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Title:

Comments: [External Email]Mountain Valley Pipeline's (MVP) Draft Supplemental Environmental Impact Statement

[External Email]

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Dear US Forest Service Director,

An Order 1 Soil Survey would make performing a RUSLE2 calculation possible, but not without it. Soils change frequently, within 100 feet, in the Appalachian Mountains, with slopes over 35 % steep.

This means, that every soil location greater than 35% slope cannot be used in the RUSLE calculation - the calculation falls apart and does not reflect real life soil behavior.

Soils in a continuous linear path may have but a short length of landscape that could be less than 35% slope and that length, slope, soil characteristics, climate all go into the calculation. But you see, large sections of the landscapes are removed from the total value, because we cannot accurately predict soil behavior over 35% slope.

RUSLE was designed for less than 9% slope.

RUSLE has a limit of area of 285 acres of uniform soils. Again, there are not uniform soils in a linear path through steep mountains. You see, no one has the data to do the math.

Sincerely,

Nan Gray

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