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First name: Dr. Robert
Last name: Jones
Organization:
Title:
Comments: TO: Dr. Homer Wilkes, Under Secretary, U.S. Department of Agriculture. George Washington & Jefferson National Forests, MVP Project, 5162 Valleypointe Parkway, Roanoke, VA 24019 SM.FS.GWJNF-PA@usda.gov

FROM: Dr. Robert M. Jones, Adjacent Landowner to the Jefferson National Forest

RE: Mountain Valley Pipeline and Equitrans Expansion Project Draft Supplemental EIS #50036

I am a civil engineer, a military engineer, and an Emeritus Professor of Engineering Science and Mechanics at Virginia Tech. I have a Ph.D. in Theoretical and Applied Mechanics and have written four advanced engineering books. The MVP crosses 174 feet from my front door, so I have deeply investigated the engineering and geological facets of the pipeline. I have attended many meetings with agencies and citizen's groups and filed many reports to FERC and various agencies.

An unacceptable condition exists on the MVP in the Jefferson National Forest on Sinking Creek Mountain and Brush Mountain (but not on Peter's Mountain because there are no pipes, unburied or buried, only cut trees, but pipes reserved for Peter's Mountain have been sitting exposed to the sun in a West Virginia lot since the fall of 2017). Unburied pipes are strung along the edge of the Right of Way up on decaying cribs. The epoxy coating on the unburied pipe is over five years past its manufac-turer's allowed exposure to sunlight of six months. Accordingly, the pipe can begin to corrode or at least have a shorter life that if the pipe had been installed in a timely manner. The degraded coating can increase the corrosion of the steel pipe making the pipe not safe to convey natural gas! Thus, inevitably the MVP will send excessive sediment to our streams and wetlands polluting our environment.

Moreover, the portions of the MVP that cross the JNF are not adequately protected against landslides that would lead to explosion of the pipeline. The only alerting system for possible pipe movement on a steep slope is having strain gauges mounted to detect movement prior to pipe collapse. The poor soil, torrential rains, steep slopes, and recent earthquakes of the Giles County Seismic Zone are an obvious combination of factors that raise the likelihood of landslides to an unacceptable level for safe passage of natural gas in a flimsy, flexible pipeline. Dr. Ernst Kastning, a Karst Geological Scientist who has studied the area for thirty years, warned of this serious danger in his June 2016 expert report (FERC Accession 20160713-5029).

Thus, the lack of mention of strain gauges being installed on the pipes that are on the very steep northside slopes of Peter's Mountain and Brush Mountain is negligence of an important safety feature. It is a geological fact that the northsides of folded mountains in the Appalachian Mountains are always far steeper that the southside because of continental collision many millions of years ago. Moreover, the Brush Mountain and Sinking Creek Mountain slopes are about a mile from the largest-ever landslide in eastern North American history (Google 'The Mountain That Moved'). MVP has not made any attempt to install strain gauges to monitor

probable pipeline movement on Peter's, Sinking Creek, and Brush Mountains. Thus, the MVP in the JNF lacks an essential alerting mechanism for landslides and therefore endangers the nearby landowners to blast and fire and the Jefferson National Forest to fire.

The Forest Service is well aware of the MVP gross overprediction of erosion prevention that has not been corrected since it was discovered causing two Forest Service permits for MVP being vacated by the Fourth Circuit Court of Appeals. That overprediction has not been corrected in the latest draft permit to account for real-world experience on the cleared right of way on Brush and Sinking Creek Mountains.

The draft EIS does not account for the actual conditions on the MVP described above, so is therefore deficient.