­­A picture containing logo

Description automatically generated

Feb. 20, 2023

William Neilan, President RATC

Tom McAvoy, Conservation Supervisor RATC

Roanoke Appalachian Trail Club

PO Box 12282

Roanoke, VA 24024-2282

tmcavoy@vt.edu

Dr. Homer Wilkes

Under Secretary U.S. Department of Agriculture

c/o Jefferson National Forest MVP Project

5162 Valleypointe Parkway

Roanoke, VA 24019

Dear Dr. Wilkes,

We are responding to the Mountain Valley Pipeline’s (MVP) Draft Supplemental Environmental Impact Statement (DSEIS).

1. The analysis of the effectiveness of erosion control devices is severely flawed. The DSEIS claims that MVP’s erosion controls are effective at controlling erosion, runoff, and sedimentation under normal conditions when properly installed and maintained. However, MVP has a proven track record of improperly installing and not maintaining erosion controls. West Virginia Department of Environmental Protection has cited MVP with over 250 instances where MVP failed to comply with the requirements of their stormwater construction permit resulting in over 50 violations of water quality standards. Due to the effects of climate change designing erosion control devices based on ‘normal’ weather patterns is simply no longer adequate and erosion measures must be based on extreme weather events as being the new normal.

2. The DEIS must also analyze MVP’s contribution to climate change. The DSEIS fails to consider the social cost of greenhouse gases when asserting that there are only beneficial effects from MVP. If completed, it is predicted that MVP will contribute 1% to the U.S. contribution to climate change and this will increase substantially over time.

3. Construction of MVP has already proved to be highly impactful to land and water resources which is inconsistent with the Forest Plan. The USFS must refrain from making the 11 amendments the Jefferson National Forest Plan.

4. There was no mention in the DSEIS of monitoring the streams that will be crossed. If any negative impacts occur due to the crossing, MVP cannot be held accountable. If this proceeds, demand that scientifically valid stream monitoring is done.

5. The pipeline is being built in an active seismic area. On July 14, 2021, a 2.7 magnitude earthquake occurred approximately 12 miles from the Big Stony Cr. MVP crossing. On Sept. 13, 2017, a 3.1 magnitude earthquake occurred 8 miles from the Big Stony Cr crossing. The largest earthquake recorded in Virginia occurred on May 31, 1897, in Giles County and was felt in an area of at least 280,000 square miles. A recent earthquake with a 2.6 magnitude, occurred near Lafayette, VA on Sept. 27, 2021, approximately 4 miles from MVP crossing under Interstate 81

6. The underlaying rocks through which the pipeline will be built in Giles and Montgomery Counties are predominantly limestone. The major characteristic of this limestone/karst landscape is dissolving of the bedrock creating sinkholes, sinking streams, caves, and springs. Burying a 42” gas pipeline in this topography is highly unsafe and will be prone to leakage and contamination of water.

7. Finally the USFS should not provide concurrence to the Bureau of Land Management (BLM) to accommodate the MVP with a right of way and temporary use permit to cross the Appalachian Trail. The proposed route of the pipeline extends up the very steep slopes of Peter’s Mt. This would degrade the scenic nature and the wilderness experience of this internationally popular trail.

The primary mission of the USFS is to protect our public lands from the very real threats of a 42” gas pipeline in some of the steepest terrain in North America.

For these reasons, we request the United States Forest Service (USFS) choose the No Action Alternative.

Sincerely,

William Neilan, President of the Roanoke Appalachian Trail Club



Tom McAvoy, Conservation Supervisor of the Roanoke Appalachian Trail Club

A picture containing insect

Description automatically generated