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

Re: Comments on 22 July 2016 site visit to propose Mountain Valley Pipeline crossing location of the Appalachian National Scenic Trail. Docket No. CP16-10-000

Ms. Bose,

I am writing on behalf of the Appalachian Trail Conservancy to provide you with comments from a field visit I attended to the proposed Mountain Valley Pipeline crossing location with staff from FERC contractor CARDNO, the Roanoke Appalachian Trail Club and the United States Forest Service on 22 July 2016. The field visit was an opportunity to learn more about the proposed project, and EQT's approach to crossing the Appalachian National Scenic Trail (A.T.). I was also able to conduct an initial review of EQT's 24 June filing and a brief desk-top review of two proposed route alternatives filed by EQT on 18 July.

Based on this field survey, I have concerns about the review process that should be addressed to assure appropriate protection of the Appalachian National Scenic Trail and the 90 year public investment therein.

Comments on proposed MVP pipeline route site visit:

It is clear from the site visit that the route of the proposed MVP pipeline will be visible from numerous places along the Appalachian National Scenic Trail. A large and popular open area less than 1,500 feet Trail north of the proposed crossing location has a significant risk of being severely impacted from the proposed pipeline's construction. Visual simulations must be completed and confirmed in the field to adequately evaluate impacts to the A.T. These simulations should also include indicative simulations and include multiple viewpoints since the trail traverses the open areas for some distance. Other locations of probable impact include, but are not limited to: Angels Rest, Rice Fields, Kelly Knob McAfee Knob, Wind Rock and the numerous unnamed vistas in the open areas along Peters Mountain.

- It cannot be determined with confidence if proposed bore pit location on the north side of the Appalachian Trail (West Virginia side) will be visible from the foreground of the crossing location until leaf-off.
- The proposed bore pit location south of the Appalachian Trail (Virginia) is more likely to be not visible from the foreground area of the crossing location of the A.T. although a final decision cannot be made until leaf-off.



- View shed simulations need to be conducted from Rice Field, Angels Rest, Kelly Knob, McAfee Knob, Wind Rock and the unnamed campsite/vista Trail south roughly .3 miles from Symms Gap showing the bore pits and the pipeline corridor location. These simulations should visually depict the setting during leaf-off and include an indicative simulation.

Based on this field survey, we have concerns that the pipeline as proposed would have significant negative impacts on the visual quality of the mountain top and the recreation experience available to the public on the A.T. The proposed pipeline crossing fails to meet numerous criteria in ATC's 2015 policy on pipeline crossings required to avoid opposition by the ATC. Language from the policy is in bold below and comments on the MVP relative to each criterion immediately follow. We have shared ATC's policy on pipelines with EQT representatives, as well as U.S. Forest Service representatives, at earlier meetings.

“It is the policy of ATC to oppose pipeline crossings of Appalachian Trail corridor lands... unless they meet all of the following criteria:” (ATC policy on Pipeline Crossings of the Appalachian Trail).

“2. The proposed pipeline crosses the A.T. landscape at a point already subject to *significant* impact”

-The proposed pipeline crossing location is an area of unbroken wild landscape consisting of forest, rocky outcropping and grassy bald with no impacts of any kind. As a result, this location is unsuitable to cross the A.T.

“3. The Pipeline proposal includes use of best practices to minimize its impact to the A.T. including:

- **“Taking all feasible steps to minimize landscape fragmentation”**

-Nearby fragmenting agents such as powerline corridors, pipeline corridors and transportation corridors are in the immediate vicinity of the proposal but are not utilized to avoid additional fragmentation

“4. The proposed pipeline does not cross an area unsuitable for such development including:”

- **“Wilderness and wilderness study areas”**

-The proposed crossing is immediately adjacent to the Peters Mountain Wilderness area and would negatively impact a visitor's wilderness experience and the protection value of Wilderness for the A.T.

- **“Alpine zones, balds and wetlands”**

-The proposed crossing location occurs in the foreground of natural grassy bald providing excellent views of West Virginia and Virginia.

We remain concerned about the proposed pipeline project's significant potential impact to the A.T. and reiterate our request for view shed simulations to be conducted from Rice Field, Angels Rest and the unnamed campsite/vista Trail south .3 miles from Symms Gap showing the bore pits and the pipeline corridor location.



Comments on 24 June 2016 EQT Filing
EQT filing Language appears in bold.

P4.16-4.17: **“...conventional bore outside of the approved construction right of-way will be made only following the necessary approvals from FERC and through consultation with the USFS.”**

-This should read: “...and through consultation with the United States Forest Service, *The National Park Service and the Appalachian Trail Conservancy*”

P. 4.17: **“The open-cut crossing method is the last viable contingency option if a conventional bore of the Appalachian National Scenic Trail and Weston Gauley Turnpike cannot be achieved successfully.”**

-Under no circumstances is an open-cut method a suitable option to cross the Appalachian National Scenic Trail. As a result, the conventional bore of the Trail should be completed as the first step in the construction process to avoid investment in pipeline infrastructure before determining if the Appalachian National Scenic Trail can be appropriately crossed.

p. 5.17: **“and the fact that the right-of-way will not be visible from the trail, the overall scenic attractiveness class would not change and, therefore, the total acreage of land classified as Scenic Class 1 would not be affected.”**

-This statement is factually incorrect. The pipeline right-of-way will be visible from numerous locations on the trail, potentially continuously visible as the visitor traverses numerous open areas and collectively visible from up to 5 miles or more. This should be considered a significant impact to the Appalachian National Scenic Trail Experience.

p. 5.17: **“Three representative viewpoints were chosen in consultation with USFS staff”**

-The National Park Service, The Appalachian Trail Conservancy and the affected Trail Management clubs must be involved in the development of representative viewpoints or key observation points. Three points is not sufficient for analysis as the pipeline corridor is likely visible for many miles of Trail including the iconic vistas of Angel’s Rest, Dragons Tooth and McAfee Knob.

p. 5.17 **“A “seen area” viewshed analysis was conducted from the representative viewpoints and showed there would be no visibility of the pipeline right-of-way from the selected points along the Appalachian National Scenic Trail.”**

-As of 3 August 2016, the Appalachian Trail Conservancy has not seen or evaluated the accuracy, efficacy or confirmed the existence of any viewshed analysis. Further, our internal review of the proposed pipeline project identifies numerous locations where the pipeline corridor would be visible from the Appalachian National Scenic Trail.

P. 5.17 **“A viewshed was created using the Appalachian National Scenic Trail as a linear feature with a height of 5.5 feet to account for average viewing height and the vegetation adjacent to the trail was digitized. The digitized vegetation was set at a height of 40 feet to account for the range of vegetation types adjacent to the trail corridor. This additional viewshed analysis concluded that the pipeline corridor and bore locations would not be visible from the Appalachian National Scenic Trail. The desktop view shed analysis was supplemented with field review and site photography as well as contrast rating sheets. At the selected viewpoints used to evaluate potential views from the Appalachian National Scenic Trail, the vegetation observed in the field appeared dense enough to screen views of the pipeline. The vegetation is primarily composed of oaks (chestnut, white, scarlet, Northern red, and Eastern black oak), with heights ranging from 30 to 60 feet. Field review concluded that the deciduous vegetation is dense enough that, even in leaf-off conditions, the**



vegetation would screen views of the pipeline right-of-way from the Appalachian National Scenic Trail.”

-The Trail Corridor traverses numerous open areas at, within the foreground of and adjacent too the proposed pipeline crossing location. These open-areas are visible through a cursory evaluation using the publically available “Google Earth” and “Google Maps” software and have been confirmed in field visits with the Appalachian Trail Conservancy and EQT. Given that the above passage indicated that the digitized vegetation height was incorrectly set at “40 feet” for a section of trail that commonly has vegetation at less than 5 feet, a new, accurate visual simulation needs to be conducted.

p. R.5 (p. 445):

“• Notify the JNF and the NPS 48 hours in advance if any anticipated delays are anticipated for trail users

• Provide at least 7 days advance notice if a temporary trail detour is needed;”

- It needs to be made clear to all parties under what circumstance a delay or a detour may occur. A detour is extremely difficult to establish or enforce and generally is not a viable management solution. 48 hours is insufficient advanced notice for a delay.

Comments on 18 July 2016 route alternatives filed by EQT:

Based on a desk-top review of the “AEP – Appalachian Trail Route Variation” and the “State Route 635 Appalachian Trail Route Variation” there is reason to consider these alternatives as viable options and move forward with further review.

Comments on the evaluation process:

- A complete evaluation of the proposed route change cannot be conducted with appropriate confidence unless the location is observed and evaluated during leaf-off.
- All public land managed for preservation of the Appalachian National Scenic Trail corridor should be equally considered for alternatives based on potential environmental, scenic value and recreation impact regardless of land ownership.

Respectfully,

A handwritten signature in black ink that reads 'Andrew Downs'.

Andrew Downs
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