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Organization:

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Comments: An Order 1 Soil Survey performed by competent Licensed Professional Soil Scientists with experience in Appalachian Mountain Soils would have made this whole Mountain Valley Pipeline project much shorter in time with much less damage and need for extensive erosion and sediment control expense. An Order 1 Soil Survey would have exposed the extensive soils and landscape features needing attention after disturbance and an estimate of cost could have been made to include soil erosion control materials and structures, cost of manmade diversion ditches, soil amendments such as lime, fertilizer and water to keep vegetation alive in the ROW to reduce further erosion of bare fill material and cut banks of native soil.

Why resist something (bona fide Order 1 Soil Survey) on the grounds that every time the soils change, the soils get sampled and analyzed for vegetative nutrient requirements and described with any dangers noted. This is the proper course of action and still should be, so that safety and vegetation can be maintained. Forest Soil lab tests are not the same as Agricultural laboratory nutrient tests.

A proper Order 1 Soil Survey through the Jefferson National Forest should still be performed by competent Virginia Licensed Professional Soil Scientists who are familiar with Appalachian Mountain Soils. The Order 1 Soil Survey should apply to the whole mvp route, ROW, workyards, pipeyards, roads, etc.

A Licensed Professional Soil Scientist would have noted all the water seeps on Sinking Creek Mountain, also near the mvp ROW, because the disturbed ground now channels the seep water down the ROW rockface., concentrating flow to turbulent action and displacing soil and rock particles into a deep gully.

A Virginia Licensed Professional Soil Scientist familiar with mountain soils would have interpreted the route as unsuitable for existent soils intercepted by the path. I have not seen any soils that are suitable for a pipeline in the mvp route.

An Order 1 Soil Survey of the Mountain Valley Pipeline route would have convinced MVP to not follow the route it has chosen, and it would have caused immediate denial of the permit to harm that first soil.

Please deny mvp entry into the JNF. They have refused to do the work required to decide what to do with this project. Do not let mvp move into the JNF to wallow about.