



Preserve Craig ~ Sustaining the Quality of Life We Value

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June 16, 2015

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

RE: Docket Number PF15-3-000; Mountain Valley Pipeline

Dear Ms. Bose:

By letter dated June 15, 2016, Preserve Craig shipped to FERC by UPS a disc that contained records obtained from the Forest Service. We obtained the disc the same day, June 15. We expect you have received the disc by now. We asked that those comments be incorporated into the FERC scoping record and considered in the EIS analysis.

The disc was supposed to contain copies of all of the comments submitted to the Forest Service when they considered MVP's request for a special use permit to conduct resource and civil surveys on the National Forest.

Upon review of the disc, we realized that the disc did not contain all of the comments submitted to the Forest Service, as we had requested be provided by the Forest Service. Instead, the disc contained a random and limited selection of comment letters, and an Excel spreadsheet that purports to summarize the comments. We assure you that the summaries of the comments prepared by the Forest Service are both inadequate and inaccurate.

Enclosed with this letter are copies of some of the letters from residents of Craig County that were sent to the Forest Service upon their consideration of the survey permit. Preserve Craig requests that the issues raised in the enclosed letters be considered in the EIS analysis for the construction and operation of the Mountain Valley Pipeline.

We further assert that the issue of Cultural Attachment is significant throughout Craig County, and not only in the Peter's Mountain area, as asserted by the Forest Service in its comments filed today. Landowners in the various communities throughout Craig County are culturally attached to their land and the issue is not limited to the Peter's Mountain area. A full study of Cultural Attachment must be performed, and is the subject of a written request by the Craig County Board of Supervisors to enter into an agreement to perform, which request has been filed on this docket.

Preserve Craig, Inc. is a 501(c)(3) nonprofit corporation formed in 1991 using volunteers and donations to protect our natural, historical, and cultural resources. Tax Identification Number: 54-1597979

Ms. Bose
June 15, 2015
page two

Sincerely,

A handwritten signature in cursive script that reads "Sam Easterling".

Sam Easterling, Co-Chair
Preserve Craig

A handwritten signature in cursive script that reads "Bill Wolf".

Bill Wolf, Co-Chair
Preserve Craig

Enclosures

We are respectfully requesting that you deny MVP the special use permit to run their pipeline through the National Forests, our property and the property of others in Craig County Virginia. We have a sizeable amount of acreage that would be affected in this area. We are concerned with the after effects on our land and water and mainly on the National Forest itself. The Jefferson Forest that you protect was never meant to have utility corridors such as this proposed pipeline running through it. We don't believe it was ever intended to even be a reason for any amendments to be considered for such a purpose. We went through a lot of trouble to purchase our land here to protect it from development of any kind. It is a pristine, "protection worthy at all costs" area that should never be subjected to abuse such as the proposed pipeline...Please heed these concerns of ours and the many others, including but not limited to the governing Board of Supervisors for Craig County....Thank you for your time.

Sincerely,
Richard and Christine Layton, New Castle Virginia and New Milford, Ct.

Re: MVP Special-Use Survey Permit Application.

Dear Supervisor Speaks:

Item 16, on page 2 of Form 299 (Application Number BBW4333OIT, dated 3-10-15) required Mountain Valley Pipeline, LLC (MVP) to; *“Describe probable effects on the population in the area, including the **social** and economic aspects, and the rural lifestyles.”* Their answer was; *“The proposed surveys will not effect the population of the area, their economic aspects, or the rural lifestyle.”* They totally failed to address the **social** aspect in their required response. Their incredibly simplistic response totally omitted the required **social** aspect.

The Forest Service (FS) accepted the Application as complete because, apparently, they didn't care about the **social** aspect either, even though this issue was a required feature of the application. MVP's failure to address the **social** impact of their proposal makes the Application incomplete. This particular omission was also present on the original 11-24-14 Application that just concerned a 2.13-mile survey. The Application should be rejected because it did not meet the required explanation of the **social** impacts, this should be re-filed with MVP's stated position on this question and the time period should be extended so the public can respond to the omitted **social** impacts of the proposal.

There are **social** effects, and there are effects on the rural lifestyle that require a more comprehensive response than simply saying there will be no effects. Instructions on page 3 of Form 299 for item 15. Allows that; *“Generally, a simple statement of the purpose of the proposal will be sufficient.”* But, for items 16 through 19 it states; *“Providing this information in as much detail as possible will assist the Federal agency in processing the application and reaching a decision.”* Item 16 regarding the description of probable effects on the population in the area including the **social** and economic aspects, and the rural lifestyles falls in this category requiring a more comprehensive answer. Page 3 of the Application stated; *“If all the information is not provided, the Application may be rejected.”* The required information on this **social** aspect was NOT provided, and I respectfully request that MVP's Application be rejected.

Following are my reasons for justifying the social effects and impacts to the rural lifestyle resulting from this project.

Cultural Attachment has social effects, and impacts the rural lifestyle in certain areas. Alternative 110 cuts across the Waiteville area in Potts Valley, West Virginia and the Sinking Creek area in Virginia which are both classified as having a “High/Med” degree of Cultural Attachment (see Appendix “M” of the FS Draft Environmental Impact Statement, DEIS for APCO 765 KV Transmission Line, Vol. IV, June 1996). MAP 3, in Appendix M delineates the Waiteville area, and the Sinking Creek area in Yellow. Although these two specific, mapped, areas were detailed in the DEIS for an electric transmission right-of-way, the existing condition of the

qualities they identified are the same, no matter what project is proposed. MVP's Special-Use Survey Permit covers activities in these two specific areas.

These two specific, mapped areas are referred to in the study as Waiteville, and Sinking Creek, both of which are extremely sensitive to any sort of intrusion. Maintaining the social and rural lifestyle in these specific areas would be compromised to some extent by EQT's survey planting red ribbons across the landscape planning a project that can seriously impact the rural lifestyle of these special areas.

I understand the FS position that any future project would be outside-the-scope of the project, but I also understand that Forest Supervisor Eakins correctly stated in his scoping letter for this project, dated 3-13-15, in reference to Black Bear Habitat, that; *"While the current Forest Plan direction would not allow the construction of the pipeline in these alternative routes, we do have the authority to amend the Forest Plan."* This statement by the Deciding Officer opens the door to understanding the true scope of this Survey Permit which is more than just digging holes in the ground and defacing the mountain with survey tape. This Survey Permit is the first step in allowing what will come next, and can't be isolated from their greater plan that MVP has formally announced in their FERC pre-approval application. FERC's planned EIS will allow plenty of time to survey MVP's proposal in its proper context. It would be a more honest way of doing things.

"In cultural attachment, land is not seen as a commodity but as a part of the family system that has a sacred quality"(Appendix M. p. 27). These areas are fast-diminishing islands that should be preserved. Peoples reverence for the land needs to be considered in the analysis so these special areas can be identified and avoided. Cultural Attachment is a significant issue.

"In areas of high cultural attachment, a relatively undisturbed area where public activity support their culture through daily choices, an intrusion such as a powerline, four-lane road, or other major project which would be highly intrusive (quotes in this letter are taken from the DEIS, dated June 1996, Appendix M)". The Mountain Valley Pipeline (MVP) project threatens this living culture. *"Alternatives that pass through one or more areas of high or high/medium cultural attachment are considered destructive to the cultural attachment in the area."*

Avoid it, or destroy it, are the only options because; *"Cultural attachment does not lend itself to mitigation."* These special areas are quickly disappearing from the landscape and should be preserved. *"For alternatives with high intrusive impacts on cultural attachment where intrusions have been minimal and individuals make daily choices based upon their culture, avoidance is the most culturally appropriate action."*

Appendix M goes into considerable detail identifying this Cultural Attachment issue. There are no tribal Indian lands in this area, but that doesn't mean that the inhabitants should be denied protection from this Federally handled project. *"There is a striking similarity between this phenomenon and the description of cultural property that is often used in discussing Native American's cultural and spiritual relationship to land and place. Identification of this cultural phenomenon can be established through: active rituals on the land, burials of family members, family history rooted in stories about the land, and intimate understanding of the resources*

which the land provides sustenance. All of these apply to the federal lands in the Peters Mountain Area."

People here have a reverential regard for Peters Mountain. It is sacred ground. Alternative 110 proposes to slice a linear right-of-way through the heart of an identified, mapped, Cultural Attachment area on Peters Mountain, Waiteville, and Sinking Creek. The area should be avoided because of this identified Cultural Attachment issue.

The importance of this Cultural Attachment issue has been recognized by the FS. The FS is a cooperating agency with FERC on this MVP project. Appendix M of the 1996 FS-APCO DEIS is a FS document. One of the six rationales used by Jefferson National Forest Supervisor Damon in turning down APCO's application in the DEIS Record of Decision stated; *"Alternatives 1 through 6 would cross several areas where Cultural Attachment, or the way people relate to their surroundings and interact with each other within the community, was pronounced. Alternatives 1 through 6 would effect the Peters Mountain Area, where the effects of a transmission line were rated high. Additionally, the Waiteville and Sinking Creek Areas would be moderately impacted by Alternatives 1 through 4"* (ROD, dated 2002, P.5). And, then finally when another alternative corridor was found that avoided the Waiteville and Sinking Creek areas, he stated; *"The West Virginia PSC (Public Service Commission) approved a route that avoided all National Forest lands in West Virginia thus avoiding the impacts related to Peters Mountain (cultural attachment, visuals along Peters Mountain and remote habitat).."* The FS precedent for considering the Cultural Attachment issue in Waiteville and Sinking Creek Areas has direct application on your MVP Survey Permit consideration today.

Preserving the rural landscape in these specific, mapped areas, previously recognized and acknowledged by the JNF is being threatened by this Survey Permit Application. Residents here aren't the fools you assume them to be. When they see the survey tape and crews roaming through their mountains they know what's coming next. Your proposed Survey poses an actual present-day threat to the people that live around this identified area. Cultural Attachment is based on preserving the rural lifestyle that MVP so capriciously addresses in their one line "no effect" answer to item 16 of their Survey Application. Please consider this issue, and reject their Survey Application.

Sincerely,

Richard Ettelson

Dear Madam or Sir:

I write regarding the Mountain Valley Pipeline, currently contemplated to traverse Craig County, Virginia. Proposed route Alt 110J, per <http://mountainvalleypipeline.info/wp-content/uploads/2015/02/Craig-County-Alternative-Rev3-2.pdf>, would cause immeasurable destruction to the private property of residents and public property of the Jefferson National Forest. It would permanently destroy some of the nation's most pristine and beautiful wilderness that makes the New Castle and Craig County area a draw for tourism.

This private project plans to traverse Sinking Creek and will inevitably damage that waterway's fragile ecosystem. Route Alt 110J would also destroy a creek and the spring from which that creek originates on the property of Tom Morgan at 14510 Cumberland Gap Road. This creek is known to provide drinking water to all kinds of forest animals. It is one of the defining characteristics of the hillside in that area, where trees have finally matured and returned the mountains to their full color and splendor after the over-harvesting that occurred in those forests a century ago.

Proposed route Alt 110J is, as its name implies, an alternate route created to assuage the complainants of the originally planned route. Proposed route Alt 110J still carries with it, though, the plan to dig a massive trench for a 42"-wide pipe, and its construction will carve a swath of destruction in the hillside over a hundred feet wide and several miles long, literally de-foresting much of that region. The carnage it will inflict upon the forest and creek bed in its path is irreparable.

My family, and many of our friends, consider this area to be one of the most picturesque spots in the world. We vacation there. We shop in New Castle. We canoe in the New River. We hike in the mountains above the Jefferson National Forest. We photograph the magnificent trees in the fall. We go to this area, as many others do, not for its infrastructure, but for the opposite: we go there for its natural, unspoiled, beauty.

Tourism is not just an economic lifeline for a region, it is a source of great joy and inspiration for all citizens. Please do whatever you can to halt any plans for a pipeline that would enter Craig County, traverse the mountains of the Jefferson National Forest, or destroy the forest and creek above 14510 Cumberland Gap Road.

Sincerely,

Cheryl M. Temple

Ventura, CA

To: USDA Forest Service Mountain Valley Pipeline Survey Comments
From: Debbie and Chip Snead, Mountain Branch Farm, Craig County, VA

We would like to go on record opposing the application for special use permit that would allow Mountain Valley Pipeline to survey across the Jefferson National Forest or other public land in Craig County, Virginia. As landowners of a sizable beef cattle farm, it is critical for us and other farmers in the County to maintain uninterrupted pasture and crop land for our cattle. A potential pipeline would not only disturb grazing, growing of forage for feed, and watering for the cattle, but also the homesteads that manage the farms.

Agriculture is the number one industry in Virginia, and beef cattle as a component, is the number one industry in Craig County. Any interruption or halt in the ongoing activity of any agricultural process not only impacts products and livestock, but the economic development of farm families and the County itself.

There are over 180 square miles of the George Washington and Jefferson National Forest in the County which serves as an attraction to Craig residents as well as citizens of the state. The natural beauty and opportunities for hunting, fishing, hiking and camping bless us all with the availability for individual, family, group and tourism activities.

For these and numerous other reasons, we ask that the request for any survey or potential pipeline be denied, so as not to spoil the beauty and economy of Craig County. Thank you for the opportunity to comment.

George and Deborah Snead

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Debbie Snead

267 Mountain Meadow Lane

New Castle, VA 24127

Phone: [540-864-5047](tel:540-864-5047)

E-mail: dsnead@vt.edu

Ladies and Gentlemen:

RE: Jefferson National Forest in Craig County, VA-Proposed Mountain Valley Pipeline

As the organization that is charged as the caretaker for the National Forests in this area, I am asking for the organization to refuse permission for Mountain Valley Pipeline, LLC, MVP, to secure utility corridors through the Jefferson National Forest in Craig County, VA. As you well know, the National Forest constitutes a large portion of the land in Craig, 112,000 acres, and it would be an egregious mistake to give permission for MVP to scar the protected lands that we so need to safeguard. To cite the US National Forest Service,

"Perhaps the rebuilding of the body and spirit is the greatest service derivable from our forests, for what worth are material things if we lose the character and quality of people that are the soul of America."

--Arthur Carhart, Forest Service Landscape Architect, 1919

How sad it would be to lose sight of what Mr. Carhart envisioned almost a hundred years ago for our precious forests, for the gain of MVP, which wishes to profit through a 42-inch pipeline-a material thing. This pipeline would sacrifice the character and quality of people that are the soul of America....and might I add, specifically Craig County.

Also, The Craig County Board of Supervisors recognized that MVP had violated its fiduciary responsibility by failing to schedule an Open Forum for the Craig County residents and stakeholders prior to the Comment Period Deadline that was established by your organization for responses with questions, comments, and/or concerns. MVP has now scheduled an Open Forum for April 7th, again after your published Comment Period Deadline, and I request that you extend the deadline to 30 days past the April 7thMVP Forum so that I may hear and see what MVP is presenting and be more informed in my comments to the US Forest Service.

Best Wishes and thank you for being the Steward for the National Forest in this and surrounding Counties. I welcome any questions you may have about my concerns.

Reference

USDA Forest Service - Recreation, Heritage and Wilderness. (n.d.). Retrieved March 30, 2015, from <http://www.fs.fed.us/recreation/>

dking

A. Dale King, Ph.D.

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Hickory, NC 28602

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[828-328-7294](tel:828-328-7294)

My husband and I own two properties on the proposed alternate 110R Mountain Valley Pipeline route in Craig County, Va. I agree and stand with "Preserve Craig" in its beliefs and actions in helping Craig County residents protect and preserve our natural, historical, and cultural resources. I fully support the "Preserve Craig" Science Committee Environmental Document. I believe the United States Forest Service should protect Craig County residents interest in our Forest lands, with 54% of Craig County land being USF land. The future of our County depends on our Forest lands. We depend on that protection for our way of life, and security. Our subdivision, (Foxfire) is a group of private property owners on a private road, with some of those properties bordering the Brush Mtn. East Wilderness in Craig County, and the Brush Mtn. Wilderness in Montgomery County, which are now Federally Protected Wilderness areas. On March 30, 2010 President Barack Obama signed the Omnibus Public Lands Management Act of 2009. (H.R. 146). The Virginia Ridge and Valley Act was part of that legislation, making Brush Mtn. East, and Brush Mtn. Newly protected Wilderness areas. The Wilderness Act signed into law by President Lyndon B. Johnson in 1964 gave this legal definition of the term Wilderness: "A Wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and community of life are untrammelled by man, where man himself is a visitor who does not remain." My husband and I as land owners in Craig County have denied Mountain Valley Pipeline the right to survey our land for their private gain. We do not want our way of life, our peace, and serenity, our properties and future plans, or the safety of our family jeopardized. To allow Mountain Valley Pipeline to survey would put us in this jeopardy. To allow MVP to survey our properties would be the step that opens the door to the MVP process that could take our private land from us for the personal gains of others and rob from us life as we now know it. We have future plans of a Ministry Retreat Cottage, and a possible future Bed and Breakfast for those wanting to enjoy a retreat from city life and relax in the arms of our Mountains. To allow MVP to survey our properties would start a process that could result in a 42" Gas Pipeline running the full border, at the front entrance of our future Ministry Retreat Cottage. That same pipeline would come close to 100 ft. from our Main House, where our family, and future visitors would sit on our rocking chair porch looking directly at a clearly marked Gas Pipeline path. Both of these future plans would be greatly hindered, if not prevented by this result. The Emotional Fear Factor associated with living near a 42" Gas Pipeline is UNEXPLAINABLE, and should never be forced upon anyone! The possibility of that brings me great stress. As of now we have halted our plans to build a new fence, and our Private Road is in extreme need of repairs of which we, and many of the residents of Foxfire are greatly concerned about the possibility of this pipeline, and do not want to put money towards the needed repairs of our road, which would be completely torn up under pipeline construction. This possible pipeline is a HUGE emotional factor for me. I have a special attachment to our Forest Lands, and our Wilderness areas. As our Forests and Wilderness lands are owned by the people of the United States, I am making Voice to that ownership and asking the United States Forest Service to NOT ALLOW the Mountain Valley Pipeline To SURVEY in Craig County USF, or Wilderness lands. For the USFS to allow MVP to survey Craig County Forest Lands could start a process that could leave our Forest, our Wilderness, our private lands, and the Craig County governmental body itself unprotected and in danger of great physical loss, great financial loss, and great emotional loss. I ask the United States Forest Service to STAND FIRM on the formal decision made in 2002. "A FINAL RECORD OF DECISION", where Craig County Jefferson National Forest was NOT an appropriate place for a transmission utility corridor. As a Craig County resident, my way of life, well being, natural resources, and the special environment of this area, along with my interest in our Forest lands needs your protection. I TRUST the United States Forest Service to administer that

PROTECTION. I am relying on the USFS to Stand Firm in their "Final Record of Decision" of 2002. Please consider deeply the present, and future impact of this survey decision. Please STOP even the possibility of this Gas Pipeline by denying the Mountain Valley Pipeline the right to survey our USF lands and put us in Craig County at Peace once again beneath our Protected Beloved Mountains. Respectfully Yours; Patti L. Allman

My husband and I have lived along Craig Creek on the Roanoke side of New Castle, Virginia for twenty eight years. The portion of Craig Creek that runs along our property is healthy and living as evidenced by a Save Our Streams investigation which showed the abundant presence of James Spiny Mussels. There is also an abundant variety of fish and macro-invertebrates visible in pristine, clear water. We rely on a well for our water and it is my understanding that our well water quality is dependent, in part, on the health of the creek. Our section of the creek frequently hosts fishermen, swimmers, as well as recreational kayakers. I am a supporter of Preserve Craig and agree with their science committee comments documenting why the Forest Service should deny the survey permit. If the proposed route of the Mountain Valley Pipeline were allowed to proceed, said pipeline would traverse Craig Creek upstream from our property and have a direct impact on the health of this vital waterway. It is also worth mentioning that I am a retired teacher from Craig County Public Schools. In my tenure at CCPS, I served as an Appalachian Arts and Studies in Schools (A.A.S.I.S) sponsor teaching students a sense of place, pride in their community, stewardship of our natural resources, and the cultural value of this region. On two separate occasions, my co-sponsor and I took groups of high school students on overnight camping hikes on sections of the Appalachian Trail in Craig County. Additionally, we hosted a trail feed to allow students to interact with hikers as they came through Craig County. Hikers that students interviewed consistently marveled at the beauty of the trail here. This was an incredible learning experience for all involved, and impacted one participating student so profoundly that she will be paid by Appalachian State University as a graduate student to complete a through hike of the Appalachian Trail for the purpose of collecting medicinal plants. The proposed route of the pipeline in Craig would be visible from large portions of the trail that cross Craig County and risks marring one of the greatest recreational assets to this community. I rely upon the Forest Service to protect our natural resources and the special environment of this area as this is our economical life blood. Craig County is not an appropriate place for a utility corridor. I implore you to deny the permit to survey.

Sincerely,

Sue Crenshaw

6775 Craig Valley Drive

To whom I ask to be concerned,

This pipeline could come right through my land, my creek bed!! I purchased this beautiful property to relax, get away, enjoy God's gift to us all and spent 200K for it. To even think there is a consideration to run a 40" pipeline full of high pressure explosive gas is nothing less than a bad joke.

This area of Virginia is beautiful, with beautiful people living there, some for generations. To consider ruining it for profit is just another slap in the face regarding the rights of US citizens, us the land owners. When will someone besides us take a stand, how many times has this already happen in the name of PROGRESS--the only letter correct is the P and it's for someone I will never know gaining--PROFIT.

Help us take a stand and for once do what's best for the people who worship nature and it's beauty.

James

James B. Ringer ADM, LUTCF, CSD
Registered Principal, Farmers Financial Solutions, LLC
email: james.ringer@farmersinsurance.com

Dear US Forest Service Folks,

I am asking the US Forest Service to deny MVP's application to conduct these surveys. I am a resident landowner in Sinking Creek Valley, located along Sinking Creek. I have been following the progress of this proposed gas pipeline and its alternates in Craig County and am in agreement with the Preserve Craig organization and in particular the comment of its Science and Technology Committee submitted to the forest service by Mr. Willis several days ago. There is no reason to re-open a debate that was settled years ago. Craig county and the US Forest Service lands within it are still the wrong location for a utility corridor. I will not attempt to re-state the reasoning in that comment. Rather, I would like to add some insights as to the effect of this survey application on me and my household.

The very reason for coming to and remaining in Craig County is to daily take in and enjoy the unique tranquil natural environment found here. This area is like very few others - I think a remark my wife has made about this place over the years encapsulates the goodness found here and our connection to it— whenever you come back home [to upper Sinking creek] from being away, the land tells our bodies to relax and we do! The peace pervades us and we respond. Our ties to this land go far beyond what can be articulated. We literally feel the connection in our bones when we come back home.

Among the reasons I felt safe in planting my family here is that this isolated valley is surrounded by National Forest lands, managed “to sustain the health, diversity, and productivity of the nation’s forests and grasslands to meet the needs of present and future generations” [quotation from Forest Service Mission Statement]. I understood and still understand the Forest Service to be a protector of many of the qualities that make this area unique. In a way though, it feels like a breach of trust for the forest service to even accept this application and consider permitting this survey. Things that I thought were fixed are now bouncing around loose and causing chaos. The peace that was inevitable is more elusive these days while the Forest Service decides whether to permit the survey. Statements made by MVP to the effect that no harm will come to anyone because of this survey are just not true. Because of this looming survey our valley is in jeopardy – and that too we feel very deeply.

We hunt, hike, fish, bird watch, and sometimes just loaf on these lands and they have become one with us. We raised our children here – the connection we share to each other and to this place draws them back. To allow this survey diminishes this connection to our place as it is the first step in a process which will have no beneficial impact on these lands and can only diminish the goodness found here and in very few other places.

Statements made by MVP to the effect that the pipeline will be safe, quiet, unobtrusive, environmentally sound and economically beneficial all ring hollow. The mere threat of the survey harms our mental, emotional and spiritual peace and forces a hold on plans related to the sale, purchase and use of lands anywhere close to the pipeline route. The actual conduct of the survey even more so, because it is the first step along the way to building this blight on the land.

I urge you to stand firm on the forest service mission to protect these lands for the good of all – deny this application to survey for a pipeline that need not pass through Craig county federal and private lands.

If enough of us just say no to this madness, the pipeline will never be built – to the betterment of us all and those who will follow us.

Sincerely,

Chuck Harris
859 Bethel Church Rd.
New Castle Va. 24127
[540/544-7079](tel:5405447079)
chuck.harris@pemt.net

To whom it may concern,

I am writing in regards to the MVP Alternate Route 110 that is proposed to run through Johns Creek-Black Diamond. My wife and I bought in that subdivision over two years ago and plan to start building our retirement house in the next 1-2 years. Purchasing Lot 102 came after 3+ years of walking numerous lots throughout the Roanoke Valley, Smith Mountain Lake, and the Blacksburg/Christiansburg areas. We were looking for the perfect area and we found it at Black Diamond. The rural setting with the valley, trout stream and surrounding mountains is like a scenic postcard that make people feel that it is God's Country. And it is. This iconic setting and the wildlife that inhabits it would be severely altered if the MVP is allowed to follow Alternate Route 110's proposed path across John's Creek and through Black Diamond.

I have been a Mechanical Engineer since 1980 and although I never directly worked on a pipeline, I do understand the engineering processes that need to be followed for designing/developing any new project. It appears to me that whoever laid out this route did not properly investigate the impacts for all areas (homeowners, wildlife, and natural setting) that this pipeline would affect. Instead they went for the most direct and cheapest route without understanding the consequences. That is not good engineering practices.....they just wanted to save money. That shouldn't be the priority. There are better paths around John's Creek-Black Diamond without as much of an impact to the surrounding area.

Thank you for your time.

Charles A. Zintner

Greetings U.S. Forest Service,

We are supporters of Preserve Craig and agree with the [Preserve Craig Science Committee comments](#) documenting why the Forest Service should deny the survey permit. We rely upon and trust the Forest Service to protect our interests and well-being, our natural resources, and the special environment of this area.

We firmly believe the proposed MVP project will disrupt, jeopardize and potentially destroy the following treasures in our backyards bordering the National Forest:

- * The breeding population of wild trout in the Pickles Branch and Trout Creek.
- * These waters are also major tributary headwaters of Craig Creek which joins the Jackson River to form the James River, eventually leading into the Chesapeake Bay.
- * On the Cove Mountain side of Pickles Branch are the ecologically-sensitive shale barrens which are the home to the endangered Dusky Salamander in the spring branches of the watershed emanating from the mountains.
- * significant fossil beds which exist in the drainage beds.

Our county government's plans rely on the long-term USFS presence and its promise (through the 2002 Record of Decision) that the Jefferson Forest would be protected from utility corridor.

Thank you for your consideration,
Homeowners on Rt 624/Miller Cove Rd (Alternate Route 110J)

Garland Hopkins
Judy Hopkins
Gary and Ruth Hendricks
Robert Cannaday
Louis Buck
Curtis Steele
Gloria Campbell
Doug Wright

USDA Forest Service/ George Washington and Jefferson National Forests:

We are supporters of Preserve Craig and feel strongly that the survey for the proposed Dominion pipeline should not be allowed.

We bought our property largely because it bordered the National Forest and because of the spectacular views from our house, which is less than a quarter mile from Maggie. We have already canceled plans to add on to our house on Johns Creek Road since property values are in limbo or have declined.

We hike in the National Forest often, and believe that allowing a pipeline through it would ruin the experience of being in a quiet, peaceful swath of nature and wildlife.

We rely upon and trust the Forest Service to protect our interests and well-being, our natural resources, and the environment of the area. Please live up to that trust by not allowing a pipeline survey.

Lou and Denny Kelly Bouvier

4867 Johns Creek Road

New Castle, Virginia 24127

[540-864-5176](tel:540-864-5176)

[336-601-4323](tel:336-601-4323)

Rick and Kathy Wiseman
14900 Cumberland Gap Road
New Castle, Va. 24127

Mountain Valley Pipeline Comments:

My family moved to Craig County in June of last year because we like to be in a rural area with neighbors that are like us and the National Forest lands with all of the wonderful natural advantages.

Then the Mountain Valley Pipeline rises up to change and damage the reasons we moved here. Our neighbors will be affected and land will be permanently changed and not for the better. For these reasons my family respectfully requests that you to deny MVP the special use permit. We also request you NOT to amend the Forest use plan to allow utility corridors of this nature to pass through Jefferson National Forest. We also agree with the Board of Supervisors to allow Craig County residents 30 days past the MVP open house on April 7 to make comments.

The path of the pipeline will take it through at least 3 National Forests and, it appears, other public lands such as State Parks in WVA. This pipeline, with the other 2 planned, will affect approximately 14,000 acres and much of this will be in the National Forests. The land will, for all intents and purposes, be permanently de-forested leaving a very ugly scar on all the land on the planned route. Herbicides will be used routinely to keep the plant life at a minimum and I'm sure they will say it is safe, but I am sure DDT was thought safe at one time also.

I understand and believe that trees are a renewable resource and not all can be left standing but this is not that case. The scar will be there for generations and will negatively impact the beauty of the Appalachian Trail, Black Bear habitat, Wilderness areas, Bobcat habitat, streams containing the endangered James Spiny mussel, summer range of the Endangered Indiana bat, Bald Eagle nesting sites and the habitat of many other "species of concern".

The Virginia Department of Game and Inland Fisheries lists on their site 122 species of wildlife that are endangered, threatened or a species of concern and reside year round or seasonally in Craig County. I will include the list at the bottom of this letter.

It contains:

2 Federally Endangered Species - James Spiny Mussel and the Indiana Bat

1 State Endangered - Bewick's Wren

1 Federal Proposed

8 State Threatened

16 Federal Species of Concern

5 Critical Wildlife Action Plan

6 Very High Need Wildlife Action Plan

9 High Need Wildlife Action Plan

There are many species on this list people will think about - Bald Eagle, Timber Rattlesnake, Barn Owl and the Northern Bobwhite Quail to name a few. But there are other small insects/invertebrates that many people would say "so what?". Then the question becomes is it really necessary to build this pipeline and affect the large and the small species?

The answer is, it is **absolutely not necessary to build this pipeline(s)**. There are several other options of transporting natural gas but the bottom line is **profit margin**. It is the least expensive method which will boost the profit margins of the companies involved and the profits will be large for this **private** company. They plan to spend \$3.5 billion on this project which means they expect to make hundreds of millions of dollars, there has to be a very profitable payback or they would not put this kind of money in to it. So a decision has to be made on taking less profit and protecting natural resources, which in this case are the National Forests and its wildlife or taking the other path they have chosen.

I have an MBA, worked in the manufacturing sector for 26 years and was a plant manager of a manufacturing facility in Southwest Va. for 4 years. I was involved in many budget planning sessions, project planning sessions where ideas to boost profits would be kicked around. Whenever a suggestion would come up that was environmentally not the right

thing to do someone was always willing, me or someone else, to be the "Lorax" and speak for the trees, speak for the environment, speak for what was the ethical step to take. I sleep well at night because we did the right thing.

Putting large profits ahead of the environment and private landowners is not the right thing to do. I own 51 acres of land in Craig and currently it will not be directly affected by this pipeline. The back of my land has a border with the National Forest and most of my neighbors land also borders USNF land. Everyone is a steward of the National Forests but I consider the area that borders my property my own personal section to care for and protect and I consider the effect of what I do on my property and what effect it will have on the National Forest. I feel my neighbors have the same considerations for the NF and the pipeline is something I personally have not met anyone in Craig that thinks this is a good idea. So while it affects me as someone who loves the National Forests it has a double hit to my neighbors and other citizens of Craig who will have their land and "their sections" of the National Forest impacted.

Another option to reduce the impact is the full use of pipelines that already exist and are being underutilized. It should be required for maximum utilization of the existing lines. Additional lines will create a safety concern for the citizens of Craig, environmental concerns, water quality concerns which will affect human and wildlife as well. Also the potential for serious forest fires would be fed by the gas for a certain period, until it can be turned off and the gas consumed.

In conclusion I don't see anything very positive with this pipeline and I do see a whole lot of negatives.

Thank you.

VDGIF List on 3rd page below.

Craig County Species Endangered, Threatened or of Concern

From Va Dept of Game and Inland Fisheries Site

Species Information Report selected 500 Species Booklets In County (045) Craig
Table is currently ordered by Status importance*

Species Code	Status*	WAP**	Common Name	Scientific Name	Source
50023	FESE	I	Bat, Indiana	Myotis sodalis	BOVA,HU
60017	FESE	I	Sparrow, James	Pseudobemba collina	BOVA,HU
40267	SE	I	Wren, Bewick's	Thryomanes bewickii	BOVA
40129	ST	I	Sandpiper, upland	Bartramia longicauda	BOVA
40293	ST	I	Shrike, loggerhead	Lanius ludovicianus	BOVA,HU
40178	ST	I	Sparrow, Heron's	Ammodramus heronowi	BOVA
10076	ST	III	Shiner, emerald	Notropis atherinoides	BOVA
40292	ST	I	Shrike, migrant loggerhead	Lanius ludovicianus migrans	BOVA
50022	FP		Bat, northern long-eared	Myotis septentrionalis	BOVA
70017	FS	I	Annishead, Epineurat Cave	Physobromus ephemerus	HUG
100155	FSST	I	Skipper, Appalachian grizzled	Pyrgus wyandot	HUG
100248	FS	I	Fritillary, regal	Speyeria idalia idalia	BOVA,HU
10127	FSST	II	Madtom, orangefin	Noturus gilberti	BOVA,HU
10046	FS	II	Shiner, roughhead	Notropis semperparper	BOVA,HU
40093	FS	II	Fagle, basile	Haliaeetus leuccephalus	BOVA,HU
60173	FSST	II	Pigtoe, Atlantic	Fusconia masoni	BOVA,HU
70003	FS	II	Isopod, Henrot's Cave	Caecidotea henroti	HUG
70006	FS	II	Isopod, Vandel's Cave	Caecidotea vandeli	HUG
70009	FS	II	Annishead, Allegheny County	Cave Siphonurus hoffmani	HUG
100154	FS	II	Butterfly, Persius duskywing	Erynnis persius persius	HUG
100256	FS	II	Crescent, tawny	Phyciodes batesii batesii	HUG
100333	FS	II	Beetle, cave	Pseudanophthalmus gracilis	HUG
100348	FS	II	Beetle, spotted	Pseudanophthalmus punctulatus	HUG
100634	FS	II	SPRINGTAIL, CAVE	Arrhopaltes concolor	HUG
110318	FS	II	MILLPEDE, Pseudotremia	sublevis	HUG
10429	FS	III	Sculpin, Bluestone	Cottus sp. 1	BOVA
60029	FS	III	Lance, yellow	Elliptio lanceolata	BOVA,HU
100001	FS	III	Fritillary, Diana	Speyeria diana	BOVA
10199	CC	II	Darter, candy	Etheostoma osburni	HUG
20020	CC	II	Helibender, eastern	Cryptobranchius alleghaniensis	HUG
30012	CC	IV	Rattlesnake, timber	Crotalus horridus	BOVA,HU
30040	I		Phreesnake, northern	Pituophis melanoleucus	BOVA,HU
40225	I		Sapsucker, yellow-bellied	Sphyrapicus varius	BOVA
40306	I		Warbler, golden-winged	Vermivora chrysoptera	BOVA,HU
40319	I		Warbler, black-throated green	Dendroica virens	BOVA
40772	I		Crossbill, red	Loxia curvirostra	BOVA
40052	II		Duck, American black	Anas rubripes	BOVA,HU
40213	II		Owl, northern saw-whet	Aegolius acadicus	HUG
40266	II		Wren, winter	Troglodytes troglodytes	BOVA,HU
40304	II		Warbler, Swainson's	Limnethys swainsonii	BOVA,HU
40320	II		Warbler, coral	Dendroica coronata	BOVA,HU
80187	II		Clubtail, green-faced	Somphus viridifrons	HUG
30039	III		Greensnake, smooth	Opheodrys vernalis	BOVA,HU
30068	III		Turtle, woodland box	Terrapene carolina carolina	BOVA,HU
40062	III		Redhead, Aythya	americana	HUG
40094	III		Harrier, northern	Circus cyaneus	BOVA,HU
40204	III		Owl, barn	Tyto alba	BOVA,HU
50024	III		Myotis, eastern small-footed	Myotis leibii	BOVA,HU
60145	III		Rainbow, Notched	Villosa constricta	BOVA,HU
60180	III		Springtail, blue Ridge	Antonsia orotias	HUG
100150	III		Butterfly, mottled duskywing	Erynnis martialis	BOVA
10089	IV		Shiner, New River	Notropis scabriceps	HUG
10131	IV		Eel, American	Anguilla rostrata	BOVA
10020	IV		Darter, riverweed	Etheostoma podostemone	BOVA
10007	IV		Perch, Percina	caprodes	HUG
10210	IV		Darter, blackside	Percina maculata	HUG
10212	IV		Darter, sharpnose	Percina oxyrinchus	HUG
10386	IV		Minnow, bullhead	Primephales vigilax	BOVA
20018	IV		Frog, upland	Rhombophryne	BOVA,HU
20031	IV		Salamander, Jefferson	Ambystoma jeffersonianum	BOVA,HU
20061	IV		Spadefoot, eastern	Scaphiopus holbrookii	HUG
30017	IV		Scarletsnake, northern	Cemophora coccinea copei	HUG
30024	IV		Snake, eastern hog-nosed	Heterodon platirhinos	BOVA,HU
30033	IV		Snake, queen	Regina septemvittata	BOVA,HU
30045	IV		Ribbonsnake, common	Thamnophis sauritus sauritus	BOVA,HU
40028	IV		Heron, green	Butorides virescens	BOVA,HU
40065	IV		Scap, greater	Aythya marila	HUG
40100	IV		Bobwhite, northern	Colinus virginianus	BOVA,HU
40109	IV		Rail, yellow	Coturnicops noveboracensis	HUG
40127	IV		Whimbrel, Numenius	phaeopus	HUG
40140	IV		Woodcock, American	Scolopax minor	BOVA,HU
40142	IV		Downy, short-billed	Limnodromus griseus	BOVA
40180	IV		Tern, Forster's	Sterna forsteri	HUG
40202	IV		Cuckoo, yellow-billed	Coccyzus americanus	BOVA,HU
40214	IV		Chuck-will's-widow	Caprimulgus carolinensis	BOVA,HU
40215	IV		Whip-poor-will	Caprimulgus vociferus	BOVA,HU
40217	IV		Swift, chimney	Chaetura pelagica	BOVA,HU
40229	IV		Kingbird, eastern	Tyrannus tyrannus	BOVA,HU
40240	IV		Flycatcher, willow	Empidonax traillii	BOVA,HU
40243	IV		Pewee, eastern wood	Contopus virens	BOVA,HU
40248	IV		Swallow, northern rough-winged	Petelodipteryx serripennis	BOVA,HU
40264	IV		Creep, brown	Certhia americana	BOVA,HU
40269	IV		Wren, marsh	Cistothorus palustris	HUG
40272	IV		Catbird, gray	Dumetella carolinensis	BOVA,HU
40273	IV		Thrasher, brown	Toxostoma rufum	BOVA,HU
40277	IV		Thrush, wood	Hylocichla ustulata	BOVA,HU
40297	IV		Vireo, yellow-throated	Flavivirens mustelina	BOVA,HU
40302	IV		Warbler, black-and-white	Mniotilta varia	BOVA,HU
40303	IV		Warbler, prothonotary	Protonotaria citrea	HUG
40305	IV		Warbler, worm-eating	Helmitheros vermivorus	BOVA,HU
40307	IV		Warbler, blue-winged	Vermivora pinus	BOVA
40312	IV		Parula, northern	Parula americana	BOVA,HU
40313	IV		Warbler, yellow	Dendroica petechia	BOVA,HU
40328	IV		Warbler, prairie	Dendroica discolor	BOVA,HU
40330	IV		Ovenbird, Seius	lurocapilla	BOVA,HU
40332	IV		Waterthrush, Louisiana	Seiurus motacilla	BOVA,HU
40333	IV		Warbler, Kentucky	Oporornis formosus	BOVA,HU
40337	IV		Chat, yellow-breasted	Icteria virens virens	BOVA,HU
40340	IV		Warbler, Canada	Wilsonia canadensis	BOVA,HU
40344	IV		Meadowlark, eastern	Sturnella magna	BOVA,HU
40349	IV		Blackbird, rusty	Euphagus carolinus	HUG
40355	IV		Tanager, scarlet	Piranga olivacea	BOVA,HU
40358	IV		Grobeak, rose-breasted	Pheucticus ludovicianus	BOVA,HU
40375	IV		Toad, eastern	Pigilo erythrophthalmus	BOVA,HU
40378	IV		Sparrow, grasshopper	Ammodramus savannarum	BOVA,HU
40391	IV		Sparrow, field	Spizella pusilla	BOVA,HU
50006	IV		Shrew, long-tailed (rock)	Sorex dispar dispar	BOVA,HU
50040	IV		Weasel, least	Mustela nivalis alleghaniensis	BOVA,HU
50046	IV		Skunk, eastern spotted	Spilogale putorius	BOVA,HU
50081	IV		Woodrat, Allegheny	Neotoma magister	BOVA,HU
50106	IV		Cottontail, Appalachian	Sylvilagus obscurus	BOVA,HU
60005	IV		Mussel, single floater	Alasmodonta undulata	BOVA,HU
60135	IV		Snail, steep	Mudialta leptostis dilatata	HUG
60137	IV		Creep, Strophitus	undulatus	BOVA,HU
60159	IV		Lance, Carolina	Elliptio angustata	HUG
60176	IV		Spike, Atlantic	Elliptio producta	BOVA,HU
70090	IV		Crayfish, New River	Cambarus chasmodactylus	BOVA
70100	IV		Crayfish, Teays River	Cambarus sciotensis	BOVA,HU
70128	IV		Crayfish, Spiny Stream	Orconectes cristavarius	BOVA,HU
100138	IV		Butterfly, hoary elfin	Callophrys pollus	BOVA
100229	IV		Butterfly, early hairstreak	Iraora laeta	BOVA
100243	IV		Butterfly, northern metalmark	Caliphetis borealis	BOVA

* FE=Federal Endangered; FT=Federal Threatened; SE=State Endangered; ST=State Threatened; FP=Federal Proposed; FC=Federal Candidate; **FS=Federal Species of Concern; CC=Collection Concern

** I=VA Wildlife Action Plan - Tier I - Critical Conservation Need; II=VA Wildlife Action Plan - Tier II - Very High Conservation Need; ***III=VA Wildlife Action Plan - Tier III High Conservation Need; IV=VA Wildlife Action Plan - Tier IV - Moderate Conservation Needed

List completeness is dependent on a search for published scientific records of which there may be many naming countries but few for other area types.

I am a supporter of Preserve Craig and I agree with the Preserve Craig Science Committee comments documenting why the Forest Service should deny the survey permit.

I rely upon and trust the Forest Service to protect my interests and well-being, our natural resources, and the special environment of this area.

Several years ago my wife and I bought six acres of land on Johns Creek and recently finished construction of a new home. We plan to retire to Craig County within the next eighteen months. For me, a major reason for relocating to Craig County is that its ecological balance and natural beauty have been relatively untouched by the forces of extractive industries which have devastated so much of the areas I have lived in up to now, meaning southern West Virginia and Eastern Kentucky. One of Mountain Valley Pipeline's alternate routes passes close by the merger of Dick's Creek and John's Creek, within sight of our new house. I should point out that I and thousands of West Virginia and Kentucky citizens have resisted the destruction of our mountains and streams for thirty years, with many significant victories. But the environmental and cultural devastation done by the coal and natural gas industries was well advanced before citizens mobilized to contain it. I am encouraged that the citizens of Craig County and neighboring counties have organized early in the process, and are inoculating themselves against MVP's formulaic propaganda campaign.

My concern is not only with the potential damage MVP's project would inflict on our property. I do not want to fight against this project only to push it out of my sight, but I want to challenge whether the pipeline should be constructed anywhere. One reason for my thinking is that as members of the world community we should be limiting, not expanding, our dependence on fossil fuels. Another is that, according to the attorneys for Appalachian Advocates, existing pipelines could easily handle the demand for natural gas for the foreseeable future-----especially as we scale back and divert our research and construction into alternative sustainable energy. Mountain Valley Pipeline would not be filling a public need-----and certainly not a public good, but is strictly conceived to maximize shareholder dividends for a private corporation. The vague assurances from MVP of tax revenues for the county carry little weight with citizens who understand the potential devaluation of property in the county and likely losses of tourism trade if this pipeline is built. The erosion of these revenue streams will, over time, far outpace any payments from Mountain Valley Pipeline.

Mountain Valley, according to its spokesman who spoke to the Craig County Council in March, chose the Craig County routes by drawing on a topographical map. Moreover, they have never constructed a 42-inch pipeline. I sincerely hope they never will.

You are well aware of the potential for leakage and dangerous explosions, and the likelihood of poisoning the pristine streams in Craig County. The routes I have seen pose inevitable disruption of the nesting and feeding areas of John's Creek's eagle population, which includes American Bald Eagles. The great promise offered by reasonable development of the county's tourism potential would almost certainly be undermined, thereby hurting one of the county's opportunities to nurture a diverse, ecologically sensitive local and regional economy.

Aldo Leopold was one of the great pioneers in the field of wildlife management, conservation, and ecological and biodiversity studies. He began his professional career in the Forest Service before moving to the University of Wisconsin to build an innovative program in forest and wildlife management and agricultural science. In 1948 he published *A Sand County Almanac*, which included an essay called "The Land Ethic." It has served as a touchstone for environmentalists and responsible land managers ever since. In it Leopold said

Yes, but just what and whom do we love? Certainly not the soil, which we are sending helter-skelter downriver. Certainly not the waters, which we assume have no function except to turn turbines, float barges, and carry off sewage. Certainly not the plants, of which we exterminate whole communities without batting an eye. Certainly not the animals, of which we have already extirpated many of the largest and most beautiful species. A land ethic of course cannot prevent the alteration, management, and use of these 'resources,' but it does affirm their right to continued existence, and, at least in spots, their continued existence in a natural state.

John Hennen

We bought our home and property 23 years ago because it was surrounded by national forest. We were willing to make sacrifices to live way out in the country because we wanted to live in an area with access to the national forest and we also wanted the surrounding land to be protected from development, or environmental encroachment. We knew that the Forest Service would do that for us.

Over the past 23 years, we have become a part of a community, here in Upper Craigs Creek, who rely on the land for our sense of community. Our lives are tied to each other and the land. We know how much rain it is going to take to shut the road down because of an overflow in one area at the beginning of Upper Craig Creek Rd. We call each other who we know are at work and let them know that the road may soon close. We know when the Great Blue Heron is going to start appearing on Craig Creek, and we look for him and let our neighbors know when he arrives. We know when the ground is dry and the winds start to blow, to watch the mountains for fires. This attachment to the land and the forest brings us together. The Forest Service allowing surveying for this pipeline, brings fear to our hearts, because we know that it is the beginning of a threat to our own land and the protected lands that surround us.

Besides the harm to our community as a whole, I have specific monetary harm caused by the survey request. We own a farm and were planning on building another building to house our farm equipment. We have put this project on hold, as we do not want to put any more money into our property. The value of our property has been greatly devalued, because of the likelihood that the Forest Service will allow MVP to survey. Who would want to buy a half a million dollar piece of property near a national forest that has a 42" gas pipeline running through it?

We have a well on our property, which is directly down from the fall line from where the pipeline is proposed. The water comes from the national forest above our property. I am afraid that our water quality will suffer greatly during pipeline construction, and permanently from the pipeline. The other factors particular to our property that are significant, are a pond for erosion control, Upper Craigs Creek which will be damaged if the pipeline crosses it, and hickory trees with bat roosts. We also have great blue herons in our pond and the creek which return annually, which are not that common in western Virginia, but which should not be disturbed.

Not only does my community, and myself individually, rely on the National Forest to protect our land and way of life, but our county as a whole relies on the National Forest's plan of protection. As you know, a large portion of Craig County is forest. We used to have a forest service office in Craig and more jobs and support services from the National Forest. Now the greatest benefit we receive from the Forest Service is protection of our Jefferson National Forest. We need to be able to rely on your support of opposing the pipeline through national forest.

Sincerely,

Nancy Nemec, Esq.

Douglas Nemec, M.D.

H. Thomas Speaks, Jr.
Forest Supervisor
George Washington and Jefferson National Forest
5162 Valley Pointe Parkway
Roanoke, VA 24019

RE: request to extend comment period to survey in Forest Service Lands

3 March 2015

Dear Mr. Speaks,

The National Forests are a treasure. Mountain Valley Pipeline company has suggested alternative routes to their PF 15-3, pre-filing application after the 1 December filing date. The new routes are a substantial change from the Pre-filing PF 15-3 and where the change would impact the National Forests. I would like to request the Forest Service extend the comment period regarding surveying for Mountain Valley Pipeline in the National Forest Lands. Further, the alternative routes through Craig County cross a Political Jurisdiction unmentioned in the PF 15-3 MVP pre-filing application. And, a significant nexus exists to the entire region and surrounding areas': safety, water, soil, geology, cultural health, mental health, prime agricultural and forest lands managed well and in recognition of the value of Natural Resources and National Forest Lands.

The MVP alternative routes cross Craig County near or at where the American Electric Power Company (AEP) proposed in 1989-1992 to the (Virginia) State Corporation Commission to construct a 765 kV above-ground powerline through Craig County, Virginia. Findings from that Environmental Impact Statement research found Cultural Attachment (Cultural Heritage) to the land and Environmental Sensitivity of rare and endangered flora and fauna of Craig County. Mountain Valley Pipeline should research those areas listed so as to avoid conflict with documented "no go" zones. Reference below *. The MVP alternative routes seem to be of equivocal origin.

Due to the substantial route change from PF 15-3, insufficient and inappropriate notice to the Citizens of Craig County that the MVP pipeline route alternatives included Craig County after 1 December 2014 closing date, I would like to request of the Forest Service that they (the FS) extend the surveying comment period so that the folks of Craig County can comment, on the Mountain Valley Pipeline to survey in the National Forest Lands. This issue is now local within Forest Service Lands, integral to Craig County, Virginia.

It is important to call attention to what the Forest Service and Forest Service Supervisor, William Damon, did in their AEP 765 kV powerline decision in 2001. The comment period was extended. This sets the Precedence for the MVP pipeline routes through Craig County, Virginia.

What should be the process to extend a comment period? And if not now, when?

Thank you, Mr. Speaks, for your time and consideration. Please feel free to contact me if you have any questions.

Sincerely,

*[Federal Register Volume 66, Number 151 (Monday, August 6, 2001)]

[Notices]

[Pages 40967-40970]

From the Federal Register Online via the Government Printing Office [www.gpo.gov]

[FR Doc No: 01-19555]

<http://www.gpo.gov/fdsys/pkg/FR-2001-08-06/html/01-19555.htm>

DEPARTMENT OF AGRICULTURE

Forest Service

March 23, 2015

Dear Supervisor Speaks,

Thank you for opening the comment period on the Jefferson National Forest special use permit for Mountain Valley Pipeline. The forest is of special significance to me. The one reason I chose to live where I do is because of the benefits of that forest. Let me explain further.

First, the forest surrounds me with the world of nature which I can't live without. The barred owls, the wood thrushes, the cool morning mist drifting down the slope, the sounds of roaring wind, the clean water that feeds my spring, the earsplitting silence on a snowy day. The views of the mountain slopes in their pastel buds preparing for spring are food for my soul. My friends who have made their careers in the USFS know what I mean. One can never tire from this nourishment. The citizens of Craig County are fortunate to be surrounded by this every day of their lives. People who were raised in this special place know it is a treasure, especially when they go away and come back home. I have traveled extensively and there is no other place with this feeling.

In addition to the aesthetic appeal, the practical facts are that the forest harbors trees and wildlife that this county depends on for its economic livelihood. The bikers come from all over the world to join the Mountains of Misery bike race for the natural beauty found in Craig County. The hunters enjoy the abundant wild turkey and bear. The entire county depends on the forest for their clean water supply. Indeed, the purity of the headwaters of the New and the James depend on the National Forest.

Now, specifically let me address this MVP proposal. This company, in fact, has given little time for the citizens of Craig County to even find out about the proposal and to react. The sudden move of the pipeline to our county is remarkable in its reverse management. Survey teams are already on the ground as though it's a done deal. Citizens are signing a petition to you at this very moment to voice their opposition, and to point out that the USFS already has the information it needs to deny this activity. We are behind you! I urge you to do the right thing.

I am confident that the forest service remains the citizens greatest ally if this fight. Anyone who knows Craig County can see that the slopes here are subject to severe erosion. This is why there are strict rules imposed on loggers in building their roads. The very idea of a 150-300 foot cleared construction right of way is preposterous. Then, there is the Brush Mountain Wilderness area which will be undoubtedly affected by the pipeline and associated construction and maintenance. Citizens know the MVP had one route that actually cut right through the Wilderness area! Thankfully, you put a stop to that quickly. In any other case, this type of activity adjacent to a wilderness area would be disallowed. It should in this case too.

Although the AT is not the jurisdiction of the USFS, the enjoyment that hikers receive for their efforts comes directly from the national forest. The viewsheds that will be horribly affected and the slashing of that AT corridor are a poor reflection of the values of this country to others.

This sensitive Appalachian biological ecosystem is a narrow strip along the spine of Virginia that is encroached from all sides by development. Its' only protection is the regulations provided by my US Forest service. I say USFS is mine because the forest and its management are the responsibility of everyone. I have volunteered hundreds of hours in trail maintenance for the USFS and I have come to appreciate the very strict management of these activities. To allow a corridor right through the middle of these areas on Peters Mountain, Johns Creek Mountain, and Sinking Creek Mountain is an atrocity. You know that the spraying of the right of way, the introduction of non-native plants and the permission for perpetual access from the company are all terrible ideas.

The potential for uncontrollable forest fire in the event of a leakage is unthinkable where most residences adjoin the Jefferson National Forest. The building of this large diameter pipeline for the very first time on these steep and unstable slopes is an extremely risky idea.

The endangered James spinymussel is found nowhere else on earth like here in Craig County. Our national bird, the Bald Eagle nests here. These birds are protected by law and disturbance of nesting foraging or sheltering behavior is prohibited. A 660 foot buffer is required for construction in nesting areas. "The buffer areas serve to minimize visual *and auditory* impacts associated with human activities near nest sites" . These eagles forage up and down John's Creek valley and are often seen in Sinking Creek valley as well.

I urge you to remain true to our forest service use plan and deny the permit. If ever in the future the forest use plan *was ammended* to allow for private utility construction, it would be *then* that the survey would be considered, not *now*. To amend the plan which protects black bear habitat and old growth forest will open the door to this destructive activity is a dangerous precedent. It will erode the confidence of those who count on you to follow the established plan. Supervisor Speaks, I urge you and your colleagues to deny the special use permit.

Marjorie Lewter

New Castle

Sinking Creek resident

From: Gene Seago <seago@vt.edu>
Sent: Monday, March 30, 2015 11:48 AM
To: comments-southern-georgewashington-jefferson@fs.fed.us
Subject: Mountain Valley Pipeline

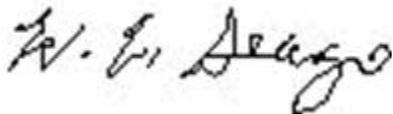
To: the US Forestry Service
From: W. Eugene Seago, Ph.D.

I am very concerned about the threat to the forests and surrounding houses that a pipeline in Craig County would create. One of my concerns is in regard to the threat of fires resulting from pipeline explosions.

The wind in Craig County can be extremely strong. Winds of 40 miles an hour are common in the Winter and Spring months.

Last November I watched my home become engulfed in flame in a matter of 5 minutes as a small fire in the crawl space, fanned by high winds, was transformed into a holocaust. A pipeline explosion in the area forests would cause an uncontrollable fire that would destroy thousands of acres of woodlands. This is not an unlikely event. U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration Final Report No. 12-173 reported over 80 pipeline ruptures during a 30 month period.

The possibility of less expensive energy for some is not worth the extraordinary risks to life and property of others. Moreover, the energy would surely not be less expensive if the pipeline owners were held accountable for all of the added costs of protecting the community from the added risks.

A handwritten signature in black ink that reads "W. E. Seago". The signature is written in a cursive style with a large, sweeping "S" at the end.

P.O. Box 615

Wake Forest, NC 27588

April 1, 2015

Mr. H. Thomas Speaks, Jr.

Forest Supervisor

George Washington and Jefferson National Forests

5162 Valleypointe Parkway

Roanoke, VA 24019

RE: Mountain Valley Pipeline Survey Comments

Forest Supervisor Speaks:

I write in support of dear friends and beautiful vistas, all located in Craig County in Southwest Virginia. When my wife and I moved to the Washington, DC suburbs from Louisiana over 25 years ago, the first couple we met introduced us to their gracious family and rugged, mountainous terrain. We were, and are, enthralled. While work has taken us away from Virginia, we look forward to retiring in Craig County, as it meets all of our requirements: endearing people, a nearby university town, well-trained medical personnel, and natural beauty untainted by a potential 300 foot wide scar extending into West Virginia.

I offer these comments in response to your request for comments on whether or not to issue a temporary (one year or less) special use permit to Mountain Valley Pipeline, LLC (MVP) to conduct civil, wetland and waterbody delineations, cultural resource surveys, and rare, threatened and endangered species surveys on National Forest System lands within the Jefferson National Forest (JNF). I do not support permit issuance, and, based on your office's own Forest Plan, neither should you.

As mentioned in your "Dear Interested Citizen" letter dated March 13, 2015, proposed alternatives 110J and 110R consist of over 46% Black Bear Habitat and Old Growth with Disturbance areas. That same letter specifies that these types of areas are unsuitable for the designation of new utility corridors or utility rights-of-way.

While I appreciate that the Forest Plan would allow the proposed survey activities and that you desire "a more complete analysis of potential impacts," I do not believe you should allow MVP to expend effort on a futile pursuit.

Before making your decision, please consider each of the following comments, and when compiling your record of decision, please ensure a complete response to each of the following comments is prepared.

1. MVP is ill-prepared to provide an adequate survey. MVP appears to be a hastily-assembled company that has never built a natural gas pipeline. According to links on MVP's website, EQT Corporation appears to be a hydraulic fracturing-based natural gas driller, Next ERA Energy appears to be a large natural gas seller in Florida, and WGL Midstream, a two-year old, recently-acquired partner, plans to build three other natural gas pipelines. As evidenced by the eleven pages of specific items that Federal Regulatory Energy Commission (FERC) directed MVP to address via an Environmental Information Request, MVP had difficulty assembling a thorough, original request for FERC. Those comments are included in this letter and can be found in Attachment A. Please have MVP respond to each of them prior to rendering your decision. Moreover, I request that once MVP provides a complete response, you extend your decision deadline, as well as the comment period, by at least 45 days so that I and others can review MVP's responses and formulate additional comments, as necessary.

More on point to your decision, MVP's inexperience in the activities associated with pipeline building is evidenced by sending you a request to route the pipeline through areas incompatible with new utility corridors or utility rights-of-way. I am concerned that MVP's lack of due diligence with respect to such a straight-forward matter will carry over into its data gathering, collection, and reporting activities, thus rendering its survey results less thorough or complete as you would desire. Should you allow the survey, please state how you will ensure the survey activities are conducted completely and thoroughly.

2. MVP appears to have begun collecting survey information without permission. Table 1 of your letter contains start dates of November 2014, February 2015, and March 2015, even though you could not grant permission prior to review of public comments. You should find out what data have been collected, review the data if you like, but in any event you should require recollection of those data only after you have issued appropriate permits. Please explain the survey start date discrepancies; the consequences for MVP's trespassing, if the survey has begun without permission; the minimum time you believe would be necessary to conduct a complete and thorough survey; and the steps you will take to ensure a complete and thorough survey is performed if you decide to allow the survey permit.
3. MVP's permit application (BBW43330IT, filed March 10, 2015) is incomplete.
 - a. No information related to compressor station size, air emissions control devices, or location, as is required by item 7b, is provided. Should this pipeline be approved, such compressor stations will be the cause of ongoing emissions of air pollutants including but not limited to:

nitrogen oxides	carbon monoxide	carbon dioxide
sulfur dioxide	volatile organic compounds	methane
particulate matter	total organic compounds	formaldehyde

propane.

Without complete related structure and facility information - which your office requires - no one can assess the impact of the proposed project. As you know, these pollutants can have adverse impact on flora and fauna in forest lands.

Moreover, these pollutants damage human health, as well. Recent studies have associated increases of these pollutants to harmful effects ranging from increased allergen production and potency¹ to increased suicide risk².

- b. Complete physical specifications, i.e., width and construction techniques for all anticipated terrain during all seasons, of the proposed project, as required by item 7c, are not provided. The lack of information regarding construction techniques through known karst-type soils, which are prone to allow rapid contamination of groundwater from construction activity,³ and which are known by the commonwealth of Virginia to be problematic for pipelines⁴, renders it impossible to determine whether MVP plans to use best practices - such as double liners with leachate collection systems - to protect the drinking water aquifer upon which residents and animal rely - in its proposed project.
- c. The term of years needed for the proposed project, as required by item 7d, is not provided.
- d. The time of year of use or operation of the proposed project, as required by item 7e, is not provided.
- e. The volume or amount of product to be transported by the proposed project, as required by item 7f, is not provided.
- f. No information regarding MVP's financial capability to own, operate, maintain, and terminate the proposed project, as required by item 12, is provided. Adequate capital is necessary, for even experienced, deep-pocketed companies with crews of trained personnel, such as Pacific Gas and Electric, a 110-year old corporation worth \$26 billion, can have trouble installing pipelines, as witnessed by the \$1.4 billion fine imposed by California regulators due to the explosion in San Bruno caused in part by improper installation of a 30 inch natural gas pipeline. Moreover, no information regarding MVP's ability to construct a 42 inch pipeline over the terrain in Virginia is provided. In addition, no information concerning the amount of horsepower required to operate the proposed pipeline is provided, so the reference to 150,000 horsepower associated with pipelines elsewhere has no context.
- g. MVP has not considered all other reasonable alternative routes, as required by item 13a. No discussion concerning sending the natural gas northward to ports on the Ohio River or Lake Erie, where the natural gas could be liquefied and put on barges, is provided. Going north appears to be both shorter in length and easier to construct, meaning lower costs for construction and no impact to the JNF. Another reasonable option - liquefying the natural gas near the wells in West

¹ http://www.upi.com/Science_News/2015/03/23/Air-pollutants-may-bolster-airborne-allergens/5301427117568/#ixzz3VPgsLhao

² Baklan, Amanda J. et al. Acute Air Pollution Exposure and Risk of Suicide Completion. *American Journal of Epidemiology* (2015) 181 (5): 295-303.

³ See http://www.dcr.virginia.gov/natural_heritage/documents/IntroVAKarst.pdf

⁴ See <http://www.vaemergency.gov/webfm_send/853/Section3-14-KarstTopography.pdf>

Virginia and shipping it in 11,000-gallon intermodal tanks via rail, as is being proposed in Alaska⁵ - is not discussed. This option would have the benefit of no additional disruption to the JNF. Indeed, existing infrastructure could be used to transport the natural gas to the public MVP contract holders, who remain unknown to the public. One other reasonable option, using the same corridor through the George Washington National Forest and / or the JNF for this proposed project as for other proposed projects such as the Atlantic Coast Pipeline.

As you know, adoption of more routes through our national forests increases fragmentation, and, as shown in a recent paper⁶ which drew conclusions from 35 years of experiments, habitat fragmentation reduces biodiversity by 13 to 75 percent and impairs key ecosystem functions by decreasing biomass and altering nutrient cycles. Such fragmentation resulting from pipelines is documented in research conducted by your own agency.⁷

- h. Given that item 13a lacked all reasonable alternatives for the proposed project route, item 13b also lacks completeness.
- i. Given that item 13a failed to identify at least 3 reasonable alternatives for the proposed project route, item 13c fails to explain why these – and other – reasonable alternatives may or may not need to cross Federal Lands.
- j. MVP failed to provide even a cursory overview of the authorized and pending applications for similar proposed natural gas pipeline projects, as required by item 14. With such information, you might be able to assess this response with those required by items 13a and 13c. Without such information, you are unable to make such a determination.
- k. The response for item 15 does not meet your requirements. No simple statement of need of benefit for the project, including economic feasibility, cost of the proposed project, and cost of the next best alternative is provided. Based on the limited information contained in MVP's press releases, business in areas distant from JNF appear poised to reap the alleged benefits from the proposed project, while persons, flora, and fauna in and near JNF will bear the ecological and environmental damage imposed by the proposed project.
- l. The response for item 16 does not meet your requirements. Rather than providing a complete response with respect to the proposed project, MVP offers a response

⁵ See <<http://www.eenews.net/stories/1060014956>>

⁶ Haddad, Nick M. et al. Habitat fragmentation and its lasting impact on Earth's ecosystems, *Science Advances* (2015):1:e150052

⁷ Adams, Mary Beth; Edwards, Pamela J.; Ford, W. Mark; Johnson, Joshua B.; Schuler, Thomas M.; Thomas-Van Gundy, Melissa; Wood, Frederica. 2011. [Effects of development of a natural gas well and associated pipeline on the natural and scientific resources of the Fernow Experimental Forest](#). Gen. Tech. Rep. NRS-76. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 24 p.

limited to the survey portion of its request. On its face, even the limited, offered response is incorrect and incomplete, as there is no way that survey activity in JNF will have no effect on the population, its economic aspect, or rural lifestyle.

- m. The response for item 17 does not meet your requirements. No information regarding the likely environmental effects that the proposed project will have on air quality, visual impact, surface and ground water quality and quantity, the control or structural change on any stream or other body of water, existing noise levels, and the surface of the land, including vegetation, permafrost, soil, and soil stability is provided. As was done for the response for item 16, MVP attempts to narrow the proposed project into just the survey. Even with that incorrect, limited view, MVP's response is incorrect and incomplete, for ancillary documentation describes manual removal of vegetation up to two inches in diameter.
- n. The response for item 18 does not meet your requirements. As with the other responses, MVP impermissibly attempts to transform the proposed project into a survey. Information from item 18 must be provided before you can make an informed decision.
- o. The response for item 19 does not meet your requirements. As before, MVP impermissibly attempts to morph the proposed project into a survey. It is hard to imagine that construction, maintenance, and operation of a 42 inch pipeline could occur without the use of hazardous materials including but not limited to gasoline, diesel, hydraulic fluids, mechanized engine oils and fluids, and radioactive sources for x-raying pipeline welds.

Thank you for considering my comments.

Sincerely,

Barrett Parker

Attachment A: FERC's Comments for MVP

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/G3
Mountain Valley Pipeline LLC
Docket No. PF15-3-000
§ 375.308(z)

March 13, 2015
Paul Diehl, Senior Counsel
Equitrans, L.P.
625 Liberty Ave., Suite 1700
Pittsburgh, PA 15222

Re: Comments on First Draft Resource Reports 1 & 10

Dear Mr. Diehl:

The enclosure contains the comments of the staff of the Federal Energy Regulatory Commission (FERC or Commission) on Mountain Valley Pipeline LLC's (Mountain Valley) first draft environmental resource reports (RRs) 1 (Project Description) and 10 (Summary of Alternatives) filed with the FERC on December 1, 2014, and additional alternative routes filed on February 18, 2015, for the planned Mountain Valley Project (MVP or Project) in West Virginia and Virginia in the above-referenced docket. The comments ask for clarifications of discrepancies and identify missing information that we believe is necessary to begin substantive preparation of an environmental impact statement for the Project.

In addition, we are requesting clarification of issues raised in comments filed by stakeholders that may be addressed in future draft RR's covering other environmental resources. To facilitate review of the future draft and revised RR's, Mountain Valley should include a matrix that identifies the specific locations in the RR's (i.e., section and page number) where the information requested in these comments may be found.

When filing documents and maps, be sure to prepare separate volumes, as outlined on the Commission's website at <http://www.ferc.gov/help/filing-guide/file-ceii/ceii-guidelines.asp>. Any plot plans showing equipment or piping details or other Critical Energy Infrastructure Information should be filed as non-public and labeled "**Contains Critical Energy Infrastructure Information – Do Not Release**" (18 CFR 388.112). Cultural resources material containing location, character, or ownership information

should be marked **“Contains Privileged Information – Do Not Release”** and should be filed separately from the remaining information, which should be marked **“Public.”**

For all materials submitted, in addition to the copies filed with the Secretary of the Commission, please provide electronic and hard copies directly to our third-party environmental contractor, Cardno (one each to Lavinia DiSanto and Doug Mooneyhan).

Thank you for your cooperation. If you have any questions, please contact me at 202-502-8059 or paul.friedman@ferc.gov.

Sincerely,

Paul Friedman
Environmental Project Manager
Office of Energy Projects

Enclosure

cc: Public File, Docket No. PF15-3-000

Mountain Valley Pipeline Project
Docket No. PF15-3-000

ENVIRONMENTAL INFORMATION REQUEST

Draft Resource Report 1 – General Project Description

1. Discuss whether, to the best knowledge of Mountain Valley, any natural gas transported for this Project would be designated for export. If all of the gas transported in the Mountain Valley pipeline would be for domestic use, describe the type of customers who would be using the gas. In particular, discuss realistic opportunities for use by local distribution companies along the pipeline route.
2. Include descriptions of any planned interconnections along the Mountain Valley pipeline route, including maps showing their locations, and detailed plan view drawings of any new proposed delivery meter stations.
3. Describe any modifications needed at Transcontinental Gas Pipe Line Company's (Transco) existing Station 165 to receive the natural gas from Mountain Valley. In addition, identify and describe any other modifications required to existing natural gas systems upstream or downstream of Station 165 to handle volumes from the Project.
4. Indicate if Mountain Valley plans to install any communication towers along the proposed pipeline route, and if so, identify their location and height.
5. Clarify the diameter of the pipeline. Would it be 36-inches or 42-inches in diameter? If multiple diameters would be used, include a table by milepost (MP) that provides the segment for each diameter.
6. Section 1.1 (page 1-1 of Resource Report [RR]1) stated that the Project would require approximately 217,000 horsepower while table 1.2-2 sums to 217,200 horsepower. Clarify the apparent discrepancy.
7. Clarify the expected operating range for the Harris Station.
8. Include information missing from table 1.3-1, Land Requirements (on page 1-8 of RR1).
9. Table 1.2-2 (page 1-6 of RR1) listed MP 75 as the location for one of the pig launcher/receivers, while table 1.3-3 (page 1-10) stated it would be located at MP 76. Clarify the apparent discrepancy.

10. Include a complete justification for the request to use a 125-foot-wide construction right-of-way in uplands and 75-foot-wide permanent easement. In particular, justify the proposed construction right-of-way width in forested areas. Include a detailed justification for the request to modify the FERC's *Wetland and Waterbody Construction and Mitigation Procedures* (Procedures) to use a 85-foot-wide construction right-of-way across wetlands.
11. Revise table 1.3-3 (page 1-10 in RR1) to include the locations of cathodic protection rectifiers and beds.
12. Include measures to be implemented to avoid or minimize impacts on sensitive resources, such as wetlands and forest, along new access roads.
13. Describe and justify any Project-specific deviations from the FERC's May 2013 versions of our *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) and Procedures.
14. Include Project-specific plans for burning slash, and detail measures to be implemented to protect forest, waterbodies, wetlands, air quality, nearby residents, and other sensitive resources in areas where slash would be burned.
15. Include a Project-specific plan for winter construction. If construction would be halted during the winter, provide a Winterization Plan that outlines measures to secure the right-of-way, and protect it from erosion or other damages, until construction would resume in Spring.
16. Clarify if automated welding techniques would be used during pipeline construction (see section 1.4.1.1, page 1-16 of RR1).
17. Justify the clearing of a 15-foot-wide swath associated with horizontal directional drills (HDD) (see section 1.4, page 1-21 of RR1). Outline measures that would be implemented to minimize impacts on trees along the centerline-guide wire of an HDD. Discuss the possibility that pulling an HDD in segments, thereby increasing construction flexibility and eliminating the need for prefabricated HDD sections (and pullback workspaces) to be the same length as the HDD.
18. Clarify the size of the foreign pipeline crossing at MP 0.6 listed on Table 1.4-2 (page 1-22 of RR1) as -99. Also, include details about the size of the seven foreign pipelines at MPs 35.8 and 286.2 listed as "unknown."
19. Describe special measures that would be used for construction or restoration in steep terrain. Explain how Mountain Valley would prevent rocks from rolling off the right-of-way, install erosion controls, and prevent post-construction landslides. Address the comment filed by stakeholders that steep ridge tops often form

property boundaries, and that these boundaries could be affected by post-restoration changes in topography.

20. Identify any nonjurisdictional facilities associated with the Project (implied in Section 1.9, page 1-38 of RR1). If there are any nonjurisdictional facilities that would be built as a result of the new gas volumes associated with this Project, include the following detailed information for each facility:
 - a. company/owner;
 - b. type of facility;
 - c. dimensions (pipe diameter, length, horsepower, etc. as appropriate for pipeline and land area for other facilities);
 - d. maps showing locations;
 - e. federal permits required and their status;
 - f. status of local and state permits required; and
 - g. any environmental reviews required for local, state, or federal permitting authorities.

21. Clearly state whether or not Mountain Valley would participate in FERC’s third-party construction compliance monitoring program.

22. Revise Section 1.10 of RR1 to identify the location [e.g., county, state, watershed, and Air Quality Control Region (AQCR)], timeframe, general description, and estimated impact acres of recently completed, current, and reasonably foreseeable projects. Use the fifth-field hydrologic unit code (HUC) watershed as the geographic extent of the analyses, except where that is non-applicable, such as for an air quality basin and socioeconomics at the county level. Include a detailed discussion of cumulative impacts that these projects combined with the proposed MVP would have on each of the applicable environmental resources, such as soils, vegetation, wildlife, cultural resources, land use, air quality, etc. Outline measures other project proponents may implement, if required for local, state, or federal permitting, to avoid, minimize, or mitigate cumulative impacts.

23. Describe the material(s) Mountain Valley would use to backfill the trench over the pipeline. Discuss whether “fly-ash” would be used for backfilling material, as claimed by a comment filed by a stakeholder.

Draft Resource Report 10 – Alternatives

1. Include a map illustrating the locations of existing pipeline systems, existing electric transmission lines, and existing major highways in the region (West Virginia and Virginia), and explain if the Mountain Valley pipeline could follow all or portions of those existing rights-of-way as route alternatives.

2. Discuss if any existing interstate pipelines in the region could be used as a system alternative for the Project. Include a table listing the current capacity of each existing system, and their potential to transport the additional volumes proposed by Mountain Valley.
3. Include a map and an analysis of an alternative route that would follow the existing East Tennessee Natural Gas pipeline near Blacksburg, Virginia, then proceed southeast to the existing Transco pipeline, then follow the Transco line northeast to Transco Station 165.
4. Include an analysis regarding whether a modified Alternative 1 route is feasible, where the alternative would be collocated with an electrical transmission line route and periodically deviate away to avoid severe side slopes before resuming collocation. Additionally, consider the feasibility of a hybrid Proposed Route-Alternative 1 route, and include a complete analysis of resource impacts along the hybrid route.
5. Further assess the potential for collocation of the Mountain Valley pipeline with other proposed pipeline systems in the region, such as the proposed Dominion Atlantic Coast Pipeline (PF15-6), Spectra Carolina Pipeline, Dominion Supply Header Project, and Williams Appalachian Connector Project. Include a map, and consider alternative routes that would totally or partially follow any of the proposed pipeline routes. Include an analysis of each of the alternative routes that lists potential impacts on environmental resources, based on a desk-top review of existing data bases. In addition, assess the potential for two or more proposed pipelines (including the Mountain Valley pipeline and the Atlantic Coast pipeline) in the region for combination into a single pipeline alternative.
6. Revise Sections 10.3, 10.4 and 10.5 to ensure that data categories are consistent in tables for all alternative routes considered. Data categories should include the extent of collocation, river crossings, acres of wetlands affected, miles of forest, acres of habitat for federally-listed threatened and endangered species, National Register of Historic Places listed or eligible sites, miles of steep side-slope construction, areas with landslide potential, karst geology, numbers of landowner parcels affected, and residences within 50 feet of work areas.
7. Revise Section 10.5 (page 10-9 of RR10) to include alternative locations for the crossing of the Blue Ridge Parkway, Appalachian Trail, and the Mill Creek Springs Natural Area Preserve. Include collocation of the pipeline with existing roads or utilities at alternative crossing locations, and consider ways to minimize visual impacts and impacts on forest in the vicinity of the alternative crossings.
8. Discuss route alternatives identified by stakeholders in comments filed in this docket. Illustrate the location of each of the alternative routes on maps, and include

a description and analysis of each alternative that compares impacts on environmental resources; in a manner as suggested in question 6 above.

9. Include a table that lists all minor modifications adopted into the proposed pipeline route since Mountain Valley's filing of the Summary of Alternatives in December 2014. The table should list each route modification by location (by MP), description, and rationale for why each minor route adjustment was made.
10. Add the location of existing communication facilities that were avoided to Figure 10.5-4 (page 10-15 of RR10).
11. Revise Section 10.6 (page 10-20 of RR10) to balance consideration of alternative compressor station locations near existing roads with the desire to locate compressor stations in isolated areas away from residences. For each compressor station alternative location, evaluate site topography and existing vegetation (i.e., trees) as potential sound and visual buffers relative to the nearest noise sensitive areas and residents. Include all applicable information for the sites as described in the comparison table included in Section 10.4 of the FERC's "Guidance Manual for Environmental Report Preparation."
12. Include an analysis of alternative sites for all other (non-compressor station) aboveground facilities, such as meter stations and valves, that considers their potential for visual impact or noise effects upon residents in comparison to the proposed aboveground facilities locations.
13. Table 10.4-1 (page 10-5, RR10) stated that there are no populated areas within 0.5-mile of the proposed route. However, the proposed route would cross the community of Preston Farms. Identify all residential areas, housing tracts, or subdivisions within 0.5 mile of the proposed route and all alternative routes considered. Discuss how the proposed route and all alternative routes would avoid or minimize impacts on specific nearby residential areas, housing tracts, or subdivisions.
14. Compare each of the new alternative routes provided in Mountain Valley's February 18, 2015 filing with the FERC, using the data categories suggesting in question 6 above. Identify and describe any associated Project changes associated with each new alternative considered, such as relocation of aboveground facilities. Discuss any environmental issues raised by stakeholders for each of the new alternative routes.
15. Describe the public outreach efforts conducted or planned for stakeholders located along the new alternative routes identified in Mountain Valley's February 18, 2015 filing.

Based on comments received by the FERC to date from stakeholders, address the following in the specified first draft RRs:

Draft Resource Report 2 – Water Use and Quality

1. Describe how Mountain Valley would determine the Project's effect on groundwater supplies, such as wells or springs. If construction would adversely affect a groundwater supply, outline the measures Mountain Valley would implement to mitigate impacts on landowners, including ensuring that a temporary source of water would be provided until the well is restored, and explain how the damaged water supply system would be repaired and returned to its former quality and quantity.
2. Include a detailed discussion of the Red Sulphur Public Service District watershed. Include the distance crossed of both the watershed and the “Zone of Critical Concern,” a map of these areas, and proposed impact avoidance, minimization, and mitigation measures.
3. Include a discussion of the Town of Boones Mill water source and treatment plant and the Banister River Basin (Cherry Stone headwaters). Include distance crossed, a map of these areas, and proposed impact avoidance, minimization, and mitigation measures for each feature.
4. List, in a table organized by MP, site-specific methods to be used to cross all waterbodies, based on waterbody size and designation, in accordance with the FERC Procedures. Identify any waterbodies that would be crossed using Direct Pipe trenchless technologies.
5. Include a detailed discussion of the crossing of the headwaters (Mill Creek near MP 230) to Bottom Creek, an Exceptional State Water (Tier III) stream. The analysis should outline measures proposed to avoid, minimize, or mitigate impacts on this stream system.

Draft Resource Report 3– Fish, Wildlife, and Vegetation

1. List, in a table organized by MP, all parcels of forest or wood lots that would be crossed by the proposed pipeline route. Include miles and acres of forest affected by Project construction and operation. Discuss how the creation of forest edge or fragmentation would affect habitat and wildlife, including potential impacts on federally-listed threatened and endangered species and migratory birds. Describe measures that would be implemented to avoid, minimize, or mitigation impacts on forest habitat.

2. In response to stakeholder comments, include a detailed discussion regarding impacts on local apiaries and honey bees due to removal of flowering vegetation along the proposed pipeline route.
3. Discuss if state and federally protected bat species would be affected by the Project. Identify bat habitat, including caves and forest, that would be crossed by the proposed pipeline route. Outline measures that would be implemented to avoid, minimize, or mitigate impacts on bat habitat. Document consultations with state and federal wildlife agencies regarding Project impacts on bats.
4. Discuss if state and federally protected mussels would be affected by the Project. Identify any streams containing mussel populations or habitat for mussels that would be crossed by the proposed pipeline route. Outline measures that would be implemented to avoid, minimize, or mitigate impacts on mussels. Document consultations with state and federal wildlife agencies regarding Project impacts on mussels.
5. Identify and describe the migratory bird species of special concern and their habitats known to occur in the project area. Include the following information:
 - a. an evaluation of the short-term, long-term, and permanent impacts on these species of special concern by construction and operation of the proposed facilities. The evaluation should include the direct, indirect, and cumulative effects of the Project;
 - b. Project-specific conservation measures and best management practices, developed in consultation with the U.S. Fish and Wildlife Service (FWS), to protect migratory birds and their habitats and to avoid or minimize take; and
 - c. documentation of consultation with the FWS regarding project-related impacts on migratory bird species of special concern.
6. Include an assessment of the recommendations regarding aquatic resources provided by the Virginia Chapter of the American Fisheries Society in their filing dated March 9, 2015. State which recommendations would be adopted by Mountain Valley, and if some recommendations would not be adopted, include a discussion of the rationale.

Draft Resource Report 4– Cultural Resources

1. Discuss how the Project would avoid, minimize impacts, or mitigate impacts on the following National Register of Historic Places (NRHP) listed Historic Districts or other NRHP listed or potentially eligible properties identified by stakeholders in the vicinity of the pipeline route or alternatives:

- a. Pence Springs Hotel Historic District, Summers County, WV;
 - b. Colonel Gwin Plantation, Summers County, WV;
 - c. Colonel James Graham Home, Summers County, WV;
 - d. Prehistoric archaeological sites along the New River, Giles County, VA;
 - e. Two historic covered bridges near Newport, VA;
 - f. Greater Newport Rural Historic District, Giles County, VA;
 - g. Civil War cemetery along Alternative 210;
 - h. North Fork Valley Rural Historic District, Montgomery County, VA;
 - i. Cahas Mountain Rural Historic District, Franklin County, VA; and
 - j. Bowman Farm, Franklin County, VA.
2. Prepare a cultural resources research design and survey strategy for the Project, and document that the design was reviewed by the State Historic Preservation Offices of West Virginia and Virginia, and Indian tribes that may attach religious or cultural importance to properties within the area of potential effect.

Draft Resource Report 5– Socioeconomics

1. Estimate the number of temporary and permanent jobs that would be generated during construction and operation of the Project. Provide a breakdown of temporary Project-related construction jobs by construction spread (and the MPs and counties for each spread).
2. Identify areas along the proposed pipeline route (by census block) that contain populations of ethnic groups or minorities, economically disadvantaged, disabled, non-English speakers, children, or elderly, and evaluate if the Project would have adverse economic, environmental, or health impacts on those populations. Explain if the pipeline route was selected in a manner that would disproportionately affect minority or low-income populations.

Draft Resource Report 6 – Geological Resources

1. Include a discussion of the Saint Clair fault line. Indicate what impacts the fault may have on the pipeline. Outline measures that would be implemented to avoid, minimize, or mitigate impacts from this fault.
2. List, by MPs, areas along the pipeline route that have the potential for landslides. Outline the measures Mountain Valley would implement to avoid, minimize impacts, or mitigate impacts related to landslides.
3. List, by MPs, areas along the pipeline route that have karst features or the potential for sinkhole development. Outline measures Mountain Valley would implement to avoid, minimize impacts, or mitigate impacts related to karst features or

sinkholes. Document consultations with appropriate local, state, and federal resource agencies regarding karst features and sinkholes.

4. List, by MPs, any caves that would be crossed, or would be within 0.5-mile of the pipeline route. For each cave, provide its name (if known), distance (in feet) and direction from the pipeline centerline, depth of the cave, use for recreational purposes, and potential habitat for bats. Include site-specific information on caves identified by stakeholders in comments filed with the FERC, such as: Pig Hole Cave, Smoke Hole Cave, Tawney Cave, Mill Creek Nature Preserve Caves, and Cross Smokehole Cave. Outline measures Mountain Valley would implement to avoid, minimize impacts, or mitigate impacts related to the pipeline crossing or being near a cave. Document consultations with appropriate local, state, and federal resource agencies regarding caves.
5. List, by MPs, all oil or gas wells within 0.25-mile of the pipeline. The table should provide the name of the well, distance in feet and direction from centerline, and well depth. Also, illustrate the locations of the nearby oil and gas wells in relation to the pipeline route on 7.5-minute U.S. Geological Survey topographic quadrangle maps. Outline measures Mountain Valley would implement to avoid, minimize impacts, or mitigate impacts on those oil and gas wells.
6. List, by MPs, any active or abandoned mines, including coal mines and quarries, within 0.25-mile of the pipeline. The table should provide the name of the mine, its distance (in feet) and direction from centerline, type of mine, material quarried or removed, and indicate if the mine is active or abandoned. In particular, identify any underground mine workings that may be crossed. Outline measures Mountain Valley would implement to avoid, minimize impacts, or mitigate impacts on mines that would be crossed or near the pipeline.

Draft Resource Report 7 – Soils

1. In response to comments received from stakeholders, identify areas where uranium may be found near the ground surface along the pipeline route. As appropriate, based on soil concentrations and potential for exposure, outline measures that Mountain Valley would implement to handle radioactive soils if encountered, and measures to minimize or mitigate any possible impacts on the public health. Document consultations with appropriate local, state, and federal resource agencies regarding uranium in the project area.
2. List, by MP, any hazardous waste sites crossed or within 0.5-mile of the pipeline route. Document that data bases were reviewed at the West Virginia Department of Environmental Protection and the Virginia Department of Environmental Quality. Include a discussion of industrial sludge that may have been spread by farmers, according to a stakeholder's comment filed with the FERC. Outline the measures Mountain Valley would implement to avoid known hazardous waste

sites, and describe what actions would be taken if hazardous wastes from any known or unknown sites are encountered during construction.

3. List, by MP, all soils found along the pipeline route. The table should identify soil types and characteristics, including prime farmland, erosion potential, shallow bedrock, high watertable, compaction, and reclamation potential. Document consultations with the local offices of the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service regarding potential Project impacts on soils.

Draft Resource Report 8– Land Use, Recreation, and Aesthetics

1. Document consultations with the U.S. Department of the Interior National Park Service (NPS) Appalachian Trail Office, and the USDA Forest Service Jefferson National Forest (FS) regarding the crossing of the Appalachian Trail. Outline the measures Mountain Valley would implement to reduce impacts at the trail crossing, including following existing rights-of-way, reducing forest clearing, and conducting a visual impact assessment.
2. Document consultations with the NPS and FS regarding the crossing of the Blue Ridge Parkway. Outline the measures Mountain Valley would implement to reduce impacts at the Parkway crossing, including following existing rights-of-way, reducing forest clearing, and conducting a visual impact assessment.
3. Include a discussion of impacts to parcels enrolled in resource protection programs, such as, but not limited to:
 - a. the Monroe County Voluntary Farmland Protection Program;
 - b. Agricultural Forrestral Districts of Montgomery County;
 - c. Catawba Valley Special Project Areas; and
 - d. Conservation easements with the Blue Ridge Land Conservancy.

Outline measures Mountain Valley would implement to avoid, minimize, or mitigate impacts on those areas.

4. Include a detailed discussion regarding visual impacts on the Cahas Mountain Scenic Overlook.
5. Include a detailed discussion regarding potential Project impacts on Virginia and West Virginia scenic highways and byways such as (but not limited to): Farm Heritage Road, Mountain’s Shadow Trail, Big Stony Creek Road, Virginia Route 635, Bluegrass Trail, and Catawba Road.

Draft Resource Report 9– Air Quality and Noise

1. Include a discussion of impacts resulting from greenhouse gas emissions from the Project. This analysis should include fugitive emissions from all Project components. Further, estimate how much of the natural gas delivered from the Project would be used to supplant other existing fuel sources, such as using new natural gas supplies to replace retiring coal-fired power plants.

April 11, 2015

Dear Supervisor Speaks,

I am writing regarding the Mountain Valley Pipeline request for a special use permit for alternate routes 110 through Craig County Virginia.

I wholeheartedly agree with the science committee's comment from Preserve Craig, Inc. I agree that it would be irresponsible of the USFS to approve this survey when the survey itself will cause harm.

How and who will be documenting the endangered species that lie along the route? The act of surveying these to document their existence is an unnecessary intrusion because the facts are documented.

The citizens of this rural county expect that the Jefferson National Forest provides a safety buffer against development which clearly includes utilities. The opening of the floodgates to private corporations with the guise of "energy independence for America" is a stride towards extinction of a valuable resource that does belong to all Americans. The Jefferson National Forest provides clean water, clean air, tourism, hunting, wildlife habitat, plant species and timber resources that are rapidly dwindling on the East Coast.

The peace of mind that I have by living in this place surrounded by forest land is being eroded day by day by threats and visions of the encroachment of development. The rugged slopes are supposed to be our area's treasure: the domain of the plants, animals and our clean water; not the corridor for public utilities and all that accompanies them.

There is more than just the danger of forest fire and the visual scars. There is the access to the previously inaccessible forest that worries me. There is the use of pesticides and the "control" of the forest to prevent its retaking of the land. There are easements and heavy equipment and noise pollution, there is sedimentation and disruption of water supplies by construction and roads to access the pipeline. All of these things are mentioned in the Preserve Craig report and *I urge you to take the scientific data presented and use it to support your decision.*

The correct action from the USFS is to protect these things we have entrusted to you for the good of all Americans. We all know that there is no recovery or restitution for the forest and its resources once it is lost to development. We owe a correct decision to our children and future generations to come.

Sincerely,

Marjorie M. Lewter, DVM

Kenneth E. Mills
5909 Algoma Street
Dayton, Ohio 45415-2408

13 April 2015

To: Jefferson National Forest

Subject: Mountain Valley Pipeline

I have been keeping up with the "New Castle Record" coverage of the subject pipeline. The pipeline routing being considered shows it a few miles from an earthquake fault near the Craig/Giles County line. This gives reason for concern if there is a "shake" like the western part of Craig County and eastern part of Giles County had a few years ago. My Grandfather said it has happened several times before. If there is a 42 inch natural gas pipeline in the area, it could be ruptured releasing large volumes of natural gas into the hollows of the forest. Any ignition source such as a lightning strike and you will experience a forest fire like you have never experienced before. Therefore, I suggest you give some serious thought, before permitting the passage of the proposed pipeline to pass through National Forest land.

April 13, 2015

Via Electronic Mail: comments-southern-georgewashington-jefferson@fs.fed.us

USDA Forest Service
H. Thomas Speaks, Jr., Forest Supervisor
George Washington and Jefferson National Forest
ATTN: Mountain Valley Pipeline Survey Comments
5162 Valleypointe Parkway
Roanoke, VA 24019

Dear Mr. Speaks:

I am writing today to respectfully ask you to reject the Mountain Valley Pipeline (MVP) request to conduct field surveys in the Jefferson National Forest (JNF) in Craig County, VA as part of the evaluation of what MVP calls Alternative Routes 110, 110J and 110R. ***I write this letter as a landowner whose property directly adjoins the JNF in the Sinking Creek Valley of Craig County, Virginia.*** All of the Alternative 110 Routes proceed south from Waiteville, WV, cross the ridge of Johns Creek Mountain in the JNF directly behind (and uphill) of my property, and then cross onto my property and continue across the Sinking Creek Valley.

My property in the Sinking Creek Valley is my primary residence, and I own no other property. I place high value on wild and natural ecological communities, and I value any opportunity to spend time in such. I moved to this property nearly 20 years ago because it offered the opportunity to be adjacent to the JNF where such ecological communities exist. I have spent nearly two decades performing a variety of conservation actions on my own land, to create a mosaic of plant and wildlife habitats that complement the mature forest on the adjacent JNF lands. I also moved to this property because I thought that being adjacent to the JNF would offer some level of protection from any damaging development in the area. I fully realize that National Forest (NF) lands are managed for multiple uses, and certainly I do not expect there to never be any changes on the JNF. But this proposed pipeline route clearly would violate known Best Management Practices (BMPs) for land stewardship, and lead to severe environmental impacts on the JNF and on a number of rare communities that the Forest Service is pledged to protect. Construction of the pipeline also would damage or destroy environmental services in the JNF on which my family and my neighbors rely, including quantity and quality of groundwater and surface water, protection from erosion off the NF, and protection from potential catastrophic landslides (including giant boulder fields) that could leave NF lands and damage private property below. Clearly, USFS should not allow this process to proceed any further, as the pipeline project that is proposed is in contradiction to all known land stewardship principles that the conservation community embraces on both public and private lands, and the USFS is legally, philosophically, and ethically bound to uphold. ***Approving the permit to survey would imply that USFS does not recognize the severe environmental impacts that will result from this pipeline, or that USFS does not consider those potential impacts to be important. I know that neither of these assertions is true, so I implore you to deny the permit application from MVP and put an end to any speculation about a pipeline that would cause such severe environmental damage ultimately being built on these proposed routes.***

Below I offer details on the various aspects of egregious violations of ethical land-stewardship principles and USFS policy that the pipeline project would commit, if allowed to move forward.

1. Construction of the MVP across NF lands on Johns Creek Mountain would destroy uncommon habitats and ecological communities that USFS is committed to protect.

The current Land and Resource Management Plan (USFS 2004) for the Jefferson National Forest describes two unique and uncommon ecological communities that merit USFS protection in the JNF:

- a. *“Moss / lichen boulderfields: Non-vascular vegetation occupying exposed, minimally weathered boulderfields on mountain ridges of western Virginia. Boulderfield habitats have resulted from periglacial phenomena and the collapse of resistant strata from weathering and erosion of weaker underlying rocks. The most numerous and extensive exposed boulderfields are composed of sandstone or quartzite . . . Open boulderfields are favored by timber rattlesnakes (Crotalus horridus horridus), which often locate their hibernacula in the rocky substrates. These small-patch community types are uncommon and are primarily threatened by air pollution and acid rain.” (USFS 2004; pp. C-18, C-19)*
- b. *Black Bear Habitat: This area emphasizes providing optimal habitat for black bears and other wide-ranging area sensitive species. Management activities are designed to: 1) provide a secluded and diverse habitat; 2) ensure adequate den sites, and 3) maintain hard and soft mast production. . . The landscape character of this area retains a natural, forested appearance. A mid- to late-successional forest greater than 40 years of age dominates the landscape. The area is interspersed with both forest communities greater than 100 years of age and herbaceous openings providing both wildlife habitat diversity and visual diversity. (USFS 2004; p. 3-120)*

These habitat descriptions fit perfectly the rocky ridgetop of Johns Creek Mountain where the MVP proposes to cross, and the mature forest near the top of both sides of the ridge. Since I live immediately adjacent to these JNF lands, I have spent extensive time on the ridge of Johns Creek Mountain above the Sinking Creek Valley. That ridge has large boulderfields in which I have personally observed timber rattlesnakes, and I have seen adult female black bears with cubs immediately below the ridgetop.

Those are extreme slopes on that ridge, measuring in excess of 80% on the topographic map [Craig Springs quadrangle, 7.5 Minute Series] and which I can personally vouch to well exceed 100% in places. Those extreme slopes have likely prevented timber harvests in the second half of the 20th century, and the forest on that ridge contains many trees approaching or in excess of 100 years of age. I personally can lead you to chestnut oaks in that area which are likely closer to 200 years than 100 years old. Very large trees on that ridge (on both the JNF and my adjacent land) and the boulderfields above likely provide desirable denning areas for black bears, thus explaining the common occurrence of females with cubs. To reach this area of the ridge requires foot travel of more than 1 mile from the nearest public access on Route 658, which contributes to the isolation that makes this area ideal for both rattlesnakes and bears.

Landowners on both sides of Johns Creek Mountain have entered collaborative conservation and wildlife-habitat programs with a range of state and federal agencies and NGOs. Private-land efforts have created wildlife corridors, riparian corridors, native grasslands and shrublands, and soft-mast food sources to complement the late-successional forest habitat found in the JNF on the ridge above. My land and that of my neighbors, in combination with late-successional forest and boulderfields in the JNF lands above, create the very landscape mosaic that USFS seeks as habitat for black bears and other forest wildlife. **USFS should not even consider allowing the MVP pipeline to**

cross this ridge and destroy this valuable and unique wildlife-habitat partnership on both public and private lands.

2. Construction of the MVP across JNF lands on Johns Creek Mountain could destroy unique and rare mountain wetland communities on private lands below the National Forest that support rare, undescribed, and even endangered species.

- a. I am sure that you are fully aware of the presence of the endangered James spiny mussel in the Johns Creek Valley, so I will not offer extensive comments on this issue. Suffice it to say that while the James spiny mussel is not necessarily found on JNF lands, any clearing of the forest and excavation for the MVP pipeline on extreme slopes in the JNF in that area would result in erosion of NF lands and sedimentation into the streams that are critical for the survival of this species. Such erosion and sedimentation would certainly result from any pipeline construction on the northwest face of Johns Creek Mountain behind my property, where mapped slopes exceed 60%. **No erosion mitigation measures could stop sedimentation down into Johns Creek if the forest is cleared and the pipeline is excavated straight up that slope, as MVP proposes.**
- b. Admittedly I am not a wetlands scientist, but a section of my property immediately adjacent to the JNF fits one of these descriptions in your Forest Plan:

RARE MOUNTAIN WETLAND COMMUNITIES

CALCAREOUS FENS AND SEEPS - Shrub and herbaceous wetlands of calcareous hillside or foot-slope spring seeps and seepage zones in small stream bottoms. These small-patch wetlands are widely scattered in carbonate rock districts of western Virginia, primarily in valleys of the Ridge and Valley province. Calcareous fens are extremely rare on the Forest and are high priorities for conservation. (USFS 2004; p. C-9)

MONTANE BASIC SEEPAGE SWAMPS - Saturated deciduous forests of gently sloping stream headwaters, large spring seeps, and lateral areas in ravines and stream bottoms where groundwater emerges at the base of slopes. These communities are locally scattered throughout western Virginia in areas underlain by metabasalt (greenstone), base-rich granite, calcareous shale, and limestone. Habitats usually have considerable cover of bouldery, cobbly, and gravelly alluvium; braided seeps and stream channels; moss (except Sphagnum)-covered hummocks; and muck-filled depressions. This community is rare on the Forest. (USFS 2004; p. C-10)

APPALACHIAN BOGS - Saturated shrub and herbaceous vegetation of gently sloping, groundwater discharge zones along valley floors and headwaters streams in the mountain region of Virginia. Habitats supporting bogs are usually less than 0.4 hectare (one acre) in size. (USFS 2004; p. C-10)

MOUNTAIN/PIEDMONT ACIDIC SEEPAGE SWAMPS - Saturated deciduous forests of gently sloping stream headwaters, large spring seeps, and ravine bottoms underlain by sandstone, quartzite, or base-poor granite. Certain basin wetlands that are saturated or seasonally saturated by perched groundwater support similar vegetation and probably belong in this group as well. These communities are locally scattered throughout the western Virginia mountains and Piedmont foothills, up to about 900 m (3000 ft) elevation. Hummock-and-hollow microtopography, braided streams, areas of coarse gravel and cobble deposition, muck-filled depressions, and abundant Sphagnum mats are typical habitat features. (USFS 2004; p. C-11)

The specific identification as to which of these Rare Mountain Wetland Communities is actually found on my property is of much less consequence than the biological community itself that is found there. Extensive collections from a forested wetland on my property by Roger Thoma of the Midwest Biodiversity Institute and the Carnegie Museum of Natural History have included unique and undescribed morphs of an upland

crayfish species. Description of this species will soon be published, and its rarity could merit consideration for listing as endangered. Roger Thoma describes this unknown species, and other rare crayfish species that will be impacted by the MVP pipeline, in his letter that is posted to the FERC Docket for this project (PF-15-3) (http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20150401-5067). That previously unknown crayfish species on my land, possibly other rare and maybe as-yet-undescribed wetland invertebrate species, and this entire mountain wetland itself rely on the natural hydrology of the JNF immediately uphill of the wetland. ***The proposed MVP pipeline would sever spring flow and ephemeral stream flow that supports this unique wetland.***

3. **Construction of the MVP across NF lands on Johns Creek Mountain and other steep terrain in Craig County cannot possibly be done in an ecologically appropriate manner that respects appropriate land stewardship values of both USFS and adjacent private landowners.**

As mentioned in Item #1 above, the slopes of Johns Creek Mountain easily exceed 80%, and even 100% in places. MVP has declared that, if built, the MVP pipeline would traverse directly up and down these slopes. Furthermore, a corridor of at least 125-ft width would be cleared directly up and down these slopes, and excavation and/or blasting would occur in a linear fashion up and down these same slopes. Not only would important late-successional habitat be destroyed in this process, but it will be impossible for MVP to prevent serious erosion of JNF lands on these severe slopes. All BMPs adhered to by every land management agency in the world prohibit such activities, because no erosion control measures exist that can possibly prevent erosion on such severe slopes without extreme modification to the natural topography. Construction on these slopes would violate all known best management practices for forest clearing, erosion control, sedimentation control, and protection of rare terrestrial and aquatic communities. The picture below, from a pipeline project in West Virginia, illustrates how basic principles of ethical land stewardship cannot possibly be followed in the construction of these pipelines on severe slopes. The slope pictured is not even as steep as some those I have personally observed on Johns Creek Mountain.



https://appalachianchronicle.files.wordpress.com/2015/02/ed-wade_small-repair-photo.jpg

Besides erosion, there also is the possibility of construction-related landslides from the NF down into private lands. The top few hundred feet of Johns Creek Mountain is covered with large boulder fields, and some of these boulders must weigh tens of tons or more. What will MVP do with these boulders to make room for the pipeline corridor? How will they stop them from sliding down the mountain, and destroying forest on both the NF and private lands in the process? In their natural place, these boulderfields represent a unique and valuable natural habitat. When construction disturbs them, they may become destructive agents. ***The steep slopes of Johns Creek Mountain, and other slopes along the proposed MVP route, are best left alone to serve their natural purposes.***

4. **Construction of the MVP across NF lands on Johns Creek Mountain would damage or destroy ecological services from the JNF on which private landowners rely.**

The domestic water supply for my household comes from a permanent spring on my property, very close to the boundary of the JNF. ***Spring water that originates in the JNF has provided the water supply to the farm on which my family lives for more than 100 years.*** Obviously our water-supply spring relies on the natural hydrology of the JNF lands immediately uphill of the spring. The proposed MVP pipeline is mapped only a very short distance uphill of this critical spring, on both my property and the JNF. ***Construction of the MVP pipeline (excavation and/or blasting) would in all likelihood disturb, damage, or destroy this spring that provides my family with water.*** The Forest Plan for the JNF (USFS 2004) discusses the need to protect watersheds in the JNF that are relied upon for domestic water supplies. Critical water supplies for hundreds or even thousands of people could be negatively impacted by construction of the MVP pipeline through the JNF in Craig County, and such construction should not even be considered. ***Please do not allow a private company to destroy this century-old connection between federal lands and your neighbors and mine who live adjacent to the National Forest.***

Surface flow from the JNF is also critical for a variety of land uses in the Sinking Creek Valley below. Agricultural operations in the valley fully depend on both groundwater and surface water that originate in the JNF. On my own property, I have converted all of the fescue-hay pastures to warm-season grasses and wildflowers as part of habitat-restoration and pollinator programs with both VDGIF and NRCS. Wildlife that use these newly created habitats depend on surface water in two ponds on my property, both of which would be damaged or destroyed by interrupted stream flow or erosion from the JNF. Additionally, my agricultural operation now is centered on honeybees, which rely on those wildflower fields for nectar and those ponds for their water supply. ***What you allow to happen on JNF land adjacent to my property holds the potential to severely impact my property, my neighbors' property, and local agricultural livelihoods.***

5. Finally, I want to point out to you that my family's farm is actually on one of the routes for the proposed 765kV power line back in the 1990's. The USFS did not approve construction of that power line across the JNF in Craig County at that time due to the unacceptable impacts posed by that project. Now MVP is again proposing a project with even more-severe environmental impacts that would cross our farm and the same adjacent section of the JNF as was denied for the previous power line. All of the reasons that led to the power line not being approved still exist, and the proposed pipeline project would have even greater environmental impacts due to the even-larger corridor that would be cleared and deeply trenched on severe slopes through the JNF.

For all the reasons described above, my family, my neighbors, and I all sincerely implore you to deny the pending survey application by MVP. ***Please take this opportunity to put an end to discussion of such an environmentally destructive project impacting both the Jefferson National Forest and the Forest's neighbors who have worked to protect the natural values and services of both private and National Forest lands in Craig County.***

Thank you sincerely for your consideration of this request.

Respectfully,



Brian R. Murphy
8227 Cumberland Gap Road
New Castle, VA 24127
Phone: 540/544-7973

Reference: USFS (US Forest Service). 2004. Revised Land and Resource Management Plan, Jefferson National Forest. Management Bulletin R8-MB 115A. US Forest Service Southern Region, Atlanta, GA.

cc: U.S. Senator Mark Warner
U.S. Senator Timothy Kaine
U.S. Representative H. Morgan Griffith
Virginia Governor Terry McAuliffe
Virginia Delegate Gregory Habeeb
Virginia Senator Stephen D. Newman
Craig County Board of Supervisors
Preserve Craig, Inc.

April 14, 2015

Tom Speaks, Forest Supervisor, Jefferson National Forest
USDA Forest Service Mountain Valley Pipeline Survey Comments

Dear Mr. Speaks,

Knowing that a 42" high pressure pipeline can be forced upon us - running all the way across our 100 acres - has made this a year of high stress and uncertainty. As you have heard from others, this will do absolutely no good for Craig County VA or its citizens or the land or the waters or the fish, fowl, bears, etc.

I find that I don't want to be away from home over worry of what liberties the surveyors may take. Already there has been a grass fire in a county east of here where a surveyor had the stupidity to drop a cigarette. Someone told me he was on that property without permission. Now I am deciding not to go on vacation and hesitate to leave town to see my children. This action is happening so fast and keeps morphing into something new, plus it is taking a huge amount of time just keeping up with the project.

The Forest Service has taken the majority of land in Craig County but seems to be neglecting it with fewer rangers, no office, etc. You decided in 2002's "final Record of Decision" that Craig County's Jefferson National Forest was not an appropriate place for a utility corridor. Please don't waffle now! The answer is still the same: **NO!** You have a duty to protect our forest and it doesn't cost you a dime.

In addition, we are finding that the people from MVP are disingenuous. Their meetings are a charade - held to try to keep us from learning the real truth. At the open house they held in New Castle last week, the most common answer seemed to be "I don't know the answer to that, go ask another person." The other person often turned out to be some young, recent hire who had no answers either. They will not do a good job of surveying the forest. They are in a big hurry to 'git her done' so they can begin cutting down the forest and start digging a 10' trench for 300 miles. One of the engineers admitted that they were in a hurry to beat the competition with this pipeline. Why would that be? The answer is the money they will make sending gas *through the area* - not *to the area* for us to use.

My number one concern is for the water we drink. It comes from two springs that are next to the stream which flows through our property and into Sinking Creek. Those springs get muddy from time to time when there is heavy rain. I cannot imagine that a 125' bare earth corridor, which has to cross that stream and Sinking Creek, would avoid damage to our water supply. Of course, we are not alone with water worries since everyone here has water only from springs and wells. Thirty to 40 head of cattle live off our land, too. They need far more water than we humans do, and the source is the same stream our springs flow into. The aquifers all through this area are connected underground and the karst terrain means there is less rock to filter the water.

The science committee of Preserve Craig has sent you a long document detailing the problems with putting this monster through this area and I agree with it and support the actions of Preserve Craig.

I have always thought of the Forest Service as an agency which protected the forest and the plants, animals and waters that are within it. Am I wrong? Are you in league with big (make that BIG) business and against the natural world? We need some good news in this stressful world and your denying this very BIG BUSINESS the right to survey the forest for their own gains would be good news indeed.

Thank you.

Sincerely,

Martha J. Dillard
Sinking Creek, Craig County, VA

Supervisor Tom Speaks, USDA Forest Service
George Washington and Jefferson National Forests
ATTN: Mountain Valley Pipeline Survey Comments
5162 Valleypointe Parkway
Roanoke, VA 24019

April 15, 2015

Dear Supervisor Speaks:

When I first moved to Craig County from Alexandria in the early 1980's, to teach in the Craig County school system, I was shocked by the small size of the student body, the aging equipment, and the lack of programs and resources for the students, not to mention my very low salary. "Well, you know Craig County is over half National Forest," I was told with pride. That didn't make any sense to me then, not understanding how school and county funding worked. But I fell in love with the mountains. It was like living in one of the National Parks my parents used to take us to growing up for summer vacations.

Then I met my husband, a dairy farmer and Craig County native, and we had children. I didn't understand why families were asked to participate in fundraisers every year for basic school supplies. We were asked to donate toward athletic programs and playground equipment. Why can't the county pay for these things, or for a better waste management system, or more funding for the fire and rescue squads? "Oh, don't you know, Craig County is over half National Forest. There's no tax base, there's no money." We just dipped deeper into our pockets to make sure our children and our community had what was needed. We made do, knowing that we were richer for the good fortune of living nestled within the National Forest, an amazingly rich and beautiful area protected by the federal government. It has always been a source of pride for us.

In 2002 when the USFS declared, through the Record of Decision, that the Jefferson National Forest would be protected from utility corridors, we all stood up a little taller, comforted and protected. But it wasn't for economic reasons that utility corridors were disallowed. It was because they would harm the forest, the water, and the local culture.

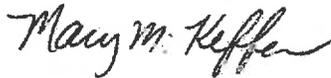
Both of our children are through college, and our son has chosen to stay here. He will be the fourth generation to farm this land, and he has plans to expand the dairy production so that it will support he and his wife, as well as my husband and I. Now we hear that the Forest Service is considering allowing a Special-Use Permit for Mountain Valley Pipeline to survey the National Forest. We feel betrayed and frightened. The land hasn't changed. The spring and the creek both fill up with water that flows down from National Forest. The sink holes on our land are still there. The bear and the bald eagles still move through the forest and farms, not knowing which is private and which is public. Why should a survey be allowed now?

It's just a survey, we realize that. But it's more than that. It will chip away at our peace of mind, our pride in our county and in the United States Forest Service. It may open the door to a

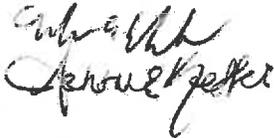
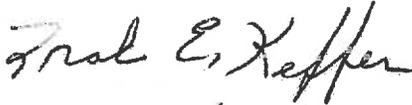
disruption through the forest and across the private land in Craig County that will be a liability forever.

Because the Forest Service is even considering allowing this survey, we are putting some of our farm expansion plans on hold pending your decision. We therefore respectfully, urgently request that you stand by your decision of 2002 and that you stand by the citizens of Craig County and deny Mountain Valley Pipeline's application for a permit to survey.

Sincerely,



Mary M. Keffer and the Keffer family



Keffer Dairy
9990 Cumberland Gap Road
New Castle, VA 24127

April 15, 2015
To The National Forest Service,

I am a resident of Sinking Creek, Virginia, a landowner on the proposed MVP route and a supporter of Preserve Craig. I appeal to the National Forest Service to deny surveying rights to EQT. I share with you the following concerns.

We chose to live in Craig County because of its unique qualities: hills and grasslands, quiet surroundings, pastoral beauty, and the quality of the air and water. A pipeline through this county would destroy the overall atmosphere of a relatively untouched landscape, something that is not easily found in other parts of the eastern seaboard. I have always felt protected from threats to this beauty by the amount of National Forest Service land that surrounds us, feeling that the Forest Service would be quick to preserve these bountiful natural resources.

Our four children grew up in this valley with a sense that the Appalachian Trail and the National Forest were part of their backyard. They spent much time in the woods and along creeks and mountains having the opportunity to become acquainted with the many plants and trees represented in this area. Our two sons have even chosen careers as a result of this interaction from a young age with their natural surroundings. One of them is the owner of Sinking Creek Horselogging and the other a graduate in Forestry -- Department of Natural Resources from Virginia Tech. and is presently working in that field. Sinking Creek Valley provided the perfect backdrop for our entire family to pursue learning homesteading skills together. We all have very fond memories of these years together and of interacting with our wonderful neighbors who welcomed us and made us feel a part of the community.

Views of our valley from the AT and other locations on the National Forest would be greatly affected by the construction and maintenance of the tree-free path it would weave through this county. It is important to preserve the beauty of our remote counties so people don't have to depend on memories to know what they are like and so our grandchildren can experience them for themselves.

The disturbance of the watersheds is of great concern as the pipeline crosses creeks, branches, wetlands and comes in close proximity to wells and springs. The pipeline company can make promises but they are unable to predict the many things that could go wrong in disturbing such large areas of interacting habitats. I support the environmental document that was submitted to you by Preserve Craig's Science Committee which has gone into much detail on these issues.

On a personal level the proposed route of the pipeline through our property passes directly through an area of pasture that we have meticulously been building up over the years through rotational grazing and application of organic matter. One of our most fertile fields would be disturbed and we would need to start over again as well as have constraints put on the manner in which we could use the land that the pipeline is built

on. In addition to this, the original path of the Cumberland Gap Trail, which can still be detected on our land, would also be disturbed in pipeline construction.

I feel that a better plan for construction of pipelines is to use existing right-of-ways rather than to carve the eastern seaboard into treeless swaths. Do we need to allow each company to have its own "Interstate Highway"? It is important to realize that just because you can do something doesn't mean that it is a good thing to do. In the future I believe we would look back and ask ourselves why we let something like this happen bit by bit. The place to prevent that regret is before us right now. It is for these reasons that I ask that you nip the whole project in the bud and deny EQT permission to survey in the National Forest.

Sincerely,
Margie Harris

April 16, 2015

US Forest Service
George Washington and Jefferson National Forests
ATTN: Mountain Valley Pipeline Survey Comments
5162 Valleypointe Parkway
Roanoke, VA 24019

To Whom It May Concern,

In 1987 my husband and I purchased 13 acres in beautiful Craig Co., VA. We were delighted to find this property and that we could afford it. We knew that Craig County was mostly National Forest land and, because of that, development in the county would be limited. We moved here in 1988. Some great things about the property are: it crosses Craig Creek and joins the Jefferson National Forest. We knew that because it joined the NF that we would never have to worry about any one building near us! We also liked the thought of living on a creek that flowed into the Chesapeake Bay. We must make sure the water that flows through our backyard is clean for the sake of the Bay! Another good thing, on the left side of our land is a strong stream, (Bone Creek) which has never been dry and it flows from near the top of Sinking Creek Mountain from the area where there was a large prehistoric landslide; "The Mountain that Moved". See <http://pubs.usgs.gov/gip/mountain/mountain.pdf> .

We love living in this area, the Appalachian Trail crosses about 3 miles below our house and we have spent a lot of time hiking the trail.

Great place for us and our horses! Or so we thought....

We spend a lot of time in the forest and in the area (Craig County) specifically where MVP wants to survey for the pipeline. We see a lot of wildlife; we know there are Black Bear dens on the ridge behind our house. Several years ago my husband saw a Mountain Lion while driving on Lee Road, a few years later he saw another one on Hall Road (sorry, no pictures). I have always trusted the Forest Service to protect the forests, the animals that live there, the water that flows from there and the sights to be seen in the distance.

The possibility of the Forest Service letting MVP survey worries us greatly. We have decided to not put an addition on our house and we have also decided to not install solar power yet. We are hesitant to invest in improving our property because its value will certainly go down if the pipeline is approved. We are worried that if the Forest Service allows the survey to proceed that it will just be the beginning of the permitting process and disruptions to our way of life will follow.

MVP should not be allowed to survey anywhere in our National Forests and Wilderness Areas. Craig County is not an appropriate place for a gas pipeline, (especially one that is 42" in diameter!). Our steep ridges, deep valleys and sensitive geologic area should be preserved for generations to come. People come to our county to hike, bike, hunt, fish, watch birds...and just be "one" with the forest.

Please, don't allow MVP to begin the process of ruining our beautiful county by allowing surveying in the National Forest for the pipeline.

Thank you,
Phillip and Susan Reed
Upper Craigs Creek Road
Catawba, VA 24070

USDA Forest Service
George Washington and Jefferson National Forests
ATTN: Mountain Valley Pipeline Survey Comments
5162 Valleypointe Parkway
Roanoke, VA 24019

April 17, 2015

Dear Supervisor Speaks:

I am writing to concur with the Preserve Craig Science Committee's request that you deny Mountain Valley Pipeline and its agents a special-use permit to conduct surveys of the Jefferson National Forest lands in Craig County, Virginia. I agree with their findings and conclusions that not only will the pipeline have hugely negative impacts upon the environment and residents of Craig County, but the survey itself would also have a negative effect.

As to my own unique situation, my husband and I are landowners on proposed Alternate Route 110-J. Twelve years ago we built a home on land through which the Cumberland Gap Trail passes and that is bordered by a pre-Civil War era cemetery where my great-great grandfather is buried. I felt that I had returned home when we moved here. On November 1, 2014 our home was completely destroyed by fire. The winds in Craig County and in our area of the Sinking Creek Valley, can be particularly strong most of the year. On the night of the fire, there were cross-winds making the fire extremely difficult to extinguish. Firefighters from five fire departments used over 40,000 gallons of water and one returned for the next two days to further extinguish the smoldering remains and occasional flaring fire. One can only imagine the damage caused to our beloved Forest and our homes from a pipeline explosion and its resulting fire. Craig County Emergency Services are not equipped to handle such an event. As traumatic as the fire itself was, just as we began designing a new home, we found out that MVP had announced alternate routes going through Craig County, one of which cut across the length of our land separating our home site from Sinking Creek and the cemetery. Needless to say, this has taken another emotional toll on our lives. Do we go ahead with rebuilding, knowing that we would never, ever be comfortable living so very close to a natural gas pipeline? How could we ethically consider selling the land we have and put anyone else's life in danger? Do we lose everything we invested in this land on

which we both feel so at home, abandoning it to move somewhere else? We seem to be stuck in a very dark, downward-spiraling situation.

Please deny the special-use permit for a survey of the Jefferson National Forest land. Craig County is a unique place to live - beautiful views, thanks to the National Forest lands, and caring neighbors. We are relying upon the Forest Service, as our neighbors have in the past, to protect our lands and community.

Sincerely,

Patricia Ann Seago, 757 Bethel Church RD, New Castle, VA 24127



312 MAIN ST., P.O. BOX 178, NEW CASTLE, VA 24127
(540) 864-6900 • FAX (540) 864-6903

April 17, 2015

USDA Forest Service
George Washington & Jefferson National Forest
ATTN: Mountain Valley Pipeline
SURVEY COMMENTS
5162 Valleypointe Parkway
Roanoke, VA 24019

To Whom it May Concern:

I'm writing in regard to the proposed Mountain Valley Pipeline. I have been a Real Estate Broker and Certified Appraiser working in Craig County and surrounding area which includes West Virginia for the last 35 years. I have been involved in several eminent domain cases as an expert witness.

Since the alternate routes of the Mountain Valley Pipeline, I have had several inquiries about properties my company has for sale. The first question is how close is this property to the proposed pipeline. My answer was these are only alternate routes and the National forest has not given permission to survey their property. This is not a satisfactory answer and, until they find out they are not interested in pursuing the said properties. The land owners are wanting to know how much their property will be devalued.

If you decide to allow Mountain Valley Pipeline to survey this will completely stop the sales of the properties on or near the corridors they have mapped.

There is no question that easements such as the pipeline devalues the property that it is going through and also the joining properties. You hold the key as to keeping our property values stable. We do not need to have our mountains, valleys, streams and farm land scathed by the Mountain Valley Pipeline.

Sincerely

A handwritten signature in dark red ink, appearing to read 'P. K. Charlton', is written over a light blue horizontal line.

P. K. Charlton
Real Estate Broker
License in Virginia and West VA.
Certified Appraiser License in VA
P. O. Box 178
New Castle, VA 24127



REALTORS® • AUCTIONEERS • APPRAISERS



**Second Star Farm
4962 Little Mountain Road
New Castle, Virginia 24127**

April 17, 2015

H. Thomas Speaks, Jr.
Forest Supervisor
George Washington and Jefferson National Forest
5162 Valleypointe Parkway
Roanoke, VA 24019

Re: Request to Deny MVP Special Use Permit Survey Application for Alternate 110 Routes

Dear Supervisor Speaks:

Our country was founded to protect our unalienable rights to life, liberty, and the pursuit of happiness. The Forest Service was founded to foster conservation and to help provide our citizens the opportunity to pursue these rights. Gifford Pinchot, first chief of the Forest Service, described the connection between the role of our National Forests and our right to pursue happiness when he said *"Unless we practice conservation, those who come after us will have to pay the price of misery, degradation, and failure for the progress and prosperity of our day."*

My wife and I chose to buy land nestled against the Jefferson National Forest back in 1972, knowing that we were making substantial trade-offs – living in a protected and pristine watershed and view shed environment in trade for giving up many conveniences of our times. Craig County is my home and 42 years later it is one of the few remaining places where there are no stop lights, people wave at one another as they pass on the road, the water is clean, and the views are uninterrupted by industrial development or utility corridors.

I own property in the Waiteville area of Monroe County, in the town of New Castle, and in the Sinking Creek area. The proposed MVP survey itself is having substantial negative impacts on me personally and potentially on the two businesses I operate in New Castle. I had come to expect that the Forest Service, which essentially controls the viewshed and sense of place of Craig County, would protect this special place and maintain the promises it has made to the local citizens and to the country to provide a safe haven for residents and visitors to enjoy.

In 1991 a large transmission line was proposed by American Electric Power (AEP) to cross through the National Forest and the county. It was a civil and open process in which all parties disclosed and discussed everything about the project and shared facts and opinions. The options were carefully vetted and reviewed openly. After careful consideration, we opposed the project for a number of environmental, social, and economic reasons. It did not fit the Forest Service's plan, the proposed site, or the County plan. The ridgetops of Peters and Potts Mountains of Craig and Monroe Counties, and the ridgelines of Johns Creek and Sinking Creek Mountains are rare and special sites, loved by our community, by Appalachian Trail hikers and bikers alike. After very careful and thorough study, the US Forest Service made a preliminary decision in the 1990s and a final Record of Decision in 2002 that, both

because of environmental and cultural reasons this is not an appropriate place for a utility transmission line.

With the knowledge of that final decision, we purchased and moved to our farm in Sinking Creek over 15 years ago, in 1999. It is very near the original proposed route for the 765kV power line and now quite close to one of the proposed MVP Alternate 110 routes for the 42" high pressure gas pipeline. We relied on the power line decision to protect our community from utility corridor development when we moved to Sinking Creek.

I have two small businesses in New Castle. Years ago the Darden Business School studied my business and told me that it would be far more successful if we moved to a metropolitan area with a larger labor pool and customer market. We laughed and said we liked the place where we live and would accept the trade-off. My businesses are thriving, in part because my staff is also culturally attached to the environment in Craig County and Monroe County.

Why am I telling you all this? Because I am so attached to this place and the beautiful viewshed I am looking at right now, as I write to you, that it makes me sick to think that the Forest Service even accepted the application to survey to build an industrial pipeline following a similar path to the utility route that the Forest Service had already rejected. The feeling of betrayal is further exacerbated by the comparison of the two processes. The AEP transmission line proposal in the 1990s was carefully and publicly vetted, with full and accurate disclosures, informative and civil discussion and public input, and a thorough Environmental Impact Study.

I have come to appreciate how civil and democratic that process was, when compared to the way the MVP project is being handled. The difference between the AEP and the MVP project is that the discourse is neither civil nor public. It has been less than two months since the Alternate 110 routes were proposed and Craig County even became a possible impacted area. MVP is neither civil nor honest and accurate with their facts. The information we are being given about the pipeline changes every day and is generally inaccurate and disingenuous. At the recent open house on April 7, we were told that report 10 would come out shortly and would answer our questions and provide more details on Alternate 110. That report came out yesterday and did no such thing. The company is not a public utility, but rather a private company. The process of selecting routes is being done on maps in Pittsburgh, without input from the public. In fact, the company is not a public utility and is not accredited or certified to act in the public interest, and yet MVP may be granted the powerful right of eminent domain.

It is beyond my comprehension that any federal agency, whether it be the Forest Service or the Federal Energy Regulatory Commission (the FERC), would accept an application from a firm whose managing owner is not in compliance with all State and Federal laws. In my field, the certification of sustainable and organic products and companies, one of the questions asked of an applicant is "Are you in compliance with all federal and state laws?" And that's just to be inspected for a product claim, not for granting rights of eminent domain!! How have we come to the point where a newly formed and unregulated private company can literally terrorize citizens with the threat of eminent domain without being accredited, licensed, or reviewed for their ethics, finances, personnel, expertise, etc.?

For the past eight weeks I wake up every morning with a start, thinking this was just a bad dream. Then I discover this is really happening and the insanity of rushing a new gas supply to market without a

careful assessment of the options and all the implications is bulldozing over the civil and democratic process that makes the U.S. so special.

So, what I am asking of the Forest Service is to stop this madness, honor the decisions and policies already in place, and deny the permit application, at the very least for the Alternate 110 routes that the Forest Service has already determined are not appropriate for a utility corridor.

What is the regulatory basis for the Forest Service to deny the application? After all, it is just a survey, right? There are at least three reasons that I am aware of:

1. the existing Record of Decision;
2. the documentation provided to you by the Preserve Craig Science and Technical Committee;
3. MVP's misleading and inaccurate answer to Question 16 of the Forest Service application.

"Describe probable effects on the population in the area, including the social and economic aspects, and the rural lifestyles."

MVP answered: "The proposed survey will not affect the population of the area, their economic aspects, or the rural lifestyle."

MVP did not say "may not be affected", but were quite clear in stating "will not affect..." I can state without a doubt that I am already affected and harmed by their application to survey. It has put the comfort of my home and my community in jeopardy. I had plans this year to expand my organic farming activities, enlarge the historic varieties orchard, plant a pick-your-own berry operation, and increase the research activities on the Sinking Creek farm. I have put those plans on hold pending the Forest Service decision about the survey. My farm is with the known blast zone of the proposed Alternate 110 routes.

My viewshed includes National Forest lands where the pipeline would traverse the area. My sense of place is in jeopardy and it is very disturbing to think that the Forest Service would not honor its promises. In fact, the stress of what feels like a betrayal by my government is affecting my health, my sleep patterns, and my personal relationships.

I have neighbors who have also halted projects and some who are having health problems as a result of the prospect that the Forest Service would allow a survey, even though the decision had been made that this was not a place for a utility corridor. Some are military veterans whose PTSD is returning and others are having to go back on heart medicines after years without it, because of the calm environment here.

If you issue this survey permit, my community and I will be harmed financially and physically by your decision. Four years ago, when my wife of 40 years, Ellen Coleman, became critically ill, she asked that I maintain the vigilance of protecting this special place that she had worked so hard to guarantee in the 1990s. I made her a sacred promise to do so.

I will pursue every legal recourse available to protect myself and those of my community. There are many others who feel the same way that I do. So, please, make us proud of the US Forest Service and make the right decision and reject the MVP application to survey the National Forest.

Sincerely,

Bill Wolf

April 17, 2015

USDA Forest Service
George Washington and Jefferson National Forest
ATTN: Mountain Valley Pipeline Survey Comment
5162 Valleypointe Parkway
Roanoke, VA 24019

Sirs:

We support the efforts of Preserve Craig in opposing a special-use permit to Mountain Valley Pipeline to conduct surveys on the Jefferson National Forest in Craig County, Virginia. The comments of the Science and Technical Committee of Preserve Craig, Inc. present an accurate and persuasive case for denying this permit. The academic credentials and professional experience of that Committee argue for the validity of their conclusions. We rely upon the U.S. Forest Service to protect our interests in the natural resources of this county, particularly in view of your majority ownership of its land area.

Like many residents of this area, we have a multi-generational attachment to the mountains and valleys of Southwest Virginia and southern West Virginia. Many of us are descendents of people who settled here prior to the Revolutionary War when this was the western frontier. The families who have remained here over generations have done so largely because of their love for this as their native home. A utility corridor on the scale being proposed will drastically alter and mar that traditional home place.

Thank you.

Jack Bostic
Sue Bostic

USDA Forest Service

George Washington and Jefferson National Forests

ATTN: Mountain Valley Pipeline Survey Comments
5162 Valleypointe Parkway
Roanoke, Virginia 24019

To : Our Forest Service

I am writing to ask for your support in our opposition of the Mountain Valley Pipeline. This pipe line has three alternate routes which will cross our family farm in Craig County. Not only will this destroy the integrity of our farm, which includes two homes and our dairy operation. It will disrupt the fresh water spring that provides pure, clean water for our family.

Allowing our forest lands to be used for the 42 inch pipe line will bring environmental damage to everyone. I feel the high -pressure gas pipelines are not safe. Our volunteer fire departments do not have the equipment to handle gas pipeline explosions.

The beauty of our forest lands and farms draw many, many tourist to our county. Among these visitors are hundreds of motor cycle riders. Craig County is also host to bicycle races--each year. People come from all over the United States to ride and enjoy the wonderful sights of nature.

Please do not let Mountain Valley Pipeline or any other company destroy our God given land and all the conservations efforts created by our private citizens, with the help of our state and federal agencies.

Please do not let surveying take place on our Jefferson National Forest.

Nellie Keffer

Land owner, Craig County

PRESERVE CRAIG, INC.
P O BOX 730
NEW CASTLE, VA 24127

April 17, 2015

H. Thomas Speaks, Jr.
Forest Supervisor
George Washington and Jefferson National Forest
5162 Valleypointe Parkway
Roanoke, VA 24019

Re: Request to Deny MVP Special Use Permit Survey Application for Alternate 110 Routes

Dear Supervisor Speaks:

On behalf of Preserve Craig, we wish to thank you for extending the comment period on the subject Special Use Permit so that the impacted citizens of recently added Alternate 110 routes that would traverse Craig County, Virginia and Monroe County, West Virginia would have an opportunity to learn more about them at Open Houses held by MVP on April 6 and 7. Upon a careful review of information made available and the detailed maps of the routes, we now respectfully request that you deny the Special Use Permit Application that was submitted by MVP to perform surveys on the new Alternate 110 Routes.

We are totally convinced that a routing of the pipeline via any of the Alternate 110 routes is in direct conflict with current Forest Service policy and the Record of Decision that was issued by the Forest Service in 2002. The Alternate 110 routes follows nearly the same route that was considered for an interstate electric power transmission line in the 1990s, and which was rejected by the Forest Service. We submit herewith that Record of Decision, so that it will be officially a part of the comment record on this special use permit application.

Finally, we wish to affirm that the entire Preserve Craig organization and its supporters are in agreement with the Preserve Craig Science and Technical Committee detailed comments and report submitted to the Forest Service on Friday, March 10, 2015.

Thank you in advance for your thoughtful consideration of and prompt action on this request. We implore your favorable action on this.

Sincerely,

The Steering Committee of Preserve Craig, on behalf of the community and supporters of Preserve Craig

Martha Dillard, Pam Easterling, Sam Easterling, Bill Gentry, Chuck Harris, Bonnie Joyce, Mary Keffer, Scott Klopfer, Marge Lewter, Nancy Nemec, Tracy Roberts, Gene Seago, Elisabeth Willis, Larry Willis, Bill Wolf, and Jim Workman

Preserve Craig, Inc. is a non-profit corporation formed in 1991 with the support of more than 80% of Craig County households to preserve and protect our natural, historical, and cultural resources.

TAMMY L. BELINSKY
Attorney at Law
9544 Pine Forest Road
Copper Hill, Virginia 24079
mobile telephone (540)874-5798
telefax (540)929-9195
email: tambel@hughes.net

April 17, 2015

H. Thomas Speaks, Jr., Forest Supervisor BY ELECTRONIC MAIL
USDA Forest Service
George Washington and Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, VA 24019
email: comments-southerngeorgewashington-jefferson@fs.fed.us

RE: Mountain Valley Pipeline Survey Comments

Dear Supervisor Speaks:

The following comments are submitted on behalf of Preserve Craig, Inc., a 501C3 nonprofit corporation formed in 1991 to protect the natural, historical, and cultural resources of Craig County. In addition, Preserve Craig adopts and incorporates by reference the comments submitted by Appalachian Mountain Advocates by letter dated February 13, 2015, to the extent those comments apply to the special use permit application as amended by the applicant.

The community and environment of Craig County, Virginia, are unique to the consideration of a special use permit to conduct civil and resource surveys on the National Forest as a preliminary step to proposing to construct a natural gas pipeline (“pipeline”). The “Alternative 110” routes proposed for pipeline surveys are similar, and in some instances transverse the same locations, as routes that were proposed in the past for electric-transmission-line development. Your predecessor, Bill Damon, expressly decided that impacts along the routes proposed for a 765 kV transmission line through Craig County were either too severe or could not be mitigated.

The decision to deny transmission line development through the same areas of Craig County where the applicant now proposes to survey for the purpose of pipeline development is addressed in more detail below, and is the basis for asserting that the Forest Service must deny the permit application on its face as a matter of law. In 1996, the Forest Service found that impacts to Cultural Attachment from transmission line development could not be mitigated. Therefore, it is arbitrary and capricious to permit survey activity as a precursor for pipeline construction that will cause harm to the human environment that cannot be mitigated.

Even if you disagree with the legal significance of the 765 kV line decision, the special use permit to conduct civil and resource surveys for a pipeline should not be subject to Categorical Exclusion from Documentation. The 765 kV decision found significant the potential impacts to populations of endangered freshwater mussels in the Upper Craig Creek watershed

and to the residents of Craig County and their Cultural Attachment to their environment. The findings and analysis of the 765 kV line decision process are evidence of extraordinary circumstances that should be analyzed in the decision to permit survey activity. Furthermore, the presence of endangered fish and mussels requires the involvement of the USFWS even in the survey phase because the Biological Opinion for the Revised Land and Resources Management Plan for the Jefferson National Forest ("Forest Plan") specifically reserves to the USFWS the authority to require more stringent buffers than prescribed by the Forest Plan.

Preserve Craig sets forth its comments in more detail below. Please consider these comments in combination with the comments submitted by The Science and Technical Committee of Preserve Craig, Inc. on April 10, 2015, and the numerous comments submitted by residents of Craig County, Virginia, and Monroe County, West Virginia that assert impacts from the proposal to survey the National Forest.

The Permit Application Is Incomplete

As a preliminary matter, Preserve Craig takes exception to any assessment that the permit application is complete. In the initial permit application, which is undated, the applicant is identified as Equitrans, LP. An addendum to the application was filed on March 10, 2015, in which the applicant is identified as Mountain Valley Pipeline, LLC. Since the March 10, 2015 application is considered an addendum to the original application and not a revised application in its entirety, it is unclear whether both entities are applicants or just one -- particularly since the same person is named as an applicant contact, but different persons executed each of the applications. The signature on the initial application is illegible.

The Forest Service must require the proper identification of the permit applicant and the responsible officials on the face of the application, and Preserve Craig wants to know the identity of the responsible entity and who individually is taking corporate responsibility in accordance with the application instructions.

The identity confusion on the face of the application is both telling and of concern. Many supporters of Preserve Craig attended the open house information meeting at the Craig County High School on April 7 that is required by the process prescribed by the Federal Energy Regulatory Commission ("FERC"). At the open house, agents for the applicant manned various tables where resource information was presented. There was constant confusion among the applicant's agents because some are employees of a member entity of Mountain Valley Pipeline, LLC, and some were lobbyists who also were wearing the developer's uniforms. In other words, there was no one in charge and no single person responsible for assuring that the citizens' questions were answered. Several comments noting the unaccountable conduct of the open house were submitted to the FERC. Not only does this conduct signal disorganization, but also a lack of a sense of responsibility. This is of significant concern because no one would allow survey activity on their lands without the identification of the responsible entity.

Either the applicant is not ready or it is not capable of undertaking the activity it is proposing, and in either case, the application is incomplete.

Preserve Craig also asserts that the application is incomplete for item number 16 on the permit application. Item 16. directs the applicant to: "Describe probable effects on the population in the area, including the social and economic aspects, and the rural lifestyles." The applicant responded, "The proposed surveys will not affect the population of the area, their economic aspects, or the rural lifestyle." Preserve Craig disagrees with the applicant's representation, and numerous residents of Craig County have submitted comments asserting that the proposal to survey for pipeline construction purposes is enough to cause them personal distress, to change plans that have economic consequence, and to undermine their sense of place and cultural attachment to their communities that is fostered by the surrounding National Forest lands. The applicant must acknowledge and analyze these impacts in light of the record of decision for the 765 kV transmission line.

The Residents of Craig County, Virginia and Monroe County, West Virginia Are Culturally Attached to the Landscape the Impacts to Which Cannot Be Mitigated

In 1991, APCo proposed to construct a 765 kV electricity transmission line that crossed the Jefferson National Forest. The alternatives proposed included routes that closely follow or transverse the Alternate 110 variations in the current applicant's survey permit proposal. The APCo power line routes can be compared to the proposed pipeline survey routes using the maps included with the Draft Environmental Impact Statement ("DEIS") that was released in June 1996. *See* Attachment A.

In the analysis of the impacts from the 765 kV line, Cultural Attachment was identified as a significant issue. The 1996 DEIS for the 765 kV line includes an analysis of the impacts of the proposed line on Cultural Attachment. *See* Attachment B, Excerpts from Chapter 4 of the DEIS. The analysis discusses the issue as it relates to the various communities through which the power line was proposed. Importantly, the analysis concludes that "Cultural attachment does not typically lend itself to mitigation." Attachment B, p 4.15-6.

The analysis also concludes that "There is a striking similarity between this phenomenon [cultural attachment] and the description of cultural property which is often used in discussing Native American's [sic] cultural and spiritual relationship to land and place." Attachment B, p 4.15-7. Current residents of Craig and Monroe Counties have submitted comments that describe their relationships to their communities in tribal manner. One of the extraordinary circumstances related to a proposed action that warrant further analysis and documentation in an EA or an EIS is American Indians and Alaska Native religious or cultural sites. The issue of cultural attachment in Craig and Monroe Counties is a similarly extraordinary circumstance.

The analysis of the impacts of the 765 kV power line routes as proposed in 1991 resulted

in a decision by the Forest Service to recommend the No Action Alternative. The Forest Supervisor wrote a detailed letter to the Virginia and West Virginia utility-regulating agencies that explained the decision. In regard to the issue of Cultural Attachment, the Forest Service reinforced its conclusion that the issue is not subject to mitigation:

Alternatives 1-6 . . .

Cross several areas where Cultural Attachment, or the way people relate to their surroundings and interact with each other within the community, was pronounced. For the Cultural Attachment issue, Alternatives 1 through 6 would have the greatest impacts due to the effects on the Peters Mountain Area, where the effects of a transmission line were rated high. Additionally, the Waiteville and Sinking Creek Areas would also be affected by Alternatives 1 through 4. These Areas were considered to be moderately impacted by a transmission line. *It is important to note that impacts to Cultural Attachment are not subject to mitigation.*

Attachment C, Letter, USDA Forest Service, June 18, 1996, p 4 (emphasis added).

APCo proposed alternative routes, and in 2002 the Forest Service issued its Record of Decision granting a special use permit for the construction of the 765 kV line further south from the routes proposed in 1991. In the Record of Decision, the Forest Supervisor cited the impacts to Cultural Attachment in Craig and Monroe Counties as one basis for the decision to deny the development of the Alternatives 1 through 6 of the originally proposed routes. *See Attachment D, Record of Decision (December 2002), p ROD-5.*

The local government for Craig County has submitted a resolution to you that describes the County's reliance on maintaining the character of the landscape as important to the County's recreation-based economy. *See Attachment E.* Both the local government and the residents have relied on the recognition by the Forest Service that the landscape in Craig County that is dominated by the National Forest and the mountain-valley terrain is a significant social and environmental factor. Many residents have submitted comments to the Forest Service in this proposed action that describe their cultural attachment today, as well as the harms that the threat of surveying has already caused them.

The Forest Service has already determined that the very same areas of Craig County proposed for pipeline surveying are unsuitable locations for an electricity transmission line. The act of allowing a survey is enough to undermine the sense of cultural attachment. Accepting the permit application has already done harm because the residents of Craig have relied upon and trusted the Forest Service to protect the landscape.

Preserve Craig asserts that the decision documents for the 765 kV transmission line represent a legal decision concluding that Cultural Attachment in Craig and Monroe Counties is

both a significant issue and not subject to mitigation. Permitting survey activity causes harm to cultural attachment, and constructing the pipeline most certainly will. If not as a matter of law, then as arbitrary and capricious, the Forest Service cannot permit survey activity that itself will impact Cultural Attachment and that the foreseeable outcome of which is the construction of a pipeline, the impacts to Cultural Attachment from which cannot be mitigated.

At the very least, the impacts on Cultural Attachment from survey activities must be analyzed and documented.

The Bear Habitat, Old Growth and Remote Back Country Forest Plan Prescriptions Are Integral to the Cultural Attachment to the Landscape

When the 765 kV power line development-proposal was analyzed by the Forest Service, the Forest Plan at the time also delineated similar, if not the same, areas of the National Forest as bear habitat and remote back country management prescriptions as are those proposed for pipeline surveying in the current permit application. The lands under these management prescriptions have been so designated for decades. In the analysis for the 765 kV power line, the Forest Supervisor concluded that the same six alternatives that would impermissibly impact Cultural Attachment would also severely impact wildlife habitat and the remote recreation experience.

Alternatives 1 through 6 . . .

Cross the National Forest in areas where there are few existing linear disturbances. The construction of a transmission line and its associated access roads would substantially reduce the value of these areas for the remote recreation setting they afford and the wildlife habitat they provide. Black bear prefer large areas with limited access while certain migratory bird species require the large unfragmented forested blocks afforded by these generally unroaded and remote areas. Of the 13 action alternatives considered in our analysis, these alternatives resulted in the most severe impacts to wildlife habitat and the remote recreation experience.

Attachment C, Letter, USDA Forest Service, June 18, 1996, p 3. The nexus among the bear habitat, the opportunities for remote recreation experience and the Cultural Attachment of the residents is the landscape that is defined by the National Forest and the ridge and valley features. The local government for Craig County has identified the bear habitat and the back country opportunities as vital to their economic developments. Attachment E.

The current Forest Plan prohibits corridor construction through the bear habitat and remote back country management-prescriptions. The Forest Service cavalierly suggests in the scoping notice for the pipeline survey permit that the Forest Plan can be amended to permit

pipeline construction. Preserve Craig asserts that such a suggestion is in conflict with the public processes by which the original and revised Forest Plans were developed, and also in conflict with the decision process for the 765 kV power line. How many times must the public, and in particular the residents of Craig County, assert and defend their interests in the landscape upon which they rely for their well-being?

Preserve Craig asserts that it would be arbitrary and capricious to permit surveying for resource attributes when any decision to permit construction would violate the Forest Plan or require an amendment to the Forest Plan that is guaranteed to be not only controversial and divisive, but also harmful to the human environment and the Cultural Attachment it fosters.

Surveying for “Wetland and Water Body Delineations” Cannot be Excluded from Documentation

The GW&JNF’s Federally Listed Threatened and Endangered Mussel and Fish Conservation Plan (“Conservation Plan”) prescribes buffer zones of differing sizes around ephemeral, intermittent, and perennial streams the scope of which are slope dependent in each category. *See* Attachment F, GW&JNF’s Federally Listed Threatened and Endangered Mussel and Fish Conservation Plan (2004), pp 10-12. The prescription and methodologies are specific and detailed. While the Revised Land and Resources Management Plan for the Jefferson National Forest (“Forest Plan”) appears to incorporate by reference the Conservation Plan, the applicable riparian prescription in the Forest Plan is not as specific.

Nonetheless, neither of the prescriptions may be adequate under the Biological Opinion for the Revised Jefferson Forest Plan. When the US Fish and Wildlife Service consulted with the Forest Service on the Revised Forest Plan, it expressly rejected an inclusive approach to the riparian standards for all activities proposed to be conducted on the Jefferson National Forest, and reserved the right to require greater protections for endangered fish and mussels:

The FWS recognizes the importance of riparian areas associated with intermittent and ephemeral streams as well as perennial streams in protecting and maintaining riparian habitats and water quality. We applaud the FS’s adoption of protective standards that extend beyond perennial streams to include intermittent and ephemeral streams. However, we consider the core buffer widths outlined in the Revised JLRMP riparian standards to be the minimum widths necessary to protect the aforementioned federally listed aquatic species. Consequently, standards may need to be adjusted at the project level to ensure additional protection. The forest-wide riparian standards outlined in the Revised JLRMP require a 100 foot (ft.) and 50 ft. riparian core protection area on each side of perennial and intermittent streams, respectively. While the revised riparian standards offer considerable habitat benefits to many species, protecting diverse terrestrial riparian wildlife communities generally requires stream-side buffers of 300 ft. or

greater (Wenger 1999). Given that more detailed planning will be required at the project level, the FWS stresses the need for our continued involvement as part of an interdisciplinary team that will ensure adequate protective measures for aquatic listed species and critical habitat.

Attachment G, Biological Opinion, USFWS (January 13, 2004). The USFWS did not universally sign off on the riparian prescription in the Forest Plan when it issued its Biological Opinion. The same adaptive approach also is prescribed by the Conservation Plan on page 11, noting the intent to coordinate with the US FWS in such cases.

The survey applicant in this case proposes to delineate wetlands and water bodies at the same time they are surveying for a centerline for the pipeline. It is impossible to get them both right without the involvement of the USFWS. The USFWS has already declared that it is likely to require formal consultation on a project that impacts any portion of endangered mussel habitat watershed. Attachment H, Letter from USFWS (April 3, 2015). It is reckless and irresponsible commitment of resources to permit surveying for both water resource delineations and a centerline for a pipeline without NEPA analysis and the involvement of the US FWS because without the involvement of the US FWS, neither can be performed with any expectation of reliability.

Preserve Craig, Inc. also hereby puts the Forest Service on notice that the James Spnymussel currently is subject to a petition for critical habitat designation. *See* http://www.biologicaldiversity.org/campaigns/freshwater_mussels/pdfs/CBD_Critical_Habitat_petition_for_9_northeast_species.pdf.

The Biological Opinion for the Indiana Bat Predates White Nose Syndrome

The Biological Assessment and Biological Opinion associated with the development of the Revised Land and Resource Management Plan for the Jefferson National Forest were developed before the introduction of white nose syndrome which is impacting bat populations. Therefore, the impacts of mist netting under the current population conditions has not been considered by the US Fish and Wildlife Service. *See* Attachment G, Biological Opinion.

The Methodology for the Collection of Environmental Data Should be Subject to Analysis Under NEPA

The applicant is proposing to collect a wide range of resource data that will impact any future decision to construct a pipeline on the National Forest. Survey methodology is as important as the results from such surveys, and the public's involvement in survey methodology is activity that is contemplated by NEPA. The survey methodology and results of the survey have the potential to significantly impact the environment should a decision to permit pipeline construction be based on the outcome of the surveys. Categorically excluding the pending

application from documentation in accordance with NEPA cuts the public out of the process and forecloses opportunities down the line to raise concerns in regard to survey methodology and the conduct of surveys. Note that the USFWS has asked the applicant's consultant not once, but twice, to amend a protocol which is telling of the process to be expected. *See* Attachment H, p 4.

The Forest Service must review and concur on survey methodology in order to assure reliable results. The protocols should be reviewed and approved in the context of a NEPA process so that the public is informed. The protocol review processes will be subject to FOIA, so they might as well be conducted under a NEPA analysis.

Recommendations If the Forest Service Chooses to Grant the Permit to Survey

Preserve Craig recommends that if survey activity is permitted, that the agents for the applicant who conduct the surveys are accompanied by two Forest Service staff members and a third-party environmental consultant at all times, at the applicant's expense. Energy project developers are notorious for conducting activities that compromise resources in their efforts to secure construction permits. For many years, coal companies have hired anyone who needs the work to cut down snags and potential bat roost trees on their lands before surveys are conducted for surface-mining-permit purposes. While cutting vegetation greater than 2 inches in diameter may not be proposed by the applicant, any number of resources could be compromised either intentionally or by the inattention to detail on the ground.

In particular, impacts to water resources and aquatic habitats from pipeline construction have been identified as significant concerns. The GW&JNF's Federally Listed Threatened and Endangered Mussel and Fish Conservation Plan prescribes buffer zones of differing sizes around ephemeral, intermittent, and perennial streams the scope of which are slope dependent in each category. The Forest Service should not trust the developer to 1) fully identify the location of ephemeral and intermittent streams, and 2) properly carve out the buffer zones. This is important if the applicant is also surveying the centerline for pipeline construction at the same time. The prescription is described on pages 10-12 of the 2004 Conservation Plan (Attachment F) and is highly technical in nature. It appears that the standards in the Conservation Plan differ from the riparian standards prescribed in the Forest Plan because the Conservation Plan standards are slope-dependent, and the instructions for delineation are quite detailed.

As a final comment, Page 1 of Attachment A of the application states that "Biodegradable flags will be left behind. . ." To our knowledge there are no flags that are certified to a recognized standard for use of the term biodegradable. Biodegradable refers to materials that are capable of decaying through the action of living organisms. These flags will not come into adequate contact with microorganisms. The Biodegradable Products Institute has established certification of certain products, in cooperation with the National Sanitation Foundation ("NSF") for confirming biodegradable products that are intended to be composted. This protocol uses laboratory test data demonstrating compliance with ASTM D6400 or ASTM D6868. However

Supervisor Speaks

April 17, 2015

page nine

no standards have been established for flags. The Federal Trade Commission considers such sloppy terminology as presented in the permit application to be misleading and deceptive. We request that the applicant be required to demonstrate that their flags are certified biodegradable under a recognized independent third party certification or be required to remove all flags within 30 days after they have been placed on National Forest lands.

Conclusion

If not denied entirely, the Forest Service should not exclude the proposed activity from NEPA documentation because extraordinary circumstances are present, even for the consideration of survey activity due to both the impacts to Cultural Attachment and the necessary involvement of the USFWS in assessing the proper width of riparian corridors which will be assessed by the survey activity in relation to the centerline for any pipeline.

Preserve Craig urges the Forest Service to deny the applicant's request to conduct civil and resource surveys on the Jefferson National Forest in Craig County for the ultimate purpose of constructing a natural gas pipeline. The record of decision for the 765 kV transmission line provides more than enough documentation of impacts to the human environment to deny the special use permit application. An infeasible construction alternative is not a viable survey alternative, and the applicant's permit application must be denied.

Respectfully submitted,



Tammy L. Belinsky,
Counsel for Preserve Craig, Inc.

Attachments

APRIL 10, 2015

Via Electronic Mail: comments-southern-georgewashington-jefferson@fs.fed.us

Re: Mountain Valley Pipeline Special-Use Permit Comments

USDA Forest Service
George Washington and Jefferson National Forest
ATTN: Mountain Valley Pipeline Survey Comments
5162 Valleypointe Parkway
Roanoke, VA 24019

Dear H. Thomas Speaks, Jr.:

As the Science and Technical Committee of Preserve Craig, Inc. we urge the US Forest Service (USFS) to **deny the application by MVP for a Special-Use Permit to conduct surveys on Jefferson National Forest Lands in Craig County, Virginia**, pursuant to Alternative Routes 110, 110J and 110R for the Mountain Valley Pipeline (MVP) Project. The USFS has already judiciously denied such permission for a portion of Alternate 110 as incompatible with present land designation (i.e. Wilderness Area). We contend that the proposals of Alternative Routes 110J, 110R and the remaining parts of 110 show a similar lack of professional diligence on the part of MVP, as detailed in the attached assessment.

We understand the USFS typically allows surveys even when the proposal is highly questionable. In this case, however, **established facts about Alternates 110, 110J, and 110R clearly demonstrate that the route is so egregious and environmentally disastrous** that the USFS should reject the Special Use Permit application on the grounds of known environmental concerns. Specifically, current facts demonstrate that these alternatives 1) threaten the security of domestic water supplies, 2) violate longstanding management practices and policies, 3) violate multiple water quality BMPs, 4) threaten federally listed species, 5) damage viewsheds, and 6) negatively impact longstanding relations between the USFS and the citizens of Craig County.

At the same time, the exceptionally poor survey design will provide no useful information to support sound decision-making: the proposed surveys will be extensive rather than intensive (i.e. cover a wide area in a cursory way), and will be extremely limited spatially (300-ft survey corridor) and temporally (4-5 months for 300+ miles). While MVP will attempt to make definitive statements from such insubstantial data, the limited nature of their findings cannot address concerns for rare taxa, water quality, and other issues noted in our assessment.

If, the USFS does allow the surveys, we strongly suggest that 1) **the survey design be peer-reviewed by experts** to provide the best possible information, and 2) the survey work specifically **address the issues raised in the attached document.**

We appreciate the chance to submit comments and offer our services as the USFS considers this important decision. For more information, contact Larry Willis (ldwillis1028@gmail.com).

Sincerely,

The Scientific and Technical Committee of Preserve Craig, Inc., on behalf of the community

W. Samuel Easterling, Ph.D., Civil Engineering
W. Cully Hession, Ph.D., P.E., Certified
Ecological Designer

Scott Klopfer, M.S., Certified Wildlife Biologist
Duane Means, Certified Forester #3301

Brian Murphy, Ph.D., Certified Fisheries Professional

Marie C. Paretti, B.S. Chemical Engineering,
Ph.D. English

Gene Seago, Ph.D., J.D. Accounting
Lawrence Willis, Ph.D. Stream Ecology
Bill Wolf

Jim Workman, M.S. Engineering Administration

cc: Kim Smith, US Fish and Wildlife Service, Virginia Field Office
Brian Watson, Virginia Department of Game and Inland Fisheries
Amy Ewing, Virginia Department of Game and Inland Fisheries
Rene Hypes, Virginia Department of Conservation and Recreation
Liz Stout, US Fish and Wildlife Service, WV Field Office
Federal Energy Regulatory Commission
Craig County Board of Supervisors
Preserve Craig Steering Committee
Governor Terry McAuliffe
Senator Mark Warner
Senator Tim Kaine
Congressman Morgan Griffith
State Senator Steve Newman
House of Delegate Gregory Habeeb

ASSESSMENT OF THE IMPACT OF THE MOUNTAIN VALLEY PIPELINE
Prepared by the Scientific and Technical Committee of Preserve Craig, Inc.

Our assessment of the Mountain Valley Pipeline survey request addresses 6 critical areas:

1. Security of Domestic Water Supplies
2. Long Standing Land Management Strategies, Agreements, and Decisions
3. Water Quality, Landscape Considerations, and Best Management Practices (BMPs)
4. Rare, Threatened, Endangered, and Invasive Species
- 5 Viewsheds
6. Cultural Issues

Based on serious, well-documented, easily predicted violations of both policy and law across these six categories, we find MVP's request for a Special Use Permit to survey Jefferson National Forest Lands in Craig County unsupportable and recommend immediate rejection.

1. Security of Domestic Water Supplies

Virtually every Craig County resident (more than 5000 people) gets their domestic household water supply from water sources that originate in the Jefferson National Forest, and any large-scale disturbance of forested JNF lands will potentially interrupt or degrade these supplies. All households in Craig County draw their domestic water supplies from springs and wells within the county. This includes more than 500 households and businesses and more than 1200 people serviced by the Craig-New Castle Public Service Authority, which relies on local wells. Additionally, every Craig County agricultural operation relies on either groundwater or surface water that originates at least in part from the JNF. Therefore, the entire water supply for Craig County depends on the JNF for spring flow, stream flow, and groundwater flow to wells through easily disturbed karst geology. This highly sensitive karst geology means that fractures, cracks, channels, and sinkholes readily form throughout the region's limestone base, creating a deeply interconnected and fragile water supply. Excavation and blasting for pipeline construction thus has the potential to severely impact many miles and acres of NF and neighboring lands. One need only look at two case studies in this area to understand how sensitive karst-geology water supplies can be damaged 1) wells were disturbed by construction along the I-81 corridor and 2) drilling an exploratory gas well near Paint Bank contaminated the spring feeding the Paint Bank Fish Hatchery.

Moreover, allowing the passage of the pipeline through JNF lands would mean that the proposed pipeline would also pass through approximately 150 private-land parcels in Craig County that would be directly affected by the major forest-clearing, excavating, blasting, and related ground-disturbing activities required to build the MVP pipeline, creating additional risks for residents throughout the county, regardless of whether their land lies along the pipeline route..

The Forest Plan for the JNF (USFS 2004) extensively discusses the need to protect watersheds in the JNF that are relied upon for domestic water supplies. That discussion focuses on domestic water-supply impoundments for urban communities, but ignores the fact that protection of water supplies is equally, if not more, critical for rural communities where no alternative water sources exist. The JNF composes more than 50% of the land in Craig County. Thousands of Craig county residents rely on spring water and well water that depends at least in part, and in many cases substantially or entirely, on hydrology from the JNF. These water sources deserve and need protection just as much as domestic water-supply reservoirs. This issue is an oversight in

the present Forest Plan that certainly needs to be addressed in the next planning phase, but that must also be taken into account immediately as the USFS considers MVP's request.

A survey of surface features will do little more than identify a few existing sinkholes and will provide no information to assess the risks associated with future construction. At the same time, known, planned activities associated with the pipeline construction itself threaten the County's water supply:

- The survey corridor will be stripped of forest cover, removing an important water-filtering component of the forest floor that is particularly critical in karst regions, where channels and sinkholes can take surface water directly into the aquifer.
- A 10-foot-deep trench will be excavated through the rock and soil, and such activity itself has a history of altering groundwater flows.
- A 42-inch metal pipe will be placed in the ground and water breaks will be installed which will unavoidably alter near-surface water movement.
- The survey corridor will be compacted, creating a more-impervious surface.

The Weeks Act charged the Forest Service with restoring and protecting forests, watersheds, and water supplies (Williams 2003, Weeks Act of March 1, 1911; 36 Stat. 961). The domestic water supplies for hundreds of people could be negatively impacted by construction of the MVP pipeline through the JNF in Craig County, and such construction should not even be considered in such a hydrologically sensitive and critical area. *The residents of Craig County call on the Forest Service to help protect and secure their water supplies by denying the proposed actions of a private company that threaten the water security of many county residents.*

2. Long Standing Land Management Strategies, Agreements, and Decisions

The Mountain Valley Pipeline Alternate Routes 110, 110J, and 110R contradict and outright violate previous USFS studies and decisions, the USFS Land and Resource Management Plan, and private citizens' conservation efforts with other state and federal agencies.

First, in the 1990s a power line was proposed to cross Craig County and the Jefferson National Forest (JNF) in the same general area as the current proposed pipeline routes. **After extensive studies of thirteen proposed routes, the USFS effectively denied a request for a power line to cross the region (USFS 1996a, USFS 2002).** In that decision, the Forest Service considered economic, environmental, technical and other factors to not approve any of the routes in order to best fulfill their statutory missions and responsibilities.

The reasons for that decision are more important today than they were 20 years ago. The proposed route for the MVP most closely resembles routes assessed in 1996 that were among the worst for crossing steep slopes with high erosion potentials. Because a pipeline requires ditch excavation, it is a much more intense disturbance to the land and cultural assets than a power line, and is an equally intense disturbance to recreation and viewsheds (see Section 4). As a result, the proposed MVP routes 110, 110J and 110R would have an even bigger effect on the landscape than a power line. The power line routes through Craig County were also considered *"...the most severe impacts to wildlife habitat and remote recreation experience"* (USFS 1996b). Allowing a pipeline through this area now would contradict the decision made in 1996.

Second, the USFS has adopted a management plan for the Jefferson National Forest (USFS 2004) in which they made the decision that utility rights of way are **not appropriate in some of the areas proposed for the current pipeline**. The development of that plan took many years to complete and relied on extensive public comment. The plan was a well-deliberated compromise of multiple uses that included management prescriptions 6C-Old Growth with Disturbance areas and 8C- Black Bear Habitat.

The management prescriptions for 6C-Old Growth with Disturbance in the Forest Plan (USFS 2004) provide a number of clear, specific reasons for disallowing new pipeline construction and related infrastructure (e.g., roads and staging areas); 6C-026C specifically prohibits new utility right-of-way construction:

“These areas are unsuitable for designation of new utility corridors, utility rights-of-way, or communication sites. Existing uses are allowed to continue.” (Page 3-84)

The 8C–Black Bear Management prescriptions are founded on the idea that disturbances such as road construction and use should be kept to a minimum to provide seclusion. Clearly, the activities surrounding the design, construction, and maintenance of the pipeline and resulting corridor will violate this directive. In fact, 8C-028 specifically prohibits new right-of-way construction:

“These areas are unsuitable for designation of new utility corridors, utility rights-of-way, or communication sites.” (p. 3-124)

As we have stated, the current Forest Plan, including these prescriptions, resulted from an arduous process involving multiple, diverse stakeholder interests. While it is possible to amend the plan to accommodate the pipeline request, it is not possible to change the reasons these areas were designated as they were. The uses were assigned as the agreed-upon best use of the land, and the limitations were stated for sound scientific, ecological, and social reasons based on input from numerous experts as well as citizen stakeholders. Changing the plan will undoubtedly require a reinvestment of time and energy from stakeholder groups to address the resulting changes and their impacts on management across the JNF. **The proposed survey will not be sufficient to provide the data needed for a major change in USFS Policy.**

Third, although the USFS has stated that it will only be considering Forest Service owned lands in this deliberation, there is undoubtedly a strong connection between private and public lands, and what happens on one strongly affects the other. The proposed routes will degrade private conservation easements, private wildlife habitat restoration projects, and other longstanding, private conservation efforts created by concerned citizens in collaboration with state and federal agencies, land conservancies, and other dedicated conservation entities. These conservation efforts and public participation are important to USFS goals and affect USFS land management activities. Allowing MVP to proceed with its survey on Forest Service land will have ripple effects among hundreds of private land owners who to date have served with the USFS as citizen-stewards of our region’s forests.

Together, these violations of current USFS and JNF policies and practices clearly warrant a refusal of MVP’s request for a survey.

3. Water Quality, Landscape Considerations, and BMPs

The MVP would clearly negatively impact water quality and landscape, and violate related BMPs. The importance of watershed protection is clear throughout the current Forest Plan, and effectively summarized in the following excerpts:

- a. *“Maintenance and restoration of healthy, diverse, and resilient watersheds, which include not only the water, but also the soil and air, will be given the highest priority in all of our management activities.”* (Page 2-2, paragraph 2, line 2)
- b. *“Water quality remains within a range that ensures survival, growth, reproduction, and migration of aquatic and riparian wildlife species; and contributes to the biological, physical, and chemical integrity of aquatic ecosystems. Water quality meets or exceeds State and Federal standards.”* (p. 3-180)
- c. *“The biological integrity of aquatic communities is maintained, restored, or enhanced. Aquatic species distributions are maintained or are expanded into previously occupied habitat. The amount, distribution, and characteristics of aquatic habitats for all life stages are present to maintain populations of indigenous and desired nonnative species. Habitat conditions contribute to the recovery of species under the Endangered Species Act.”* (p. 3-180)
- d. *“Any human caused disturbances or modifications that may concentrate runoff, erode the soil, or transport sediment to the channel or water body are rehabilitated or mitigated to reduce or eliminate impacts. Channel stability of streams is protected during management activities.”* (p. 3-181)
- e. *“On all soils dedicated to growing vegetation, the organic layers, topsoil and root mat will be left in place over at least 85% of the activity area.”* (p. 2-7)
- f. *“No herbicide is aerially applied within 200 horizontal feet, nor ground-applied within 30 horizontal feet, of lakes, wetlands, perennial or intermittent springs and streams.”* (p. 2-28)
- g. *“Use advanced harvesting methods on sustained slopes 45 percent or greater to avoid adverse impacts to the soil and water resources. Use advanced harvest systems on sustained slopes over 20 percent when soils have a high erosion hazard or are failure-prone.”* (p. 2-33)
- h. *“This Forest Plan meets or exceeds State Best Management Practices. Current State BMP handbooks or manuals are incorporated as direction in the Forest Plan and are implemented for those resource management activities that are covered by the handbooks/manuals. Standards for activities not included in BMP handbooks/manuals are included in Chapters 2 and 3 of this Forest Plan.”* (p. A-3)

If any of the proposed routes through Craig County (110, 110J, 110R) were approved, **EVERY** goal and strategy listed above would be violated during both construction and operations, and some of the most important stream habitats within the National Forest boundaries would be adversely affected.

While the subject of route feasibility is one of the goals of a survey, the extensive information already available clearly and directly indicates Alternates 110, 110J and 110R are inappropriate under any circumstances.

Two landscape features stand out as particularly obvious problems with regard to water quality along the proposed routes: **steep slopes and extremely sensitive aquatic habitats.**

First, with respect to the slopes, one key reason MVP proposed alternate routes at all was the presence of steep slopes along their original route. These proposed alternates do nothing to address that concern. Alternative Route 110 and all related routes (110J, 110R) traverse extreme slopes in the JNF in Craig County, including:

- the southeast face of Potts Mountain: up to 42% slope
- the northwest face of Sevenmile Mountain: up to 63% slope
- the northwest face of Johns Creek Mountain: up to 63% slope
- the southeast face of Johns Creek Mountain: up to 85% slope
- the northwest face of Sinking Creek Mountain: up to 63% slope
- the northwest face of Cove Mountain: up to 63% slope

As clearly stated in USFS policy, “*Current Forest Service policy directs compliance with required CWA permits and State regulation and requires the use of BMPs to control nonpoint source pollution to meet applicable water quality standards and other CWA requirements*” (USFS 2012; p. v), which clearly includes adherence to BMPs with respect to slope runoff.

Pipeline construction activity on these steep slopes will inevitably violate BMPs and create problems with slope failure, erosion, sedimentation and ground water and surface water quality.

These problems are not merely *potential* effects – they are certainties, even with all state-of-the-art mitigation practices observed. BMPs are implemented to minimize negative effects; they are never assumed to eliminate effects. Moreover, the effectiveness of BMPs is dependent on many factors, including the steepness of the landscape. The slopes involved in Alternate Routes 110, 110J, and 110R are clearly outside the design limits and are unacceptable under BMPs. In addition, BMPs for road building promulgated by the Virginia Department of Forestry dictate that “*roads should follow contour as much as possible, with grades between two percent and 10 percent*” (VDOF 2011; p. 18). The “Gold Book” (USDI and USDA 2007) that governs oil and gas exploration on federal lands stipulates that

“*[road] gradient should fit as closely as possible to the natural terrain . . . The gradient should not exceed 8 percent . . . in order to minimize environmental effects. In mountainous or dissected terrain, grades greater than 8 percent and up to 16% may be permissible with prior approval of the surface management agency.*” (USDI and USDA 2007; p. 25).

Pipelines are a much more intense disturbance than road building because of the consistent depth of excavation and because they are oriented perpendicular to the slope. The steep slopes encountered along the proposed routes in Craig County will cause erosion, increased runoff and sedimentation problems in the watersheds. **No mitigation procedures are capable of**

eliminating these inevitable problems on the slopes. These problems *will* occur, thereby affecting water quality and the sensitive aquatic habitat in surface streams along the route.

Moreover, given the steepness of the slopes, the 300-ft survey corridor, 125- ft construction corridor and the ultimate 75-ft maintenance corridor described in the MVP application are **misleading to the USFS and the public**, as the ultimate corridor would necessarily be significantly wider than stated to accommodate access roads, further increasing runoff, erosion, and sedimentation. In their detailed route analysis of the initial Proposed Route and Alternative Route 1 (MVP 2014; filed 1 December 2014), **MVP rejected using some existing transmission line rights-of-way along Route Alternative 1 due to steep side slopes** that would have to be traversed by the pipeline. MVP further stated that if such slopes were indeed to be traversed, then the impact corridor for pipeline construction will necessarily be much wider than the 125-ft corridor initially described:

“Initial flight reconnaissance and ground check revealed that much of the route that followed existing overhead electric transmission line rights-of-way was along severe side slopes. While the overhead transmission lines span significant areas of slide slope, these areas would be required to be crossed directly by the pipeline. As a result of this next phase of route analysis, MVP determined that Route Alternative 1 represented insurmountable construction challenges, as well as a high risk of slope failure and pipeline slips, once the pipeline was to be in operation.” (MVP 2014: p. 1-4) . . . However, in areas where Route Alternative 1 is alongside slopes, the construction right-of-way would need to be significantly wider than 125 feet to accommodate significant cut-and-fill that would be required for construction, which would result in an even greater area of construction impact.” (MVP 2014: p. 1-5)

In other words, MVP’s own extensive route analyses (MVP 2014) ruled out Route Alternative 1 as presenting “*insurmountable construction challenges*” because of steep slopes. Yet in MVP’s filing Summary of Alternative February 2015 (MVP 2015a), the company proposed new Route Alternatives 110/110J/110R through Craig County that cross extreme slopes that reach and even exceed 80%. The exact same construction challenges MVP identified on Route Alternative 1 are present on the severe side slopes along Route Alternatives 110, 110J, and 110R, and would also require a construction corridor significantly wider than 125 feet. This point is never revealed in either MVP’s 18 February 2015 filing to FERC that first describes these Route Alternatives (MVP 2015a), nor is it ever mentioned in MVP’s application to USFS for the permit to survey in the JNF (MVP 2015b). **Thus the survey-permit application to USFS contains incomplete and/or misleading information.**

On the steep slopes crossed by Route Alternatives 110, 110J, and 110R, it will be impossible to engineer either construction-access roads or maintenance-access roads that meet required USFS BMPs (USFS 2012), even by utilizing the entire proposed 125-ft temporary construction corridor for switchbacks. Properly built roads that represent responsible land stewardship and meet BMP guidelines would necessarily have multiple switchbacks and a properly designed drainage network, which would be impossible to construct even within the larger 125-ft construction corridor, much less the 75-ft permanent easement corridor described by MVP.

Therefore, if the pipeline were ever allowed to be constructed through the JNF in Craig County, either the corridor through the National Forest would be much wider than suggested, or MVP would have to violate accepted BMPs **and USFS would have to contradict its own policies to allow such egregious violations.**

The second key landscape feature concerns the sensitive aquatic habitats along the Alternatives 110, 110J, and 110R. **These routes will negatively affect known sensitive aquatic habitats.** While we defer discussion of the sensitivity of specific habitats and species to Section 4 (Rare, Endangered and Invasive Species), we note here that **several of the streams to be crossed have exceptional water quality that supports species that are especially sensitive to sedimentation.**

With respect to water quality, the proposed routes will remove forest cover that protects critical water resources on both public and private lands and destroy streamside buffers. Construction will compact the soil in the construction corridor, thereby causing increased runoff to nearby stream channels outside the corridor that will result in channel erosion and sediment problems downstream. These are **known, predictable outcomes.** Additionally, construction could potentially destroy ground water connections and clog underground drainage networks. Nearly the entire length of the proposed Alternatives 110, 110J, and 110R intersect karst geology that provides the supply and protection of clean water for wildlife (as well as for residential and agricultural use, as noted in Section 1).

The proposed routes will run along and across innumerable small un-named headwater streams that are essential for aquatic habitat, as well as the more-well-known named streams (Dicks Creek Johns Creek, Sinking Creek, and Craig Creek). Construction of buried pipeline stream crossings is known to cause negative impacts to stream ecosystems (Levesque and Dube 2007). In particular, construction of these crossings will directly impact stream beds and banks, increase suspended sediment and deposition and, thereby, impact fish and macroinvertebrate habitats (Tsui and McCart 1981, Reid et al. 2002). While little research exists concerning the long-term impacts of pipeline crossings, there will certainly be impacts on the local riparian forests and the many recently implemented CRP and CREP conservation efforts in the area.

A survey will do little to improve our already extensive understanding of these water quality issues. We already know where the important resources are and why they are important. We know the proposed route is inappropriately steep. The USFS was formed in large part to protect watersheds, and its formation led to the restoration of millions of acres of denuded, eroded land and the protection of related water resources (Williams, 2003). It would be incongruous to allow that same land to be newly denuded and eroded for a purpose that is clearly unsuitable for the land.

4. Rare, Threatened, Endangered and Invasive Species

The proposed Alternate Route 110 and all related options will negatively impact multiple rare, threatened, and endangered species. The Forest Service Plan makes clear, unambiguous declarations about the USFS goals for protecting important species that inhabit the corridor for MVP Alternative Routes 110J and 110R (USFS 2004):

- a. *“Sensitive aquatic species is a concern throughout this watershed. The James spiny mussel is found in all the 6th level watersheds except Upper Barbours Creek. In addition, the orange-fin madtom is present in Upper Craig Creek, Johns Creek and Lower Craig Creek. The Atlantic pigtoe, a state-listed threatened mussel and the roughhead shiner a state species of special concern are also found in the Upper James River watershed.”*
- b. *“Clean water and gravels will be provided in streams inhabited by and upstream of the James spiny mussel, Atlantic pigtoe and their host fish, as well as the roughhead shiner*

and orangefin madtom so that populations can be maintained, protected and restored.” (p. 4-10)

- c. *“Priority Watersheds which Possess Outstanding Aquatic Biodiversity (Potts Creek, Johns Creek, Upper Craig Creek, Lower Craig Creek): Within these watersheds, we will seek opportunities for dialog with adjacent private landowners and work collaboratively with local governments and other Federal government agencies to restore water quality or maintain and restore aquatic habitat. In addition to identification of these priority watersheds, the Forest (Service) has developed a Federally Listed Fish and Mussel Conservation Plan in collaboration with the U.S. Fish and Wildlife Service, and continues to work with the Virginia Department of Game and Inland Fisheries to protect and recover federally listed and sensitive aquatic species.”* (p. 2-4)
- d. *“Aquatic Habitat Areas: Forest management activities within these areas are designed to protect habitat for threatened, endangered, and sensitive fish and mussels in streams adjacent to or immediately downstream from, National Forest System lands. These lands and their associated streams reflect the physical, chemical, and biological structure that sustains exceptional aquatic diversity.”* (p. 3-163);
- e. *“Timber harvest is not allowed unless associated with reasonable access to valid existing rights or salvage of hazard trees for public safety and/or aesthetics.”* (p. 3-165)

The various alternative routes cross all five known locations for the endangered James spiny mussel (*Pleurobema collina*) in the Upper James River watershed including: South Fork of Potts Creek, Little Oregon Creek, Dicks Creek, Johns Creek, and Craig Creek.

All of the known populations of James Spiny mussel in the Upper James River basin are directly downhill from National Forest lands and within what are commonly referred to as the boundaries of the National Forest. **This federally protected endangered species would be negatively impacted by any activities in the National Forest that might increase erosion and resultant sedimentation into the headwater streams.** As fully demonstrated in Section 3, there is no doubt that a pipeline on the severe slopes of the proposed routes will cause erosion. There are no BMPs that can possibly eliminate, or even hope to reasonably control, erosion caused by the proposed project. Our assertions of the ineffectiveness of BMPs for pipelines on steep slopes and the problems this can cause with endangered mussels is documented by an important case study of the East Tennessee Gas Pipeline in Tazewell and Smyth Counties, Virginia. In 2006, during construction of a 20-inch gas pipeline, extreme care was taken by FERC, USFWS, the Virginia Department of Conservation and Recreation, and the company to ensure that state-of-the-art erosion control measures were in place (TRC et al. 2009). In addition, hourly turbidity monitoring was conducted by the USGS during construction to provide nearly real-time feedback on construction activities (USGS 2009). In spite of this extreme attention to detail, slopes failed in two independent events resulting in a kill of several hundreds of individuals and multiple species of endangered mussels in Indian Creek and N. F. Holston River (Dinkins 2011). The worst sediment problems originated high in the watershed where small streams transported sediment to the larger streams (USGS 2009, TRC et al. 2009).

Dr. Richard Neves, internationally recognized authority on endangered mollusks, points out the importance of the James spiny mussel populations in the upper James basin and specifically relates how projects like the MVP and Alternative Routes 110, 110J and 110R can have catastrophic failures like the incident at Indian Creek. Dr. Neves writes (emphasis added):

*Let me answer your 2 questions about the 1) significance of the meta-population of the endangered James spiny mussel in upper John's Creek, Dicks Creek, and Little Oregon Creek, and 2) potential effects of a pipeline crossing of those streams. By way of background, **I co-conducted the initial status survey of this species (Clarke and Neves 1984), assisted Andy Moser, FWS, with preparation of its federal Recovery Plan in 1990, and have supervised graduate students who worked on its life history and habitat requirements (Hove 1989, Hove and Neves 1989, Hove and Neves 1994), and status of various populations (Ensign and Neves 1995, 2000; Petty and Neves 2002, 2006; Johnson, Petty and Neves 2005) throughout the James and Dan river systems, but particularly in the Craig Creek drainage. I have also conducted many mussel surveys for VDOT in Craig and John's creeks for bridge replacement and ford crossing projects over the last 30 years (e.g., Gatenby and Neves 1994), and discovered the Dicks Creek and Little Oregon Creek populations of the James spiny mussel during one of those surveys (Gatenby and Neves 1994). Thus I am very familiar with the species and its habitat requirements.***

The meta-population of James spiny mussel in John's, Dicks, and Little Oregon creeks is the largest and most reproductively viable population known, throughout the species' range. Detailed monitoring studies by state malacologist Brian Watson over the last 4 years have confirmed this. My sampling of other populations in various streams throughout its range over the last 30 years, to include Craig Creek, has indicated a gradual decline of those populations, with limited recruitment likely due to poor reproductive success. Conversely, John's Creek has maintained its healthy population because of excellent water quality and minimal impacts to physical habitat in the stream(s). For the last 7 years (e.g., Dan and Neves 2014), we have been using gravid females from John's Creek to augment natural reproduction in Craig Creek, as a component of a Biological Opinion issued by FWS to VDOT in 2007. John's Creek drainage is the only creek system throughout the species' range where we can readily collect reproductively mature females for this project.

*With respect to the potential effects of a pipeline crossing of any of these streams, I can say that **any negative impact to water quality or physical habitat, such as erosion or sediment (Henley et al. 2000), could jeopardize the resident population, particularly the more isolated populations in Dicks and Little Oregon creeks. This species does best in high-quality headwater streams, witnessed by its present range in small streams with good water quality, stable substrates, and healthy populations of resident host fishes. Relocation is not an acceptable option for this species, as the resident population(s) in the upper John's Creek drainage occupy what has been empirically determined by them to be most suitable for their survival, growth, and reproduction. I conducted many mussel surveys for stream crossings of the Jewell Ridge Lateral Gas Pipeline project by Spectra Energy in southwest Virginia (Ostby and Neves 2005), and was called by FWS to assess two known sediment spills in 2006 from this project; one in Indian Creek, Tazewell County, and the other in upper North Fork Holston River (NFHR), Smyth County. The sediment plume in Indian Creek degraded the habitat of 2 federally endangered species (Ostby and Neves 2006), and the washout of the crossing site on NFHR caused the death of some mussels, particularly in the area of the coffer dam (Ostby and Neves 2006a). Evidence of the sediment was detected as far as 2 km downstream (Ostby and Neves 2006b). Thus in spite of a contractor's best efforts and implementation of Best Management Plans, accidents and unexpected events do happen, with potentially serious***

consequences to mussels.” [Richard Neves, USGS and Virginia Tech, retired; e-mail communication; March 21, 2015]

The proposed Alternate Routes 110, 110J and 110R pass through and would disrupt the most important streams *on earth* for the Federally Endangered James spiny mussel, and **because the effect is predictable it violates the Federal Clean Water Act Mandated Best Management Practices**, which state:

“Discharges must not take, jeopardize, adversely modify or destroy the critical habitat of threatened or endangered species as defined under the Endangered Species Act.

In the Recovery Plan the USFWS charges the USFS with giving this area special protection with this statement:

“Wherever possible, the Forest Service should acquire those habitat areas and watersheds, with priority placed on the Craig/Johns Creek watershed” (USFWS 1990).

Recently, the USFWS wrote a letter (dated April 3, 2015) to an agent for MVP recommending alternative routes be developed that avoid the Johns Creek and Craig Creek watersheds because of the importance of the watersheds to the conservation and recovery of the spiny mussel. The letter went on to say that presence/absence surveys are not necessary for Craig, Johns, Little Oregon and Dicks Creeks.

In addition to the **likely violations of federal law and stated policies** raised above, Alternatives 110, 110R, and 110J also impact multiple other rare, endangered, threatened, and protected species:

- The Johns Creek Watershed has been proposed as Critical Habitat for the James spiny mussel (Hartl 2015)
- Johns Creek and Craig Creek are known habitat for the Federally Endangered Orange Finned Madtom.
- Craig Creek is habitat for the Atlantic pigtoe, which is proposed for Federal Listing as Endangered.
- North Fork of the Roanoke River is documented to contain the Federally Endangered Roanoke Log Perch in the vicinity of Route 110 crossings.
- The proposed routes will pass near known nesting sites for bald eagles.
- All of the proposed routes cross caves that have been historically used by endangered species of bats.
- The proposed routes pass through wetlands that support diverse amphibian assemblages and karst areas that support numerous rare cave organisms.
- Many of the streams that are endangered-species waters are also of concern as known habitat for native brook trout. In addition, Alternate 110J runs alongside Trout Creek for several miles and crosses Pickles Branch, which are both native brook trout streams.

- Sinking Creek riparian wetlands, in the area crossed by the alternative routes are habitat for an endemic, undescribed species of crayfish that will likely receive Federal Protection. Details regarding this species in the Sinking Creek watershed, and other endangered crayfishes that are threatened by the MVP pipeline, can be found on the FERC Docket for the proposed MVP project (http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20150401-5067).

At the same time that the MVP directly threatens multiple rare, threatened, and endangered species, anthropogenic corridors like pipelines are known to **spread invasive species and diseases**. Perhaps the best evidence is a drive down any interstate highway in Virginia. Road rights-of-way are choked with autumn olive, tree of heaven, fescue and multiflora roses, among other state-listed invasive plants (the full number of potential invasive species is too long to list here). Furthermore, the standard mitigation approach to replanting vegetation along the pipeline is to broadcast fast-growing, typically non-native plants, which consistently results in an injection of highly invasive, non-native species into sensitive management areas of the forest - a result that is clearly incompatible with existing management directives. Management of the right of way by the spraying of herbicides or mowing further exacerbates the problem for invasive grasses like fescue. Even if the right of way is seeded with native plants, without active management invasive plants spread on their own in such disturbed areas.

Given the known likely direct threats to federally listed species and potential associated violations of federal law, **the USFS should reconsider its decision to seek a categorical exclusion for the environmental analysis for the permit**. There are potential environmental effects to endangered species that must be examined, and details of those examinations must be addressed. For example, how will the mussel surveys be conducted? Will they be performed in conjunction with long-term studies the USFWS and VDGIF are conducting? Could the mussel surveys interrupt these long-term studies? How will the bat mist-net surveys insure that diseases like white-nose syndrome will not be spread? Will the bat studies identify bat roost trees? Will the bat studies follow the USFWS Indiana bat survey guidelines? MVP has described the surveys as being conducted on foot through the USFS lands, but already low-level aerial (helicopter) surveys are being conducted that are affecting private livestock. Will that be allowed during the surveys and what would be the effect in the 110R corridor between the Brush Mountain Wilderness areas? The USFS should consider doing an environmental analysis on the effect of the surveys before even considering approval of such surveys.

5. Viewsheds

The proposed route will damage viewsheds in ways that violate both the spirit and the letter of the current Forest Plan with respect to visual impact. The Jefferson National Forest Plan (USFS 2004) includes numerous statements about how activities on the Forest Service lands should minimize the effect to viewsheds:

- “Utility corridors and communication sites on National Forest System lands minimize negative environmental, social, or visual impacts; minimize acres of land affected; are designed using good engineering and technological practices; and clearly benefit society.” (p. 2-59)
- “Linear Rights-of-Way and Communication Sites: Develop and use existing corridors and sites to their greatest potential in order to reduce the need for additional commitment of lands for these uses.” (p. 2-60)

- c. “When feasible, expansion of existing corridors and sites is preferable to designating new sites.” (p. 2-60)
- d. “Design new corridors and sites to meet a scenic integrity objective as high as practicable. (p. 2-61)
- e. Locate new public utilities and rights-of-way in areas of this management prescription area where major impacts already exist. Limit linear utilities and rights-of-way to a single crossing of the prescription area, per project. “(p. 2-63)
- f. “Require mitigation measures including screening, feathering, and other visual management techniques to mitigate visual and other impacts of new or upgraded utility rights-of-way.” (p. 2-63)
- g. “Designated Utility Corridors: Where possible, existing corridors are expanded as needed rather than creating additional areas. Compatible multiple uses are encouraged, including co-location of communication uses on existing electric transmission towers.” (p. 3-71)

In direct violation of these policies, the proposed routes will create a new 75-125 ft-wide corridor through the National Forest that will affect views throughout the county as well as from the Dragons Tooth overlook and from multiple vantage points along the Appalachian Trail (AT). The Forest Service has a long-term connection with outdoor recreation, and especially the Appalachian Trail, as demonstrated by the purchase of property in Millers Cove specifically to protect the AT corridor (USFS 1997). A major reason listed for not approving the power line in 1996 was to protect viewsheds (USFS 1996b). The proposed routes cross and will be visible from the Appalachian Trail and Dragons Tooth, and thus negatively impact this long-standing partnership.

From a viewshed perspective one of the most disturbing aspects of the pipeline is the corridor that runs alongside Trout Creek and next to the Millers Cove property that the USFS bought. It appears virtually impossible to responsibly construct the pipeline as mapped in the extremely steep and narrow Trout Creek gorge without major alterations to the stream, road, and houses. Moreover, the Trout Creek gorge is directly across the valley from Dragons Tooth, which is one of the most iconic day hikes in the region and on the entire AT system. The hike culminates in dramatic views from the Dragons Tooth rock formation that look directly across the valley at Millers Cove and the Trout Creek gorge. The thought of scarring these views is incomprehensible and in direct contradiction to the policies of the current Forest Plan. Moreover, as noted in Section 3 of this analysis, the corridors would likely need to be even wider than the proposed 75-125 feet, exacerbating the damage to these viewsheds.

6. Cultural Issues

Finally, the proposed Alternate 110, 110J, and 110R routes pose a significant cultural risk to the local community. **The citizens of Craig County have a unique connection to the National Forest System, and carving a (minimum) 125-foot-wide corridor through the heart of the National Forest will inevitably have a negative effect on the community and users of the forest.**

Because 54% of Craig County is U.S. National Forest and these federal lands essentially surround all private land holdings, it is impossible to separate what happens on private and federal lands. We all affect each other. Moreover, the citizens of Craig County have a unique

connection to the National Forest and the land, as documented by the cultural attachment study the USFS commissioned in 1995 (James Kent Associates 1996) and these cultural issues were listed as one reason for not approving the power line (USFS 1996b) . Long-term residents have traditional and longstanding cultural attachments to using federal lands, and many new arrivals have moved here because they want to be a part of that culture. The residents of Craig County feel like they live *in* the National Forest, in part because many do technically live within its boundaries.

Given our deep connection to the land, a scar across our Forest would affect us all. It would lessen our sense of living in a unique place, characterized by clean, abundant water in wild streams that support diverse biological communities with minimal impact from development and industrialization. Craig County communities are naturally shaped by the landscape. John's Creek, Sinking Creek and Craig Creeks are not just streams; they are both biological and social communities shaped by the landscape. They are also communities that have historically opposed power lines and now a pipeline. In the 1990s, 80% of the households in the county united to oppose the power line. We are experiencing a similar response to the proposed MVP.

The 1996 Cultural Attachment Study (James Kent Associates 1996) defines an intrusion as “an outside force brought into an area, which will create a significant long-term change in the relationship between people and land which cannot be absorbed into existing culture, thereby changing that culture.” The proposed MVP represents just such an intrusion. Our cultural attachment and sense of place cannot be mitigated, and a survey of a proposed route will likely tell you little about the long-term negative effect on our communities. In fact, the proposal of a pipeline and the possibility that the USFS might even consider a pipeline by allowing a survey has been a threat to our communities that we are having trouble absorbing. It is beyond our understanding that a major environmental stressor could be allowed to weave between protected wilderness areas, through our streams and water supplies, through our forest and our homes.

As urbanization of other parts of the country intensifies, natural landscapes like those found in Craig County are increasingly rare and valuable. Craig County is the center of a hotspot of biotic diversity. This wild and rural character may be the county's single greatest asset for attracting and holding land-conscious residents and those seeking to recreate within such landscapes. The degradation of these landscapes through ill-conceived projects like the Mountain Valley Pipeline will only increase opportunities for additional projects (either within the same right of way, or through others) until the cumulative impact degrades the landscape as a whole. The character of the county would then be so deeply changed as to no longer embody the qualities and values that the county and its residents have so carefully stewarded.

SUMMARY

Given the known negative impacts resulting from both the survey and Alternative Routes 110, 110J, and 110R documented in this assessment, the Scientific and Technical Committee of Preserve Craig, Inc. urges the USFS **deny the application by MVP for a Special-Use Permit to conduct surveys on Jefferson National Forest Lands in Craig County, Virginia.** As professionals with extensive expertise in forest management, wildlife management, fish biology, water quality, stream ecology, law, and engineering, we developed our assessment of the proposed project based on our deep familiarity with both the scientific and cultural issues at stake for Craig County. As researchers and environmental professionals, our knowledge combines technical expertise with direct, on-the-ground knowledge of the slopes, habitats,

species, water systems, and ecologies we describe. This assessment reflects over 200 years of combined experience in areas directly related to the issues at hand.

As a result, we respectfully ask the USFS to consider the information documented above, consider the known risks involved for this project (from the survey stage through construction and operation), consider whether a cursory survey such as that proposed will really provide any meaningful or useful new information, and move now to reject the request to survey on the basis that the proposed alternate routes through Craig County are detrimental to water supplies, long-standing Forest Service goals, water quality, endangered species management, viewsheds, and cultural resources. **Moreover, allowing the proposed route creates a preferred pathway for future utilities to collocate, and the potential effects could widen in the future.** The long-term cumulative impacts of such possibilities represent unsustainable, unsupportable damage. The USFS must act now to fulfill its mission and protect JNF resources in Craig County.

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