played on the affected citizens. While the developers publicly insist that there are no plans for a Virginia Compressor Station, land men have pressured neighboring landowners to sell land for a station.

IND 889-3 | There is minimal safety oversight of pipelines by PHMSA in rural areas. Congress has directed PHMSA to prioritize populated areas and allows lower standards in rural areas. Those whose land is effectively taken are not adequately compensated. A token one-time payment is not sufficient for giving up permanent control of part of ones land. Significant annual payments must compensate landowners. If developers were forced to negotiate with landowners in good faith and without threatening eminent domain, it is possible that fair arrangements could be made. However, developers appear to view the approval process as simply one where specific steps must be taken, boxes checked off, whether adequate information is provided or not. Their sense of entitlement to invade private property further deters landowner trust.

Please direct that the Draft Environmental Impact Statement for the Mountain Valley Pipeline be completely redone. Direct preparers to completely address the required aspects in the process without considering the original inadequate draft.

Sincerely,

Irene E. Leech

4220 North Fork Rd.

Elliston, VA 24087

IND889-3

See the response to comment IND2-1 regarding safety. PHMSA regulates pipeline design, construction, and operation. The statements regarding compensation are noted. See the response to comment IND184-1 regarding easements and compensation.

INDIVIDUALS

IND890 – Marianne Hughes

Marianne Hughes, New Martinsville, WV.

December 22, 2016

Comments to FERC on Environmental Impacts of the MVP
Docket Number CP16-10

IND 890-1 I live in rural Wetzel County, West Virginia, surrounded by pipelines. A FERC-approved 30-inch pipeline was recently completed near my home. And there definitely are "significant cumulative impacts" to the environment and public health and safety caused by pipeline construction. Throughout the DEIS we find the statement ". . . would not result in significant cumulative impact . . ." This is nothing short of preposterous! It seems most unlikely that any member of FERC who had input into this document has lived anywhere near or even visited any area where a pipeline of this magnitude was being constructed. It would be wise to get your feet on the ground, and not just rely on what the industry tells you, before you write an environmental impact statement
Let me tell you what it is really like here.
1. Major impact of truck traffic belching diesel fumes, significantly increasing air pollution for an extended period of time, and interfering with local traffic with no consideration for the people who live here. And who, by the way, will not benefit from the existence of this pipeline.

IND 890-2 2. Extensive cutting of trees, then burning trees and brush, significantly increasing air pollution for an extended period of time. And the loss of these trees in and of itself has a significant impact on the environment. Great swaths of once forested extremely steep hillsides are now just grass. This is in a very geologically unstable area. Trees hold soil in place. Slips are common. Slips cause ruptures in pipelines. We are now living in a very dangerous place.

IND 890-3 3. This is happening in an area where an intense concentration of shale gas well sites is already adding a significant air pollution factor. This has not been taken into consideration in the DEIS. Even the huge Mark West plant which is within site of the place where the MVP is proposed to originate, and which has already had a significant air pollution impact, is not given the serious consideration which it requires. Many of the shale gas wells near Mobley, WV, were not even listed. We had clean air here a few years ago. It's gone now. And we do not need any more pollution added to what we are already subjected to.

IND 890-4 4. This pipeline will only encourage more shale gas drilling. This is extremely counterproductive to protecting the environment, as well as public health and safety. The resources to construct pipelines would be put to better use in constructing clean energy systems which would decrease fossil fuel production and consumption. The Federal Energy Regulatory Commission should certainly be taking these things into consideration and regulating for much more clean energy and decreasing dirty energy. Let's turn this thing around, folks!
I am sure you are much more aware of the number of pipeline accidents/ruptures/explosions than I am. I cannot give you figures,

IND890-1 Traffic is addressed in section 4.9 of the EIS. Air quality impacts from truck traffic are addressed in section 4.11.1 of the EIS.

IND890-2 See the response to comment FA15-5 regarding forests. Air quality impacts from burning are also addressed in section 4.11.1 of the EIS. Slips are addressed in section 4.1 of the EIS.

IND890-3 See the response to comment IND2-3 regarding hydraulic fracturing. The FERC does not regulate shale gas wells. These sites were identified to the extent possible in section 4.13 of the EIS.

IND890-4 See the response to comment IND241-1 regarding induced development. See the response to comment IND2-1 regarding safety. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

INDIVIDUALS

IND890 – Marianne Hughes

IND 890-4 cont'd

but I am sure you have them. This is not a safe endeavor, either in the construction or in the maintenance and long-term use. To summarize, here in Wetzel and our surrounding counties where we are encircled by dozens of compressor stations, hundreds of new large well pads, and many hundreds of new, big gas wells and a constant diet of dirty diesel fumes from the thousands of trucks daily, we are now faced with the proposed MVP to add another large pipeline and a massive 89,600 Horse power of compressor station to continually add to our ever growing stew of unhealthy air pollutants. And to add insult to injury, FERC casually refers to all this as an insignificant issue. It appears that no one working for FERC actually has lived here in the sacrifice zone and daily experienced the fumes from all this activity. Otherwise, there is no way that they could conclude, as they repeat over and over, that this pipeline and its related gas production will only result in insignificant and unimportant impacts to our neighborhood.

Please seriously consider refusing the permit for the construction of the MVP!

INDIVIDUALS

IND891 – Elisabeth Struthers Malbon (on behalf of Hersha Evans)

20161222-5481 FERC PDF (Unofficial) 12/22/2016 4:01:16 PM

December 22, 2016

FERC Commissioners, and Kimberly Bose, Secretary,
Federal Energy Regulatory Commission

Ms Victoria M Craft, Project Manager
Bureau of Land Management, Southeastern States District Office

Joby Timm, Supervisor,
George Washington and Jefferson National Forests

FERC Docket Number: CP16-10 and CP16-13
Proposed Amendments, Land Resource Management Plan for the Jefferson National Forest (JNF)

Dear Commissioners, Ms. Bose, Ms. Craft, and Supervisor Timm,

IND 891-1 I'm writing to you as an intervenor, a citizen of Montgomery County, and an individual who strongly opposes all four proposed amendments. Each amendment results in cumulative and severe impacts within and around our Jefferson National Forest (JNF), and all are incompatible with Forest Service land designations and the National Forest Management Act.

Proposed Plan Amendment 1. FERC's September 16, 2016, Notice of Availability describes "Designated Utility Corridors as serving a public benefit by providing a reliable supply of electricity, natural gas, or water essential to local, regional, and national economies."

I see no **public** benefit in such a proposal, although if approved, this proposal would enrich the economies of the private and limited liability corporations (and their subsidiaries) that have invested in Mountain Valley Pipeline, LLC. Also standing to benefit would be future corporations that choose to join MVP through a massive, industrialized and ecologically dysfunctional pipeline/utility corridor trenched through our treasured JNF.

Compounding this potential scenario is the issue of "need" for the MVP, particularly in light of the thorough report, *Risks Associated with Natural Gas Pipeline Expansion Across Appalachia*, published April 2016, by the Institute for Energy Economics and Financial Analysis (IEEFA). Their report concludes that both the proposed MVP (as well as the proposed Atlantic Coast Pipeline) are examples of overbuilding by the natural gas industry. FERC has redefined the definition of "need" – i.e., that MVP LLC has met some sort of undefined (at least to me) quota for contracts from shippers, regardless of the fact that the shippers are subsidiaries of the corporations who are also part of the "joint venture partners." In FERC's world, "need" becomes a matter of membership, rather than a thorough and thoughtful evaluation of a public need for additional natural gas pipelines and of currently underused capacity on existing pipelines. Also relevant is FERC's policy that encourages overbuilding of pipelines. "The high rates of return on equity that FERC grants to pipeline companies (allowable rates of up to 14%), along with the lack of a comprehensive planning process for natural gas infrastructure, attracts more capital

Evans to FERC

12/22/16

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IND891-1 See the response to comment FA8-1 regarding Amendment 1.

INDIVIDUALS

IND891 – Elisabeth Struthers Malbon (on behalf of Hersha Evans)

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into pipeline development than is necessary¹ (*Risks Associated with Natural Gas Pipeline Expansion Across Appalachia*, IEEFA, Apr 2016, 1).

The prospect of a 500-ft permanent corridor, or even a 50-ft permanent corridor, through our JNF carries too heavy a burden – a price borne by our beloved forest; our streams, springs, watersheds, aquifers, and well water; the air we breathe; our Appalachian families and communities and our ever-increasing tourist and recreation-based economies; our wildlife within and around our JNF; and, certainly not least, by our treasured Appalachian National Scenic Trail.

The destruction caused by either a 50-ft or a 500-ft corridor through the JNF, if approved, is irreversible and is incompatible with the National Forest Management Act. A 500-ft corridor exponentially compounds the damage and significantly magnifies the degradation of our currently healthy, forested ecosystem that requires nutrient-rich soils, clean water with intact and healthy riparian areas. It also compounds the significant dangers faced by residents and wildlife living within and near the karst-rich Slusser Chapel area, as well as those along Craig Creek and along the proposed corridor's northern border.

A 500-ft wide corridor in our forest, fragmented by infrastructure development, is incompatible with the Forest Service's mission to "sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations." Approving Amendment #1 makes a mockery of this mission. And forest fragmentation can have negative, irreversible effects by reducing the size of habitat areas, decreasing species diversity, isolating plant and animal populations, degrading soils, decreasing the amount of above- and below-ground biota available for carbon storage, ushering in edge-effects, and clear-cutting 9 acres of our old growth forest. Such a corridor would become a very hospitable location for invasive-species. Controlling their take-over would be a never-ending chore, even with the judicious use of herbicides. And chemical control carries its own negative impacts for pollinators and other animals and life-forms that depend on healthy soils.

For all the reasons stated above, **I strongly oppose Amendment 1. I urge the BLM to deny a Right-of-Way through the JNF for a 500-ft Rx 5C Designated Utility Corridor/s. I also urge the Forest Service to oppose a Right-of-Way for a 5C Designated Utility Corridor. And I also oppose the granting of a 50-ft ROW through the JNF.**

IND
891-2

Proposed Project-Specific Amendments 2 through 4.

Proposed Amendment 2, exceeding restrictions on soil conditions and riparian corridor conditions. Segregating topsoil is a worthy goal in theory, but I'm having difficulty imagining how successful the endeavor would be on slopes, and after tree-removal and compaction by earth-moving equipment – activities that would impact the microorganisms within the soil as well as the soil structure itself. Intact and well-functioning riparian corridors are highly attractive to wildlife by providing dense plant cover, protection from predators, food, breeding/nesting areas, and close access to water. Healthy riparian areas also improve water quality, reduce erosion

¹ Risks Associated with Natural Gas Pipeline Expansion Across Appalachia. *IEEFA*. Apr 2016, 1. <http://ieefa.org/wp-content/uploads/2016/04/Risks-Associated-With-Natural-Gas-Pipeline-Expansion-in-Appalachia-April-2016.pdf>

IND891-2

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

INDIVIDUALS

IND891 – Elisabeth Struthers Malbon (on behalf of Hersha Evans)

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IND 891-2 and sedimentation, help control flooding, and are a vital part of the forest ecosystem. Lowering
cont'd Forest Service standards are not in the best interests of our forest, soil, and riparian areas.

IND 891-3 **Proposed Amendment 3, removal of old growth trees.** Purposely killing 9 acres of old growth trees (and reallocating 19 acres of them for a potential Designated Utility Corridor) is an unconscionable act. (It would take roughly seven high school football fields to fill the empty space left in the wake.) The destruction would be even more egregious if done to comply with the interests of a private, for-profit company whose pipeline may have at best a 20-year useful life, with apparently no environmentally-friendly method for its abandonment and/or removal.

Old growth trees play an irreplaceable role in forest health. Beyond providing essential biodiversity, wildlife habitat, nutrient cycling, and soil enrichment, they also sequester the largest amount of carbon when compared to younger trees.² Their existence is a gift to those of us who are able to experience their presence and feel their majesty.

Dr. Jerry Franklin, during a 2013 interview, stated that "Big, old trees have suffered the slings and arrows of climate, insects, and diseases, so they typically have a lot of features like cavities, which are really important from the standpoint of wildlife" that use these cavities as homes. (8/12/13 interview with *American Forests*.) Dr. Franklin also advocates for the development of forest plans that create diverse-age canopies throughout forests and policies that recognize the importance of both saving and restoring old growth trees and forests because "it's important to the completeness of these ecosystems."³

IND 891-4 **Proposed Amendment 4, ANST crossing and SIO reclassification.** The Appalachian National Scenic Trail is a national treasure and is also cherished internationally. (I know this from questions I've received, especially from Austrian and German citizens whose favorite non-winter pastime appears to be hiking.)

The impacts on the ANST are excessive and are inadequately addressed in the DEIS, including the impacts on the viewshed, which is an integral, and emphatically important aspect of the trail. The integrity of the trail and its viewshed deserve priority attention. The topography around the crossing is steep, making it quite vulnerable to erosion and permanent degradation, and the DEIS map of the ANST on Peters Mountain (appendix B, map 28) appears to be placed incorrectly.

For the above reasons, I strongly oppose the adoption of Proposed Amendments 2, 3 and 4, by the Forest Service, and I oppose any ROW granted by BLM.

Sincerely,

Hersha Evans
55 Griggs Street
Christiansburg, VA 24073

² Stephenson N. L. *et al*, Rate of tree carbon accumulation increases continuously with tree size. *Nature* 507 90-93 (Mar 6, 2014) <http://www.nature.com/nature/journal/v507/n7490/full/nature12914.html>

³ Interview with Dr. Jerry Franklin, by *American Forests* (Aug 6 2013)
<https://www.americanforests.org/blog/the-importance-of-big-old-trees/>

IND891-3 See the response to comment FA10-1 regarding Amendment 3.

IND891-4 See the response to comment FA10-1 regarding Amendment 4.

INDIVIDUALS

IND892 – Tina Smusz (on behalf of Jacob Tileman)

20161222-5491 FERC PDF (Unofficial) 12/22/2016 4:09:29 PM

December 22, 2016

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

Cc:

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

Dear Ms. Bose and Members of the Commission:

IND
892-1

I am writing to voice the serious concerns I have with the draft environmental impact statement (DEIS) for the Mountain Valley Pipeline (MVP) project, many of which are not mitigable and will cause irreparable harm to our local communities and environment. The DEIS is critically flawed in numerous respects, and under no circumstances can it even be considered for approval in its current form.

According to the DEIS, the only negative impacts of the pipeline would be to forests, and would be only temporary. This assertion would be laughable were it not for the true severity of the grievances MVP is asking our local environment and communities to bear. Forests, while incredibly important, are but one element of a complex and interdependent biological, geological, hydrological, economic, and social landscape, and the DEIS fails to address many of these impacts even superficially.

The impacts of constructing and operating the pipeline present numerous grave environmental and human health concerns, both locally and globally, and immediately and in perpetuity:

- Without trees, shrubs, and other groundcover in place, the pipeline corridor will inevitably experience significant loss of topsoil. This soil will pollute local waterways, harming aquatic life and silting drinking water reservoirs. It will further complicate any efforts to revegetate after pipeline construction, and on the steep slopes that characterize the Appalachian Mountains this greatly increases the likelihood of erosion undermining the structural integrity of the pipeline. On October 24, the U.S. Forest Service submitted an information request to FERC highlighting these concerns, in great detail, for the Jefferson National Forest (File Code: 1900; 2720). At present, the DEIS is out of compliance with the Jefferson National Forest Management Plan.
- The heavy machinery and new roads needed to reach remote regions of the proposed pipeline route means even more forest will actually be removed than the 125-foot wide, 300-mile long corridor itself, which entails even more topsoil loss and compaction.
- The pipeline corridor will create significant habitat fragmentation, and facilitate the spread of invasive species. Some of the areas MVP seeks to build through are wilderness areas, and have been declared as such in order to safeguard their inherent worth.
- The removal of so many trees contributes to the loss of one of the world's most important carbon sinks, forests, and does so in order to move a product to market that will only

IND892-1

The EIS states that impacts on forest would be long-term and significant. See the response to comment IND70-1 regarding erosion. If approved by the Commission, the Applicants would only be permitted to impact the approved construction right-of-way width and ATWS. Forest fragmentation is addressed in sections 4.4 and 4.5 of the EIS. Carbon sequestration is addressed in section 4.13 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. See the response to comment IND2-1 regarding safety. See the response to comment CO14-3 regarding spills. Radon is discussed in section 4.11.1 of the EIS.

INDIVIDUALS

IND892 – Tina Smusz (on behalf of Jacob Tileman)

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further contribute to greenhouse gas emissions. With momentum to shift to renewable energy sources occurring at global, national, regional, and local scales, now is the time to divest from fossil fuels, not expand development. In fact, estimates of global divestment from fossil fuels topped \$5 trillion in 2016.¹ Failing to address cumulative impacts related to climate change is a violation of the NEPA process. Furthermore, oil companies themselves are even moving into renewable energy – the Norwegian state oil company, Statoil, was recently awarded a \$42 million contract to develop an offshore wind farm that will supply New York City and Long Island with 600 megawatts of power during the first phase of the project alone.²

- Current energy demand is more than met by existing infrastructure, and failure to assess the need for this project, along with reasonable alternatives, is a violation of the NEPA process. Furthermore, it is an open secret that overbuilding is business-as-usual in the pipeline industry.³
- The volatility and flammability of pressurized natural gas ensures that any accident occurring over the hundreds of miles of 42-inch pipeline will pose a grave and existential threat to the safety of pipeline workers, emergency responders, and our communities.⁴
- Given the karst geology of the region, any spill has the potential to cause irreparable harm to our local and regional groundwater aquifers, readily transporting contamination over possibly hundreds of miles. The Jefferson National Forest Management Plan discusses the issue of karst topography in even greater detail. At present, we have no idea how big a spill must be in order for it to be detected along the proposed pipeline.
- The issue of naturally-occurring radiation in natural gas has been well-documented, and poses a risk both to pipeline workers and uninvolved third parties.^{5,6} Even in the absence of a spill, non-negligible amounts of radiation will be released along the entire length of the pipeline due to the decay of radioactive isotopes naturally occurring in fossil fuels. This problem will remain even after the pipeline is no longer in operation.

IND
892-2

The impacts of constructing and operating the pipeline present numerous concerns with respect to the physical and psychological wellbeing of our communities, both immediately and in perpetuity:

- The heavy machinery required to install the pipeline will congest our small country roads, which presents an inconvenience not just to our local drivers who commute to and from work every day, but hampers the ability of emergency responders to reach our remote communities. The increased volume of traffic and size of vehicles is a safety hazard in-and-of itself.
- During construction, the incessant noise from industrial machinery and frequent blasting will disturb residents for miles around, and potentially even damage private property.
- Once the pipeline is built and in operation, the noise pollution from pumping stations will remain a permanent fixture over the entire life of the pipeline. The solace provided by the sounds of the forest is one of the biggest attractions to those living in this area.
- The permanent right-of-way will be a significant scar on the landscape, destroying our viewsheds, including some of the most iconic vistas along the entire 2,190 miles of the Appalachian Trail (e.g., Dragon's Tooth, McAfee Knob, Angel's Rest). The Appalachian Trail Conservancy has already filed comments with FERC addressing this concern, among many, in great detail.

IND
892-3

The impacts of the pipeline present numerous economic concerns for our communities:

IND892-2

Traffic is addressed in section 4.9 of the EIS. The Applicants would maintain access for emergency response vehicles. Noise from construction, periodic blasting, and operation of compressor stations is addressed in section 4.11.2. A revised visual analysis of the ANST can be found in section 4.8 of the final EIS.

IND892-3

See the response to comment IND12-1 regarding property values. The EIS provides a discussion of tourism in section 4.9 and Historic Districts in section 4.10.

INDIVIDUALS

IND892 – Tina Smusz (on behalf of Jacob Tileman)

20161222-5491 FERC PDF (Unofficial) 12/22/2016 4:09:29 PM

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- Even though MVP has not yet been approved, property values are already being negatively affected in many areas, and local construction companies are suffering as clients consider whether to follow through on plans to build in areas near the proposed pipeline route.
- For many of our small communities that rely on Appalachian Trail hikers and other tourists to contribute to their economies, MVP is an existential threat that will have direct and lasting consequences on these communities. According to the Appalachian Trail Conservancy, MVP has made no effort to reach out to them and solicit advice on how best to address the issue of the pipeline crossing the AT, which further reinforces the perception that MVP and others are disregarding input from local stakeholders. Furthermore, many small communities near the Trail (e.g., Newport) are historic districts, which are protected the National Historic Preservation Act.

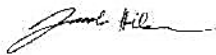
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892-4

That such a deficient DEIS could be deemed the product of a thorough and rigorous investigation, and ready for public release, should come as an embarrassment to FERC. However, it is also possible the report reflects the fact that if the true biophysical and socioeconomic impacts of MVP were properly investigated and documented, it is inconceivable MVP could ever be justified. Should FERC believe a revised DEIS can address these concerns, and my list of grievances is by no means exhaustive, then I look forward to reviewing this new DEIS in the future.

Given the inadequacy of this DEIS, we are at present being asked to accept this project on nothing more than the words of those with vested interests in seeing the pipeline built. However, there are only two words that matter to our communities, and they are the same two words that showcase the monumental hubris of the proposed pipeline: mountain and valley. These two words are the core identity of our Appalachian communities, and are the source of our material and spiritual wellbeing. These two words will also be the project's own undoing should FERC ignore the scientific community and local stakeholders and approve the pipeline.

I sincerely hope that FERC does not abandon reason to the whims of greed; MVP offers no benefits to our communities, and will prove a disastrous investment for developers.

Respectfully,



Jacob Tileman, Ph.D.
5555 Mt. Tabor Rd.
Catawba, VA 24070

References:

1. https://www.arabellaadvisors.com/wp-content/uploads/2016/12/Global_Divestment_Report_2016.pdf
2. <http://www.statoil.com/en/NewsAndMedia/News/2016/Pages/15dec-wind-new-york.aspx>

IND892-4

See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS.

INDIVIDUALS

IND892 – Tina Smusz (on behalf of Jacob Tileman)

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3. <http://ieefa.org/wp-content/uploads/2016/04/Risks-Associated-With-Natural-Gas-Pipeline-Expansion-in-Appalachia- April-2016.pdf>
4. http://www.citylab.com/weather/2016/11/30-years-of-pipeline-accidents-mapped/509066/?utm_source=SFFB
5. <https://ohsonline.com/Articles/2012/10/01/Radiation-Sources-in-Natural-Gas-Well-Activities.aspx?Page=1>
6. http://www.nytimes.com/2011/02/27/us/27gas.html?pagewanted=all&_r=0

INDIVIDUALS

IND893 – Tina Smusz

20161223-5494 FERC PDF (Unofficial) 12/22/2016 4:15:42 PM

December 22, 2016

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

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

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

Ms. Bose and Members of the Commission,

IND
893-1

It is environmentally self-defeating to construct a pipeline carrying enormous amounts of nonrenewable, CO2-generating fossil fuel through forested landscape which helps mitigate fossil fuel pollution via CO2 sequestration. Areas of hitherto "protected" National Forest border or occupy Mountain Valley Pipeline's (MVP) route – forests which provide a carbon sink for reducing global warming. There are 201,073 acres of National Forest Land in the combined counties of Craig, Giles and Montgomery (information supplied by the Eastern Divide Ranger District, 12/1/2016). Unfortunately, most of the area included in conservation easements, the Appalachian Trail, and National Forest along or near the pipeline route is impossible to adequately protect in the event of fire. Unique geologic features of our area threaten the integrity of any structure spanning the mountains and valleys. Karst terrain, steep slopes, and high seismic activity areas greatly magnify the risk of pipeline rupture and resulting primary and secondary fires. However, it is not common knowledge that local fire fighting resources can only address the secondary fires in nearby forest and structures.

Primary pipeline fires, i.e., explosions or leaks which ignite directly from the pipeline contents, are not directly extinguishable by external efforts of fire fighters. This is especially true for a huge 42" diameter pipeline carrying pressurized gas. Response to quelling primary fires involves turning off mainline valves (MLV) on either side of the conflagration. The fire then burns itself out as the volume of fuel between main line valves is consumed. An illustrative example of a primary fire is provided by the November 29, 2016 pipeline explosion in Platte County, Missouri which continued to burn 24 hrs after it started. This event involved a relatively small 10" diameter line carrying ethane and propane which ignited sending flames "hundreds of feet into the air" (<http://www.kshb.com/news/local-news/crews-fighting-large-pipeline-explosion-in-platte-county>). Secondary fires in response to a persistent primary torch of fire hundreds of feet high, lasting hours, could spread widely based on prevailing winds and dry conditions.

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

INDIVIDUALS

IND893 – Tina Smusz

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The DEIS reports the following: "If unexpected pressure changes are noted that indicate the possibility of a leak, the gas controller on duty can either shut down the pipeline MLVs upstream and downstream of the apparent leak and/or dispatch field technicians to investigate the pressure change. According to information provided by Mountain Valley, the remotely controlled MLVs could be controlled both locally and remotely and would close within 2 minutes following issuance of a remote signal to close." (DEIS 4.4.2.6 Reliability and Safety). How long might it take a field technician to "investigate the change" in mountainous terrain? Also, MVP should supply actual data relating to the time it may take to remotely turn off MLVs in mountainous terrain, topography which significantly interferes with radio and cell tower signals.

There can be many miles of land, forest and burnable materials between main line valves. Distances between mainline valves covering territory in Giles and Montgomery County include 11.5 miles between MLV #24 and #25; 11.2 miles between #25 and #26; 11.3 miles between #26 and #27; 0.9 miles between #27 and #28; and 12.6 miles between #28 and #29. The volume of gas that would need to burn off to quell a primary fire between MLVs situated 11 miles apart is 45,616 cubic feet of highly pressurized gas (volume = pi x radius squared x height). To allow adequate planning for local fire response, MVP should provide an estimation of how long that volume of gas would take to burn off.

Much of the MVP route goes through remote areas situated between far flung rural volunteer fire stations with few roads connecting these small fire fighting agencies and the lands they protect. See link to map showing fire stations closest to the intended route through Craig, Giles and Montgomery counties: (www.google.com/maps/search/+Fire+Departments/@37.2879271,-80.5793767,11.53z). Issues related to Mountain Valley Pipeline's (MVP) inadequate and cavalier analysis of fire emergency response resources for pipeline fires have been addressed in detail by the following submissions (Pamela Ferrante: Emergency Responders [a request for critical emergency services data], Document #20160907-5211; Maury Johnson: document #20161205-5231; and Thomas Bouldin: document #201506155225). This letter presents additional details and concerns related to MVP's misleading portrayal of local fire stations' ability to respond quickly and effectively to primary and secondary pipeline fires/explosions in Giles and Montgomery Counties of Virginia.

MVP notes the following "*In the most remote portion of the MVP, the maximum distance between a fire department and the pipeline is about 8 miles. There are 37 fire stations within one mile of the MVP. The number of fire departments ranges from 2 in Craig County to 11 in Pittsylvania County.*" (4-467 Reliability and Safety). This statement begs the question of whether there are traversable roads for the fire stations to rapidly access a fire, and whether there are any accessible water sources nearby for fighting the fire. Significant delays in fire station response time will occur due to intervening forest, non-traversable waterways, or mountainous terrain.

FERC should require MVP to provide a realistic assessment of the adequacy of fire coverage along the route by using actual data from the fire stations involved **modeling both response times from nearest fires stations to accessible portions of the pipeline route, and the location of reliable seasonal water sources which provide the depth and surface area required for refilling pumper trucks.** On cursory inspection, the Craig county, Giles county and Blacksburg fire departments may appear to be within a

INDIVIDUALS

IND893 – Tina Smusz

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reasonable response distance from the MVP route, but they may not be able to effectively fight fires in terrain which lacks both navigable roads and sufficient water to refill and prevent spread of fire.

In addition to MVP work crews (if present during construction or repair activities) and local fire stations, the National Forest Service Eastern Divide Ranger District also responds to fires involving its territory. The current Mountain Valley Pipeline route passes through 3.4 miles of National Forest in Monroe County, W VA, and Giles and Montgomery Counties in Virginia. The Eastern Divide Ranger District covers 11 counties from Botetourt to Tazewell in Virginia from two locations: Newcastle, Virginia in eastern Craig County, which has a type 6 fire truck and 6 firefighters, and Blacksburg, VA with a type 7 truck (see truck descriptions below).

Wildland fire engines classifications (<https://www.nps.gov/fire/wildland-fire/learning-center/fire-in-depth/engines.cfm>):

Type 6

- An initial attack wildland engine with a minimum pump capacity of 30 GPM, 150 to 400 gallon tank, 300 feet of 1 1/2" hose, 300 feet of 1" hose, Gross Vehicle Weight Rating (GVWR) generally less than 26,000 pounds, Requires a minimum crew of 2

Type 7

- A standard duty vehicle chassis, The vehicle has a small pump (10 gpm), 50 to 200 gallon tank, 200 feet of 1" hose, It is a multipurpose unit used for patrol, mop up or initial attack with a crew of 2

These USFS resources (which are increased proactively during high fire season) cover a large area of Forest Service land on or near the pipeline path through the counties of Monroe WV and the Virginia counties of Craig, Giles, Montgomery and Roanoke. From the above, it is obvious that the National Forest Service can contribute very little materially to a rapid response. Assuming good road conditions, the driving time from New Castle, Virginia to the closest section of pipeline in Giles County is 38 minutes (~28.9 miles calculated using current Google maps). Pipeline fires in off-road areas could take much longer to reach using pipeline access roads, private driveways, national forest fire trails, etc.

MVP admits their role in increasing the risk of wildfires. DEIS 4.4.2.6: *"Specific activities that could increase the risk for wildfires include burning of brush and slash piles, refueling with flammable liquids, parking vehicles with hot mufflers or tailpipes on tall dry grass, or welding. Measures that would be taken to limit wildfire risk include training personnel, issuing fire danger ratings which would guide blasting and welding operations, and designating smoking areas."*(DEIS pg 150, underlining is mine). It is unconscionable that MVP employees would be allowed to "smoke" on site. One brush fire has already occurred from a subcontractor smoking during surveying activity on private land in April 2015. ("Pipeline company apologizes after smoking subcontractor starts brush fire in Franklin County," The Roanoke Times, April 7, 2015)

The response was immediate to easily accessible pipeline fires in Appomattox, Virginia (2008, along a paved road close to town) and San Bruno, California (2010, within an urban area). Nevertheless, significant damage was done in both these locations. San Bruno response involved 67 fire trucks and 8 fatalities. Unlike those settings with much smaller pipelines, Mountain Valley Pipeline is a 42" diameter

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IND893 – Tina Smusz

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pipe with highly pressurized gas. A fire could not be contained rapidly in the area through which the MVP intends to travel. Under dry conditions (increasing due to global warming), vast areas of forest, rural farms and homes could be sacrificed to this pipeline in the event of a fire. Fire threat will be increased in the presence of extensive construction operations, pipeline & easement maintenance and the enormous volume of high pressure combustible gas running through our forests and rural lands.

It is unconscionable for multiple wealthy investment companies to focus on nonrenewable, time-limited, polluting fuels for energy production when effective wind and solar powered technology are available, technologies which do not threaten irreparable damage to the environment. Shale gas pipelines have the very real potential for ground water pollution, forest destruction, and sobering future dangers not yet fully delineated for the communities where hydraulic fracturing is occurring. A single county along the pipeline route in southwest Virginia, Franklin County, hopes to benefit directly from the Mountain Valley pipeline. One county's development goals do not justify jeopardizing southwest Virginia's forests, our water supplies, preserved agrarian areas and our nationally known tourist sites (McAfee's knob, the Appalachian Trail, etc). The Mountain Valley Pipeline would result in Virginians shouldering all the ecologic, environmental, and esthetic burdens for a group of entrepreneurs with no tangible assurance that Virginia will benefit. In fact, focusing this enormous amount of money and effort on a non-renewable energy source hinders the economic impetus for the development of safe wind and solar options.

I am deeply concerned about both the known and undisclosed components in the "fracked gas" that is intended to flow through MVP's massive, high pressure pipes. Why would any oversight agency (FERC) trust the public safety to investment and gas exploration companies that refuse to disclose all chemicals used in fracking solutions, some of which will pass through hundreds of miles of pipeline – chemicals for which a targeted emergency response cannot even be planned? We never imagined the World Trade Towers would burn to the ground, but they did - with lasting health impacts on emergency responders and other local citizens subjected to that highly polluted environment. Any breach in this 42" pipeline could result in irreversible human and ecologic devastation to the very areas that currently safeguard the environment via carbon sequestration – our forests and their human stewards.

I encourage you to weigh private investors' short-term gains from several decades of plentiful natural gas, against the more thoughtful investment in non-polluting energy sources – wind and solar - which can best protect our state's forest and wild areas long into the future.

Tina L. Smusz
Catawba, VA 24070

INDIVIDUALS

IND894 – E. Scott Geller

20161222-5505 FERC PDF (Unofficial) 12/22/2016 4:20:46 PM

E. Scott Geller, Ph.D.
Alumni Distinguished Professor
Center for Applied Behavior Systems
213 Williams Hall
Virginia Tech

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

Subject: MVKKP CP16-10-000

Ms. Bose;

IND
894-1

I sincerely and earnestly request that the Federal Energy Regulatory Commission (FERC) and its consultants evaluate carefully the geological report by Dr. Ernst Kastning, and note the evidence-based conclusion: Do not approve the MVP plan to build a 42" gas pipeline through the Appalachian counties of the Giles, Montgomery and Roanoke Co., VA, as well as Monroe County, WVA.

The DEIS published by FERC shows lack of consideration of the sound scientific anti-pipeline evidence prepared by a recognized expert in geological sciences. The Kastning report indicates convincingly that the MVP application did not address effectively the environmental hazards generated by the proposed pipeline, especially the risk of groundwater contamination caused by: a) the karst terrains, b) the hydrologic alterations, c) the below-ground karst features resulting in the potential for surface collapse, and d) the accelerated erosion, slope instability, weak soils, and seismic risks. According to the Kastning report these geologic hazards cannot be predicted, avoided or mitigated with engineering intervention.

Giles County in Southwest Virginia is inundated with sinkholes, caves, and subsurface waterways, making the construction of a 42' pipeline extremely difficult and dangerous, and would cause irreversible harm to our picturesque environment—from historical landmarks to tourist-attracting forests, streams and waterfalls.

IND894-1

See the response to comment IND62-1 regarding Dr. Kastning's report. The EIS provides a discussion of sinkholes and karst in section 4.1. Water resources are discussed in section 4.3.

INDIVIDUALS

IND894 – E. Scott Geller

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894-2

The proposed MVP route is going directly through Newport, between Mt. Olivet Church and the Newport Recreation Center. In the year 2000, the Department of Historic Resources voted to support the inclusion of Newport, VA on the National Register of Historic Places and the Virginia Landmarks Register. In fact, the National Register of Historic Places specifies that “the historical and cultural foundation of the nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people.”

Most of the homes within the area of Newport designated as “a historic district” are within one-half mile of the proposed pipeline. According to the National Register an environmental impact study is required for any project that could have an adverse effect on historic buildings, archaeological sites or landscape features within a historic district. Such a study was not conducted by MVP staff.

IND
894-3

The Jefferson National Forest Service has stated publicly that given the terrain, the MVP could not be built in compliance with the current Forest Management Plan. FERC’s “solution”: Re-zone! I sincerely hope you see this solution as inadequate.

The Jefferson National Forest and the Appalachian Trail belong to the citizens for their pleasure and recreation. Building the pipeline through the National Forest and across the Appalachian Trail would significantly degrade and impair the resources of Peters Mountain Wilderness, Sinking Creek Mountain across from Kelly Knob, Dragon’s Tooth, The Appalachian Trail, and Brush Mountain.

IND
894-4

The Appalachian Trail Conservancy (ATC) has been strongly opposed to the MVP project from the start because it would detract notably from the scenic landscape of the Appalachian Trail, produce irreparable harm to local ecosystems, and potentially lead to millions of dollars in lost revenue for communities that rely on outdoor recreation-based tourism. The Forest Management plan should not amend or reduce their standards per recommendations by FERC. The destructive and irreversible impact of the MVP cannot be justified.

IND894-2

See the response to comment SA2-3 regarding historic properties and the Greater Newport Rural Historic District. The pipeline would be 430 feet away from the Newport Mount Olivet Methodist Church and 945 feet away from the Newport Recreation Center (1933 High School).

IND894-3

The FS is working with Mountain Valley to incorporate mitigation measures, such as reducing the permanent operational right-of-way that is converted to herbaceous cover from 50 feet wide to 10 feet wide for its length on the Jefferson National Forest. Reducing the herbaceous right-of-way width and allowing more of a vegetative transition within the operational corridor (i.e., grasses over the pipeline then shrubs between the grasses and treeline) would help mitigate the effects of the change to the scenic character of the area.

IND894-4

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

INDIVIDUALS

IND894 – E. Scott Geller

20161222-5505 FERC PDF (Unofficial) 12/22/2016 4:20:46 PM

IND
894-5

“Eminent domain” is given for the proposed destruction of our environment and the never-ending risk of an explosion or earthquake. But let’s be clear and brutally honest: The MVP would transport fracked gas overseas for private gain. There would be no gain for the thousands of Americans who would experience the loss of their natural environmental resources devastated for the financial profit of a select few business partners. PLEASE re-evaluate your stance on the MVP project, on behalf of equity, and the welfare and well-being of many Americans.

Thank you for your time and consideration,

Respectively,

E. Scott Geller, Ph.D.

Alumni Distinguished Professor

Center for Applied Behavior Systems

213 Williams Hall

Virginia Tech

Blacksburg, VA 24061-0436

Neil Kornze, Director

BLM Washington Office

1849 C St. NW Rm 5565

Washington, DC 20240

Joby Timm, Supervisor

George Washington and Jefferson National Forests

5162 Valleypointe Parkway

Roanoke, VA 24019

Jennifer P. Adams, Special Project Coordinator

George Washington and Jefferson National Forests

5162 Valleypointe Parkway

Roanoke, VA 24019

IND894-5

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

INDIVIDUALS

IND894 – E. Scott Geller

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

US Army Corps of Engineers
Headquarters
441 G Street NW
Washington, DC 20314 – 1000

US Army Corps of Engineers
South Atlantic Division
600 Forsyth Street SW
Atlanta, GA 30303-8801

US Army Corps of Engineers
Huntington District
502 Eighth St.
Huntington, WVA 25701

Giles County Board of Supervisors
315 N. Main Street
Pearisburg, VA 24134

Montgomery County Board of Supervisors
755 Roanoke St. Ste. 2E
Christiansburg, VA 24073

Roanoke County Board of Supervisors
5204 Bernard Dr.
4th Floor
Roanoke, VA 24018-0798

Monroe County Commission
PO Box 350
Union, WVA 24983

INDIVIDUALS

IND894 – E. Scott Geller

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Other Officials:

VA Governor, Terry McAuliffe
WV Governor, Earl Ray Thomblin
Senator Tim Kaine
Senator Mark Warner
Representative H. Morgan Griffith
Representative Bob Goodlatte
VA Senator John Edwards
VA Delegate Joseph Yost

INDIVIDUALS

IND895 – Judy Vanek

20161222-5508 FERC PDF (Unofficial) 12/22/2016 4:22:25 PM

December 21, 2016

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

Dear Secretary Bose and Members of the Commission:

IND 895-1 | I am writing to you today in order to express my opposition to the proposed Mountain Valley Pipeline, FERC Docket CP16-10-0000. My reasons encompass all of those expressed by many concerned citizens.

FERC concedes that there will be permanent adverse impacts to forests. The MVP would cross thousands of acres of prime forest land and habitat for species listed as threatened and endangered. It would cross national treasures like the Appalachian Trail on Peters Mountain and the Blue Ridge Parkway. The AT has stated that the impacts to the AT are severe and would impact the trail like no other project ever. It would also impact the Brush Mountain Inventoried Roadless Areas, Old Growth Forest Areas, Peters Mountain, and Wilderness Areas to name a few. The DEIS says FERC will consult with the U.S. Forest Service to minimize impacts. However, the Forest Service has already commented that the sum of these crossings will result in significant impacts. The U.S. Forest Service has raised several of these forest impact issues, yet they have not been addressed by FERC or the project partners.

IND 895-2 | The project will also permanently impact farmland, fragile karst areas and fragment habitats of species listed threatened or endangered. Yet again, the DEIS waves off these concerns, only saying that FERC will consult with the U.S. Fish & Wildlife Service or will "mitigate" these concerns while offering no real plans on how this could be done. The EIS process should not move forward until all concerns raised by the United States Forest Service, the Appalachian National Scenic Trail, the BLM and citizens are addressed.

I would also like to comment on the Amendments to the USFS Land Management Resource Plan Amendments as proposed by the NOAI contacted as part of the DEIS for the MVP.

I support none of these amendments to the forest plan. National Forest Service land is for the preservation of our heritage, our rights, our water and our natural resources. Ownership of the Forest is a privilege of all citizens and not something that should be given away to a corporation for financial profit.

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

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

IND895-1

See the response to comment FA15-5 regarding forests. The EIS analyzes impacts to forest, including old growth and core/interior forest in detail in sections 3, 4.4, and 4.8. A revised visual analysis of the ANST and the BRP can be found in section 4.8 of the final EIS.

IND895-2

See the response to comment IND322-1 regarding farming. Karst is addressed in section 4.1 of the EIS. See the response to comment CO2-1 regarding benefit. See the response comment FA11-12 regarding need. The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD.

INDIVIDUALS

IND895 – Judy Vanek

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IND 895-2 cont'd | The pipeline and the gas transported will provide no additional benefits to the citizens in this area (an issue already decided by the Monroe County Court in August of 2015 and reinforced by the WV Supreme Court in November of 2016) but it will have a detrimental impact on the environment affecting all citizens of the area for generations to come. Real questions have been raised about the real need for this pipeline. It appears the purpose of the MVP pipeline is for the sole interest of a few private corporations to make a substantial profit at the expense of our National Forest and local citizens.

IND 895-3 | Recreation and tourism are critical to many communities, especially in Monroe county, and surrounding counties in WV and VA. A prime reason many people, including us come here is for health, wellbeing and relaxation. The impact by a pipeline corridor across the area, especially Monroe County, Peters Mountain and the Jefferson National Forest would cripple the important tourism industry of the area.

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

IND 895-4 | I strongly oppose the proposed 500 ft Designated Utility Corridors. A 500-foot Right Of Way is ridiculous. Everyone can comprehend the length of a football field. This would create a corridor that would be nearly twice the length of a football field! The Right of Way would be the initial step for future expansion, with the potential for more pipelines, electrical lines, water lines, etc., to be constructed. The USFS needs to protect the JNF from not only the immediate environmental impacts of this pipeline but possible future pipelines and other utilities. The impact of the entire width of the designated corridor and whether that conflicts with the forest plan must be evaluated, as well as the impacts to private landowners within that same corridor, as well as those nearby.

This proposed amendment would not only create a "Utility Corridor" across the JNF, but would also create a Pipeline/Utility Alley in Monroe, Summers, and Greenbrier Counties, WV as well as neighboring counties in VA. The damage done by this "Alley" across these counties would be severe, but the greatest impact would be to private landowners in counties on each end of this corridor, as all future projects would have to traverse these areas to enter and leave the corridor across the National Forest Lands. Thus, many landowners in these adjacent counties could become nothing more than custodians of the utilities lines and could not use their land for anything, making it useless and worthless at the same time.

I believe that Peters Mountain Wilderness Area, The Appalachian Trail, Mystery Ridge, Brush Mountain Wilderness and Road-less Areas would suffer substantial damage with the construction. I find it objectionable to allow the construction of the MVP pipeline to exceed restrictions on soil and riparian corridor conditions. These exceptions in the fragile forest should not be allowed. MVP should comply with the current restrictions in place regarding soil and riparian corridor conditions and not be allowed to exceed them. I stress that the riparian buffer zones along streams in the JNF should remain intact to minimize adverse effects to the water bodies. Furthermore, I firmly believe that if soil conditions are exceeded, both ascending and descending Peters Mountain and other steep slopes in the forest it will cause silting of the water bodies below, damaging critical habitats and drinking water source.

The removal of old growth trees within the construction corridor is unacceptable. Ancient woodlands have attained unique ecological features because they have not been disturbed. They are a *rare natural resource*, and could never be replaced once destroyed. To destroy

IND895-3 | Recreation is addressed in section 4.8 of the EIS while tourism is addressed in section 4.9. See the response to comment FA8-1 regarding Amendment 1. See the response to comment FA10-1 regarding Amendment 3.

IND895-4 | See the response to comment FA10-1 regarding Amendment 4.

INDIVIDUALS

IND895 – Judy Vanek

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IND
895-4
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these marvelous trees would be reprehensible. This great National resource should not be sacrificed for an industry's private gain. The existing regulations are sufficient and should not be changed to remove more old growth trees.

The USFS should not change the forest plan to affect the AT. This project should not be allowed to impact the AT in the extreme way it proposes. The Appalachian Trail, America's first National Scenic Trail, was initially envisioned in 1921 and first completed by citizens in 1937. It is maintained by volunteers nationwide, who have devoted thousands of hours and millions of dollars to its upkeep and maintenance. It is America's most beloved trail. We should respect the natural beauty of our land and protect it for future generations.

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

To these I would like to add some special concerns of my own. It is unfair and undemocratic for those needs of our community to be run over "roughshod" by already rich private enterprises that will help no one but themselves. This violates the basic tenants that our country was founded on. West Virginia has a long history of the natural resources being exploited by out of state interests. This needs to stop.

I believe that the needs of big oil and greed are more important to our government than "We The People". Find it in yourselves to see farther than the end of your noses.

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

Sincerely,

Judy Vanek
143 War Ridge Road
Wayside, WV 24985

INDIVIDUALS

IND896 – April Keating (on behalf of Arthur and Judy Roberts)

20161222-5511 FERC PDF (Unofficial) 12/22/2016 4:23:53 PM

Arthur C. & Judy D. Roberts

158 Point Lick Dr.

Charleston, WV 25306-6784

IND 896-1 | My wife and I own a 193-acre farm in Lewis County, WV, on the proposed right-of-way of the Mountain Valley Pipeline, off Sleepcamp Run in the Indian Fork drainage area. We bought the farm to manage the timber and wildlife, each of which will be affected as well as our hay production by this construction. We will also be paying taxes on property that can't be utilized, according to MVP's proposal, as no equipment can cross the ROW.

Excavation and any blasting along the ridgetop during construction will ruin two of my seasonal springs and cause erosion, the silt from which will clog the three streams that run through our farm. These streams empty into Indian Fork, that flows into the Sand Fork of the Little Kanawha River and will eventually cause an environmental impact in this area. There is also a large seep on our farm that in all probability will also be affected. We have a good water well that, if ruined, will cause us great hardship and the expense of having to purchase water.

IND 896-2 | There are two vertical-shaft natural gas wells along the ROW line from which we receive free gas. One is very near the ROW line, and if these wells are destroyed, or have to be shut down, this will also cause us a loss of asset and, in turn, will cause us hardship and force us to find and buy alternate fuel.

In the event of a gas line explosion along our property line, our farm, according to blast estimates, will be destroyed, which means our 750,000 plus board-feet of timber would be gone. A 20-inch gasline ruptured and exploded in Kanawha County several years ago, destroying homes and a section of county highway and interstate highway. It was never published who was responsible; we assumed it was the owner, Columbia Gas. But the ROW and construction of the high-pressure gas line was approved by FERC. This agency and those the sign off on the approval should share in the liability.

According to what I have read in MVP's proposal, the property owner has no recourse against the contractor or the owners. Only a fool would sign such an agreement. My wife and I are against this pipeline, as are some of the owners on neighboring farms.

Respectfully,

Arthur and Judy Roberts

IND896-1

See the response to comment IND332-1 regarding heavy equipment. See the response to comment IND270-1 regarding wildlife. See the response to comment IND3-1 regarding drinking water. See the response to comment CO14-1 regarding blasting. See the response to comment IND70-1 regarding erosion.

IND896-2

Oil and gas wells are discussed in section 4.1 of the EIS. See the response to comment IND2-1 regarding safety. See the response to comment IND28-3 regarding financial responsibility.

INDIVIDUALS

IND897 – Steven Hodges

20161222-5518 FERC PDF (Unofficial) 12/22/2016 4:26:10 PM

December 22, 2016

TO: Kimberly D. Bose, Secretary
Neil Kornze, Director, BLM Washington Office
Joby Timm, Supervisor, George Washington and Jefferson National Forests
Jennifer P. Adams, Special Project Coordinator, Jefferson National Forests
Tony Cook, USFS Southern District Regional Forest Supervisor, Forest Service-USDA

VIA
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426
e-filed 22 Dec, 2016

Re: BLM and USFS Request for Comments of JNF Forest Management Plan Amendments:
Docket Nos. CP16-10-000

FROM: Steven C. Hodges, Registered Intervenor, Affected Land Owner, Good Neighbor to
Jefferson National Forest, Stakeholder in the Future of Forest Management Planning Policy

IND 897-1 My family and I live in Craig County, on the Border between Giles to the West, and Montgomery County to the South. Our land lies adjacent to and immediately north of the Jefferson National Forest (JNF). The decision of BLM and the USFS regarding these amendments will have significant and permanent impacts on our land, our livelihood, and the ecosystem services we derive from, and offer freely and in abundance to JNF and others in our community. Your decision affects not only my family, but those of all of my neighbors, hundreds of other JNF-adjacent landowners in Giles, Craig and Montgomery Counties, and even your own employees. We know JNF is very interested, as your closest neighbors, in how we manage our land in support of your mission, and we in turn are certainly interested and invested in how JNF manages its land. The JNF Forest Management Plan represents a significant and critical document in communicating that mission and the JNF implementation of that mission.

Any change in the JNF-FMP, therefore, constitutes a change in how you view your stakeholders, and how your stakeholders will view JNF, and the entire Forest Management Plan Policy.

I have a BSF in Forestry and Wildlife Ecology, an MS in Soils Genesis (both from the Univ. of Florida), and a Ph.D. in Soil Science (Agronomy: Soil Physical Chemistry and Mineralogy) from Virginia Tech. I have over 35 years of experience in soil-related research, teaching, and extension, and was a licensed soil scientist in North Carolina prior to moving to Virginia. I currently serve as Professor of Managed Ecosystems at Virginia Tech in the Crop and Soil Science Department where I am responsible for training majors in Environmental Science, in assessing ecosystem services, and majors in Crop and Soil Science, who will assess agricultural landscapes to write nutrient management plans. I was trained in Forest Policy by Professor John Gray, at the University of Florida and can very much appreciate the difficult predicament faced by the BLM and the USFS to alter this critical document under pressure from another Federal Agency and powerful Energy lobbyists.

IND897-1

The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD. The FS has worked to minimize resource effects on NFS lands, not only to protect NFS resources but also to lessen impacts on other lands.

INDIVIDUALS

IND897 – Steven Hodges

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IND 897-2 | Let me state clearly and without hesitation, my family and I strongly oppose the proposed amendments to the JNF Forest Management Plan. First, regardless of the outcome of the MVP and FERC demands to grant these amendments under such a back-handed, fragmented process would not only be unprecedented, but would significantly reduce protection of the JNF for true multiple uses, including the view-shed services JNF offers to the Appalachian National Scenic Trail (ANST). Secondly, it would with high certainty, lead to permanent and devastating impacts on cultural, economic, and environmental well-being of hundreds of adjacent landscapes and property landowners, many of whom, like myself, must face the prospect of not one reckless, inefficient, and ill-informed private company confiscating their land, but continued exploitation by all future utilities certain to exploit this corridor. The floodgate of cumulative impacts on fragile local landscapes and imminently affected ecosystems must be considered in making this decision.

IND897-2 Comments noted.

IND 897-3 | The FERC has now delivered a DEIS that the public, including cultural, environmental, and economic experts have denounced as biased, incomplete, and incompetently executed. (My own comments on the Soils Section are available as Submission ID: 724116, and I would urge you to have your own soil scientists review them and see if they concur. As a landowner who accompanied every survey crew visiting my property, I can verify that there were no field assessments of soils conducted in developing either the Soil or Karst resource reports. Apparently, a knowledgeable soil scientist was not consulted or involved in the compilation of subsequent data or in drafting the DEIS.)

IND897-3 All relevant environmental comments on the draft EIS were addressed in the final EIS. This included reports filed by outside parties. Soil scientists produced the soils section of the EIS (4.2).

IND 897-4 | FERC has now demanded that BLM and USFS to rubber stamp their rubber stamp by granting these amendments. Such an action, based on this DEIS could only be viewed as USFS admitting that the Forest Management Plan is subject to modification at the request of a private, profit-seeking corporation that has failed to present to anyone except the FERC a justified need, a positive economic benefit to the affected communities or region, and a consistent and technically sound set of Resource Reports on which to build a credible and convincing DEIS.

IND897-4 See the response to comment FA11-12 regarding need. The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD. See the response to comment FA8-1 regarding Amendment 1.

As BLM has strongly reminded the FERC in its recent filing on mandated deadlines, the decision rests not with the FERC, but with the BLM to ensure consensus, and ultimately with the USFS. The question then is does the FERC implementation of NEPA-EIS process meet or exceed the standards and requirements the BLM and USFS would require under their own EIS processes? As a private citizen, I must ask, are your standards being met for private lands providing the multiple ecosystem services the JNF is charged with protecting on their own managed lands? In simple terms, can this DEIS be given any credence at all in the face of such overwhelming criticism?

Implications of Granting these Amendments

- 1) As such, granting these amendments would undermine stakeholder trust in the goals, the credibility, and the integrity of the USFS Forest Management planning process nationally. This is doubly true for JNF stakeholders, including county governments in Giles, Craig, Montgomery, and Roanoke County opposing the amendments, who will soon be asked to participate in the now overdue revision of the 2004 JNF Forest Management Plan. Amending the plan as requested by FERC would set a dangerous precedent with potential impacts on other Forest Plan prescription areas protecting

INDIVIDUALS

IND897 – Steven Hodges

20161222-5518 FERC PDF (Unofficial) 12/22/2016 4:26:10 PM

IND
897-4
cont'd

Wilderness, Old Growth Forest, Inventoried Roadless areas, and fragile successional habitats nationwide. Establishing a new utility corridor directly adjacent to Federally Designated Wilderness would drastically decrease or eliminate multiple beneficial ecosystem services, including aesthetic viewshed services to the ANST, while providing only ecosystem disservices to the JNF, forest users, and local communities.

- 2) If granted, the intent and purpose of establishing a utility corridor will, by definition, bring with it more utilities, meaning more and more pipelines. Since the JNF mission, and ability to provide ecosystem services is strongly linked to surrounding landscapes in Giles, Craig, Montgomery, and Roanoke Counties, particularly with regard to wildlife, fisheries, and aesthetic resources, JNF must consider the impacts on adjacent landowners and communities. BLM and USFA must be convinced that with this DEIS, flawed as it is, the FERC has effectively and persuasively demonstrated and clearly communicated that a “limited permanent lasting impact” conclusion is justified – for the resource providing adjacent lands, and for the JNF itself.

Please allow me the opportunity to convince you otherwise, as a good neighbor, as a person trained in wildlife, forestry, and soil science with over 35 years of experience in assessing landscapes, including karst, and as a man strongly committed to telling the truth, and the whole truth. If you have any questions about what I document below, I would love to answer your questions, and have you visit this unique, fragile landscape.

IND
897-5

Impact on USFS Neighbors

I offer these comments as a landowner who cooperated with MVP on the condition that they notify me 24 hours in advance, and that they allow me to accompany every survey party that visited my land. I found the survey parties to be professional, well informed, and knowledgeable within the areas they were contracted to assess. I have maintained contact with neighbors, and know that the findings I share here apply to many other locations in Giles and Craig County, and are common to nearly all locations located in karst.

1. My land (MP 215.7 to 215.8) was declared UNCONSTRUCTABLE by an MVP hired Routing Engineer. This declaration was made in the fall of 2015 by MVP employee, Nate Turner, and was confirmed by Tim Wahl of Coates Field Services the following day. This was a result of severe slopes, slip-prone soils and shallow soils, and active soil sloughing (a sign of active deepening) in two locations along the steep descending slope (>75%) into a sinkhole through which the pipeline had to be routed. Mr. Turner indicted this was the only possible path because of multiple other sinkholes above and below the centerline on both my property and on adjacent properties. He indicated he would tell MVP “not to come this way”. MVP has not disputed this fact, but has chosen to disregard the advice of a trusted engineer who was unwilling to risk his professional reputation in endorsing this route. To me, this seems reckless on the part of MVP.
2. This sinkhole (MP 215.8) has become hydrologically active. MVP survey parties and MVP representatives (Rick Ellmore, Coates Field Services) have been informed repeatedly of this new development but have shown no interest and no concern
3. No on-site assessment of soil resources was conducted on any karst landscapes. The Professional Geologists conducting the karst “level 1” review were well informed

IND897-5

The EIS provides a discussion of steep slopes, blasting, karst, sinkholes, caves, and seismicity in section 4.1. Section 4.2 of the EIS addresses erodible and compactable soils. Cultural resources are addressed in section 4.10.

INDIVIDUALS

IND897 – Steven Hodges

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897-5
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regarding geology, and spelunking, freely admitted that they were there to assess the Geology, not the soils. In fact neither of them had soils expertise, nor did anyone at the company for which they worked. They acknowledged, not only knowledge of, but strongly endorsed the Virginia Cave Boards “Standards of Karst Assessment” (copy attached), and indicated they had a copy in their car. This Standard requires on-site assessment of soil resources prior to development activities within karst landscapes.

They indicated that there were no surveys scheduled to address soil resources in karst. I can confirm at this time that no on-site soil assessments were ever conducted.

4. The DEIS has looked at factors in isolation. Nowhere do they consider the impacts of multiple factors, nor the fact that mitigation of one factor could in fact enhance damage on another. Nor have they considered the implications of placing a 42-inch pipe (a dam) and associated protective measures laterally across steep slopes on the future soil hydrology, subsequent slope stability, or impacts on underlying karst. Cover sinks and pinnacles are a complete unknown since the geology crew assessed only surface features.

Allow me to describe the landscape along the route from Newport to the Montgomery County line. This line immediately to the north of JNF, and hosts six or more unique Appalachian forest habitats, including rock flows and cliffs that support bear dens along their base. Most of the pipeline is routed roughly along the base of the slope, behind an intermittent ridge of protruding high calcium limestone of the Knox formation. Topographically, the valley formed between the primary slope of harder rock and the softer limestone ridge should support streams running parallel to the ridge of the mountain. Instead, the only streams run perpendicular to the mountain and have cut through this softer rock on their way to Creek. The valley floor is internally drained due to extensive networks of cracks, fissures, sinkholes and caves that have formed in the limestone bedrock. This is precisely where soils such as Frederick and Carbo are prominent and where MVP has located their “only possible route” for the centerline.

Now let’s list the compound limitations within this landscape that the FERC DEIS has both underestimated and refused to consider in total:

- steeply sloping soils
- “slip-prone” soils
- erodible soils
- compactable soils
- moderate to high corrosivity to uncoated steel (Carbo)
- shallow depth to bedrock, requiring blasting (Carbo, Poplimento)
- areas of exposed bedrock requiring blasting
- karst surface features and landscapes, including disappearing streams
- sinkholes within the right of way, and many more within 0.25 mi
- a major cave (Canoe cave), and many small caves
- lies within the Giles County Seismic Zone
- exhibits a cluster area of many previous land-slides
- includes the Newport National Historic Districts
- includes area deemed a Cultural Landscape by MVP Environmental Anthropology consultants.

The FERC DEIS has deemed each one of these of no concern, but clearly has failed to consider

INDIVIDUALS

IND897 – Steven Hodges

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IND 897-5 cont'd the cumulative impacts on this sensitive environmental and cultural landscape. Can this landscape and these people endure the multiple pipeline projects that will surely come to pass if JNF opens the floodgate by issuing a utility corridor? And how about the Mt Table karst plain to the south? Will any of us truly escape permanent and lasting damage? The probability is low.

And if a disaster, such as the recent FERC regulated pipeline explosion in Pennsylvania, were to happen on this landscape that currently protects the JNF, what would be the outcome for our National Forest? What damage would occur to the wooded slopes on Sinking Creek Mountain were we to experience such an explosion at the base of the slope, and with the strong prevailing winds we experience? Would the JNF survive?

We encourage you to assess the science and credibility of the DEIS. We encourage you to consider your responsibilities under NEPA. We encourage you to consider your mission. We encourage you to consider your Forest Management Planning Policy. We encourage you to consider adjacent landscapes and communities as you make this critical decision.

Please do not approve these amendments to the JNF Forest Management Plan, at least not in this manner.

Respectfully,



Steven Hodges

Cc: Neil Kornze, Director, BLM Washington Office
Joby Timm, Supervisor, George Washington and Jefferson National Forests
Jennifer P. Adams, Special Project Coordinator, Jefferson National Forests
Tony Cook, USFS Southern District Regional Forest Supervisor, Forest Service-USDA

OTHER OFFICIALS:

Rep. Morgan Griffith
Rep. Bob Goodlatte
Senator Tim Kaine
Senator John Warner
Craig County Board of Supervisors
Montgomery County Board of Supervisors
Giles County Board of Supervisors
Virginia Department of Conservation and Recreation
Cave Conservancy of the Virginias
New River Land Trust
Gov. Terry McAuliffe

INDIVIDUALS

IND898 – Thomas E. Adams, III

20161222-5521 FERC PDF (Unofficial) 12/22/2016 4:29:23 PM

Thursday, December 22, 2016
Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Mountain Valley Pipeline proposal, Docket No. CP16-10-000

Dear Ms. Bose and Members of the Commission,

IND 898-1 Environmental protections within the Jefferson National Forest Management Plan will not allow the pipeline. The Forest Service has publicly said that in this terrain, the MVP could not be built in compliance with the current Forest Management Plan.

It has been proposed that the following amendments to the Jefferson National Forest Management Plan be made to allow construction of the Mountain Valley Pipeline:

- (1) Re-zone part of the Jefferson National Forest to create a 500-foot wide “Utility Corridor” for future gas, electricity and water lines.
- (2) Permit the MVP corridor to exceed existing restrictions on soil and riparian conditions.
- (3) Permit removal of currently preserved old growth forests within the construction corridor of the MVP.
- (4) Permit the MVP to cross the Appalachian National Scenic Trail (ANST) on Peters Mountain; **reduce the Scenic Integrity Objective for the ANST from “high” to “moderate” at pipeline crossing;** and allow vegetation restoration to take up to 10 years following construction.

IND 898-2 I strongly oppose these amendments to the Jefferson National Forest Management Plan. The Jefferson National Forest is key to the scenic beauty of southwestern Virginia and what has attracted many to the area, including permanent residents and visitors. The destruction of this beauty and natural wilderness with a 500-foot pipeline corridor will be detrimental economically to the region and threatens the safety and water supply of thousands. Moreover, the proposed MVP path through the complex topography of the Appalachian Plateau, Ridge and Ridge Province, and Blue Ridge Mountain poses significant natural geologic hazards that should halt the MVP project from being started. The Draft Environmental Impact Statement is filled with scientific inaccuracies and grossly understates the risk of pipeline failure. Namely:

- (1) numerous natural gas pipeline failures have occurred (see, for 2006-2010 https://opsweb.phmsa.dot.gov/pipelineforum/docs/Secretarys%20Infrastructure%20Report_Rev%20per%20PHC_103111.pdf and are summarized here: https://en.wikipedia.org/wiki/List_of_pipeline_accidents_in_the_United_States), the most frequent causes are due to (a) material and/or weld failures (36%) or (b) corrosion (24%).
- (2) With over 300 miles of pipeline with the MVP, there will be on the order of 30,000 welded sections, all of which must be welded perfectly to eliminate the chance of failure — what is the likelihood of this happening? Statistics show that these failures will happen (https://primis.phmsa.dot.gov/gasimp/docs/finalreport_pipelinecorrosion.pdf) — it’s a matter

IND898-1 The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the Plan of Development (POD). See the response to comment FA8-1 regarding Amendment 1.

IND898-2 See the response to comment IND519-1 regarding black powder sludge.

INDIVIDUALS

IND898 – Thomas E. Adams, III

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898-2
cont'd

of time not IF a failure will occur. Moreover, with the complex topography comes highly variable soils and soil chemistry. To halt or impede corrosion from stress corrosion cracking (SCC), 31 cathodic protection systems are being proposed, essentially 1 every 10 miles. With the complex topography, changing microclimate, and significant soil & soil geochemistry variability, the cathodic protection systems (which must be tuned to local geochemical conditions) can not possibly prevent SCC — catastrophic failure will occur. These problems are known by the Oil and Gas industry (<http://www.eia.gov/naturalgas/>, http://www.eia.gov/naturalgas/weekly/archivenew_ngwu/2016/12_15/)

- (3) With steep topography, the MVP route traverses many rivers and countless small streams, the likelihood of pipeline failure resulting from flooding and associated streambed scour is very high. Just recently, 24 June 2016, in the Greenbrier River Valley in West Virginia, 24 died from flash flooding due to rainfalls exceeding a 500-year recurrence; extreme streambed scour occurred and many debris flows were associated with the flooding (<https://www.climate.gov/news-features/event-tracker/thousand-year-downpour-led-deadly-west-virginia-floods>). In 4-7 November 1985 Cheat, Potomac, Shenandoah, Greenbrier, Elk, Buckhannon, Tygart, Monongahela, Upper Gauley rivers, 47 in West Virginia and 22 in Virginia died from flash flooding where stream beds were severely scoured and many debris flows occurred (<http://pages.geo.wvu.edu/~skite/DeadliestFloodsInWestVirginiaHistoryDRAFT.pdf>). In 27 June 1995 devastating flash flooding and over 100 debris flows occurred in Madison County, VA (http://csmres.jmu.edu/geollab/eaton/web/eaton_files/Publications/2004.pdf). It is known that debris flows, that include significant streambed scour, are one of the leading major geologic hazards in Virginia, in the Appalachian and Blue Ridge Mountains (http://csmres.jmu.edu/geollab/eaton/web/eaton_files/Publications/geologic_hazards_final_eaton.pdf).
- (4) Normal precipitation in the region, particularly in the Appalachian Plateau is high (<http://prism.oregonstate.edu/normals/>) and the likelihood of devastating flooding is closely associated to the frequency of precipitation, shown by http://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html?bkmrk=va . The US Geological Survey shows the entire region to be in a high-risk zone for the occurrence of debris flows.
- (5) The Oil and Gas industry fully knows that in mountainous terrain, trench excavation on steep slopes in soil and rock material may present instability hazards that could threaten pipeline integrity. (see <https://pgionline.com/2015/01/12/challenges-facing-large-diameter-pipelines-crossing-mountains/> and http://www.golder.com/id/modules.php?name=Newsletters&op=viewarticle&sp_id=201&page_id=212&article_id=733)

In sum, the natural geologic hazards leading to failure of the MVP pipeline is all but assured. The region is complete unsuitable for such a project that will end up causing significant environmental damage, threatens the only sources of water from surface and groundwater for the people along the path and downstream of spills of pipeline sludge, known as *black powder sludge*; there will be needless potential loss of life, and destruction of natural wildlife habitat, old growth forest, and scenic beauty.

I am sending these comments to the full service list via e-mail as per FERC policies.

Thomas E Adams, III
1724 Sage LN
Blacksburg, VA 24060

INDIVIDUALS

IND898 – Thomas E. Adams, III

20161222-5521 FERC PDF (Unofficial) 12/22/2016 4:29:23 PM

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

INDIVIDUALS

IND899 – Lynda Majors

20161222-5523 FERC PDF (Unofficial) 12/22/2016 4:32:24 PM

December 22, 2016

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

Dear Ms. Bose and Members of the Commission,

I concur with Dr. Pamela L. Ferrante's letter of December 20, 2016 (Submittal 20161220-5368):

IND 899-1 | The LiDAR study submitted by Johnson has contributed valuable information concerning the karst terrane in the Mount Tabor area. This study, along with the ongoing dye-trace study, has defined the Mount Tabor sinkhole plain as an expansive area, much larger than the area defined by MVP. Results of these studies demonstrate that the Mount Tabor Variation route crosses a region of high-density sinkholes. MVP has not rerouted the pipeline around the Mount Tabor sinkhole plain as FERC requested but has rerouted through another section of the Mount Tabor sinkhole plain with a higher karst density.

IND 899-2 | The DEIS comment period is coming to a close and yet it is obvious MVP has not collected and distributed all necessary data in order for a thorough evaluation of the 2016 Proposed Route that includes the Mount Tabor Variation route be performed properly. FERC is responsible for the scope and accuracy of the data presented in the DEIS. With the new information provided in the LiDAR study it is evident that the DEIS was released prematurely. The 2016 Proposed Route including the Mount Tabor Variation route was not adequately assessed based upon empirical data provided and not provided. FERC has been remiss in its duty and woefully negligent to NEPA regulations.

Due to the inaccuracy of the MVP data submitted to FERC, I therefore request that FERC issue a new DEIS with more accurate and complete data.

Respectfully Submitted,

Lynda Majors
2620 Mt Tabor Road
Blacksburg, VA 24060

IND899-1 Responses to Ms. Ferrante's letter can be viewed at IND648.

IND899-2 The final EIS provides a discussion of the Mount Tabor Variation in section 3.

INDIVIDUALS

IND900 – Adrienne Zofchak

IND900-1 I am a citizen of Blacksburg, Virginia in the New River Valley. I am extremely concerned for the safety and integrity of the Jefferson National Forest, The Appalachian Trail, and all of our local waterways.
I strongly object to the installation of the Mountain Valley Pipeline. In particular I oppose it because:

1. It does not legally comply with the current Forest Management Plan of the Jefferson National Forest. I object to amendments to the Forest Management Plan. Amendments that I object to are: rezoning part of the Jefferson National Forest to create a 500-ft wide Utility Corridor for future gas, electricity, and water lines, Exceeding current restrictions on soil and riparian conditions within that corridor, removing currently protected old growth forests within the construction corridor, and allowing the Mountain Valley Pipeline to cross the Appalachian National Scenic Trail on Peters Mountain. These amendments and more violate the letter and the spirit of the Jefferson National Forest's Forest Management Plan. I object to changes and amendments to the Forest Management Plan.

2. It is an unnecessary pipeline. Studies show that current energy demand can be met by existing infrastructure. In any case the National Environmental Policy Act process requires that the Federal Energy Regulatory Commission's environmental impact statement first assess the need for the project and include reasonable alternatives to the project in addition to investigating environmental impacts.

3. The EPA recommends FERC address climate change and infrastructure needed to address cumulative impacts, such as climate change, is a required part of the NEPA process. Climate change is a clear and present danger. Our energy needs must be fulfilled in new, sustainable, ways as soon as possible. They must change in the future, and if we do not change them soon, there will be irreparable harm done to the planet, including the health of the people and the biome of the appalachian region. This must be considered and taken into account by FERC when giving permits for pipelines like the MVP.

4. There is danger of erosion and landslides in the mountainous and wet landscape that the pipeline is intended to cross. Best management practices will not be enough to prevent that. The Jefferson National Forest Management plan addresses these concerns. The Karst Hydrology of the region is particularly susceptible to such irreparable harm.

5. There are threats, not mitigable, to historic districts, in the town of Newport Virginia, which the pipeline route is designated to travel directly through. As laid out by the National Historic Preservation Act, historic districts are to be protected from non mitigatable threats such as this pipeline.

6. There will be not mitigatable harm done to scenic views, which would impact compliance with the Scenic Integrity Objective for the Appalachian National Scenic Trail. These views include the view from Angel's Rest, Dragon's Tooth, and McAfee Knob: all iconic points on the ANST, and a piece of national natural heritage to which all citizens now and in the future have a right to.

I urge FERC to comply with all required steps of the permitting process. As a citizen, I demand that EPA requirements be addressed legally, that the Forest Plan be followed, and that the National Historical Preservation Act be followed in letter and spirit.

IND900-1 The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD.

IND900-2 Existing infrastructure as an alternative is assessed in section 3.3 of the EIS. See the response to comment FA11-12 regarding need.

IND900-3 Climate change is addressed in sections 4.11 and 4.13 of the EIS.

IND900-4 See the response to comment IND70-1 regarding erosion. Impacts and mitigation measures for karst terrain and landslides are addressed in section 4.1 of the EIS.

IND900-5 Historic Districts are discussed in section 4.10 of the EIS.

IND900-6 See the response to comment CO41-2 regarding visual resources relating to the ANST.

INDIVIDUALS
IND901 – Carrie S. Jubb

Carrie S. Jubb
182 Hidden Hills Ln.
Newport, VA 24128

December 22, 2016

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

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

Ms. Bose,

IND
901-1

As a resident of Newport in Giles County, Virginia I must tell you, that I am deeply concerned about the proposed Mountain Valley Pipeline (MVP). This proposal would inflict damage upon our area that would be inmitigable and would cause irreparable harm to our environment, historical structures, water quality, and to our national treasure: the Appalachian Trail. There are a litany of reasons why this pipeline should not be built and should not be built in this area. Here are several reasons that the Federal Energy Regulatory Commission (FERC) should not allow the Mountain Valley Pipeline:

First, the Jefferson National Forest has a Forest Management Plan in place that does not allow for this pipeline. Although FERC has suggested amendments to this plan, I believe these amendments are unacceptable and I vehemently oppose them. FERC's suggestions would allow MVP to exceed existing restrictions on riparian conditions, and to remove currently preserved old growth forests within the construction corridor of the MVP. Additionally, MVP would be permitted to cross the scenic Appalachian National Scenic Trail reducing the Scenic Integrity Objective from "high" to "moderate" at the pipeline crossing. These types of allowances weaken the existing protections on public land. Numerous view-sheds in these areas would be highly degraded, namely the iconic Appalachian Trail overlook, McAfee Knob.

IND
901-2

Second, studies show that the current energy demand can be met by existing infrastructure, so MVP's proposed pipeline is not even necessary. We do not need or want these pipelines. It is my understanding that FERC has said that they will not assess the need for the MVP pipeline in the environmental impact statement. This is a clear violation of the National Environmental Policy Act (NEPA). NEPA requires that FERC's environmental impact statement must first assess the need of the pipeline project and include reasonable alternatives to the project in addition to investigating environmental impacts.

IND
901-3

Third, after reviewing the MVP environmental impact statement, I see that there is no mention of the cumulative impacts of this pipeline on climate change. This is also a requirement of NEPA and should be addressed. We, as a part of the larger global community deserve to know how projects such of these will add to the growing issue, and devastating effects of climate change.

IND
901-4

Fourth, if permitted, this pipeline will pass through very steep, highly erodible, karst topography. These areas of karst topography are extremely complex and sensitive. It has come to my attention that similar, smaller pipeline projects in comparable terrain have caused issues with erosion, have experienced slope failures and damage to aquatic ecosystems. The interconnectivity of karst ground water systems, makes these areas very vulnerable to damage and should be seriously considered.

IND901-1

The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD. See the response to comment FA10-1 regarding Amendment 4.

IND901-2

See the response to comment FA11-12 regarding need.

IND901-3

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

IND901-4

See the response to comment IND70-1 regarding erosion. Impacts and mitigation measures for karst terrain is addressed in section 4.1 of the EIS. Impacts and associated mitigation measures for groundwater in areas of karst terrain are addressed in sections 4.3.1 of the EIS. See the response to comment IND152-1 regarding the FERC's third-party monitoring program to insure compliance with BMPs.

INDIVIDUALS

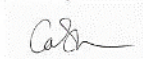
IND901 – Carrie S. Jubb

IND
901-5

Finally, the current proposed route of the MVP pipeline runs the Newport, VA which is a historic district protected under the National Historical Preservation Act. Threats to areas such as these are NOT mitigatable and would be an absolute disgrace if allowed to proceed.

I would urge FERC to seriously consider the above points and to help protect our land, resources, and climate from the MVP project. Please evaluate the comprehensive need for pipeline development to transport natural gas, in a single Programmatic Environmental Impact Statement so that this infrastructure can be appropriately sited and the cumulative impacts to our National Parks, National Forests, and private lands can be understood before moving forward. It is the responsibility of FERC to protect this area that is home to so many private landowners and is a recreational outlet and inspiration for millions of people on the A.T.

Sincerely,



Carrie S. Jubb

IND901-5

Historic Districts are discussed in section 4.10 of the EIS.

INDIVIDUALS

IND902 – Winema Wilson Lanoue

20161222-5534 FERC PDF (Unofficial) 12/22/2016

PO Box 1292

Radford, VA

24143

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

Cc: Bureau of Land Management

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

Dear Ms. Bose and Members of the Commission,

IND
902-1

The Federal Energy Regulatory Commission did not provide adequate public comment periods to the citizens in the New River Valley and that the resulting Draft Environmental Impact Statement does not accurately represent issues expressed by stakeholders living in communities that the Mountain Valley Pipeline is proposed to traverse.

The Bureau of Land Management (BLM) has made a statement that they are open to slowing down the rapid paced timeline of the MVP approval so that they may adequately research the impacts of the project on the region. They also stated that they would be available for public forums so they may gather data from multiple stakeholders.

We expect, and are entitled to an actual public dialogue with government officials that is ultimately reflected in the DEIS. I ask that we not be ignored or our concerns minimized nor trivialized. The Draft Environmental Impact Statement does not adequately address multiple important facts and concerns that citizens have repeatedly voiced to FERC, especially in respect to our karst terrain in the Slusser's Chapel Cave Conservancy. Although the route has been moved several times, it still impacts the Mount Tabor Sinkhole Plane. The Draft Environmental Impact Statement submitted by MVP does not reflect our concerns and research that our region's drinking water will be impacted by building the pipeline near this geologic feature.

In an article published in the Huffington Post (12/17/16, "This Proposed Pipeline Would Cut Right Through the Appalachian Trail," http://www.huffingtonpost.com/entry/mountain-valley-pipeline-appalachian-trail_us_5855aaa4e4b0b3d6fd8d285e), the author states "multiple environmental groups said this month that they refused to even comment on the government's Draft Environmental Impact Statement for the project because the draft has so many errors."

Along with other members of our community, I am requesting that the BLM come to the New River Valley and provide an open forum where well-researched concerns, both environmental and humanitarian can be addressed and cultural diversity is respected. I believe that this could help provide the most accurate Environmental Impact Statement.

Sincerely,

Winema Wilson Lanoue

IND902-1

See the responses to comments LA2-1 and LA5-1 regarding the FERC public comment process, the consideration of stakeholder comments in the EIS, and the overall adequacy of the EIS. See the response to comment CO6-1 regarding the Slussers Chapel Conservation Site and the Mount Tabor Variation. The ANST is discussed in section 4.8 of the EIS.

INDIVIDUALS

IND903 – Erin McKelvy

20161222-5536 FERC PDF (Unofficial) 12/22/2016 4:46:40 PM

Federal Energy Regulatory Commission

Kimberly D. Bose, Secretary

888 First St. N.E. Room 1A

Washington, DC 20426

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

To the representatives of FERC,

IND
903-1

I am a registered intervenor, and an active community member and public health protector in the Roanoke River valley who would be directly impacted by the Mountain Valley Pipeline, if it is given permission to proceed. In my assessment, this proposed pipeline is neither a convenience nor a necessity in market and infrastructure terms, and, if constructed, poses a direct, irreparable threat to woodlands and steep slopes, sensitive karst topography and underlying hydrology, riparian and wetland ecosystems, to many sites of historic, recreational and aesthetic importance, and most disastrously, to the already destabilized global climate. As such, **I fervently request that FERC deny the application for building the proposed Mountain Valley Pipeline.**

The proposed changes to the Forest Service's Land and Resources Management Plan that would create a "Utility Corridor" through which the MVP would cross the National Forest is unacceptable. It would violate public enjoyment and Scenic Integrity at its proposed Peters Mountain crossing of the Appalachian Trail, as well as aesthetic, recreational, and spiritual enjoyment of the forest areas entrusted to the Forest Service to preserve for the greater public good. The places within the Jefferson National Forest that would be impacted by these reckless LRMP changes: the view from Angel's Rest, the Rice Fields and Peters Mountain Wilderness, Sinking Creek Mountain across from Kelly Knob, the Brush Mountain Wilderness, the view of the long ridge-and-valley from Dragon's Tooth, the beautiful view from McAfee Knob, are all special places I have visited and enjoyed repeatedly throughout my life. I, and my friends, family and neighbors, would experience real loss if these places of ecological, recreational, aesthetic, and cultural import were disturbed or destroyed by a 500' easement corridor. The current protections of wildlife, old growth forest, soil and water quality, and steep slopes are there for a reason, and it is absolutely unacceptable to weaken any of them.

IND
903-2

The Draft Environmental Impact Statement for the proposed MVP project mentions, though fails to account for, many of my concerns regarding water quality, public health risks, historic places (such as downtown Newport, VA where I lived as a baby). However, alarmingly, the DEIS fails to consider the cumulative impact the MVP would have on the climate. There is no replacing old growth trees, historic communities, clean air and clean water (water is Life!), and there is no substitute for a sound decisionmaking process that allows for real input from all affected parties. I would argue that the MVP and the scoping and EIS process are not supporting any of these needs, with thousands of impacted communities, thousands of stream and river crossings, and countless negative economic impacts. Concern for the climate, though, is paramount. Climate change affects not just landowners, not just people in this region, but the entire biosphere. The DEIS of the MVP fails to account for the cumulative greenhouse gas emissions that would be brought on by this project. It not only does not sufficiently

IND903-1

The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD. See the response to comment FA8-1 regarding Amendment 1. See the response to comment FA10-1 regarding Amendment 4.

IND903-2

Water quality is addressed in section 4.3 of the EIS; Historic Districts are discussed in section 4.10. Climate change is discussed in sections 4.11 and 4.13 of the EIS. See the response to comment FA11-12 regarding need.

INDIVIDUALS

IND903 – Erin McKelvy

20161222-5536 FERC PDF (Unofficial) 12/22/2016 4:46:40 PM

IND
903-2
cont'd

consider and show plans to mitigate the downstream impacts to land and water, but also, completely disregards the demand-side, “upstream” impacts that would come with an increase of two billion cubic feet of daily gas carrying capacity.

Please do your part to stop these irreparable problems before they start. Acknowledge the resounding evidence of the harm the Mountain Valley Pipeline would inflict on our region. Admit that the proposed project is not in the public interest. Oppose the Forest Service's LRMP changes. And oppose the Mountain Valley Pipeline.

Thank you.

Erin McKelvy

2068 Lusters Gate Road
Blacksburg, VA 24060

INDIVIDUALS

IND904 – April Keating

20161222-5543 FERC PDF (Unofficial) 12/22/2016

12/22/16

To Whom It May Concern:

IND 904-1 I am writing concerning the comment period for the MVP. I understand you have a 5:00p.m. deadline; however, many people I have spoken with believe it is midnight. Since you leave the office at 5pm and will not be looking at the comments until the next business day anyway, I think you should extend your comment period until midnight. I called my friend at 4:35 and she was still composing, believing the deadline was midnight. Now, she is in a rush to get everything down and submitted, which is a process in itself. I hope she gets her comments done by 4:59, but if you do get a few comments up until midnight, would you please consider accepting them? If you were going to be reading comments after 5pm, or if you were waiting for a physical delivery, it would make sense to cut off the period at 5:00p.m., but we live in a world of electronic communication, and midnight is truly the end of the day.

Sincerely,

April Keating
115 Shawnee Dr.
Buckhannon, WV 26201

IND904-1

The request to extend the draft EIS comment period is denied. The public had adequate time to comment on the project. However, all comments were considered, if filed before the final EIS was drafted on May 11, 2017.

INDIVIDUALS

IND905 – Thomas E. Adams, III

20161222-5546 FERC PDF (Unofficial) 12/22/2016 4:53:57 PM

Thursday, December 22, 2016
Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Mountain Valley Pipeline proposal, Docket No. CP16-10-000

Dear Ms. Bose and Members of the Commission,

IND905-1 I strongly oppose these amendments to the Jefferson National Forest Management Plan, which are listed below. The Jefferson National Forest is key to the scenic beauty of southwestern Virginia and what has attracted many to the area, including permanent residents and visitors. The destruction of this beauty and natural wilderness with a 500-foot pipeline corridor will be detrimental economically to the region and threatens the safety and water supply of thousands. The proposed Management Plan changes are:

(1) Re-zone part of the Jefferson National Forest to create a 500-foot wide “Utility Corridor” for future gas, electricity and water lines.

(2) Permit the MVP corridor to exceed existing restrictions on soil and riparian conditions.

(3) Permit removal of currently preserved old growth forests within the construction corridor of the MVP.

(4) Permit the MVP to cross the Appalachian National Scenic Trail (ANST) on Peters Mountain; **reduce the Scenic Integrity Objective for the ANST from “high” to “moderate” at pipeline crossing;** and allow vegetation restoration to take up to 10 years following construction.

Environmental protections within the Jefferson National Forest Management Plan will not allow the pipeline. The Forest Service has publicly said that in this terrain, the MVP could not be built in compliance with the current Forest Management Plan. Moreover, I think there are other substantial reasons the proposed MVP pipeline should not be constructed, namely:

IND905-2 (1) Studies show that current energy demand can be met by existing infrastructure. We don't even need these pipelines!

IND905-3 (2) Potential pipeline failures and construction threaten the fragile groundwater supplies of residents in this major Karst geologic region, which also feeds surface water supplies to thousands.

IND905-4 (3) The pipeline threatens both the natural scenic beauty and historic character of the region, which is unique and must be preserved

IND905-5 (4) Most significantly, with the known threat and impacts of climate change and global warming from anthropogenic sources of carbon dioxide from the burning of fossil fuels (natural gas), accelerating the use of carbon based fuels rather than curtailing the use of them, is going in the wrong direction. We must stop the use of fossil fuels, not encourage further expansion of their use.

IND905-6 (5) The economic losses to the people of West Virginia and Virginia far outweigh any economic benefit to the residents of the states; this pipeline ONLY benefits the shareholders of the Oil and Gas industry. The effects of continued global warming, which will bring both more extreme drought and flooding will continue to harm the region.

IND905-1 The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources those standards were designed to protect. These mitigation measures and monitoring procedures are described in the POD. See the response to comment FA8-1 regarding Amendment 1. See the response to comment FA10-1 regarding Amendment 4.

IND905-2 Existing infrastructure as an alternative is assessed in section 3.3 of the EIS. The Commission would determine if the pipelines are needed.

IND905-3 Impacts on groundwater are addressed in sections 4.3 of the EIS; karst is discussed in section 4.1.

IND905-4 An assessment of visual resources, which has been updated as applicable for the final EIS, is located in section 4.8 of the EIS. Historic Districts are discussed in section 4.10 of the EIS.

IND905-5 Climate change is discussed in 4.11 and 4.13 of the EIS.

IND905-6 See the response to comment CO2-1 regarding benefits of the projects.

INDIVIDUALS

IND905 – Thomas E. Adams, III

20161222-5546 FERC PDF (Unofficial) 12/22/2016 4:53:57 PM

IND905-6 | I am sending these comments to the full service list via e-mail as per FERC policies.
(cont'd)

Thomas E Adams, III
1724 Sage LN
Blacksburg, VA 24060

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

INDIVIDUALS

IND906 – Andrew and Elizabeth Alden

20161222-5539 FERC PDF (Unofficial) 12/22/2016 4:51:11 PM

Robert M. Jones, Registered Intervenor, on Behalf of Andy and Betsy Alden
December 22, 2016

Ms. Kimberly Bose
Secretary
Federal Regulatory Energy Commission

Re: CP16-10 Mountain Valley Pipeline – Slusser’s Chapel Cave Avoidance

Dear Ms. Kimberly Bose:

IND906-1 We are writing to express our general opposition to the Mountain Valley Pipeline (MVP) as currently proposed and to specifically recommend that an alternative to the “Mt Tabor Variation route be used should the pipeline be approved.

IND906-2 Our general opposition stems from the apparent lack of benefit that the public and those impacted by its construction will gain. We recognize that pipelines that are sited, constructed, operated, and closed properly are a relatively safe and more efficient means of material transport when compared to most alternatives, such as trucking. However, the sale of our limited natural energy resources to foreign markets, as we understand the purpose of this pipeline to be, does not serve those impacted of the general public. Rather, it’s a disservice to the state of our country’s energy security and a very poor reason to execute eminent domain.

IND906-3 Our specific opposition to the Mt. Tabor Variation route stems from our understanding of the location of the pipeline and support infrastructure with respect to karst topography and critical water resources in the subject area. Indeed, the draft environmental impact statement was remiss in noting a key overland transport pathway to a cave entrance very near our property. Our water resources are just too valuable to treat with such disregard. If this project moves forward we implore you to consider the Slusser’s Conservation Site Avoidance alternative that has been proposed.

Sincerely,

Andrew and Elizabeth Alden
2540 Mount Tabor Rd.
Blacksburg, VA 24060

IND906-1 See the response to comment CO6-1 regarding the Mt. Tabor Variation.

IND906-2 The Commission would decide about public benefits of the projects. See the response to comment IND2-3 and IND1-3 regarding export and the use of eminent domain, respectively.

IND906-3 The Slussers Cave Conservation Site avoidance alternative is discussed in section 3 of the EIS.

INDIVIDUALS

IND906 – Andrew and Elizabeth Alden

20161223-5045 FERC PDF (Unofficial) 12/23/2016

22 December 2016
FERC Commissioners,
c/o Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

The DEIS for the MVP Project is Professionally Deficient, and a Disservice to the American Public

Dear Commissioners,

IND907-1 I write today as both a concerned landowner in the region to be impacted by the proposed Mountain Valley Pipeline, and as a practicing scientist with a long record of professional experience in the disciplines of natural resource research and management.

You have received a multitude of comments that detail the serious gaps and errors in data that your agency received from MVP (their Resource Reports and other supplemental filings), and then used for analysis to produce the DEIS. I need not review all of those gaps here, but suffice it to say that those gaps and errors in input (MVP's deficient filings) to your agency's analysis inevitably have resulted in serious errors and shortcomings in output (i.e., the Draft Environmental Impact Statement, the DEIS). I will offer just a few glaring examples of the serious deficiencies in the DEIS that your agency has offered to cooperating agencies and the public as "a through and detailed analysis of potential impacts" of the proposed project.

The DEIS has already offered the sweeping conclusion that construction and operation of the pipeline "would result in limited adverse environmental impacts, with the exception of impacts on forest," even before some significant data inputs were received.

- IND907-2 a. The route had not even been finalized at the time that the DEIS was written. So FERC's stated conclusion leads any thinking person to logically conclude that you have made your decision on environmental impacts (and, probably, on approving the application) without really considering the facts.
- IND907-3 b. The DEIS concludes that only forest habitat might be negatively impacted. This is a ridiculous, scientifically unsupported, and naïve conclusion that ignores significant evidence that there are no proven techniques to control erosion on the severe slopes that would be crossed by the MVP. The US Forest Service has asked for specific construction designs and related proof that they can prevent erosion; to date MVP has not bothered to provide such designs, and FERC therefore has no data to evaluate, so it is disingenuous to the public to offer the "no impact" conclusion that you did in the DEIS.
- IND907-3 c. MVP has recently (16 December 2016) reversed their long-held promise to not use pesticides in maintenance of the pipeline right-of-way. This change alone might result in some significant impacts to aquatic organisms in streams that receive runoff from the pipeline corridor, and this potential impact has never been analyzed by FERC.

IND907-1 See the response comment FA11-12 and LA5-1 regarding the preparation of the draft EIS. The draft EIS was not deficient. The MVP pipeline route was slightly modified in October 2016, and those modifications are addressed in this final EIS.

IND907-2 See the response to comment IND70-1 regarding erosion.

IND907-3 See the response to comment LA1-7 regarding the use of pesticides.

INDIVIDUALS

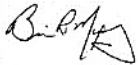
IND907 – Brian R. Murphy

20161223-5045 FERC PDF (Unofficial) 12/23/2016

IND907-4

These are just a few examples of the dishonest way that the public has been treated by your agency in the matter of evaluating potential impacts of the proposed MVP project. The current DEIS is a scientific farce, in that it contains little if any actual analysis outside of what unqualified MVP subcontractors provided to FERC. You should be ashamed to have foisted this document on the public and cooperating agencies. This level of scientific conduct would never be tolerated in legitimate scientific publications. You should hold yourselves to the same standard. Withdraw this deficient DEIS, and give the public an honest appraisal of potential project impacts.

Sincerely,



Brian R. Murphy, PhD (Fisheries & Wildlife Science, Virginia Tech, 1981)
Certified Fisheries Professional (American Fisheries Society)
Fellow of the American Fisheries Society
Fellow of the American Institute of Fishery Research Biologists

8227 Cumberland Gap Road
New Castle, VA 24127

IND907-4

The EIS meets the requirements of NEPA.

INDIVIDUALS

IND908 – Lynda Majors

20161223-5050 FERC PDF (Unofficial) 12/22/2016 5:06:10 PM

December 22, 2016

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

Dear Ms. Bose and Members of the Commission,

IND
908-1

I am writing again to express my complete opposition to all 4 proposed amendments to the Forest Service Land and Resource Management Plan that would allow the Mountain Valley Pipeline to be constructed through National Forest Lands. Proposed Amendment 1 requesting a 500 foot designated utility corridor through the forest is inconceivable to contemplate.

The sedimentation and erosion alone, from such a cut through the steep sides of Brush Mountain would seriously compromise the Craig Creek watershed and probably destroy the clean water required for the globally rare species in Slussers Chapel Conservation Area cave system. With increasingly hard rains and the incredibly steep slopes that the pipeline would be traversing, mitigation to the extent needed to ensure the integrity and purity of the water supply, will not be possible.

Amendment 2 would allow the LRMP to be amended to allow construction to exceed restrictions on soil conditions and riparian corridors. With a 500 foot corridor and pipe laid vertically up and down the slope there might as well be no Forest Plan at all. Forest professionals made this Plan and it has been a good plan to manage the Forest since 2004 so why would laying a pipeline for private profit be a good reason to change a Plan that has been in service for that long.

Amendment 3 would allow the removal of Old Growth Trees. Again, how is a pipeline for private profit a good reason to cut trees that cannot be replaced in many lifetimes. Another desecration of the Forest in Montgomery County Virginia is the pipeline route through the Inventoried Roadless Area next to the Wilderness Area.

Amendment 4 to allow the Appalachian Trail viewshed to be compromised is unconscionable. Once it is damaged, it cannot be replaced.

I am adamantly opposed to all four proposed amendments to the Forest Service Land and Resource Management Plan.

Respectfully Submitted,

Lynda Majors

IND908-1

See the response to comments FA8-1 and FA10-1 regarding Amendments 1, 2, 3 and 4. The crossing of Craig Creek and the crossing of the Brush Mountain IRA have been intensely studied by Mountain Valley and the FS because of the concerns in this comment. The effects are discussed in the EIS, Section 3.5.3.1, Brush Mountain Minor Route Variations. Mountain Valley has committed to restoring the riparian area along the tributary to Craig Creek with hand planted trees and shrubs.

INDIVIDUALS

IND908 – Lynda Majors

20161223-5050 FERC PDF (Unofficial) 12/22/2016 5:06:10 PM

2620 Mt Tabor Road
Blacksburg, VA 24060

CC: Director, Neil Kornze, Bureau of Land Management
Jennifer Adams, U. S. Forest Service
Headquarters U.S. Army Corp of Engineers

INDIVIDUALS

IND909 – Holly L. Scoggins and Joel L. Shuman

20161223-5059 FERC PDF (Unofficial) 12/22/2016 5:55:10 PM

December 20, 2016

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

Dear Ms. Bose and Members of the Commission:

IND909-1

Subject: MVKCP CP16-10-000 Draft Environmental Impact Statement
I am commenting on the Draft Environmental Impact Statement for the Proposed Mountain Valley Project and Equitrans Expansion Project (September 16, 2016), Docket No. CP16-10-000 and Docket No. CP16-13-000.

We have multiple issues with the DEIS, specifically as it applies to Newport VA and surrounds in Giles County and Craig County (MVP Alternate Route 200). Our farm borders three properties the pipeline will bisect. Direct impacts include our watershed (extremely mobile groundwater due to Karst geology plus creek at the base of the construction) and our you-pick blueberry farm's economic viability (perceived lack of safety due to proximity of pipeline) and viewshed (loss of property value).

A pipeline of this size has never been built through the type of steep terrain and karst geology that MVP would cross.

- No thorough analysis of impacts on streams **The portion of the pipeline that would impact our property would bisect a 30-60 degree slope. Sinking Creek, a tributary of the New River, parallels the pipeline at the base of that slope and borders our property for 3200 ft.** Our drinking water comes from a well, drilled through Karst, that would be impacted if there was a pipe rupture.
- The hazards of attempting to build a 42" gas pipeline through the karst terrain of Giles County, Virginia and other Appalachian counties along the MVP route, are well-documented by Dr. Ernst Kastning (report submitted to FERC 3 July 2016), entitled An Expert Report on Geologic Hazards in the Karst Regions of Virginia and West Virginia: Investigations and Analysis Concerning the Proposed Mountain Valley Gas Pipeline (Submittal 20160713-5029).

IND909-2

- Please consider the loss of property value and income with no remuneration possibility: We own a specialty crop farm: you-pick blueberries (Bee Berry Farm, <http://beeberryfarm.net/>), with 3 acres of berries in a scenic setting (Fig.1). Our farm slogan is "You-pick blueberries – with a view" and falls under the category of agritourism. Our 19-acre farm would not be crossed by the pipeline route, however three properties in our viewshed will. Proximity to the proposed pipeline (less the 0.25 miles) puts us in the blast zone. Construction on our neighbor's land (which they do not

IND909-1

See the response to comment LA1-4 regarding existing 42-inch-diameter natural gas pipelines in karst terrain. Construction in steep terrain and karst is addressed in sections 2, and 4.1 of the EIS; impacts on waterbodies in section 4.3. See the response to comment IND62-1 regarding karst terrain, groundwater, and Dr. Kastning's report.

IND909-2

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

INDIVIDUALS

IND909 – Holly L. Scoggins and Joel L. Shuman

20161223-5059 FERC PDF (Unofficial) 12/22/2016 5:55:10 PM

IND909-2
(cont'd)

want), coupled with corruption of our viewshed and potentially Sinking Creek, will obviously decrease our property value; but there will be no chance to negotiate recompense from MVP. (See 4.8.1.4, page 4-215)



Fig. 1. View from our you-pick blueberry farm – Bee Berry Farm. Sinking Creek, at the base of the hill, runs parallel to Proposed Pipeline Route (red line).

IND909-3

- Finally, and this point has been made by the Allegheny Defense Project “The DEIS lacks sufficient information about the MVP Project and its potential environmental impacts on a wide variety of resources, including water resources, wetlands, cultural resources, threatened and endangered species, and climate change implications, [all well-documented by various organizations]. The DEIS recommends that some of this missing information be supplied by the applicants either by the end of the DEIS comment period or before construction begins. (See DEIS at 5-20 – 5-24). We will not have an opportunity to meaningfully review and comment on this information before the final EIS is issued. Therefore, this information should have been included in the DEIS. Only the issuance of a revised or supplemental DEIS that thoroughly analyzes this missing information will satisfy NEPA’s public comment procedures, which “[encourage] public participation in the development of information during the decision making process.” Simply adding this

IND909-3

See the response comment LA5-1 regarding the preparation of the draft EIS.

INDIVIDUALS

IND909 – Holly L. Scoggins and Joel L. Shuman

20161223-5059 FERC PDF (Unofficial) 12/22/2016 5:55:10 PM

IND909-3
(cont'd)

missing information to the final EIS is insufficient, as it does not allow the same degree of meaningful public participation."

Because of the unaddressed concerns identified above, and other significant information gaps that have been noted by other commenters and cited within the DEIS document itself, we request that the FERC issue a new DEIS with complete and corrected information, so that we have an opportunity to assess and comment on the potential impacts of the project prior to the issuance of the FEIS."

To quote Bill Wolf of Preserve Craig County: *"It is inconceivable that our government would issue a draft EIS for public comment when it has been thoroughly documented that there are massive errors, gaps and possible falsehoods in the information provided by the private corporation that filed this application. This document seems to accept everything submitted by the company as fact, while ignoring thousands of pages of comments submitted by concerned citizens and knowledgeable professionals."*

Please take into consideration the wealth of knowledge that has been transmitted by experts and concerned individuals in the counties potentially impacted.

Sincerely,

Holly L. Scoggins and Joel L. Shuman
Bee Berry Farm
1588 Blue Grass Trail
Newport, VA 24128
(540) 818-2800
hollysc@vt.edu

CC:

Barbara Rudnick, NEPA Team Leader, U.S. EPA, Region 3
Rudnick.barbara@epa.gov

Ted Boling, Associate Director for NEPA, Council on Environmental Quality
Edward_A_Boling@ceq.eop.gov

Jon Capacasa, Director, Water Protection Division. U.S. EPA Region 3
Capacasa.jon@epa.gov

INDIVIDUALS

IND910 – Roseanna Sacco

20161223-5082 FERC PDF (Unofficial) 12/23/2016

FERC (Attention: Kimberley Bose)
888 First Street
Washington DC, 20426

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

December 20, 2016

Dear Secretary Bose and Members of the Commission:

IND
910-1

Over the past year, along with many other citizens, I have become acutely aware of the current political trend driven by private gain to deny man-made climate change, to default on the United States commitment to the Paris Agreement and to proceed with fossil-fuel development despite serious warnings from the national scientific community that the consequences of such actions would be severe and long-lasting for our planet's climate and for the international credibility of the United States.

In September of this year, 376 members of the National Academy of Sciences (NAS) * - established by an Act of Congress signed by President Abraham Lincoln in 1863 and charged with providing independent, objective analysis and advice to our nation to solve complex problems and inform public policy decisions on matters related to science and technology - published an open letter regarding climate change* which states:

"Human-caused climate change is not a belief, a hoax, or a conspiracy. It is a physical reality. Fossil fuels powered the Industrial Revolution. But the burning of oil, coal, and gas also caused most of the historical increase in atmospheric levels of heat-trapping greenhouse gases. This increase in greenhouse gases is changing Earth's climate.

Our fingerprints on the climate system are visible everywhere. They are seen in warming of the oceans, the land surface, and the lower atmosphere. They are identifiable in sea level rise, altered rainfall patterns, retreat of Arctic sea ice, ocean acidification, and many other aspects of the climate system.

Human-caused climate change is not something far removed from our day-to-day experience, affecting only the remote Arctic. It is present here and now, in our own country, in our own states, and in our own communities."

In an attempt to divert attention away from science, costly advertising campaigns and controlled media coverage continue to skew public opinion toward denial. People have a tendency to believe what they see over and over again on television and private corporations have the money to pay for repeated advertising blasts.

As an independent agency, FERC should be removed from such popular influences, yet I am sure it is difficult not to be carried away by such a strong current. Therefore I would like to take this opportunity to caution FERC to remain impartial. One of the last pieces of paradise is at stake here and the people clearly see the folly of letting it go.

IND910-1

Climate change, GHGs, and cumulative impacts are discussed in sections 4.11 and 4.13 of the EIS.

INDIVIDUALS

IND910 – Roseanna Sacco

20161223-5082 FERC PDF (Unofficial) 12/23/2016

IND 910-1 cont'd | Amid escalating claims denying climate change, some human beings felt a strong desire to do what is right, and it is my sincere intent that you, Ms Bose and the Commissioners will be moved to take a stand, as other government agencies have done.

As you know, on August 1, 2016 the Council on Environmental Quality was behooved to take such a stand on climate change by issuing guidance to assist Federal agencies, such as FERC, in their consideration of the impact proposed Federal actions would have on greenhouse gas emissions and climate change in accordance with the National Environmental Policy Act and with the CEQ Regulations Implementing the Procedural Provisions of NEPA (CEQ Regulations). The 'Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews' unequivocally states: "Climate change is a fundamental environmental issue, and its effects fall squarely within NEPA's purview." The Guidance provides a framework for analyzing a proposed action's GHG emissions and the effects of climate change relevant to a proposed action—particularly how climate change may change an action's environmental effects.

The DEIS for the Mountain Valley Pipeline Project, FERC DOCKET CP16-10-0000 issued by FERC summarily references these considerations but, on such short notice, was certainly not equipped to provide a thorough analysis of the action's GHG emissions (from extraction, compressor station venting, probability of leaks over time and explosions, burning, etc.) nor was it equipped to address what impacts the cumulative emissions of this pipeline would have in addition to the emissions of all other existing and proposed fossil fuel infra-structure actions vying for a place in the race to develop fossil fuels, despite the growing trend toward renewables. Only focusing on each proposed action separately will lead to finger-pointing, scape goating and precludes any understanding of the whole picture, which is essential to the serious analysis of the contribution of any one project to climate change. Analyzing the impact of a specific project is a complex undertaking which requires time, because climate change is a global issue, not a state-wide or country-wide issue. This must be taken seriously for decisions made now not only affect quality of life for current inhabitants of our planet, but for the future of our species.

Even more complex is the question of the impact climate change could have on the construction and operation of a 42" pipeline or a 500 ft wide energy corridor built into steep mountain terrain. It is quite understandable that the DEIS would be hard pressed to address this issue on such short notice. Nevertheless, it must be done.

IND 910-2 | A thorough study of readily available data from The Pipeline and Hazardous Materials Safety Administration (PHMSA) would be a good starting point from which to effectuate computer analyses of the probability of pipeline explosions igniting entire forests on fire during prolonged drought caused by climate change or for determining the probability of intense flooding causing massive rock slides which could crack welding and rupture segments of pipeline causing major leakage. Studies of the statistics collected by PHMSA show that the risk of high profile pipeline accidents such as fires, explosions, spills, ruptures and ongoing leaks is real. A study of PHMSA data conducted in 2014*** reveals that in the preceding 16 month period in the United States, there were 372 oil and gas pipeline leaks, spills and other incidents, leading to 20 deaths, 117 injuries and more than \$256 million dollars in damages.

IND 910-3 | A striking example of how climate change could impact pipeline infrastructure occurred right here this summer. Large quantities of water molecules from melting icebergs expanded the surface areas of bodies of water all over the globe which evaporated into the air during the hot summer and travelled great

IND910-2 | As discussed in section 4.12 of the EIS, the Applicants would design, construct, operate, and maintain the proposed facilities in accordance with the DOT's Minimum Federal Safety Standards in 49 CFR 192. As cited in multiple locations in the EIS, PHMSA data were used to inform the assessment.

IND910-3 | The potential for flash flooding is discussed in the EIS.

INDIVIDUALS

IND910 – Roseanna Sacco

20161223-5082 FERC PDF (Unofficial) 12/23/2016

IND 910-3 cont'd | distances to unfortunately encounter perfect precipitation conditions in Southeastern West Virginia on June 23.

Totally unpredicted torrential rains and flash flooding crashed down steep but narrow roadways uprooting trees and houses, killed 27 people, damaged or destroyed more than 4,000 homes and businesses and left over 1,800 West Virginians without a home. 500,000 people were without power in the aftermath of the storm, 14 water treatment stations were damaged and road and bridge repairs were estimated to be in the neighborhood of \$46 million dollars.

This is a perfect example of how climate change could affect the MVP. Had steep segments of the 120' wide pipeline corridor (the size of a 6 lane interstate highway with a median and emergency lanes on either side) been under construction or finished, such a flood would have turned the right of way into a speeding river eroding the soil to such an extent as to bare the pipeline buried a mere 4 ft underground, causing massive rock slides which could rip sections of pipeline open releasing gas into the water supplies of local residents. The devastation caused by the flood on June 23 was hard to believe, the mess caused by the same conditions on a 42" pipeline corridor would be unfathomable.

THANK YOU for your attention!

Sincerely,

Roseanna Sacco
Sweet Springs, West Virginia
304 536 1207

* For more information about The National Academy of Scientists (NAS) please visit:
<http://www.nasonline.org/about-nas/mission/>

To read the complete document 'An Open Letter Regarding Climate Change From Concerned Members of the U.S. National Academy of Sciences' published on September 20, 2016 signed by 376 NAS members, please see Attachment A, below.

**NEPA Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews :
https://www.whitehouse.gov/sites/whitehouse.gov/files/documents/nepa_final_ghg_guidance.pdf

***PHMSA To read The Huffington Post article on the pipeline safety study, November 18, 2014, please see: http://www.huffingtonpost.com/noah-greenwald/pipeline-accidents_b_6174082.html

ATTACHMENT A

INDIVIDUALS

IND911 – Linda Parsons Sink

20161223-5083 FERC PDF (Unofficial) 12/22/2016 10:14:23 PM

**To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426
CP16-10-000**

From: Linda Parsons Sink, Registered Intervenor

Date: December 22, 2016

**RE: The Old Mill Conservation Site
Protection for drinking water (for homeowners and livestock) supplied by Salmon Spring
Protection for Old Mill Cave by Choosing the MVP Proposed Oct 2015 Route**

IND
911-1

This letter is a response to Draper Aden Associates discussion of Robert Jones letter dated November 23, 2016 and submitted as Attachment F to Mountain Valley Pipeline LLC submission Accession No. 201612225442, 201612225443.

On pages 5 and 6 of the Draper Aden Report, they describe the project as follows:

clearing ground cover from a narrow right-of-way, excavation of a trench approximately 10 feet deep for installation of the pipeline, followed by backfill and grading to restore the ground to pre-construction grades and revegetation. Overall construction activities will be conducted rapidly (on the scale of days to weeks) and the trench will be exposed for only a minimal amount of time (days) prior to backfill and reclamation. This therefore entails a short-lived temporary construction procedure that presents a commensurately minimal risk. Clearing, trenching and grading for the Project will be accomplished using standard and typical construction equipment (similar to grading a residential driveway, installing a water or sewer conveyance line, etc.). Vibrations associated with operating this equipment for pipeline installation will quickly dissipate in the subsurface and will be no more intense than that resulting from the construction of a residential foundation, barn, road, etc., and likely less than drilling a water well, and there is no reasonable expectation for an induced collapse scenario asserted by Robert Jones.

This above scenario sounds very harmless taken in an abstract environment, however they fail to address the harmful impact this will have on the known watershed area for the Old Mill Conservation and the plans to cross more than **two miles of the watershed if the Mount Tabor Variation Route** is chosen. Yes, possibly this construction process will have minimal impact on the watershed if only one “residential foundation, barn, road, etc.” was constructed, not a multiple of 270 plus “residential foundations” being built across the watershed area.

IND
911-2

The Draper Aden Report also describes the following activities that can cause contamination to ground water on page 7:

IND911-1

The Mount Tabor Variation is discussed in section 4.1 of the EIS. In addition, see the response to comment CO6-1 regarding the Mount Tabor Variation.

IND911-2

Groundwater within the MVP project area is typically significantly deeper than the proposed trench depth of 10 feet. See section 4.3.1.2 of the EIS for a discussion of potential impacts and mitigation for groundwater resources. See the response to comment LA7-1 regarding pesticides.

INDIVIDUALS

IND911 – Linda Parsons Sink

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The Old Mill Conservation Site – Protection of Drinking Water
Linda Parsons Sink, Registered Intervenor
December 22, 2016
Page 2

IND
911-2
cont'd

use of septic fields for residences and drilled residential water wells. Septic fields leach harmful bacteria, contaminated water, and solids into the upper aquifer on a daily basis. Drilling a residential water well can create direct conduits for contamination between the shallow epikarst and the deeper karst aquifer (proper installation of well casing can mitigate potential conduits, but there is typically no post-construction analysis to confirm). In addition, many small farms in the area contribute chemical fertilizers and animal waste to the ground surface that has potential to enter and impact groundwater.

So how can laying a pipeline 10 feet in the ground and then maintaining the right of way with chemical herbicides not contributed to the contamination of the water in Old Mill Conservation site's watershed?

IND
911-3

Choosing the Mount Tabor Variation route should not be considered because this route affects a larger and more sensitive section of Old Mill Conservation's watershed area. As shown in the attached picture, the Mount Tabor Variation route transverses twice the watershed area and, in addition, the watershed area affected is in the area where the water enters the watershed. Trenching through this delicate karst area where Salmon Spring's water originates in the Old Mill Conservation site can cause irreversible damage to the karst areas where the water begins its filtering process. Blasting through along this route could create obstructions and diversion of how the water travels which could significantly reduce the stream flow to the Old Mill Cave. Without a reliable water supply in the cave, all the cave loving organisms, including globally very rare cave limited invertebrates and a globally rare troglomorphic beetle would perish.

My family is passionately concerned with maintaining our safe water supply from Salmon Spring. We do not want to see The Old Mill Conversation Site negatively impacted by the construction of a pipeline across its watershed. We want to be proactive in protecting our drinking water source. Old Mill Conservation Site's water protection should also be a top priority for MVP and FERC.

Respectively submitted by:

Linda Parsons Sink
1831 Catawba Road
Blacksburg, VA 24060

IND911-3

The Mount Tabor Variation is discussed in section 4.1 of the EIS. In addition, see the response to comment CO6-1 regarding the Mount Tabor Variation.

INDIVIDUALS

IND912 – Grace Terry

20161223-5085 FERC PDF (Unofficial) 12/23/2016

IND912-1

December 22, 2016

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

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

Overview of Comments

My name is Grace Terry, and I am a landowner affected by the Mountain Valley Project. I have also registered as an intervenor. My comments that follow will discuss deficiencies of the DEIS for the Mountain Valley Project (MVP) that are specific to my property located in Roanoke County, Virginia.

Part 1 discusses the omission in the DEIS of the fact that my property is in a conservation easement held by the Virginia Outdoors Foundation (VOF). I will describe details about my easement and its conservation value.

Part 2 explains how information about the proposed road through my land was disclosed (or not) to the public and how the major "stakeholders" (landowner and VOF) were not made aware of important information. I will state that whether or not it was intentional by MVP to obscure information about the road, the DEIS has proven to be insufficient in providing the information necessary for the public to study the issues in order to make meaningful comments on the project.

Part 3 presents the argument that the DEIS has not adequately evaluated the multiple negative environmental impacts of all access roads for this project. I will use the road through my easement as an example of how MVP has handled the process of reporting information on roads to support the conclusion that MVP and the DEIS are most likely underrepresenting the overall negative impact of access roads.

Part 4 identifies problems with MVP's and FERC's handling of the DEIS process in general.

Part 5 provides comment on other problems with the MVP project from my perspective as an affected landowner.

PART 1:

In its discussion of impacts on "Special Interest Areas" (Section 4.8.2.4) the DEIS omits mention of a proposed access road through my property which is protected by a conservation easement.

I have previously submitted comments to FERC and made many other efforts to inform government officials at the federal, state and local levels about the effects of the project on my property. Not only does the DEIS fail to adequately address the concerns that were raised in my previous comments, it **does NOT acknowledge the proposed road through my easement at all** in the subsection discussing impacts of the project on VOF-conserved lands.

On p. 4-253 of the DEIS, the 4th paragraph begins with the bolded heading, "**Virginia Outdoors Foundation**", and then makes this statement: "The proposed route of the MVP pipeline would cross three easements held by the VOF." It goes on to discuss the 3 referenced properties and describes them

IND912-1

Alternatives to the use of the access road within the VOF easement on the Terry parcel is discussed in section 3 of the EIS.

INDIVIDUALS

IND912 – Grace Terry

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cont'd

as being in Montgomery County, but it never discusses the proposed road through my easement in Roanoke County.

Also, MVP's map in the DEIS October 2016 supplemental filings of the proposed road through my property does NOT identify my property by either color shading or labeling as being in a conservation easement, however it does show on the same map through color shading and labeling that neighboring adjacent property is conserved land through The Nature Conservancy (TNC).

Despite the fact that VOF informed MVP of all their easement locations across the state early in the project process by providing shape files, the company submitted plans to build a road that would cross my easement property. In their original application filed October 2015, MVP proposed what they then referred to as a "temporary access road" to be built through a parcel of land that I own in Roanoke County. The parcel can be identified by its tax map parcel ID 102.00-01-01.02-0000 on Roanoke County's web site. The property address for this parcel is listed for the County's purposes as Poor Mt Rd., however, the parcel is actually on Honeysuckle Rd which originates from Poor Mt. Rd at a lower elevation. Honeysuckle Rd is a state-maintained aggregate road that climbs to the top of Poor Mountain and is used to access the summit. This parcel and two adjacent parcels that I also own comprise a total of 590 acres that are protected by an open-space conservation easement held by the Virginia Outdoors Foundation (VOF).

The purpose of placing a conservation easement on my property was to protect large tracts of undeveloped, intact forest and the riparian habitat of Big Laurel Creek. The Big Laurel is a native trout stream that originates on my sister's adjacent property and drains into Bottom Creek. Bottom Creek has been designated a Tier III stream by the Virginia Department of Environmental Quality (VaDEQ), and it is a major tributary of the Roanoke River which provides drinking water for a significant segment of the Roanoke area population. Both Roanoke County and the City of Salem withdraw drinking water from the Roanoke River.

In the 2007 application to VOF for my easement, the conservation purposes were listed as "Natural Habitat and Biological Diversity" and "Riparian Buffer Zone". Also in the application, the "Statement of Public Benefit / Conservation Value" noted that my property is nearly adjacent to the Nature Conservancy's Bottom Creek Gorge Preserve in Montgomery County.
<http://www.nature.org/ourinitiatives/regions/northamerica/unitedstates/virginia/placesweprotect/bottom-creek-gorge.xml>

Obviously, the staff and Board of VOF must have agreed with the stated conservation purposes in order to accept the easement. Also, VOF must have been in agreement with the language of the easement that restricted certain future uses of the land. The easement deed includes restrictions on tree-clearing and road-building that would be violated by MVP's proposed road.

IND
912-2

PART 2:
I'll begin with a time line and description of details about the public disclosure and communication about the road to stakeholders that will further demonstrate problems with the current DEIS.

In November 2015, I received a phone message from Martha Little, Director of Stewardship at VOF. The message said that the agency had received information from MVP concerning my easement. MVP had told VOF that they might come to an upcoming meeting of the VOF Board's Energy and Infrastructure

IND912-2

Information about the access road on the Terry parcel is part of the public record; filed by Mountain Valley. See alignment sheets and data response filed on February 17, 2017. We discuss VOF easements in section 4.8 of the EIS.

INDIVIDUALS

IND912 – Grace Terry

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Committee in Warrenton, Va., and make a presentation about VOF easements they planned to cross with their project. At the meeting, MVP employees, Joseph Dawley and Lindsey Hesch, made a slide presentation and showed a map of my property. Ms. Hesch described a proposed road through my land as TEMPORARY and said that it followed an “existing logging road”. Since no logging had occurred in my lifetime (50+ years), I didn’t know how she arrived at that conclusion, so I asked if the property had been surveyed by MVP. Neither Ms. Hesch nor Mr. Dawley responded to my question. (I have never received any letters from MVP about this parcel asking for survey access, so if the property had been entered by MVP employees, then they had done so in violation of Virginia state law 56-49.01.) I also pointed out that the slide misidentified the name of the public road where the so-called “logging road” begins as Cove Hollow Trail instead of Honeysuckle Rd. The same error went uncorrected in MVP’s April 22, 2016 filing showing Roanoke County access roads and has been repeated in the Oct. 14th, 2016 submission made during the DEIS public comment period.¹ (Most recently, the error showed up again in a new application to VOF that I will discuss below).

In February of 2016, I contacted VOF to ask if there had been any communications from MVP since the November 2015 meeting. They responded by emailing a copy of an application that VOF requires for road access through conserved lands. MVP had filed the application with VOF on Jan. 21st, 2016, still stating that the road would be TEMPORARY and that it would be restored to its original condition although it didn’t say how that would be accomplished.

In March 2016, I traveled to the VOF meeting in Charlottesville, Va., to make public comments in opposition to MVP’s proposal to build a road that I believe would be prohibited by the conservation easement deed. This time the meeting included the full board of the VOF. Again, Ms. Hesch was in attendance, however, she did not make a presentation, and the Board members did not ask her any questions. During the public comment period, I stated that it bothered me that so little information was required of MVP by the VOF application. A couple of VOF staff members responded that a lot more would be required of MVP than what they had submitted so far. According to VOF, they had let MVP know that the application was incomplete. I can’t speak for VOF to say what was missing, but from my reading of the application it appeared that a site-specific drawing showing how the existing dirt road would be altered was required. Further, MVP hadn’t provided detail on how the road would be restored. The application only stated, “...however special care would be taken to the environment in constructing the Mountain Valley Pipeline in the easement” which was an awkward sentence since it sounds like the pipeline would cross the easement property. The DEIS didn’t include a copy of MVP’s application to VOF, so a citizen who was trying to gauge the impacts of the project on conserved lands would not be able to evaluate the quality of the information MVP provided in the application which is a deficiency of the DEIS.

In March, I met VOF staff on my property for a site visit and followed up later to ask for a copy of their report. In the intervening months, I have contacted VOF staff a couple of times to ask about whether the road would be on the agenda at upcoming VOF public meetings. Each time, they said that since the status of the application remained incomplete on MVP’s end, they were withholding any further discussion or action by their staff or board.

After the DEIS was released in Sept. 2016, I couldn’t find any mention of the road during an initial look at the hard copy. I figured I would have to set aside time to study it more thoroughly, but I didn’t have any

¹ FERC docket CP16-10 #20160422-5012(31404042).pdf

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idea at the time that it was an incomplete document. That fact was revealed on Oct 14th, when MVP submitted a large amount of supplemental filings in the usual difficult-to-navigate format. I tried to look up the proposed road through my property. There were multiple large pdf files with two of them labeled "Roanoke County" in the title, however those two files didn't show access roads. I decided that this time, I was NOT going to spend my time searching through files myself looking for the needle in the haystack. Since the DEIS was supposed to be a document submitted to the public for comment, it needed to be in a form that was accessible. I then made a couple of calls to MVP representatives. I talked to Matthew Eggerding, the lawyer for EQT who submitted the filing. Mr. Eggerding said that I needed to open and search each separate file and that MVP doesn't provide an index to tell the public what is in each file. I suggested that FERC should require them to do so because it would help the public, and it would be easy for them to do. I also mentioned that I had read comments to FERC including one by Roanoke County's local government requesting that the large filings have a searchable index. Mr. Eggerding said he would "take that under advisement", however he would not agree to make that statement back to me in an email for the record.

Next, I called MVP's phone information line and asked which files contained information about my family members' properties. At first I was told that I should search each file using CTRL-F keys and the term "Roanoke". I decided to send an email explaining that this time I was NOT going to download and search all those files myself. I said that MVP had that information easily available to them and the ability to provide a searchable index for the public with their filings, but if they were going to choose not to do so, then I was going to report that to FERC. Eventually, MVP INFO sent an email attachment with the map showing the proposed road and an alignment sheet, but it took a week from my first contact before I got the information.

In looking at the "new" version of the alignment sheet, I became alarmed to see that the road was now labeled a **PERMANENT** access road. I contacted VOF staff who said they had not been made aware of any change in the road's status and for their purposes they considered MVP's application still incomplete.

After attempting to seek information from MVP and VOF during October, November and December, I was finally able to verify through VOF exactly **one week before the public comment Dec 22nd deadline** on the DEIS that MVP was filing a new application with VOF to build a **PERMANENT** road that would cross my property. I am not sure of the exact date that VOF received this changed application since the cover page was not in the copy I was emailed. VOF stated to me in an email I received on Dec. 15th that they had "coincidentally" received the new application earlier in the week on the same day that I called to ask if they had heard back from MVP on the status of the road.

To summarize Part 2:

- the DEIS omits mention of the proposed access road as being on conserved land;
- MVP did not inform VOF of the change in the status of the road from temporary to permanent even though they submitted it in their DEIS Oct 14th filing.
- MVP waited until a week before the DEIS Dec. 22nd public comment deadline to confirm to VOF about the change that I had uncovered. Further, MVP did not submit a new application with the change to the proposed road until right before the comment deadline.
- I have had to initiate all of the communication with both MVP and VOF to find out this important information about my property. It has required much persistence on my part.

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IND912 – Grace Terry

IND912-3

PART 3
The DEIS is insufficient in its evaluation of the effects of access roads. The DEIS underestimates the enormous overall impacts of the project's temporary and permanent access roads because it doesn't evaluate each one separately on its unique environmental impacts.
 The DEIS methodology for measuring impacts of access roads is flawed because the DEIS simply creates categories of measurement, then lumps all of the roads together to come up with a number that is a total for some essentially meaningless category that is contrived to look like it is important, but it's not, because it is not subjected to any kind of evaluative judgement or comparison.
 For example, the DEIS reports the number of roads by county, the total length of roads in feet, total acreage of roads, etc. By using these methods, the DEIS appears to provide information and thus appears to fulfill the requirements of reporting environmental impacts. However, the truth is that not all access roads are created equal, and, in fact, they are all different. Nowhere in the DEIS is MVP required to give a detailed explanation of why each access road is necessary. The example of the road proposed through my conservation easement is a case in point for why a separate evaluation for each road should be required by FERC and demanded by the public. What difference does it make what the number of feet of roads are by county when they're all destructive for different reasons and the necessity of each of them separately is undocumented?

IND912-3 Appendix E provides site-specific justification for each access road.

IND912-4

Multiple Reasons to Oppose the Proposed Road Through My Property:

- No individual justification of the road's necessity is included in the DEIS.
 I talked to Ms. Hesch for at least 45 minutes after the March 2016 meeting in Charlottesville, and she said she would contact me after she talked to the "engineering team" and got an answer from them for why the road through my easement was necessary since they had mapped another road also connecting to the pipeline from Honeysuckle Rd. I had asked her why two roads so close in proximity were necessary. Despite the fact that my phone number was on MVP's application to VOF, she never contacted me with an answer. In the first application that MVP filed with VOF, they had failed to give a reason why this particular construction road was necessary.

IND912-4 MVP filed an updated appendix E to the draft EIS (Access Roads for the Mountain Valley Project) on October 20, 2016. See Mountain Valley's data response filed February 17, 2017.

IND912-5

- The road would be constructed through steep terrain and through an area with high soil erodibility. (Roanoke County has submitted maps to FERC with slope percentage and soil erodibility ratings created by their GIS mapping staff).

IND912-5 The EIS addresses building on steep slopes in section 4.1. See the response to comment IND70-1 regarding erosion. See Mountain Valley's data response filed February 17, 2017.

IND912-6

- The road would invite more trespassing on my property as well as open up the adjacent property owned by the Jim Maxwell family to trespassers. The Maxwell property is roadless and steep with the steepest terrain along the Roanoke County pipeline path. Currently, it is inaccessible by vehicle from Honeysuckle Rd. There is no vehicle right-of-way granted on the dirt road in my deed to the property.

 Trespassing is already a major concern on the top of Poor Mt. because the state road makes the summit easy to access, then it is easy to enter private property undetected. People trespass for a variety of reasons—some of which are very destructive. People will hunt and shoot without permission. Frequently, they will leave trash, destroy gates and fencing, vandalize property and create deep ruts with their vehicles. It is not uncommon for people riding all-terrain vehicles to

IND912-6 The landowner is encouraged to negotiate controls to prevent trespassing such as gates and signs.

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IND912-6
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cross our family's property on Poor Mt. by following fire trails or using the cleared land under transmission lines to end up in my brothers' yards or orchard down below on Bent Mt. In a previous site visit to check my easement property, VOF staff reported damage around the dirt road entry from all-terrain vehicles. That damage would have been created by trespassers. Last winter, vandals destroyed the metal gate on Honeysuckle Rd. that blocked the dirt road to vehicle entry and left a crumpled mess.

Grading, clearing trees and widening what is currently a 6 to 8 foot wide road to the 40 foot width stated in MVP's application, would create an undue burden on me to fence the enlarged opening and continually replace the vandalized gates. It would also entice trespassers to visit my other two parcels of land that are in the conservation easement thereby increasing the liability I might face as a landowner.

Radically changing what is now an old, narrow, rutted, dirt road would create easier access and effectively deliver an open invitation for people who have no conscience about trespassing on private property. The access created for ATV and off-road vehicles is of particular concern given the steepness and highly erodible soil conditions.

IND912-7

4. This road and the pipeline it joins will cause fragmentation of a large, intact high-quality forest core area. Forest fragmentation would cause increased risk to wildlife and the health of the forest ecosystem.

IND912-7

Forest fragmentation is discussed in sections 4.4 and 4.5 of the EIS.

IND912-8

5. The large construction vehicles that will travel on this road will create soil compaction leading to erosion and sediment run off. There is also potential for fuel spills from the vehicles. MVP will not suffer the consequences. Instead, that impact will be widely distributed throughout Roanoke County. First, it will affect me as the landowner because it will devalue my property. Second, the degradation of the environment will also affect adjacent and downstream landowners as the runoff and sediment load will affect wells and waterbodies. Third, the abundant wildlife that live on Bent Mt. and Poor Mt. will be affected as they suffer reduced quality of water sources and the disruption of their habitats through tree-clearing and noise.

IND912-8

See the responses to comment CO14-2 regarding soil compaction and IND70-1 regarding soil erosion and runoff. Property values are discussed in section 4.9 of the EIS. Impacts on waterbodies are discussed in section 4.3; noise in section 4.11.

To summarize Part 3:

It is NOT sufficient for the DEIS to report the total length, width and acreage of access roads and consider that an adequate environmental analysis. Each road should be evaluated separately for the environmental impacts, then those should be tabulated. For example, a measure of erosion and the projected volume of sediment run-off during various weather scenarios is a more useful qualitative measure of environmental impact.

IND912-9

PART 4

Unfairness of the FERC public comment process on a flawed and insufficient DEIS:

My experience that I have described in trying to monitor what MVP proposes to do to my land, demonstrates the insufficiency of the DEIS. It is unfair and potentially a violation of my property rights to expect that I would have knowledge of the important status change from TEMPORARY to PERMANENT that MVP made concerning the road. As a "stakeholder", I should have the right to comment on information that is final and complete, however the impacts of the project on my land were misrepresented by MVP until one week before the end of the comment period.

IND912-9

The final EIS addresses alternatives to use of the access road on the Terry parcel in section 3, in response to your comments on the draft EIS. Therefore, the 90-day period was sufficient for staff to consider comments.

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IND912 – Grace Terry

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IND912-9
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It is important to remember that Virginia citizens are also affected, since VOF is a state agency acting in the citizens' interest to make decisions about conserved lands. The applicant, MVP, should have been required to complete all of their informational filings before FERC undertook to publish a DEIS. How could MVP have been finished with their studies if they still had surveyors on the ground in Roanoke County through the month of November?

- The 90 day comment period should be reset every time that MVP adds or changes information which is supposed to be evaluated by the DEIS and then MVP should be required to send the new information to all "stakeholders". The date of FERC's release of the DEIS was September 23, 2016, but nothing was published concerning the road through my property until MVP released an enormous amount of additional information in Oct. 14th "supplemental filings". Despite my attempts to contact MVP and VOF, I was not able to confirm the status of the road proposed through my property until one week before the Dec. 22nd DEIS comment deadline. A landowner should be guaranteed the full comment period time in which to study the issues. Instead, the publication of the DEIS was premature and it is a document that is not useful for analysis of access roads.
- It should also be taken into consideration that the 90 days that FERC sets as comment period is time that is fully available for MVP employees and FERC staff to work on as their full-time paid job. On the other hand, landowners and the public are trying to study the issues, seek advice and prepare comments at the same time that they already have full-time obligations such as, in my case, working a full-time job and caring for an aging parent. It is a travesty that in order to protect their property rights, landowners are expected to research information that is released in a half-baked form, has multiple errors, and is missing information.
- MVP continues to dump large amounts of information in a haphazard manner. The information is not well-organized and no index is provided. Without an index, landowners and the public can't quickly search the information to find what's relevant to them, yet they are expected to comment within the original 90 day comment period on material that is incomplete.
- During the time period before the DEIS, MVP has followed a pattern of initially submitting information including maps and tables to FERC that is very incomplete. Later, MVP makes a submission in which it references maps and tables that aren't in that particular submission and it's not clear where to find them. It has been very difficult for the public to know if what they are looking at with each filing supersedes what was previously filed because the information is not clearly labeled or referenced or indexed.
- Despite the above-described pattern, my expectation as a landowner was that since the DEIS was being issued, then the project plans must have achieved a certain level of completeness. However, that has not been the case as MVP has continued to submit filings since September 15, 2016, with large amounts of information, and it has become apparent in studying the DEIS document that it was published based on a project plan that is very incomplete.
- The public has the right to expect the company to have reached a reasonable level of completeness in the information they submit, and FERC has the responsibility to make sure that level is achieved before a DEIS is issued for public comment. Therefore this DEIS is inadequate as

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it is not based on a reasonable level of completeness. The experience I have described in my comments will show how that has been true with the project's plans for my property, so I can only imagine how many times other important information has been omitted, obscured, submitted very late, or inadequately reported for this project.

- There is no mechanism by which a landowner or other "stakeholders" (in this case a state agency with oversight of privately conserved lands) has additional time to comment if MVP publishes false or misleading information then changes it in a last-minute fashion.

To summarize Part 4:

Reviewing the DEIS requires a tremendous amount of time, energy, and level of technical sophistication and many individuals, groups and officials have devoted themselves to studying it. FERC needs to respond to the repeated requests by the public to provide a revised version of the DEIS with information that is not so incomplete and full of omissions and errors as the current version.

IND912-10

PART 5

In addition to the problems already discussed with the DEIS, FERC has not looked out for the public's interest during the MVP project in multiple other ways:

1. The FERC agency does not have a landowner advocate involved in the process, so there is no oversight by FERC regarding the survey process. The DEIS ignores the occurrence of multiple negative interactions experienced by landowners and community members with MVP survey crews in Roanoke County.
2. I have experienced first-hand enough of the MVP's company culture through their behavior on the ground as they have harassed my family members and neighbors in the Bent Mountain community for the last two years to be suspicious that the "omissions" or "mistakes" in the information they file with FERC are NOT unintentional and are instead planned far in advance. I believe that MVP deliberately set out to, at first, characterize the road crossing through my property as a "TEMPORARY" access road because they wanted to gauge the level of resistance from VOF before they revealed that their intention all along was to build a PERMANENT road.

IND912-11

3. The DEIS process imposes an undue burden by making it completely the responsibility of the landowner and the public to verify MVP's information and thus point out the errors and inadequacies.

IND912-12

4. FERC itself does not appear to be conducting any of its own studies for the DEIS. They came to Roanoke in November for a "Public Comment Session" and spent money on renting meeting space at a hotel and bringing staff to allow only 3 minutes of "comment" per person. However, while in town, FERC staff made no effort to visit any part of the MVP route to see for themselves what the public was commenting about. They had already paid to travel here, so they could have easily spent a couple of extra hours for a tour that would have cost them nothing. I even invited the wetlands scientist to see my family's property in person the next morning and said I would meet them as early as they liked to show them the presence of wetlands that MVP has underreported.

IND912-13

5. FERC needs to start over and publish an updated DEIS based on information that is error-free and provides more detailed and complete analysis of the environmental impacts of the project. If they

IND912-10

The FERC has a landowner hot-line, with the number provided on our internet web page.

IND912-11

The draft EIS comment process used by the FERC must work correctly, because your comments are addressed in the final EIS.

IND912-12

See section 1.4 of the EIS regarding the FERC's public participation program as part of the environmental review process for the projects. FERC staff did conduct field visits along the MVP pipeline route. However, we do not have the ability to examine every parcel.

IND912-13

The final EIS represents a revision of the draft, to address comments and update the document with supplemental information.

INDIVIDUALS

IND912 – Grace Terry

20161223-5085 FERC PDF (Unofficial) 12/23/2016

IND912-13 | don't, then FERC has incentivized MVP to continue to make filings that are late, incomplete, full of
cont'd | errors and don't provide adequate information for full analysis by the public.

IND912-14 | **Conclusion to My Comments:**
Placing my land in a conservation easement was important to me, and it was a decision I made after
careful consideration. The process involved personal expense including legal fees, appraisal costs and an
expensive mountain land survey. In addition, my siblings agreed to release my part of our jointly-owned
inherited property so I could realize my dream of conserving the property in an easement.

I love my family more than anything else in the world. Seven generations of our family have lived on and
cared for this land, but this company's project threatens the lives of my family members who live there
now. For that reason, the final statement I would like to make to FERC is that I will never agree to let
MVP put any part of their project on my property.

Respectfully submitted,
Grace Terry

IND912-14 | Impacts on conservation easements are discussed in section 4.8
of the EIS.

INDIVIDUALS

IND913 – Russell and Katherine Barksdale

20161223-5092 FERC PDF (Unofficial) 12/23/2016

December 22, 2016

IND 913-1 | We live on Labellevue Dr. in Boones Mill, VA (Franklin County). Our road is shown to be an access road that MVP Pipeline uses to access and build the 42" pipeline that may be buried underground.

We do not believe this pipeline is viable in our part of the country for many reasons. The first is the Jefferson National Forest's, Forest Management Plan. The Terrain, the MVP or any other pipeline could not be built in compliance with the current Forrest Management Plan. There is no need or reason that a 500' wide Utility Corridor should ever run through the National Forest. There is no reason that our valued land should be messed up for decades and beyond with the soil restrictions. There is no reason ever that any old growth forest should ever be removed as they are there for our environment to breath, to have undisturbed land and forest for our earth and our local environment to grow and not self destruct with erosion, vegetation, animals, our ecosystem (micro/mini and large to bears and boars), to cause self inflicted death on our resources (natural) as Teddy Roosevelt created them for the earth and American's healthy environmental experience. The National Forest will be impacted in multiple locations from; Angel's Rest, Rice Fields and Peters Mountain Wilderness, Sinking Creek Mountain across from Kelly Knob, Bush Mountain, View from Dragon's Tooth, View from McAfee Know, etc..

IND 913-2 | There are many studies that currently show that there are more existing pipelines than our infrastructure currently need or will in the future. The environmental impact statement from MVP or ACP does not show the impact in any environment that the pipelines may travel through. There are so many current pipelines that need to be dug up and replaced or fixed, the cost makes more sense to do that instead of adding more contractors from out of state to make something that our communities do not have enough fire and rescue (full time staff), paid and trained in a possible explosion, leak, fire, etc.... There will be catastrophic damage to all of the community and not just a part of the pipeline. The current structure of the mass population, ecology, and preservation efforts show that clean energy is the best way to move forward for any company to make money and help the environment simultaneously. The Institute for Energy Economics and Financial Analysis organization shows in their studies the following: The value of natural gas has been reduced based on the safety on redistribution, the price of oil has decreased, the oil will be exported; the local redistribution locations are just for show and shareholder money (Roanoke Gas), the gas can easy be distributed by rail without the mass cost to the shareholders and the communities and our environment as a whole. This will not bring any business to these areas of Virginia.

IND 913-3 | Climate change is true proven by science. The ice caps should not be melting. The weather should not be 80+ degrees in Southwest Virginia in November, and then 29 degrees the following day. There are issues with our wildlife, such as the soon extinction of polar bears, snow foxes and all animals that live in areas of the artic. These are huge issues with our entire environment. Due to the lack of consistent

IND913-1 | See the response to comments FA8-1 and FA10-1 regarding the Jefferson National Forest LRMP.

IND913-2 | Existing infrastructure as an alternative is assessed in section 3.3 of the EIS. The Commission would decide on the need for the projects. Safety is addressed in section 4.12. See the response to comment IND40-1 regarding renewable energy. The use of railcars to transport natural gas as an alternative is explored in section 3 of the EIS. The MVP would transport natural gas, not oil. Section 4.9 of the EIS provides a discussion of the potential economic benefits associated with the proposed projects.

IND913-3 | Climate change is discussed in 4.11 and 4.13 of the EIS.

INDIVIDUALS

IND913 – Russell and Katherine Barksdale

20161223-5092 FERC PDF (Unofficial) 12/23/2016

IND 913-3 cont'd | winter in the eastern south west of the US. Bears will not be able to hibernate properly, rear their young and thrive to be the consistent part of our ecosystem. There are predators and prey on all levels of the food chain that all do a job for the environment that us humans live in. These need to be consistent for all proper population growth and population ecology.

IND 913-4 | If MVP goes by the FERC's best practices to the letter, it will still not be enough to prevent erosion and landslides in our very mountainous and wet landscape this sensitive and complex karst hydrology, highly integrity forest, and high-quality streams and wetlands. The scale of the projects and the risks are unprecedented. Yet the companies propose to wait until after completion of environmental review, until after permitting, and until after initiation of construction to identify engineering solutions for a range of significant geohazard and water problems confronting the pipelines. This amounts to gaming the regulatory system, it will not provide the regulatory agencies with the information needed for permitting decisions, and it is non-compliant with the National Environmental Policy Act. Even so, FERC, the Army Corps of Engineers, and the Virginia DEQ seem willing to play along.

In contrast, the U.S. Forest Service is asking for site-specific mitigation details for selected high-hazard locations on or near National Forest lands along the proposed pipeline corridors.

IND 913-5 | These issues make a large difference with the environment that we live in. We have wells and septic tanks. With blowing rock or drilling to bury this pipeline it will ultimately upset our water table (safe water), disrupt our well (water table), and most likely disrupt all of our septic systems and allow them to contaminate the ground water too. There aren't other options on where we get our water or use for a septic system. These are reasons we decided to move to a very rural and beautiful location to live and relax. We have very sensitive water tables that are disrupted when the new subdivision down the road drills for their wells. Our sediment increases by 200 fold. These are current issues, but nothing like blasting away bedrock that will have all waste and other ecological damage flow down hill to our neighbors and us for runoff, slope-failure on our ridge, stream crossings that we have a stream or a few in our immediate neighborhood. These issues are some of

IND 913-6 | many regarding our road to be used as an access road. The road getting to our house is extremely windy, all local homeowners, farmers, and horse farms. This route does not have any industrial businesses on it and is busy with just local traffic. If any type of tractor-trailer attempted to go through our roads (Grassy Hill, Green Level and Labellevue), there will be serious issues with trucks stuck and unable to remove themselves from the location. This again causes erosion, unsafe roads for our neighbors to ride their horses, children and grandchildren to play in their

IND 913-8 | neighborhood safely. We ride our horses on the ridge that MVP wants to blast through and add this 42" monstrosity that will deplete outdoor recreation, tourism, money for the communities and state. All of us and our neighbors
IND 913-9 | purchased our homes to continue to gain value, live on a private road that only has 8

IND913-4 | See the response to comment IND70-1 regarding erosion. Landslides and karst are addressed in section 4.1 of the EIS. See also the response to comment IND152-1 regarding the FERC's third-party monitoring program. The EIS does not recommend Mountain Valley provide information "after initiation of construction." Some recommendations are "prior to the start of construction."

IND913-5 | See the response to comment FA15-7 regarding blasting and wells. Section 4.3 of the EIS has been revised to address septic systems.

IND913-6 | See the response to comment FA15-7 regarding blasting. Section 4.1.1.5 of the EIS discusses impacts and mitigation measures for blasting.

IND913-7 | See the response to comment IND288-3 regarding road damage. See the response to comment IND70-1 regarding soil erosion.

IND913-8 | Land use impacts are discussed in section 4.8 of the EIS. Tourism is discussed in section 4.9.

IND913-9 | See the response to comment IND12-1 regarding property values. Land use impacts are discussed in section 4.8 of the draft EIS.

INDIVIDUALS

IND913 – Russell and Katherine Barksdale

20161223-5092 FERC PDF (Unofficial) 12/23/2016

IND
913-9
cont'd

homes and plan on retiring here. Our property taxes go to assisting a county that allows us to live where we want and enjoy the freedom that doesn't have any pipelines of mass size, any industrial sites near our home, allows us to go to our local farm (Four Corners Farm ((That will be affected by this MVP)), not allowing my proper poultry, eggs, pork, beef, etc to be raised without any outside interference like a pipeline running through their property and the creek).

IND
913-10

There is historic preservation that is also a problem with this pipeline. MVP want to send it through Franklin County that has Native American Artifacts scattered throughout the county. Going through Newport, between Mt. Olivet Church and the Newport Rec Center, there are so many statutes to mention as to why there should not be any pipelines or anything that disrupts the area throughout Virginia, it is had to document. Please note the following link that shows all of the issues through some of the above-mentioned properties. <http://www.achp.gov/nhpa.pdf>

There will be not mitigatable and irreparable harm associated with the MVP and ACP that are trying to make money and destroy our environment in one fellow swoop. There are so many groups that state how these are issues that will not be recovered from in swift manner.

Katie & Russ Barksdale

IND913-10

Cultural resources surveys, including Native American artifacts and historical structures, were conducted for the MVP and are discussed in section 4.10 of the EIS. The pipeline would be 430 feet away from the Mount Olivet Methodist Church in Newport and 945 feet away from the Newport Recreation Center; so those historic properties should not be adversely affected.

INDIVIDUALS

IND913 – Russell and Katherine Barksdale

20161223-5092 FERC PDF (Unofficial) 12/23/2016

IND
913-11

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

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

Ms. Bose,

As a lover of the Appalachian National Scenic Trail (A.T.) I am concerned about the proposed Mountain Valley Pipeline. This proposal would do serious and unavoidable damage to the Appalachian Trail. The A.T. is a source of peaceful rejuvenation for millions of Americans each year — to permit the Mountain Valley Pipeline to sully this national landmark would be a tragedy and an embarrassment to our country. The main reasons why the Federal Energy Regulatory Commission (FERC) should not allow the Mountain Valley pipeline to be permitted include:

- The location of the proposed crossing is a scenic and unbroken forested landscape with an immediately adjacent federally designated Wilderness area. The proposed project would significantly degrade the views visible from up to 100 miles of the Appalachian Trail, including some of Virginia's most iconic vistas — Angels Rest, Rice Fields and potentially McAfee Knob.

- The pipeline will travel through a designated seismic zone and over terrain that is considered extremely unstable. As the pipeline will run over multiple fragile natural resources — including multiple fresh water sources and protected forest areas — and near several communities, this presents a completely unnecessary and avoidable safety risk to people and the environment.

- In order to accommodate the visual and environmental damage that would be caused by the Mountain Valley Pipeline, the U.S. Forest Service agreed to lower the Jefferson National Forest Management Plan standards for water quality, visual impacts, the removal of old-growth forest, and the number of simultaneous projects passing through the borders of federally protected land. This unprecedented change is extremely reckless, as it would open the gates for future infrastructure projects to cause similar destruction.

- This project could have significant economic impacts on nearby communities, decreasing property values and depriving businesses of tourism dollars generated by Appalachian Trail hikers and visitors who seek sections of the Trail unmarred by the impacts of energy infrastructure and other signs of construction.

I urge FERC to protect the Appalachian Trail and its surrounding landscape and communities. Please evaluate the comprehensive need for pipeline development to transport natural gas from the same Marcellus shale plays in a single Programmatic Environmental Impact Statement so that this infrastructure can be appropriately sited and the cumulative impacts to our National Parks, National Forests, and private lands can be understood before moving forward. It is FERC's responsibility to do the right thing — the alternative will be a turning point for the worse in an area that offers recreation and inspiration for millions of people.

IND913-12

We live on Labellevue Dr. in Boones Mill, VA (507) (Franklin County). Our road is shown to be an access road that MVP Pipeline uses to access and build the 42" pipeline that may be buried underground.

IND913-11

See the response to comment IND246-1 regarding the ANST.

IND913-12

See the response to comments FA8-1 and FA10-1 regarding the Jefferson National Forest LRMP. See the response to comment FA10-1 regarding Amendment 4.

INDIVIDUALS

IND913 – Russell and Katherine Barksdale

20161223-5092 FERC PDF (Unofficial) 12/23/2016

IND 913-12 cont'd | We do not believe this pipeline is viable in our part of the country for many reasons. The first is the Jefferson National Forest's, Forest Management Plan. The Terrain, the MVP or any other pipeline could not be built in compliance with the current Forrest Management Plan. There is no need or reason that a 500' wide Utility Corridor should ever run through the National Forest. There is no reason that our valued land should be messed up for decades and beyond with the soil restrictions. There is no reason ever that any old growth forest should ever be removed as they are there for our environment to breath, to have undisturbed land and forest for our earth and our local environment to grow and not self destruct with erosion, vegetation, animals, our ecosystem (micro/mini and large to bears and boars), to cause self inflicted death on our resources (natural) as Teddy Roosevelt created them for the earth and American's healthy environmental experience. The National Forest will be impacted in multiple locations from; Angel's Rest, Rice Fields and Peters Mountain Wilderness, Sinking Creek Mountain across from Kelly Knob, Bush Mountain, View from Dragon's Tooth, View from McAfee Know, etc..

IND 913-13 | There are many studies that currently show that there are more existing pipelines than our infrastructure currently need or will in the future. The environmental impact statement from MVP or ACP does not show the impact in any environment that the pipelines may travel through. There are so many current pipelines that need to be dug up and replaced or fixed, the cost makes more sense to do that instead of adding more contractors from out of state to make something that our communities do not have enough fire and rescue (full time staff), paid and trained in a possible explosion, leak, fire, etc.... There will be catastrophic damage to all of the community and not just a part of the pipeline. The current structure of the mass population, ecology, and preservation efforts show that clean energy is the best way to move forward for any company to make money and help the environment simultaneously. The Institute for Energy Economics and Financial Analysis organization shows in their studies the following: The value of natural gas has been reduced based on the safety on redistribution, the price of oil has decreased, the oil will be exported; the local redistribution locations are just for show and shareholder money (Roanoke Gas), the gas can easy be distributed by rail without the mass cost to the shareholders and the communities and our environment as a whole. This will not bring any business to these areas of Virginia.

IND 913-14 | Climate change is true proven by science. The ice caps should not be melting. The weather should not be 80+ degrees in Southwest Virginia in November, and then 29 degrees the following day. There are issues with our wildlife, such as the soon extinction of polar bears, snow foxes and all animals that live in areas of the artic. These are huge issues with our entire environment. Due to the lack of consistent winter in the eastern south west of the US, Bears will not be able to hibernate properly, rear their young and thrive to be the consistent part of our ecosystem. There are predators and prey on all levels of the food chain that all do a job for the environment that us humans live in. These need to be consistent for all proper population growth and population ecology.

IND 913-15 | If MVP goes by the FERC's best practices to the letter, it will still not be enough to prevent erosion and landslides in our very mountainous and wet landscape this sensitive and complex karst hydrology, highly integrity forest, and high-quality streams and wetlands. The scale of the projects and the risks are unprecedented. Yet the companies propose to wait until after completion of environmental review, until after permitting, and until after initiation of construction to identify engineering solutions for a range of significant geohazard and water problems confronting the pipelines. This amounts to gaming the regulatory system, it will not

IND913-13 Existing infrastructure as an alternative is assessed in section 3.3 of the EIS. An explanation for each elimination of an alternative, including the use existing infrastructure, is clearly stated in the EIS. See the response to comment IND40-1 regarding renewable energy. See the response to comment IND2-3 regarding export. Section 4.9 of the EIS provides a discussion of the potential economic benefits associated with the proposed projects.

IND913-14 Climate change is discussed in sections 4.11 and 4.13 of the EIS.

IND913-15 The statement regarding the efficacy of FERC BMPs is noted. See the response to comment LA1-4 regarding existing 42-inch-diameter natural gas pipelines in karst terrain. The EIS does not recommend Mountain Valley provide information "after initiation of construction." Some recommendations are "prior to the start of construction."

INDIVIDUALS

IND913 – Russell and Katherine Barksdale

20161223-5092 FERC PDF (Unofficial) 12/23/2016

IND 913-15 cont'd provide the regulatory agencies with the information needed for permitting decisions, and it is non-compliant with the National Environmental Policy Act. Even so, FERC, the Army Corps of Engineers, and the Virginia DEQ seem willing to play along.

In contrast, the U.S. Forest Service is asking for site-specific mitigation details for selected high-hazard locations on or near National Forest lands along the proposed pipeline corridors.

IND 913-16 These issues make a large difference with the environment that we live in. We have wells and septic tanks. With blowing rock or drilling to bury this pipeline it will ultimately upset our water table (safe water), disrupt our well (water table), and most likely disrupt all of our septic systems and allow them to contaminate the ground water too. There aren't other options on where we get our water or use for a septic system. These are reasons we decided to move to a very rural and beautiful location to live and relax. We have very sensitive water tables that are disrupted when the new subdivision down the road drills for their wells. Our sediment increases by 200 fold. These are current issues, but nothing like blasting away bedrock that will

IND 913-17 have all waste and other ecological damage flow down hill to our neighbors and us for runoff, slope-failure on our ridge, stream crossings that we have a stream or a few in our immediate neighborhood. These issues are some of many regarding our road to be used as an access road.

IND 913-18 The road getting to our house is extremely windy, all local homeowners, farmers, and horse farms. This route does not have any industrial businesses on it and is busy with just local traffic. If any type of tractor-trailer attempted to go through our roads (Grassy Hill, Green Level and Labellevue), there will be serious issues with trucks stuck and unable to remove themselves from the location. This again causes erosion, unsafe roads for our neighbors to ride their horses, children and grandchildren to play in their neighborhood safely. We ride our horses on the ridge that MVP wants to blast through and add this 42" monstrosity that will deplete outdoor recreation, tourism, money for the communities and state. All of us and our neighbors purchased our homes to continue to gain value, live on a private road that only has 8 homes and plan on retiring here. Our property taxes go to assisting a county that allows us to live where we want and enjoy the freedom that doesn't have any pipelines of mass size, any industrial sites near our home, allows us to go to our local farm (Four Corners Farm ((That will be affected by this MVP)), not allowing my proper poultry, eggs, pork, beef, etc to be raised without any outside interference like a pipeline running through their property and the creek).

IND 913-21 There is historic preservation that is also a problem with this pipeline. MVP want to send it through Franklin County that has Native American Artifacts scattered throughout the county. Going through Newport, between Mt. Olivet Church and the Newport Rec Center, there are so many statutes to mention as to why there should not be any pipelines or anything that disrupts the area throughout Virginia, it is had to document. Please note the following link that shows all of the issues through some of the above-mentioned properties. <http://www.achp.gov/nhpa.pdf>

IND913-16 See the response to comment FA15-7 regarding blasting and wells. Section 4.3 of the EIS has been revised to address septic systems.

IND913-17 See the response to comment FA15-7 regarding blasting. Section 4.1.1.5 of the EIS discusses impacts and mitigation measures for blasting.

IND913-18 See the response to comment IND288-3 regarding road damage. See the response to comment IND70-1 regarding soil erosion.

IND913-19 Land use impacts are discussed in section 4.8 of the draft EIS.

IND913-20 See the response to comment IND12-1 regarding property values. Land use impacts are discussed in section 4.8 of the EIS.

IND913-21 Cultural resources surveys, including Native American artifacts and historical structures, were conducted for the MVP, and are discussed in section 4.10 of the EIS.

INDIVIDUALS

IND913 – Russell and Katherine Barksdale

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913-21
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There will be not mitigatable and irreparable harm associated with the MVP and ACP that are trying to make money and destroy our environment in one fellow swoop. There are so many groups that state how these are issues that will not be recovered from in swift manner.

Sincerely,

Russell and Katherine Barksdale
507 Labellevue Dr.
Boones Mill, VA 24065

INDIVIDUALS

IND914 – Charles Chong

20161223-5095 FERC PDF (Unofficial) 12/23/2016 12:10:47 AM

Charles Chong

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December 22, 2016

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914-1

Section 4.9.1.6 of the draft Environmental Impact Statement for the Mountain Valley and Equitrans Expansion Projects discusses the potential effects of the Mountain Valley Pipeline on property values, mortgages, and insurance. In this section the Federal Energy Regulatory Commission (FERC) cites 7 studies that deal with the impact of pipelines on property value. Three of these studies deal with petroleum product pipelines and the effect the rupture of a pipeline had on property values (Simon, R. 1999. The Effect of Pipeline Ruptures on Noncontaminated Residential Easement-Holding Property in Fairfax County. The Appraisal Journal 67:3, 255-263.) and the effect of a pipeline explosion on property values (Hansen, J., E. Benson, and D. Hagen. 2006. Economic Hazards and Residential Property Values: Evidence from a Major Pipeline Event. Land Economics vol. 82, no. 4: 529-541). The third report (Natural Gas and Hazardous Liquid Pipeline Background Report. Whatcom County, Washington. October 2001.) is mistakenly identified as a study by FERC. It includes an interview with the county assessor about the effects of a pipeline on property values after a section of it exploded Bellingham, Washington. The other five studies look at the effect of natural gas pipelines on property values. They all conclude that natural gas pipelines have no effect on property values. Although the findings of these studies are often cited by the authors' peers, and by FERC, I could find no peer or critical review of the studies and no assessment of the validity and reliability of their methods or findings. It is the purpose of my paper to critically review these studies. It is my findings that all the studies use methods which are not totally valid and whose findings are not reliable. I challenge FERC to review the studies and my criticism of them. If they cannot successfully defend the methods and findings of these studies, then they should reject them.

Allen, Williford & Seale Inc. 2001. Natural Gas Pipeline Impact Study. Prepared for the INGAA Foundation.

In the INGAA (Interstate Natural Gas Association of America) 2001 report are studies which compare the values of properties located on a natural gas pipeline to properties located off the pipeline. The section of the report "Method of Analysis" does not explain how they do this comparison. Understanding the "method" of how they do the comparison reveals the weakness of the method and why the results and conclusions of the studies should be considered unreliable.

The simplest, and most unrealistic, situation to study would be a group of homes which were exactly same in every way except for one half of the homes were on a natural gas pipeline and the other half were off the pipeline. These homes would have been sold on the same date by remarkably similar sellers and realtors to remarkably similar buyers. In this situation any difference in the average price of homes on the pipeline to the average price of homes off the pipeline could truly be related to the presence of the pipeline.

IND914-1

Section 4.9 of the final EIS has been revised, as appropriate, to address potential impacts on property values.

INDIVIDUALS

IND914 – Charles Chong

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Charles Chong

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December 22, 2016

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The INGA report attempts to convince its reader that it looked at homes and the sales of these homes which were close enough to the ideal situation to allow a meaningful study and reasonable results. First the authors of the studies (Allen, Williford & Seale Inc. [AWS]) selected groups of homes which they felt were likely to have the most similarities and chose homes in subdivisions and in a residential development. In the three studies is the same statement, "The residential sales represent homes built by several different builders with several different styles; however, the sales are comparable to each other in respect to quality, design and function." In the Cinco Ranch study is the statement

Generally speaking, deed restrictions have been employed to create homogeneity within the subdivisions. These restrictions may include minimum house sizes, exterior construction, types of garages, etc. Thus, the homes within each individual subdivision are considered comparable to each other, and have not been adjusted for construction type.

In the studies homes in a subdivision are not the same but are assumed to be "comparable," except for size. A larger home is generally valued more than a comparable smaller home. To allow a comparison of homes of different sizes, the sales price is divided by the square footage of a home, and the price per square foot is use to compare values of different homes.

Homes values generally appreciate over time due to inflation and limiting supply and increasing demand or market conditions. In the INGA studies home sales occur over periods of time from 4 ½ years in the Cinco Ranch development to 8 years in the Medford, Oregon subdivisions. In order to assess whether a variable such as a natural gas pipeline effects the value of comparable homes sold on different dates the sales prices of the homes are adjusted to what they might expected to be on the same date. This date is usually the date of sale of the last home sold in the subdivision or development studied, and will be referred to as the study date. The adjusted price can be calculated by one of two equations. The first is

$$P_{adj} = P + b * P * m.$$

The second is

$$P_{adj} = P * (1 + b) \exp. m.$$

Where P_{adj} is the adjusted sales price.

P is the sales price from the home's last sale

b is the monthly increase expressed as a percentage. In the studies this value resulted from the consideration of the regression analysis of data and the paired sales analysis, and

m is the number of months between a homes previous sales date and the study date.

The second equation compounds the monthly increase.

The only variables in the formulas used to calculate the adjusted sales price of a home is the price that the home last sold for and the number of months between the

INDIVIDUALS

IND914 – Charles Chong

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Charles Chong

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December 22, 2016

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date of that sale and the study date. "b" is a constant. The adjusted sales price is divided by the square footage of the home to get the adjusted price per square foot.

In summary homes in a subdivision or development are divided into two groups, one group which is on a natural gas pipeline and the other off the pipeline. The last sales price of each of these homes is divided by its square footage to obtain the price per square foot of each home. The prices per square foot are adjusted to the study date. The adjusted prices per square foot of homes on the pipeline are averaged and compared to the average adjusted price per square foot of homes off the pipeline. In the studies the findings were that generally properties on the pipeline had a slightly higher adjusted price per square foot.

If the homes in a studied subdivision are "homogeneous" and comparable, then the adjusted price per square foot should be approximately equal for all of the homes studied. In the study of the Greenway Village subdivision of Cinco Ranch, the adjusted prices per square foot of 4-bedroom homes ranged from \$52.40 to \$74.20, a variation of about 42%, which indicate that the homes are not "homogeneous" and not comparable to each other and that there are factors other than market conditions which are likely to significantly impact what these homes sell for.

"Homes built by several different builders with several different styles" are unlikely to be of the same quality. One homebuilder will have a preference of materials and a level of workmanship and craftsmanship which will be different from another builder which will lead to homes of different qualities and values. A housing development may be planned to include homes of different values and affordability. Improvements to a home by remodeling, updating, and adding features will add value to a home, as will quality landscaping outside the home. A home which is well maintained will be valued more than a home minimally maintained or with damage and in need of repair. Neighboring homes may affect the value of a home. For example, a home in a neighborhood where the homes are not well maintained might have its value negatively impacted. Other neighborhood factors which might affect the selling price of a home include being adjacent to a major roadway, close to a school or park, or next to a natural gas or petroleum product pipeline or to the greenbelt through which they run. Finally the vagaries of the negotiation process to sell a home will affect the price a home will eventually be sold for. For example, a nice home which has more than one interested buyer may lead to a bidding war which will escalate the selling price of the home. On the other hand, an anxious seller who wants to sell in a hurry, or a distressed seller, e.g. one who is experiencing financial difficulties, may settle for a price lower than the house would sell for with a normally functioning seller.

Examples of how location within a subdivision can affect home prices can be found in the data for homes unencumbered by the natural gas pipeline in the Greenway Village subdivision of the Cinco Ranch study. Four homes on Morning Park Drive (2402, 2314, 2310, and 2306) are located next to highway 99, the Grand Parkway, and have an average adjusted price per square foot of \$56.15. Four homes on the

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same street (2107, 2119, 2135, and 2147) a couple of blocks away but separated from the highway have an average adjusted price per square foot of \$63.24, a 12.6% difference. On the street Cinco Park Place are two homes (2310 and 2314 which sold twice during the study period) with an average adjusted price per square foot of \$62.53. On Cinco Park Place Court, a short cul-de-sac off the street, three homes (23206, 23211, and 23215) have an average adjusted price of \$66.72, a difference of 6.7%. Amber Glen Lane is a street which runs about two blocks. One end opens into a park/recreation area. Three homes on this end (2011, 2014, and 2018) have an average adjusted price per square foot of \$62.28. Three homes on the other end (2103, 2115, and 2118) have an adjusted price \$58.54, a 6.4% difference.

To study the effect of a natural gas pipeline on the value of homes, the values of the home must be otherwise comparable. The assumption that homes within a subdivision or housing development and their sales are similar enough that they can be used in a study to evaluate the effect of the presence of a natural gas line on home values is wrong. The values of homes and their sales within a subdivision or development can vary significantly and cannot be considered comparable. That AWS uses this false assumption in their studies of the effect of natural gas pipelines on residential properties renders their findings unreliable.

In addition to the residential studies the INGAA report of 2001 included a study of commercial properties, which I will not address, and a "Land Sales Analysis" which I have previously discussed at length in a letter to Paul Diehl (5-16-2015), which was submitted as a comment to FERC on the draft Resource Report on Socioeconomics for the Mountain Valley Pipeline (April 2015). In brief this analysis looked at 39 properties from 27 acres to 827 acres. These properties were divided by size into four groups to evaluate the effect of a natural gas pipeline on the properties. The largest group consisted of 10 properties and the smallest 2 properties. "The sales within each category are considered comparable to each other with respect to market conditions, size, physical characteristics and location." The location of these properties extend from the valley which is the corridor for Interstate 5 and in which lies the city of Ashland up into the mountains and plateaus of the Cascades. In such varied terrain AWS offers no descriptions of the properties or how they are comparable. Furthermore, they say, "It should be noted that the conclusions of this study are weakened by the relatively small sample size (39 sales)." Because the comparability of these properties cannot be substantiated and the small number of properties used in the analyses, the findings of this "land sales analysis" should be considered unreliable if not invalid.

Integra Realty Resources (IRR). 2016. Pipeline Impact to Property Value and Property Insurability. Prepared for the INGAA Foundation.

In the 2016 INGAA report the authors, Integra Realty Resources (IRR), use the same

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IND 914-1 cont'd comparison method to determine the impact of a natural gas pipeline on property values. IRR also makes the similar assumption that homes within a subdivision are comparable.

IRR determined single family residential and townhomes to be the best property type for comparative analysis because of its homogeneity and significantly fewer characteristics influencing price, compared with vacant land and income-producing property. Single family residential is typically built around the same time period, located in the same area, governed by restrictions insuring compliance to a certain set of building standards, and typically similar in size to one another. Consequently, single family residential requires fewer adjustments, making it easier to isolate the presence of a pipeline as the variable characteristic reflected in the price.

Again that the homes in the subdivisions looked at were not comparable is suggested by the variability in adjusted sale prices. For example in the New Jersey study, after all the adjustments were made the adjusted price per square foot of homes varied from \$120.43 to \$199.84 or 66%. Although the Mississippi study had the smallest variation in adjusted prices, 27.7%, the 36 homes looked at were noted to be from four different neighborhoods making it more likely that they were not "homogenous" and comparable. That homes in a study are of comparable value is a requisite to being able to assess the effects of the presence of a pipeline on those values.

Under the section on "Methodology" IRR states "The impact of a pipeline on property values has to be studied over a period of multiple years." □ Also, "Within these study areas, there were very few areas where IRR could gather sufficient data to draw conclusions." The largest study in the 2001 INGAA report was of Greenway Village in Cinco Ranch which looked at the sales of 187 homes. The largest study in the 2016 report looked at the sales of 68 homes in Virginia. The smallest study was of 25 homes in New Jersey which looked at sales that occurred over a period of 14 months. In this study two of the 4 homes considered to be encumbered by the pipeline were not located on the easement but at least 80 feet away but were facing the easement. By IRR own standards the New Jersey study seems to lack the quality and quantity of data "sufficient" to draw conclusions.

IRR makes a substantial error in calculating the market adjustment in the Ohio study. In the Summary Statistic page for "Kyles Station Meadows Residential Sales-Sorted by Adjusted Sale Price" the home that shows 0% change under "Market Conditions" had the earliest sale of the study on 7-24-13, which would be the study date, and all home sold after that date would be adjusted back to that date. Between 7-24-13 and the date of the last sale of the study on 7-15-15 IRR determined that the sale prices of homes increased by 0.25% per month. The market adjusted sales price of a home sold after 7-24-13 would be the sales price *reduced* by an amount calculated by using its date of sale. In the IRR calculations the market adjusted sales price is the sales price *increased* by an amount calculated by the homes date of sale.

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Consequently the final adjusted sale prices are wrong and any conclusions based on these prices are wrong.

I would like to return to the Summary Statistics of this Ohio study and look at "Days on Market." The two homes which were on the market substantially longer than any other home were the 4965 Chandler Crossing home at 215 days and the 8194 Colyn Ct. home at 290 days. When you look at the Google satellite picture of these two addresses, you see that the homes sit almost opposite each other across the pipeline easement (Figure 1). On the easement next to their backyards is what appears to be a concrete pad with a length of the pipeline running along it. I believe that this is substantial evidence that the pipeline affected the sale of these homes.

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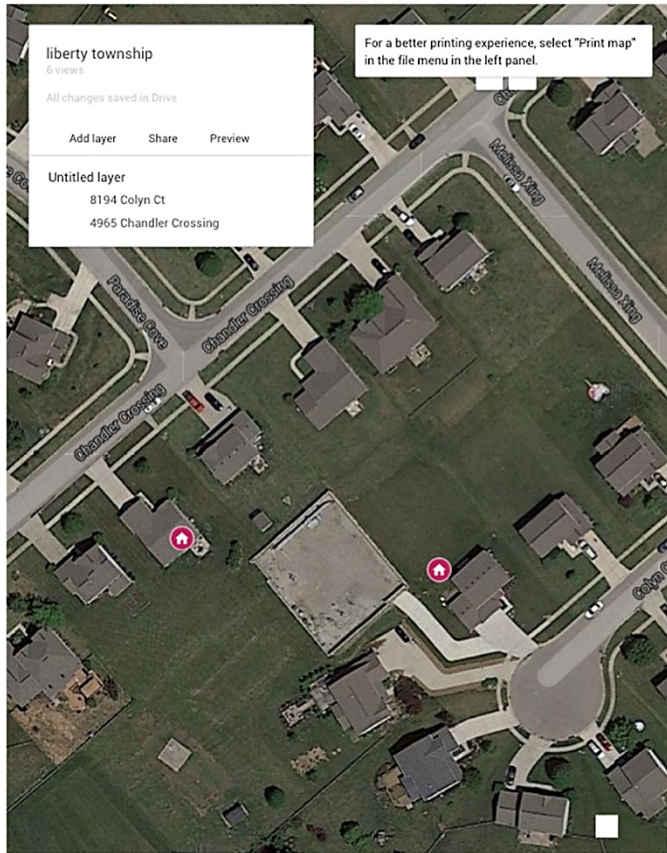


Figure 1.

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Much of the housing data for the INGAA 2016 report were obtained during the Great Recession which began in 2008. Eight million Americans lost their jobs during the recession. The housing bubble which peaked in 2005 and 2006 burst and the housing market collapsed and home prices dropped in 2008 into 2009 and stayed low until 2012 and 2013 when they began their climb back up. The number of foreclosures jumped up, new housing construction numbers dropped down, and mortgages became harder to obtain. IRR in their studies makes no mention of the great recession and its profound effects on the housing market. With their failure to acknowledge the recession, they make no adjustments to home prices in their studies for the effects of the collapse of the housing market. Maybe they knew that this study should not have been conducted with data from this period of time of economic catastrophe.

The effect of the collapse of the housing market and home prices is most evident in the Virginia study. The failure of IRR to adjust for this effect produced erroneous results. IRR did consider the effects of market conditions on home values over the 7 year period studied from 2008 to 2015. From the linear regression they estimated a \$42 per square foot increase over the 7 years (figure 2) or what I calculated to be 22.8%. In a paired sales analysis they estimated homes sold in 2015 would be reduced 2.9807% per year to compare it with a similar home sold in 2008, or about 21%. In their final adjusted sale price for the home sales in the Virginia study, they make *no* market adjustment. With the failure to make any market adjustment, the final adjusted sale price of homes should be considered incomplete and any conclusion reached using these values should not be accepted. The market adjustment would have been wrong anyway.

In figure 2 is a prominent cluster of home sales below the slope line which occurs between 2009 and 2012. This drop in home prices is most likely due to the drop in and depression of housing prices following the housing market collapse. How would you then adjust home prices of homes sold between 2008 and 2014 to compare them with prices of homes sold in 2015? One way is to look at the average home prices for the area each year between 2008 and 2014 and compare them with the average home price for 2015. On the web site Graphiq.com you can look up trends in, among other things, home prices. Looking up the median home prices for Virginia for the past 10 years I have calculated the average median home prices for the following years.

	Average Median Price	% Difference from 2015
2008	\$230,080	3.9%
2009	\$214,580	11.4%
2010	\$219,420	9%
2011	\$212,580	12.5%
2012	\$224,670	6.4%
2013	\$240,920	0%
2014	\$241,000	0%
2015	\$239,080	0%

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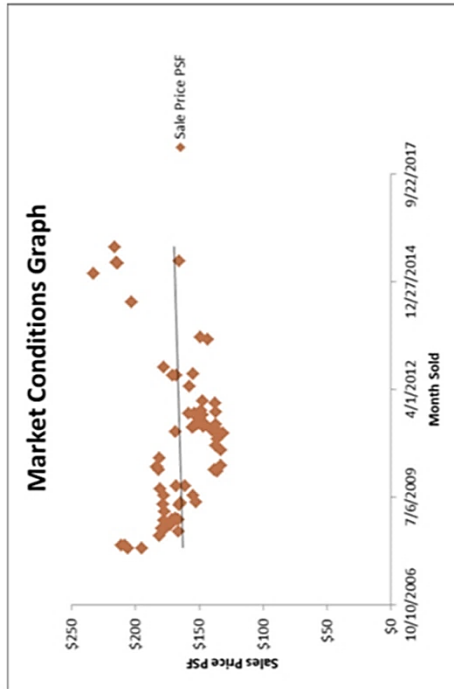
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Prices of homes sold in 2008 would be adjusted up 3.9% to compare them with 2015 prices, prices of homes sold in 2009 adjusted up 11.4%, and so on. Prices of home sold in 2013 and 2014 would require no adjustment. How would this adjustment affect the results of the Virginia study. Of the 11 home encumbered by the pipeline 5 were sold in 2008, 3 in 2015, and 3 (27%) in 2009. Of the 57 unencumbered homes 38 (67%) were sold in 2008, 2009, and 2010. Each of these home would have its sales price adjusted up between 9% and 12.5%. Without doing the calculations, I believe that using this adjustment for the effects of the collapse of housing prices would reverse the findings determined by IRR that the average adjusted price of homes on the pipeline were higher than the adjusted price of homes off the pipeline.

In the New Jersey study is a discussion of the 26 Wedgewood Dr. home. In 2010 the home sold for \$644,900. In 2014 it sold for \$579,900, a loss of 10%. The home was on a pipeline easement which contained 2 pipelines in 2010. A third pipeline was placed into the easement and put into operation in 2013. A Weichert realtor claimed the drop in price was not due to the third pipeline but to the “declining market 2010-2012.” Again turning to Graphiq.com the average median home price in New Jersey was \$273,958 in 2010. There was a decline in housing prices and the average median home price in 2012 was \$257,300. However housing prices recovered and the linear regression performed by IRR showed a 15% increase of home prices over the 14 months of home sales in 2013 and 2014. The average median home price for New Jersey homes in 2014 was \$271,800, less than 1% lower than the 2010 price. That a good part of the 10% loss in price of the 26 Wedgewood Dr. home was due to the third pipeline is a reasonable assumption.

One study was involved the sale of 17 empty lots in the 101 lot Saddle Ridge subdivision in Pennsylvania. Six lots were encumbered by the pipeline. The lots were fairly evenly distributed according to size and dates of sale between the encumbered and unencumbered properties. Vacant lots in this subdivision seem to have many less variables to affect their values than lots with homes on them. In this study the average price of lots encumbered by the pipeline was 16% less than the average price for the unencumbered lots. In this study of empty lots it is reasonable to assume that the loss of value of the lots encumbered by the pipeline was due to the presence of the pipeline.

The different studies in the 2016 INGAA report also included a paired-sale analysis and a regression analysis of the sales data. I will discuss the paired-sales technique in the discussion of the Diskin paper and the Palmer report for PGP. The description of the regression analysis is confusing because they describe both the adjusted sales price and the dummy variables of “0” for being off the pipeline and “1” for being on the pipeline as the dependent variable. The only way it would work would be for the dummy variables being the independent variable and the adjusted sales price being the dependent variable. On the plot you would have two values “0” and “1” on the x-axis. Over the zero on the y axis you would stack all the adjusted sale prices for

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properties off the pipeline, and over the “1” you would stack all the adjusted sale prices for properties on the pipeline. There are statistical methods to evaluate two sets of values and it is nonsensical to run a regression analysis when you have only 2 independent variable. Drawing a line through the mean of each of the stacked adjusted prices would give you the same result as comparing the average adjusted prices of properties on and off the pipeline. The statistical test for the regression analysis which suggests “very little correlation to indicate that the location of a pipeline on or near a property affect its value when sold” should be considered a result of applying the regression analysis inappropriately to the data.

Diskin, B., Friedman, J., Peppas, S., and Peppas, S. 2011. The Effect of Natural Gas Pipelines on Residential Values. Right of Way. January/February.

PGP Valuation, Inc. (PGP). 2008. Updated Market Analysis – The Impact of Natural Gas Pipelines on Property Values. Available at: http://pstrust.org/docs/Pipeline_Impact_on_Property_Values.pdf.

Both the Diskin and Palmer used the pair-sales technique to assess the effect of natural gas pipelines on property value. Diskin looked at housing subdivisions located near Phoenix, Arizona. Palmer, like Eric Fruits, looked at properties in Clackamas and Washington County in Oregon. The technique is described in the Diskin paper.

To determine whether there was a relationship, we gathered sales price information for properties encumbered by a natural gas pipeline easement, parcels adjacent to pipeline easements and properties neither encumbered by nor adjacent to a natural gas transmission pipeline.

In analyzing the data, we used the paired-sales technique, also known as matched-pairs analysis. The fundamental principle is to isolate the influence of a characteristic by pairing two objects that are similar, except for the attribute under review. The process is typically used to estimate how property value is affected by the particular characteristic or attribute being studied.

Two homes in the same subdivision with similar appearances and statistics for sizes and numbers of rooms can have differences which will affect their selling prices. For example they can differ in the initial quality of workmanship and materials in the construction of the home; in remodeling including updating, adding on, and landscaping; and in the maintenance provided for the home. Neighborhoods can exist even in subdivisions, for example an area of less expensive and relatively affordable housing. The negotiation for the sale of the home, which has nothing to do with the quality of the home, can significantly affect the sales price of the home. In other words, matching two homes by general appearance and measurable

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statistics will not equate their value or their selling price. Match-paired analysis to assess the affect the pipeline on homes is likely an inadequate method and its results should be considered unreliable. The findings in the Diskin study was that some properties encumbered by the pipeline had a lower sales price than its unencumbered match and some properties had a higher price than its unencumbered match, and in conclusion "no identifiable relationship between proximity and sale price could be found." The other interpretation for this finding would be that the properties were inadequately matched and the variation in the sales prices were due to other factors than the pipeline. A test for this interpretation would be to match two unencumbered homes and compare their sales prices. A similar sales price would suggest a good match. If the sales prices are significantly different, then a poor match of the properties would be suggested. Significant variation in sales prices of matched unencumbered home would confirm that the paired-sales technique is an inadequate method to compare the effect of a pipeline on residential home values. There is no information that such a control study was part of the Diskin analysis. In addition, from gaphiq.com, the median home price in Phoenix, Arizona was \$127,010 in January of 2000. In December of 2005 the median home price was \$257,000, a 100% increase due to the housing bubble. Sales data for homes in the Canyon Ridge West subdivision were obtained for the period of 1999-2005, and for Sun City between 1995 and 2004. There are no dates for sales data from other areas. The housing bubble might explain some of the variation seen in the sales prices of paired-sales analysis.

Figure 3 is the data of a subject property on the pipeline and of the comparable properties used in the paired analysis performed by Palmer for PGP. The subject property and the comparable properties are not even in the same town, and there is enough descriptive differences between the properties that I have to ask, how are they similar and comparable? Except for the vacant industrial lands which are just gravel lots, I cannot see that the properties used in Palmer's paired-sales analysis are comparable, and unless I can be convinced otherwise, I believe the results of his analysis should be considered unreliable.

In summary, I believe that the paired-sales analysis done by Diskin, Palmer, and in the studies in the INGAA 2016 report are inadequate to assess the effect of a natural gas pipeline on property values.

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Fruits, E. 2008. Natural Gas Pipelines and Residential Property Values: Evidence from Clackamas and Washington Counties. ECONorthwest, Portland.

The Fruits' paper tests the hypothesis that there is a relationship between the "proximity" of a property to a pipeline and its sales price, or in other words as the distance of a property from a pipeline changes, so does its sales price change in some corresponding manner. The sale price in his paper is not an actual sales price but a predicted price, a result of the regression analysis and hedonic model he uses.

The simple regression analysis relating the proximity of properties to a pipeline and their sales prices would involve a plot on which the independent variable (plotted along the x-axis) would be the distance of the property from the pipeline, and the dependent variable (plotted on the Y-axis) would be the sales price of the property. A point on this plot would indicate a property's distance from the pipeline and its sales price. A large number of properties (10,000 in Fruits' analysis) would need to be plotted to balance out other variables that would affect a property's price, e.g. the sizes of the home and the land it sits on, number of bed rooms, date of sale, age of home, etc. A regression line, which would suggest any trend in the relationship between the distance of the properties from the pipeline and their sales prices, can be drawn or calculated. The slope of this line, or the coefficient in regression analysis, would be an indication of such a trend. A slope that slanted up to the right would indicate that prices of homes increase the farther they are from the pipeline and have a positive coefficient. A line that sloped up to the left would indicate that prices of properties decrease the farther they are from the pipeline and have a negative coefficient. A flat horizontal line would indicate no effect of the distance to the pipeline on the sales price, a coefficient of "0," and this was the conclusion of Fruits' analysis.

The hypothesis used in previous studies is that the pipeline affects the value or sales price of properties "encumbered" by the pipeline. An encumbered property is one through which the pipeline runs or one which lies adjacent to the pipeline easement. The Fruits' analysis does not directly address this hypothesis. It only predicts the value of a property close to the pipeline and not the direct effect of a property encumbered by the pipeline.

Looking at the Descriptive Statistics page of the Fruits' study, at the distance of the properties from the pipeline in Washington County, the closest property to the pipeline is 835 feet. None of the properties in Washington County would be encumbered by the pipeline, and according to the second hypothesis none of the sales prices of the properties would be expected to be affected by the pipeline and the coefficient would be zero. Looking at Clackamas County the mean distance of properties from the pipeline was 3125 feet with a standard deviation of 1594 feet. Using the "68%, 95%, 99.7%" rule, 68% of the properties plus half of the remaining properties or 16% for a total of 84% would be between 1531 feet and 5246 feet from the pipeline. The remaining 16% of the properties would be distributed between the pipeline and 1531 feet away from the pipeline, leaving a smaller

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number actually encumbered by the pipeline. Looking at the combined statistics for both counties the mean distance was 3478 feet and the standard deviation 1130 feet. Subtracting two standard deviations from the mean, one could say that 95% of the properties plus 2.5% or 97.5% of the properties were more than 1218 feet from the pipeline. As 10,000 properties were looked at in the Fruits' study, then 9750 properties would be between 1218 feet and 5278 feet from the pipeline. A regression analysis on these properties unencumbered by the pipeline would expect to yield a coefficient of "0." The other 250 properties were distributed between the pipeline and 1218 feet from the pipeline. I'm going to say for example that 50 of these 250 properties were encumbered by the pipeline and had a significant reduction in their selling price. Put up against 9950 properties not affected by the pipeline, these 50 properties would likely minimally affect the regression analysis of all the properties to produce a coefficient which is not "statistically significantly different from zero at any of the traditional levels of significance." In other words, the Fruits' study would not address the specific effect the pipeline can have on values of properties directly encumbered by a pipeline.

Kinnard, W., S. Dickey, M. Geckler. June/July 1994. Natural Gas Pipeline Impact on Residential Property Values: An Empirical Study of Two Market Areas. Right-of-Way.

Kinnard's study on natural gas pipeline impact on residential property values looked at sales prices of properties in different "distance zones" from the pipeline. He doesn't explain how he does his study, but this is my guess. He does a multiple regression analysis (MRA) of homes in zone E. Zone E is the control zone where it is expected that the pipeline is at a distance (between 1301 and 2600 feet) where it will not effect the sales price of the property. From the multiple regression analysis (MRA) and hedonic modeling is developed the "representative property" with specified values from the statistically significant variables, e.g. lot size, home size in square feet, number of bedrooms, attached garage and its size, etc. Also predicted is the sales price for this representative property for zone E. The multiple regression analysis and hedonic modeling is done for the set of properties in each distance zone to produce the representative property for each of the zones, with the same features as the zone E representative property, and predict the sales price of the representative property in each of the distance zones. With the other variables constant, the difference in the sales price of the representative property in zone A (less than 200 feet from the pipeline easement), for example, from the sales price in zone E is assumed to be the effect of the pipeline on the sales price of the zone A property. This is the reported coefficient in the Kinnard analysis.

The Kinnard study does not provide a list of variables. It says "All the models consisted of statistically significant variables only." It does not say that all statistically significant variables were considered and included. The Connecticut study was over a period of 5 years, consisted of properties covering nine different

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towns, and apparently looked at properties along 3 different pipelines. In Fruits' analysis several environmental variables were included, variables for 17 neighborhoods, "trend" factors, and indicators for each year of the study. If all significant variables are not considered in the regression analysis and hedonic modeling, then the variation in sales prices of properties in different zones compared to zone E may be due to other factors than the distance zone from the pipeline the property is in. Kinnard in his paper does not provide information to conclude that all significant variables were considered. Also in the Conclusion section he says,

As the data set(s) decreases, greater variability of results and less reliability are encountered. Relatively large numbers of sales transaction data are required to produce stable, supportable, systematic results.

The Algonquin part of the Connecticut study consisted of 316 properties, the Tennessee part consisted of 855 properties, and the Southwestern study consisted of 2202 properties. The Fruits' study which covered 15 years included 10,000 properties, and the Wilde study included over 27,000 properties sold over 20 years. The Connecticut studies consisted of relatively small number of sales which could affect the reliability of their results. If MRA and hedonic modeling are being done on properties within distance zone, then the number of properties looked at in each zone should be noted. Assuming an equal distribution of these properties throughout the study areas, in the Southwestern study which looked at 2202 properties, 1101 would be in distance zone F, 550 in zone E, 209 in zone D, 165 in zone C, and 88 each in zones B and A. As the number of properties in a zone decreases so can the reliability of the results of the MRA and hedonic model, so that comparing the predicted sales price of the representative property in zone A with the control representative property in zone F becomes relatively more unreliable.

Kinnard does not identify the "master planned community" in the Southwestern area studied, but Wilde in her paper speculates that it is The Lakes and part of the Summerlin developments next to Las Vegas Nevada. Looking at the Google satellite maps of these areas, I can see distinct neighborhoods, e.g. with small houses on small lots, with larger houses with larger lots and swimming pools, and with houses with in between sizes. The sales price per square foot of a home in one neighborhood can be expected to vary from the sales price per square foot of a home in another neighborhood. In other words a house in a nicer neighborhood would have an increased value just because of the neighborhood. Again Kinnard does not specify a neighborhood variable in the Southwestern study, and the distance zones will pass through different and different numbers of neighborhoods. Without considering a neighborhood variable, the MRA and hedonic modeling becomes less reliable in assessing the effect of the pipeline on property values.

In summary the Kinnard study does not list the statistically significant variables which he uses in the MRA and hedonic modeling. Because of nature of the Connecticut studies, the variability in the properties looked at can expected to be

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considerable. Not taking this variability into consideration, and not providing adequate and appropriate variables for the MRA and hedonic modeling can produce results which do not reliably assess the effects of the pipeline on property values. Again Kinnard does not provide the information in his paper that he considered all significant variables and used them in his analysis. Also the number of sales transaction data used may have been inadequate "to produce stable, supportable, systematic results." For example, in the Algonquin part of the Connecticut study, assuming an equal distribution of properties in the study area, only 12 properties would have been available for MRA in both zones A and B.

Wilde, L., J. Williamson, and C. Loos. June 2013. A Long-Term Study of the Effects of a Natural Gas Pipeline on Residential Property Values. Gnarus Advisors LLC, Arlington, VA.

With sales data from over 27,000 properties in the Summerlin master planned community outside Las Vegas, Wilde in his study seems to have the large numbers of sales transaction data "required to produce stable, supportable, systematic results." The data was collected over a period of 21 years between 1991 and 2012. In an article on "Hedonic Pricing Methods," available at ecosystemvaluation.org, is an example of how the hedonic pricing method is applied to the situation to measure the benefits of an open space preservation program in a region where open land is rapidly being developed. Step 1 of this method is "to collect data on residential property sales in the region for a specific period (usually one year)." The question is whether the data collected over longer periods are stable, supportable, and systematic to produce stable, supportable, and systematic results. The Fruits' analysis which looked at 10,000 properties over 15 years included a trend variable "to capture broader trends in property prices that are typically driven by demographic factors such as population and income growth," and indicator variables for each year to "control for factors that may be idiosyncratic to a given time period." In contrast the Wilde's analysis includes a single coefficient to reflect the effect of the year of sale on the sales price of a property. During the last half of the 21 years covered by Wilde's analysis, the housing bubble occurred followed by the great recession and the collapse of the housing market with the depression of housing sales, housing prices, and new housing construction, the marked increase in the number of foreclosures, and the decreased availability of home mortgages. These events cannot possibly be represented in the single year of sale coefficient provided in the Wilde's analysis, and its results become questionable.

Wilde like Kinnard uses distance zones to assess the effect of the pipeline (KRPS) on residential property values.

In particular, we define three "bands" around the KRPS. The first is for properties approximately within one-quarter mile of the pipeline, the second is for properties approximately between one-quarter and one-half mile of the pipeline and the third is for properties approximately between one-half and one mile of the pipeline. These bands were chosen to conform to those used by Kinnard and his co-authors. As indicated above, the first two bands are

INDIVIDUALS

IND914 – Charles Chong

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Charles Chong

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December 22, 2016

potential impact areas and the third band is the non-impact or control area. In other words, if proximity to the pipeline has had an impact on the value of residential properties, it should manifest itself as a significant reduction in the sales prices of properties in the first band compared to the control band and, possibly, a lesser but significant reduction in the sales price of properties in the second band compared to the control band. We test this hypothesis for properties both within Summerlin and for properties adjacent to it.

The result of the analysis is presented for four distance zones 0-620 feet, 621-1240 feet, 1241 -2490 feet, and 2491- 5270 feet. If the analysis was done by performing multiple regression analysis (MRA) and hedonic modeling in each distance zone or "band" as previously described, it is not clear whether the analysis used the set of 3 distance zones or set of 4 zones. If the 620 foot band was used and the average lot size is about 6000 square feet, then there can be between 6 and 10 properties extending from the pipeline to the outside border of the 620 foot band. If sales properties are evenly distributed in this zone, then for every house sold on the pipeline there would be 5 to 9 houses sold that were not on the pipeline. If a house encumbered by the pipeline has a sales price significantly lower than the unencumbered houses, then in the MRA of home sales in this zone, the effect of the lower price will be diluted the larger number of prices of unencumbered homes which are not expected to have their prices affected by the pipeline. This effect would be amplified in a zone extending a quarter mile from the pipeline where between 10 to 20 sales of unencumbered properties can be expected for every property sale on the pipeline. The result would be that the predicted sales price for the representative property in the zone closest to the pipeline would unlikely be statistically significantly different than the sales price of the representative property in the control zone. So as in the Fruits analysis, the Wilde analysis would not identify the specific effect of the pipeline on the values of properties directly encumbered by the pipeline.

In summary, the Wilde analysis unlikely accounts for the effects on the housing market caused by the economic turmoil from the great recession and collapse of that housing market that occurred during the period of time from which housing sales data was collected. Unless it is proved otherwise, this deficiency renders the results of its analysis unreliable. Also the Wilde's analysis like the Fruits' study will not identify the specific effect of a pipeline on values of properties directly encumbered by the pipeline.

In summary of my review of the studies FERC cites in the Draft Environmental Impact Statement for the mountain Valley Pipeline to support the finding that natural gas pipeline have no impact on property values, I have found significant problems and limitation of the methods used by these studies to analyze the data which are likely to produce unreliable results. I am requesting that FERC review these studies in the light of my critique. If FERC cannot adequately defend the methods used by these studies, then they should reject the finding of these studies.

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December 22, 2016

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1839 Halls Run Road
Bristol, WV 26426-7350

INDIVIDUALS

IND915 – Joyce Waugh

IND915-1

Name: Joyce Waugh, president and CEO, Roanoke Regional Chamber of Commerce

Address: 210 S. Jefferson St., Roanoke, VA 24011-1702

The Roanoke Regional Chamber supports the continued development of infrastructure that is integral to business expansion in our region. Our prosperity depends on the presence of robust transportation – education – recreation – healthcare – telecommunication – and energy infrastructure. With these building blocks in place, our economy and our quality of life are given great opportunities for growth.

As a result of this philosophy, the Roanoke Regional Chamber supports the Mountain Valley Pipeline project and strongly encourages its development in accordance with laws and regulations of the United States and the Commonwealth of Virginia, in cooperation with property owners, and with the utmost safety and with respect for the environment and our region's beauty.

With this position, we noticed that in the recently released DEIS, the Federal Energy Regulatory Commission validated MVP's projected economic impact while also stating that the MVP project would result in "limited adverse environmental impacts."

Economic impact could include:

- And a tap installation in Montgomery county and Franklin County -- in proximity to an industrial park and the Roanoke Valley where natural gas has increased 15% in 15 years.

IND915-1

Comments noted.

INDIVIDUALS

IND915 – Joyce Waugh

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- Counties of Montgomery and Franklin gaining a competitive economic advantage related to companies now considering locating or expanding in these communities where before they would not, when natural gas was needed for their processes.
- The additional natural gas capacity may also assist existing businesses that are current natural gas users to grow, knowing that this resource is available.
- Construction spending of over \$400 million in Virginia and 4,000 + jobs during peak construction
- Long Term operational benefits and \$7 million annually in property tax revenue for Virginia counties

We support the Mountain Valley Pipeline and appreciate their commitment, as part of the EIS process and otherwise, to act responsibly, sensitively and minimize any adverse environmental impacts on landscapes and with property owners when surveying. This is clearly a long term project with long term implications. Handling issues sensitively and, if approved, constructing the pipeline with utmost care is essential to its future success and positive outcomes for our broader region.

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INDIVIDUALS

IND916 – Susie Vance

20161223-0012 FERC PDF (Unofficial) 12/22/2016

Public comment on draft environmental impact statement (EIS) for the project proposed by Mountain Valley Pipeline LLC (Mountain Valley) in Docket No. CP16-10-000

November 10, 2016

Susie Vance, Lewis County, West Virginia

20161223-0012

IND916-1

Hi. Good evening, everyone. It's lovely to see you all. My name is Susie Vance. I'm here to speak about Mountain Valley Pipeline. [spelling 04:22] WVLE-133 in southern Lewis County. I have farmland down there. It's pretty rugged. It's really steep. It's basically just trees with a little wetland hollow. Mountain Valley's coming through that part of the county, down towards Burnsville at Route 23 South.

We did fight Mountain Valley Pipeline with FERC last year. We got them to move the pipeline onto corporate timberland of Coastal Timberlands, which is my neighbor. Fortunately, we saved a ridge and destruction on a ridge that affected maybe seven different family farms. That was good news. Now it's on corporate land, but it saved the local farms.

Now they're cutting across through the headwaters of Second Big Run, which is one of the main tributaries for Oil Creek, which then flows into the Stonewall Jackson Reservoir. They're going to haul 900 men and two miles of pipeline over our little hollow road, and go through five timber crossings and about nine culverts. We've asked them for a wetland assessment. They did that -- 40 feet on either side, right away.

I got on their case because they're crossing two headwater creeks at the base of three mountains on Coastal's timberland, which is actually a headwater for the valley. I think the elevation's about 936 feet. We do have mountain slips in the area. We have one about 400 feet from the pipeline, which I reported, and they sent engineers out to look at. Water bubbles up everywhere there, because it's just very steep. The water comes down to the base of the hollows.

I think it's dangerous for them to be running pipeline through this part of the county. It's prone to slips, torrential flash flooding. The amount of surface water is going to increase from the amount of destruction of trees combined with the slope of the steep hills. I'm also filing for an Army Corps permit to force them to bank the entire creek, Second Big Run, going down to Oil Creek.

I just wanted to speak to alert everyone about how potentially catastrophic it is to be going through southern Lewis County for potential flooding. Thank you.

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WASHINGTON, DC 20438

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The Stonewall Jackson Reservoir would be more than 4 miles from the proposed route. See the response to comment LA15-12 regarding the open-cut dry waterbody crossing method. Landslides are addressed in section 4.1 of the EIS. Both access roads proposed for the commentor's parcel would be temporary and restored following construction

INDIVIDUALS

IND917 – Catherine Grant

20161223-0013 FERC PDF (Unofficial) 12/22/2016

Public comment on draft environmental impact statement (EIS) for the project proposed by Mountain Valley Pipeline LLC (Mountain Valley) in Docket No. CP16-10-000

November 10, 2016

Catherine Grant
2001 West Virginia Highway
Glenville, West Virginia



IND917-1

My name is Catherine Grant, commenting on the Mountain Valley Pipeline. I'm a retired physician, also. I'm not sure that I have more concern than any other citizen about safety, much of which I'm not really qualified to comment on, but other people have made comments that I do believe need to be addressed.

My main concern, here, as a citizen and taxpayer, it appears that FERC is not even following the legal requirements in failing to make their case that this pipeline is needed, which feeds into all kinds of other problems -- overbuilding infrastructure, who's going to suffer for that economically in the end, investing in the wrong things, failing to diversify the economy in West Virginia.

I think that FERC should be required to follow the law like we are expected to follow the law. These things should be addressed before a decision is made, not after. What way is accountability going to be assured if the companies are allowed to make their adjustments after the pipeline is approved?

That's the end of my comments. This is Catherine Grant, amending my comments to include my address. It's 2001 West Virginia Highway, Glenville, West Virginia.

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