



# **Preserve Craig ~ Sustaining the Quality of Life We Value**

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June 15, 2015

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

REF: Mountain Valley Pipeline (MVP);  
Docket No. PF15-3-000

Dear Ms. Bose:

With this letter, Preserve Craig is expressing its support for, and adoption of, the scoping comments filed by our local government, Craig County, Virginia. The local government comments were filed on June 12, 2015, and have been stamped in the upper left corner with the following: 20150612-0018 FERC PDF (Unofficial) 06/12/2015. The file name assigned is: 20150612-0018(30636856).

The transmittal letter from the Craig County Administrator, Clay Goodman, is dated June 10, 2015, and explains that the County has filed three separate submittals:

- 1) a list and supporting details of 19 critical issues which the Craig County Board of Supervisors believes must be addressed in the EIS;
- 2) a historical record of the 1990s efforts of America Electric Power (AEP) to construct a 765 kV electricity transmission line through Craig County; and
- 3) a request that the FERC enter into a Memorandum of Understanding (MOU) which with the Craig County Board of Supervisors for the purpose of conducting the necessary analyses.

Preserve Craig hereby adopts and endorses the above identified filing by our local government.

In addition, Preserve Craig asserts that the Notice of Intent for the Mountain Valley Pipeline is defective because it fails to include Craig County as an affected locality. The alternative 110 routes through Craig County were proposed before the Notice of Intent was published, and so there is no excuse for excluding Craig County from the Notice.

Finally, one overwhelming concern expressed by those who have filed scoping comments from both West Virginia and Virginia, including our Craig County Board of Supervisors, is the certainty of impacts to water resources. There is no question that severe impacts to our water resources will occur. The National Environmental Policy Act (NEPA) requires full disclosure of the impacts. We believe that the only way for the impacts to surface waters to be fully vetted to the public is to require regulation under an individual Clean Water Act Section 404 permit by the

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U.S. Army Corps of Engineers. Coverage under the Nationwide permit must be out of the question due to the certain impacts from pipeline construction, particularly in karst geology and Endangered Species habitat.

In support of the need for an individual CWA Section 404 permit, we are already aware that upland wetland surveys have been poorly conducted in the Bent Mountain community of Roanoke County. The contractor who is performing the surveys is from Texas, and therefore has little experience on which to base delineation opinions for upland wetlands perched on top of the Blue Ridge escarpment at an elevation of 2300 feet. Our understanding is that a wetlands specialist, Dave Trible of Watershed Strategies, Roanoke, Virginia, will be filing a report before the conclusion of the scoping period that challenges the work done by MVP's contractor on the Montouri property in Bent Mountain, Virginia.

Surface water and wetland impacts must be quantified, and disclosed to the public. The Corps of Engineers cannot do its job without accurate information. There is no means to assure that the Corps has the information required unless the activity is regulated in accordance with an individual CWA 404 permit.

Sincerely,



Sam Easterling, Co-Chair  
Preserve Craig



Bill Wolf, Co-Chair  
Preserve Craig

cc: Craig County Board of Supervisors  
US Army Corps of Engineers