

From: (b) (6)
To: [Tiernan Lennon](#)
Subject: One More Document
Date: Sunday, February 28, 2016 8:21:02 PM
Attachments: [FERC Comments to PF15-3-000.pdf](#)

Tiernan,

This was not mailed, but thought you might like to look over it. It is my Scoping Comments to FERC in June of last year. I will talk to you about it next week.

Thanks Again

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PS It is a fairly large document with lots of color pictures and graphs.

Also here is a link to the Giles Seismic Zone Study that might be of interest also
[The Giles County, Virginia, seismic zone; seismological results and geological interpretations](#) (Monroe County is part of this zone.)

**Comments to The FERC Concerning the
Mountain Valley Pipeline
(Docket PF15-3-000)**

*Crossing Monroe County, West Virginia
&
Surrounding Areas*

**TO: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426**

FROM: (b) (6)

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**Comments to The FERC Concerning the Mountain Valley Pipeline
(Docket PF-15-3-000)
Crossing Monroe County West Virginia and Surrounding Areas**

In the following pages I will try to briefly state some of the main environmental, cultural, historical and socio-economic impacts that the Mountain Valley Pipeline will cause if it were approved and built in Monroe County or the surrounding area.

First and foremost, I do not believe that this project is even necessary. There will be NO positive benefits to the people it would most affect. This is a transmission line that is designed to get gas from point A to point B, which will most likely end up being Liquefaction Plants for export.

Secondly, I have personally walked several sections of the corridors through Monroe County that MVP, LLC has proposed. In my opinion, these corridors would be environmental and social disasters of epic proportions

With that said, let me go point by point with the reasons I have this opinion.

Hans Creek Valley and Ellison's Ridge

I will start with the area that I call home; Hans Creek Valley and Ellison's Ridge. These areas are located in south central Monroe County, West Virginia, near the small town of Greenville. Going north to south, the proposed preferred route would cross Indian Creek just 1.5 miles from Greenville, and ascend Ellison's Ridge. It will follow the ridge for approximately one mile and then descend into the Hans Creek Valley, crossing a small feeder stream known as Dunlap Creek or Anne's Branch, then ascend back onto the Ellison's Ridge; it then follows another one of the ridges for one mile before descending back into the Hans Creek Valley, crossing two other feeder streams known as Left Fork of Slate Run and Shanklin's Branch. Next, it will ascend a small, very steep hill with some parts of the slope nearing 75%. Once it gets to the top it almost immediately descends into another valley which is known as Monahan Run. Then it ascends back onto Ellison's Ridge, crossing some very steep slopes, passing along a sensitive area on top and then again descends down a very steep long slope, with many rock outcropping, large boulders, small to large cliffs and caves. It finally ends, crossing Hans Creek in what is known locally as the upper part of **"The Narrows of Hans Creek"**. Every ascent and decent provides stream runoff which will drive soil debris and possible contamination into the valleys, fields and streams below. This will add to turbidity and degraded water for the citizens of the area and all points downstream — which, since we are headwaters for both the Mississippi and James River watersheds, is truly a lot of impacted people.

*(The Narrows of Hans Creek is a very sensitive area and will be addressed
in a separate part of this statement)*

Hans Creek Valley and Ellison's Ridge is the area where my family has lived for more than 200 years; some of the land settled by my ancestors is still owned and inhabited by my family. Over the years we have been offered money for this land, but refused because it would be like selling a family member. We are attached to this area and land as part of our being.

If this line were to cross this area it would endanger the livelihoods of several individuals. Two of the most prevalent on Ellison's Ridge would be Mountain Meadows Game Preserve and Grandview Cottage. This 1200 acre hunting preserve would be dissected by this line; and the pipeline would totally interrupt this business and without question would severely impact if not put it out of business. Many people travel to this preserve to hunt, relax and get away from the infrastructure, power lines, highways, noise, pipelines, air pollution and all the other things we call progress. It has become so popular with those wanting to just "get away from it all" that a couple of years ago they built two additional lodges that are known as Grand View Lodges. These adjacent lodges on a high peak of Ellison's Ridge over look different valleys . One looks over the Hans Creek Valley and the southern part of Peters Mountain; this view would be severely impacted by the proposed route. The second lodge overlooks the Indian Creek and Laurel Creek Valleys and the northern Peters Mountain and would be severely impacted by the Alternate 110 route. These lodges are less than 2000 feet from the proposed corridor and less than 1.5 miles from the Alternate 110 Corridor (just across the valley)

Also, as the proposed line treks across this area it would cross near several houses including my own. It would endanger many major and minor springs that supply water to people's homes, animals and crops. It would also threaten wells that are fed by these springs. Being in a karsts area, groundwater supplied to the wells would almost certainly be affected in adverse ways. One spring on top of Ellison's Ridge is very historic in nature. It has been reported that King George deeded this spring to the Ellison's. It was so important to the Ellison Family that over 150 years ago when they sold the top part of their land, they kept the spring. The corridor on top of Ellison's Ridge in this area would pass within 400 feet of this spring and be directly above it. Also in this area is important and sensitive Black Bear Habitat.

I have documented and photographed 14 streams that the pipeline would cross or come very near in this corridor. Also on my farm it would pass right through one seasonal spring and very near 12 permanent springs and one wetland area. It would impact several other wetlands and ponds along the ridge, and more than 50 permanent springs. It would impact more seasonal springs than can be counted.

In January I allowed EQT to survey my family's farm as did some neighbors. I walked with the survey crew as they established the corridor on this survey and as it crossed some very narrow, steep ridges. I asked the EQT representative how they could possibly build a 75 foot wide corridor on these ridges, much less a 125 foot construction corridor. The reply was they would have to "cut it down". After subsequent investigation I have discovered that the ridges would have to be cut down by 50 feet or more and the valley filled to allow for construction of such lines. This issue would be repeated all over the area as it crosses many narrow steep slopes.

Another issue faced by building this line is sensitive wildlife areas, I have already mentioned Black Bear Habitat, but on my farm there is a certified American Woodcock nesting area. This has been reported and recorded to the WV Dept of Natural Resources and they have it listed as one of the few certified nesting areas in the State of WV. Also there is an area on the farm that is a "probable" nesting area for Whippoorwills. It is known locally as having more Whippoorwills than any place in the immediate area. I have been managing this area from more than 30 years, using no sprays of chemicals and not bush

hogging the area but once every three or four years. I allow small trees and shrubs to grown on this area for critical habitat for both of these species. Recently I have observed young birds and will report this to WV DNR which will elevate it to certified nesting area, making it one of only four or five found in WV. (Photos taken by Maury Johnson)

(Photos of Nesting Woodcock on my farm from March of 2014)



Photo of American Woodcock Eggs in Nest



In the Hans Creek Valley, which lies directly below the proposed corridor and on Ellison's Ridge directly above the proposed corridor, are two businesses that could be severely impacted or even destroyed by

this project. Larew Cottage is a bed and breakfast that depends upon the rural nature of this area for its business. Grand View Lodge is a subsidiary of Mountain Meadows and depends upon its great views of the area as part of its allure. It is part of the nearly million dollars worth of business that Mountain Meadows did last year. Another attraction in the Greenville area that depends upon the rural, quiet unspoiled scenery is Creekside Resort. Without the valued attraction that is provided by this pristine and unspoiled, sacred area and vistas, these businesses will suffer severely, if not just disappear.

Another business in the lower Hans Creek Valley I want to mention is the Helmick Organic Dairy Farm. Mr. Helmick lives here and is raising his family in the valley. He owns or leases over 450 acres in the Hans Creek Valley where he operates an organic dairy farm. His milk is transported to Wisconsin and distributed by a national distributor of organic milk and milk products. Hans Creek runs through all of the properties that he owns or leases. Any contamination of the waters of Hans Creek springs or the wells he relies on, even by a diesel fuel or fertilizer spill, would seriously impact his business and could potentially put him out of business. The WV Department of Highways recognizes this designation and refrains from using chemicals or sprays near his farm to control weeds and brush.

This designation costs him over \$1200.00 annually and he has to pass numerous tests by the designating agency. It took him several years to develop this business. He is organic and even aerial spraying of the corridor in this area would impact him greatly and would have similar effect as a water contamination.

There are many other organic farms and gardens in Monroe County. Another one located very near the pipeline corridor belongs to my neighbor Beth Covington and Mike Murphy. This farm produces organic milk, cheese, eggs, meat and vegetables. My own farm is organic as is my Uncle and Aunt's farm that is adjacent to the proposed pipeline near their property to control weeds and brush.

Another organic farm found in the Hans Creek Valley is the Ernie Long Blueberry Farm and Orchard. There are several farmers, many of them organic, that participate in the Monroe County Farmers market and sell their produce as far away as the Charleston and Kanawha County area of WV. There is also an organic district being formed in Monroe County, in which I intend to participate.

Other impacts to the Ellison's Ridge and the Hans Creek Valley would be to historical buildings, views and graveyards. The cultural attachment that I and hundreds if not thousands of people have with this Valley is not measureable. I will note only two families that are not my own who inhabit the area.

The Ellison Family has lived in the Hans Creek Valley since the mid 1700's. They own and still operate a nationally recognized Bicentennial Farm. Their land is adjacent to the proposed pipeline. Currently there are 4 generations of the Ellison family living on this land.

The other farm is the Larew Farm. This farm has been owned and operated by the Larew family for over 200 years. Currently there are several of the Larew family members who live on the farm or in the immediate area. Each year they have a large family reunion on community property that they donated to the community many years ago. This reunion attracts a couple of hundred or more (4 generations) of the family and friends from all over the US, as well as from all over the world as many foreign exchange student and other International exchange participants who have been hosted by the family return as

often as they can. It is held during the 4th of July weekend and has been held annually since the mid-sixties. A couple of years ago the family had t-shirts made that read, “Some Call it Hans Creek ----- We just call it Home” , which reflects their love of their heritage.



Other families who have lived in the area for more than 200 years and still live on family lands are the Mann's, Miller's, Johnson's, Shanklin's, and Wickline's. The Cultural and Historical nature of their lands are very important to them.

“The Narrows of Hans Creek”

The Narrows of Hans Creek, including the area where the corridor would cross the creek, is a unique, environmentally sensitive area that is located between the ridges of Ellison's Ridge and the adjacent Ridge known as the Oak Hill Ridge

Hans Creek starts at a spring located at the base of Peters Mountain and travels through a wide fertile valley near Lindsie, Coulter's Chapel, Assurance (also called Cooks Run, although Cooks Run actually runs into Indian Creek near Greenville and has its own separate issue with possible impact by the proposed pipeline). It is then squeezed by these two ridges into a canyon with cliffs and steep slopes found on both sides. It then exits the canyon and spills into the lower Hans Creek Valley filled with large, historic, organic and family farms.

There are also rare and unique plants found in this area such as various types of Lady Slippers, rare or unique ferns, Mountain Laurel, Rhododendron, Jack-in the Pulpit, Trilliums, both Pink and Orange Honeysuckle (wild azaleas), unique mosses, fungi and lichens. I also think we have found at least one plant that is on the Federal List of Endangered Plant. I took a picture of what I believe to be the Small Whorled Pogonia recently and have sent it to the WV Dept of Natural Resources botanist Paul J. Harmon a few weeks ago and am awaiting his positive identification. This area would be destroyed if a pipeline corridor were placed across it in any location. The current corridor would also cross directly across at least one major spring. It would impact very sensitive habitat, hibernation and breeding areas for black bears. Also bobcat and foxes take refuge in this remote area as do many kinds of owls, hawks, wild turkeys, and other birds, mammals, amphibians and reptiles. I believe a thorough study of this entire area should be conducted before a pipeline project of any kind progresses. I think the uniqueness of this area would surprise even the most knowledgeable botanist or biologist.

Showy Orchid / Purple Hooded Orchid in the Narrows of Hans Creek



Pink Lady Slipper in the Narrows of Hans Creek



Bees

Another unique business found in the area near the upper part of the proposed corridor near Oak Hill Ridge and The Narrows of Hans Creek is the Deano and Patti Chlepas Organic Bee Farm. Domestic Honey Bees are extremely important for the production of food and the US Department of Agriculture recognizes the crisis that Honey Bees are under in this country. Some of the reasons for the decrease in honey bees is believed to be due to environmental reasons, including the use of chemicals and air pollution. The Chlepases have 135 hives with 6 million active bees in the area. Due to the pristine nature of the area they have very active and healthy bees. They transport hives to organic farmers in the area to help in pollination. This pipeline will put their operation at risk, thus putting others who depend upon their bees at risk.

Yellow Lady Slipper in the Narrows of Hans Creek



(Pictures of Orchids/Lady Slippers courtesy of my cousin, Norvel P. Mann)

The proposed corridor progressing into either side of the canyon is full of steep slopes, some approaching 65% or more. Also rock outcroppings, caves and springs are prevalent in this area. The corridor going up to Oak Hill Ridge, opposite Ellison's Ridge, crosses the very steep slope diagonally. Storm runoff would be a particular, important issue here

"Smoke Hole" and "Black Pond"

As you rise out of the The Narrows of Hans Creek Canyon, near the top of Ellison's Ridge there is a hole in the ground that produces fog at certain times. This small opening is surely an entrance to a below ground cavern or cavity that is near water as the water vapor can be seen from time to time especially in the warmer times of the year as the cool, moisture laden air hits the warmer air of the outside.

The second feature of note is "Black Pond". This naturally occurring pond is located on top of the high slope overlooking The Narrow of Hans Creek. It used to be at the edge of woodland, although I believe it to be in more in an open area now, after some land clearing that took place by a former or current owner.

According to my late grandfather, W. D. Mann, there is a lot of local history surrounding this pond and my relatives who owned it in the past. This history was recorded in the book: *Jacob Mann Jr.: Early Pioneer of Monroe County West Virginia and his Descendents*, written by Marilyn K. Fleshman, published 2003.

But of more importance is the fact that the proposed corridor passes very close to this pond. It would almost certainly change the hydrology of the area and very likely affect this pond to the extent of possibly draining it.

Eagles in the Hans Creek and Indian Creek Valley

In the past few years, beginning around 2006 or 2007 Bald Eagles began to frequent the area around Greenville in Monroe County (as well as some other parts of the county). These sightings became more frequent over time and in the past three or four years Bald Eagles have even taken up nesting in the Indian Creek Valley (I have a picture of one such nest). There have been as many as 9 juvenile Bald Eagles pictured near the proposed pipeline. It is almost a certainty that more than one nest occurs in the area, within a few feet of the corridor if not in it. I have much information from numerous people documenting this and I also have collected many pictures of Bald Eagles, both juvenile and adult Bald Eagles in the area, very close or in the corridor. So Bald Eagle Nesting and Habitat is a critical concern with the MVP Corridor in this area.

(The following pictures are of Bald Eagles in the Indian Creek Valley near Greenville and in the area of Proposed Pipeline -- Pictures Courtesy of Nancy Prince)



Juvenile Eagles in a Sycamore Tree



Bald Eagle Nest



I have many more pictures and reports concerning Bald Eagles in Monroe and surrounding counties that will be impacted by the proposed or Alternate 110 corridors.

Also, as of this past winter, at least a pair of Golden Eagle has taken up residence in the area. According to the WV Dept of Natural Resources, they are only here from October to April, but in recent days they have been observed in the area. Therefore they may have also taken up permanent residence.

Picture of Golden Eagle taken in the area this past winter



I recently create a place where people of the area could report and share data about Eagles in Monroe County and have received several responses which I will be glad to share with FERC. Sensitive Eagle Nesting area and Habitat is located in the proposed route in the Hans Creek, Indian Creek and Ellison's Ridge area of the proposed corridor. The same is true of the Alternate 110 Route across Peters Mountain, Potts Mountain and the Waiteville Valley of Monroe County as well as in Craig County, Va.

There are also reports of Eagles in the Waiteville Valley and I know of nesting Bald Eagles in nearby Craig Co. on Potts Mountain near the Monroe Co. line on the Alternate 110 Corridor near Maggie.

Finally, even though it isn't an Eagle, there are reports of either a Falcon or Osprey seen in the Indian Creek and Hans Creek Valley over the past year. I have a picture of one of the taken last summer.

Endangered Bat Species

In April of 2015 The FERC received letters from the United States Department of the Interior, Fish and Wildlife Service in their respective states. The Field Office did a fair job of Identifying Endangered Species in their area. I take exception to the report compiled by the WV Field Office. In the Virginia Field Office report it took a pretty strong position about endangered bats in the area. In Giles County, Va. for instance, on page 3 of that report they spoke about Tawney's Cave:

"The proposed route intersects with Tawney's Cave in Giles County, a known hibernaculum for Indiana and Northern long-eared bats. We recommend a minimum 5 mile buffer from known hibernaculum opening and mapping passages."

No such mention about the Greenville Saltpeter or Laurel Creek Cave in the Greenville area of Monroe County, which has the same issues as Tawney's Cave in nearby Giles County, Va. The proposed Route will pass within 1 mile or less of these very sensitive caves and Alternate 110 will pass within a mile or less of these caves. Both of these caves have been well documented for these and other endangered or very rare species.

Due to the extremely fragile nature of the habitat in the Greenville Saltpeter Cave, the Institute for Earth Education received a grant from the federal government to construct a "Bat Fence" around all the entrances of these caves to protect the hibernating bats. This is just one example of how protected these caves are.

Instead of writing all the issues between the two reports I will submit both of them with this EIS and Highlight all the things that are relevant to WV that is in the VA Report. I will list the pages at the end of this letter.

All of the following bats can be found in the area: Indiana Bat, Big Eared Bat, Virginia Bat and Gray Bat.

Rare and Federally Listed Endangered Plants and Animals

There are a number of Rare Plants in the area, including:

Buffalo Running Clover: This clover was once thought to be extinct until it was discovered in Monroe County WV in the 1970's.

Virginia Spiraea: Known to exist in the Waiteville Valley, Peters and Potts Mountain as well as possible locations within Monroe County. This plant was only identified to exist in the 1980. A complete survey of Monroe, Craig and Giles Counties should be undertaken before any project of this magnitude.

Peters Mountain Mallow: Only place in the world where it is known to grow, on Peters Mountain in southern Monroe County and adjacent Giles County VA, the area to be crossed by the proposed corridor.

Small Whorled Pogonia: Recently while researching various segments of the proposed corridor I believe I have found this plant directly in the path of the proposed corridor. I have submitted a picture of this to Paul J Harmon, Botanist for the WV DNR and am waiting positive identification. I found this plant in "The Narrows of Hans Creek while documenting the rare plants and other animals found in this unique area. Others from the Save Monroe, Preserve Monroe and the Border Conservancy may have seen a similar plant on Peters Mountain and we are awaiting more information from Mr. Harmon.

Flying Squirrels: Some species of flying squirrel, if not multiple species exist in Monroe County. I have them on my property in Monroe County, which could be crossed by the proposed pipeline. They are also reportedly seen in many other areas of Monroe County including but not limited to Ellison's Ridge, Peters Mountain, Potts Mountain, Waiteville Valley, Swope's Knob, Hans Creek, Indian Creek and Laurel Creek. Some people say they are Northern Flying Squirrels, some claim they are WV Flying Squirrels,

while others claim they are Carolina Flying Squirrels. Regardless of the species, I believe all of these are on the Federally Endangered Species List.

James River Spiny Mussel: The most important habitat for this Federally Endangered Species is one stream in Monroe County, in the Waiteville area, between Peters and Potts Mountain. The other 4 streams are located in nearby Craig County, Va. All of these streams would be impacted by the Alternate 110 corridor. Regardless of what MVP will claim, there is no way to build a pipeline corridor of this magnitude and not severely impact if not wipeout these endangered mussels.

Allegheny Wood Rat: The Allegheny Wood Rat is a “Species of Concern” for the US Fish and Wildlife Service. It is found in Monroe and Greenbrier County and is quite prevalent in our area (I live in a wooded area and I actually found one with young in my house a few days ago.) Their habitat is rapidly declining and may soon be listed as federally endangered or protected. We have prime, critical habitat for this species. We sometime refer to these as field mice.

Eastern Cougar: Although there is debate as to their existence in WV, too many credible people in the Eastern Mountains of WV and nearby VA have reported sightings over the years for them not to exist. I have seen them in Potts Mountain (1979) and also in the Ellison’s Ridge area (2005). Recently (November of 2014) a group of people including a county commissioner observed one near Lindside WV, near the proposed pipeline corridor, very near to Peters Mountain.

Other Water Dwelling Animals: Other endangered Mussels, Perch and possible other endangered aquatic animals exist in streams crossed by the Mountain Valley Pipeline Corridors in West Virginia and Virginia. A comprehensive study of critical habitat in Monroe, Summers and Greenbrier County WV and Craig, Giles, Montgomery, Roanoke and Franklin Counties in Virginia for aquatic species, should be undertaken in all streams large and small where the proposed or any alternate pipeline could impact the stream. These unspoiled and understudied areas hold whole hosts of life, many of which are still probably not fully known.

Shale Barren Rock Cress: This Federally endangered plant has been reported on the highest peak of Peters and Potts Mountain in Monroe Co., WV , Giles Co. and Craig Co. Counties of Va.

Bentley’s Coralroot: This plant, a type of wild orchid, wasn’t even discovered until 1999; it only occurs in five counties of WV and VA, two in WV and three in VA. The plant was first discovered in the Waiteville area of Monroe County, WV when a group of people was working on a project to turn the old railroad trail into a walking/hiking trail. This rare plant also occurs in Craig and Giles County VA. The occurrence of this plant in these counties is proximate to the pipeline corridors that cross the old pristine forest of the area.

Candy Darter: This is found in the Greenbrier watershed.

Northeastern Bull Rush: This protected plant exists along the Greenbrier River and other streams and marshes near the existing pipeline routes through the area of Southern WV and South Western VA.

Other Plants and Animals

Native Brook Trout: The Alternate 110 crosses two significant streams that are critical to Native Brook Trout and are the only two streams in Monroe County where they reproduce naturally. These two streams are Turkey Creek and Potts Creek. Native Brook Trout streams are rapidly disappearing from all areas of the US, especially in the East.

Turkey Creek starts on the Western Slopes on Peters Mountain, near Zenith and continues through a narrow valley and empties into Indian Creek just south of Union and Salt Sulphur Springs.

Potts Creek is a 46 mile long creek starting on Potts Mountain and also receives water from Peter Mountain and runs through the Waiteville Valley and empties into the Jackson River near Covington Va. It is part of the James River Watershed. It crosses part of Monroe County WV and two counties (Craig and Alleghany) of VA.

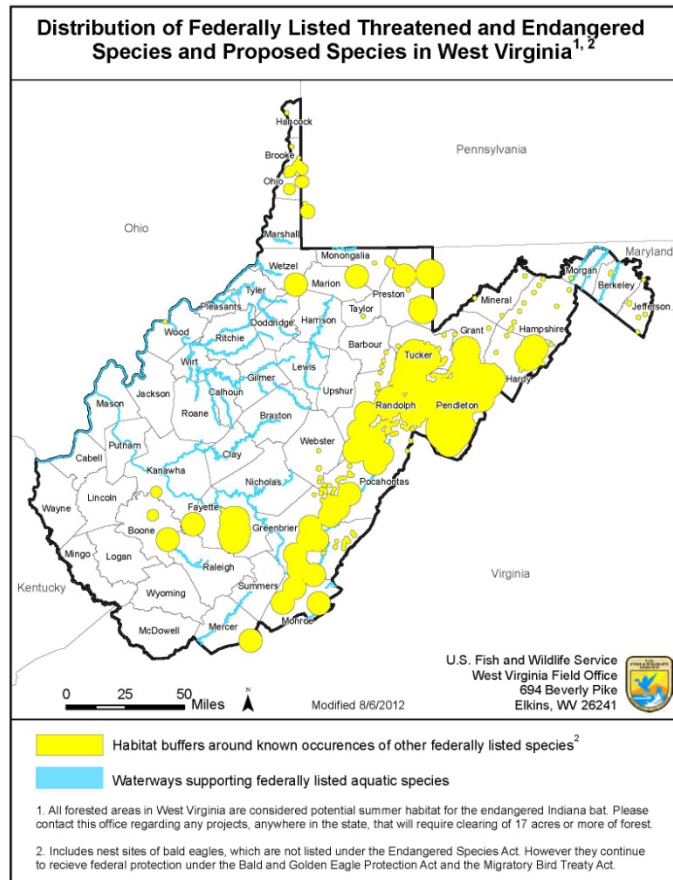
These two streams will be severely impacted by tree and vegetation removal, increased sunshine on the waters that feed the streams and possible pollution during and after, should construction occur in these areas. This would threaten this critical Native Brook Trout Habitat.

Bio Diversity: The bio-diversity of the Southern West Virginia and South western VA area, including the counties of Summers Monroe, and Greenbrier in WV, as is the South Western portions of VA, including the counties of Giles, Craig, Montgomery, Franklin and areas of Roanoke. A full comprehensive study of the plant life of this area should be completed for the entire area which will be impacted by the proposed pipeline. Not just the 200 or 300 ft construction corridor but an area far more encompassing, because the impact of this project would affect a far greater area than the construction corridor.

The introduction of invasive species itself is a serious, but not the only potentially devastating effect that the construction and operation of such a project would have on the forest, meadows and streams of the area.

From the document included after this statement you can see that Monroe County is recognized as being prime habitat for endangered and or protected species, including the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act

It shows the areas of high concern where known species exist and the buffer zones established around these zones. It would be impossible to build a pipeline across this Monroe County WV without impacting these areas.



Extremely Unique and Sensitive Areas: I am sure there are many more plants and animals that would be severely impacted by such a project, some of which may not even be known to exist as of yet or may be thought to be extinct. There should be an extensive study conducted in the unique and pristine areas, especially the sensitive and pristine areas such as Johnson's Cross Roads, Ellison's Ridge and surrounding valleys, "The Narrows of Hans Creek", Peters and Potts Mountain in Monroe County, WV and Giles and or Craig Counties in Va. When I say a study should be completed, I am not just talking about a study of the corridor, but the entire area, as we all know that animals move and plants are impacted by what happens in the area.

Native American Artifacts: The areas of Greenbrier, Summers and Monroe counties in WV are full of Native American Artifacts, from hunting grounds, encampments, trails and burial grounds. On land owned by my family on Ellison's Ridge we have found many of these artifacts over the years. According to my late father and uncle there are a couple of graves located on the family farm. These graves are just a few hundred feet from the center line of the corridor.

On June 10th 2015 I accompanied a person with some vast knowledge of Native American Artifacts on my property and another property to look for Native American Artifacts. Although we found just a few in our cursory examination, we did determine that artifact previously found on my property adjacent to and in the proposed corridor and property owned by my aunt and uncle adjacent to the pipeline date

back as much as 5 to 8 thousand years. They have artifacts from several different time periods, including burial beads from two different time periods that were found on both of our properties. We have pretty significant evidence that this area may have been used for thousands of years for hunting and maybe even a seasonal encampment. It would need more extensive examination by independent experts.

The same experts found over 80 artifacts on another part of the proposed pipeline on a property near the crossing of Indian Creek and the historic Seneca Trail.

The Alternate 110 route crosses a significant Native American Area that dates back, according to local history, to the Adeana and Hopewell Era. This area is near Historical Salt Sulphur Springs near the mouth of Turkey Creek.

Pictures of Native American Artifact and other Fossils found on or near my family's farm, either in or adjacent to the proposed MVP corridor.





Water Resources: This is one of the most important topics of concern in this statement. Although much can be said about the corridor passing across the Greenbrier River, the nation's longest free flowing stream, of the potential hazards to other streams along the proposed corridor I will concentrate on what is possibly the largest fresh water source in the eastern United States, **Peters Mountain**.

This mountain supplies the fresh water to thousands of people in Monroe Co WV and Craig and Giles Counties in Va. These three counties all have one or more possible corridors crossing this and other important aquifers. Blasting a ten foot deep ditch, clearing hundreds of acres of forest land, and all other construction activities will certainly harm or completely devastate the hydrology of these aquifers.

According to some experts, the mere makeup of Peters Mountain and to a smaller extent Potts Mountain will make construction of this pipeline extremely difficult if not almost impossible because the top layers of these mountains consist of the hardest rock found in WV.

This pipeline project threatens some of the most sensitive areas of water resources in WV and VA. It also threatens the important water resources to some of the most productive agricultural land in WV in Monroe County.

Soils: As a steward of the earth and having over 45 years of farming experience, I can tell you that construction of a line such as is proposed will cause irreparable harm to many farms, large and small. There is no way to dig a ditch and replace the soil to its original state. The soils took thousands of years to form and many years of careful tending to be where they are today. Probable problems will be mixing of the strata, soil compaction, slippage, soil subsidence and change in hydrology, to name just a few.

Giles Seismic Zone

This area is centered in Giles County VA and also includes Monroe County WV and Craig County VA. An earthquake in this zone occurred as recently as December of 2014. It is probably responsible for one of the largest landslides in the eastern United States over 100 years ago, in Craig County Va. This landslide area is crossed by Alternate 110.

Instead of wasting my time trying to write about this zone or other seismic zones that are of concern of to this area, I will direct you to the US Geological Professional Paper 1355, written by G.A Bollinger and Russell L. Wheeler in 1985. This is a comprehensive 95 page report that clearly should make the case on its own standing that placing such a hazardous piece of infrastructure in this area would be foolhardy if not downright stupid.

I will also add more evidence by including a letter to the Editor from the June 4th edition our local paper, *The Monroe Watchman*. The article was written by Dr. A.M Ziegler, retired Professor of Geology, University of Chicago.

Seismic Hazards and the Mountain Valley Pipeline

By Dr. A.M. Ziegler

Both of the Mountain Valley Pipeline tracks currently under consideration pass from Monroe County through the “Giles County Seismic Zone” as defined by the Virginia Dept. of Mines, Minerals and Energy. Many residents of these counties have felt earthquakes but few may be aware of the damage that they have caused in historical times, or could cause in the future. According to the VDMME there was “an estimated magnitude 5.5 event in 1897 centered near Pearisburg in Giles County”. They go on to say that for fifty miles around “...hardly a chimney was standing”. This would include much of Monroe County.

The U.S. Geological Survey (Bull. 1839-E) reports that there was a “landslide of considerable proportions” , also reported at the time, on the face of Wolf Creek Mountain in Giles Co. The authors of this bulletin, published in 1990, searched for surface expression of “neotectonic” features, such as recently active faults, without success, but did report “a giant rock-slide complex on Sinking Creek Mountain”, also in Giles County, and felt that it had been caused by seismic shaking, as had the “numerous other rock falls and slides in the area”. They also implied that crustal warping might be indicated by variations in the elevation of terraces along the New River.

Of course, a major rock-slide would completely disrupt a pipeline and this prospect would be worse than crossing a fault. This is because a fault is a known quantity with a known location and sense of movement, and could probably be allowed for by the pipeline engineers. The location of rock-slides, however, would differ each time and the effects could not be allowed for, even if they could be predicted.

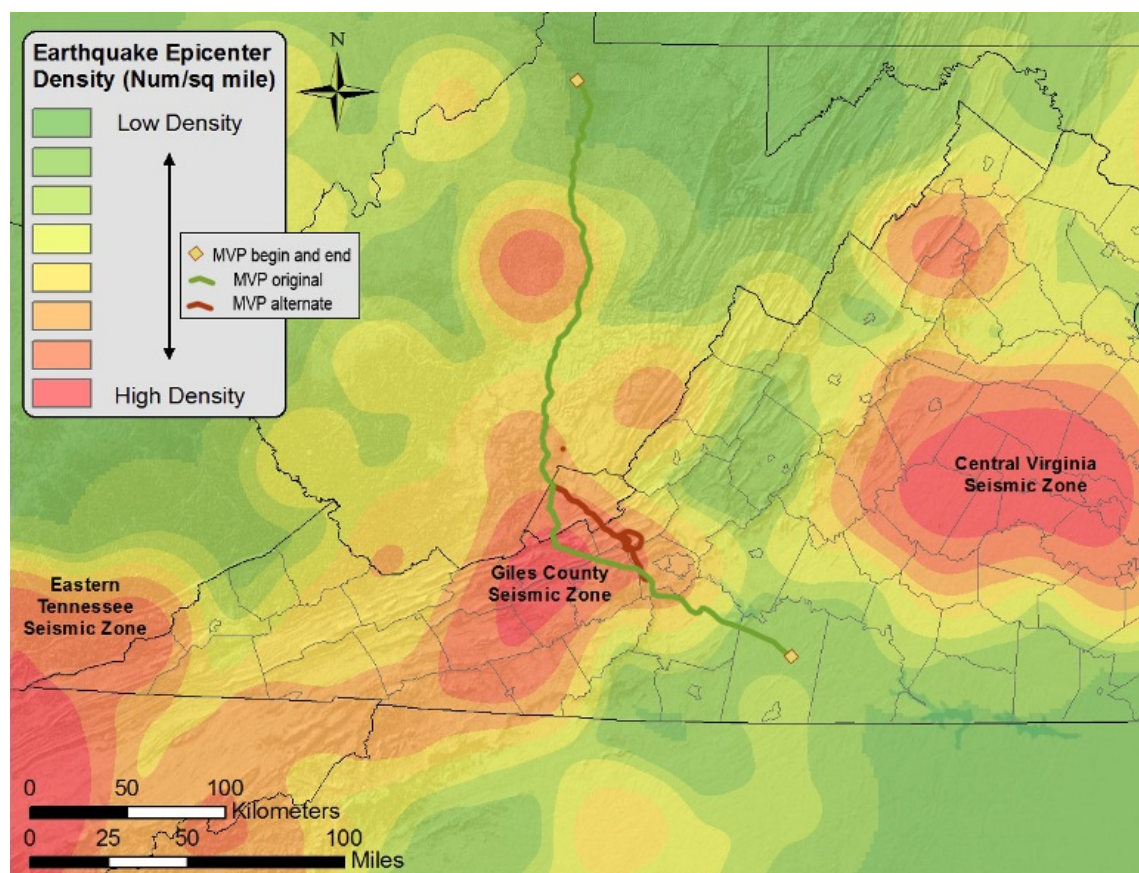
Geologists are used to thinking in terms of linear seismic zones related to plate tectonic boundaries, but the Giles County seismic zone is blob-shaped so, what could be the explanation for this feature? If we knew, we might have more predictive abilities. The St. Clair Fault along the northwest-facing margin of Peters Mountain is linear and was formed about 260 million years ago. Perhaps it could be reactivated, but this is very unlikely because it is shallow in its angle of dip, and current models show it flattening out at depth. It is just one of a family of “thrust-faults” defining the “thin-skinned tectonic pattern” of the Valley and Ridge Province. These faults are often found in the softer, less “competent” strata like shale and so are not usually exposed at the surface where they can be observed and mapped. On the other hand, they represent zones of weakness and can form the “glide-planes” of major rock-slides. And, because of the fact that limestone forms the valley floors of the Valley and Ridge Province, dissolution can undermine the mountain sides that contain the glide-planes, and this is a recipe for disaster!

The authors of the USGS bulletin were not able to suggest a mechanism for the Giles County Seismic Zone, but it may be explained by the modern geological concept of “erosional unloading”. We all know that the New River is deeply incised in the geomorphic sense, indicating that it is eroding a lot of material. This is true of the lower portions of its tributaries and together, this system forms a broad but irregular area of lowlands in Giles County. The seismic zone, as defined, is co-axial with this low area. We know that the earth’s crust is light with respect to the mantle beneath, so if material is removed

from above, you get rebound and instability. This is according to the long-standing Theory of Isostatic Rebound. The conclusion is that, for any area in Giles County, or adjacent parts of surrounding counties, the prospect of catastrophic mountain-side collapse can be expected in the future. Fortunately, people tend not to live on over-steepened hillsides, and fortunately, the MV Pipeline can be rerouted through an earthquake-free zone to the north or south of Monroe and Giles Counties.

Notes: Dr. Ziegler is a Professor Emeritus of Geology from The University of Chicago where he held a teaching/research position for 37 years. He directed the Paleogeographic Atlas Project which integrated traditional geology with the New Global Tectonics and this was supported by both industry and government funding. Among his many PhD students were three who worked on the evolution of the Appalachians with special reference to West Virginia. He retired to Monroe County in 2003 where he and his wife own Cooks Old Mill, a historic landmark, in Greenville. He is past president of the Monroe County Historical Society and Current Chairman of the Monroe County Landmarks Commission.

References: All of the publications mentioned above are available on-line. The map is from an article entitled *Mapping Seismic Hazards in Virginia* published by the Virginia Department of Mines Minerals and Energy, and also is found online.



Greenville Senior Living Project:

This project by the Monroe County Council on Aging is a planned Assisted and Comprehensive Living Facility. The project location will be the grounds of the Old Greenville School. As planned, this multi-million dollar project will house numerous single and double occupancy apartments and a multi-room unit to assist the elderly in their daily needs. This project is nearing the funding stage with construction to hopefully begin before the end of 2015. It will be a unique, one of a kind project, the details of which I will not go into in this statement. It is extremely dependant on the rural, scenic and safe environment that is found in Greenville and Monroe County. The proposed corridor would be within sight of this project and could threaten the scenic quality and safety of the future occupants and employees. It would receive its water from the Red Sulphur PSD, whose water is at risk from the proposed corridor. This project is of great benefit to the people of this area as it will support several medium and high paying jobs both during construction and operation. This project will provide more jobs to the area than the pipeline construction and operation will provide and they will be much more long term.

Caves, Sink Holes and Karsts Topography

The area around Monroe County is full of sink holes, caves, and other karst land features. Several portions of the MVP pipeline propose to transverse these areas. The damage this will cause will be unknown until it has been done and cannot be repaired. Impact to water, unique animals and even to some rare plants found only in these areas are a certainty. It has been said that a firm specializing in this type of construction will be consulted if this project is approved through karst topography. I submit that even though some may say that they can do this with minimal damage, that even “minimal damage” to these areas is actually catastrophic damage. The question has been asked *“Can you build a pipeline through this karst topography? My answer is “Should you?” And the answer to that question, in my opinion is NO!!!!!!*

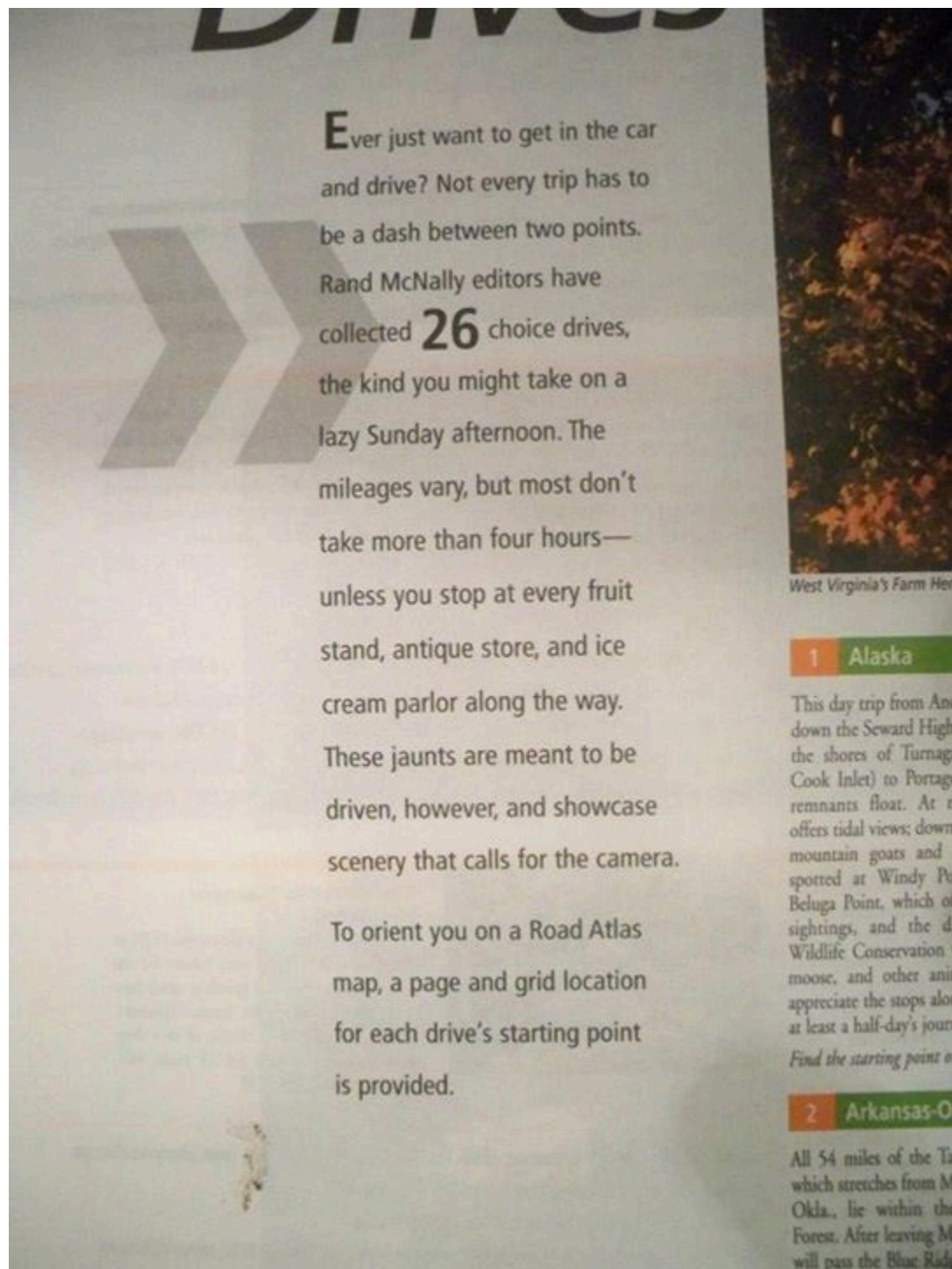
Artists, Tourism and Concerns

Many artists are drawn to the Monroe County area, due to the unspoiled nature and beautiful vistas. After seeing the area many have even moved here, including nationally and internationally known artists and crafts men and women. Many tourists from all over the country and even international travelers come to the area to see what is one of the country’s last unspoiled and unscarred areas. The noise, dust and traffic associated with construction will run these people away and then the damage done by the pipeline scar left behind will keep them away.

Other concerns raised by my neighbors are the effect to the quality of life for both people and livestock. Noise, pollution and other impacts will most likely affect the milk and egg production to dairy animals and chickens. People will no longer be able to enjoy their property or the natural resources in the area for recreation without fear, ranging from pollution and traffic on our rural roads to explosions from the pipeline.

Rand McNally

In 2008 I ran across this article in front of the 2007 Rand McNally Road Atlas. I have the Atlas if you would wish to review all the other areas listed along with the drive through Monroe County. Either pipeline corridor will spoil this Scenic Drive.



24 West Virginia

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The Farm Heritage Road staggers across West Virginia's Monroe County, alternately winding north and south. True to its name, the road carries travelers through rural landscapes, made even more authentic by the county's utter lack of fast-food chains. Take WV 3 from Sweet Springs to Union, where you'll see antebellum homes and churches. Then follow US 219 south through the former spa town of Salt Sulphur Springs to WV 122, a westerly course that will take you to Greenville, home of the 19th-century Old Mill. Head south on WV 12 and end with an orchard tour in Ballard, or continue south to Peterstown. Even a round-trip journey will get you home before dinner.

Find the starting point on p. 112, I-7.

25 Wisconsin

Some of Wisconsin's most dramatic rolling

Peters Mountain!!!!!!!

Of all the impacts I have talked about in this letter, Peters Mountain is the one that stands to receive the greatest, irreparable impacts. In my opinion building a pipeline such as the MVP across this majestic and environmentally sensitive mountain would utterly destroy it. I will not write too much here as it was addressed adequately by letters that my children and I wrote to the George Washington and Jefferson National Forest earlier in the year; I have attached these letters with this statement.

What I will do is attach a few pictures, as a picture is worth a thousand words. Actually words cannot describe the beauty and importance of this mountain.





The previous two pictures were taken just north of Zenith WV in February of 2015, and is looking at Peters Mountain in the area in which the Alternate 110 corridor would cross the mountain. This area has very steep slopes, cliffs, rock outcroppings and many springs and streams.

The following picture of a Bald Eagle was taken this spring, by UNKNOWN and was featured on the Local TV Station (WVVA) as "Picture of the Day" recently. It was taken from the Hanging Rock Observatory.



I have many more pictures taken from various areas of Monroe and other nearby counties in WV and VA that I would be glad to share.

Cultural Attachments

Cultural Attachments in this area was first raised in 1996, when APCO proposed a 765Kv Transmission line through the area. The National Forest Environmental Impact Statement from that case raises a very important federal issue for this project as well.

Both routes of the MVP proposed corridors cross Peters Mountain, Waiteville Valley in Monroe County and also Sinking Creek Valley in Craig County Va. I respectfully submit that these same cultural attachments occur in many areas of Monroe County, especially along Ellison's Ridge and The Hans Creek and Indian Creek Valleys and the greater Greenville Community.

As evidence I have already submitted letters written by myself and my children, to the Jefferson National Forest this past spring. There were also numerous letters sent to the GW&JNF by numerous people from the area, which have been or will be submitted to you for this scoping process.

Comments to GW and JNF Concerning MVP

In February and again in April the GW and Jefferson National Forest solicited comments in regards to allowing a survey of the Jefferson National Forest in Monroe Co WV and Craig, Giles and Montgomery Counties of Va. They received over 3500 comments expressing opposition to this, not only to allow a survey, but also construction of a pipeline across the Forest. At the May 13th Scoping meeting in Summersville WV, I spoke about this and delivered over 1200 paper copies of these comments collected by Monroe County groups opposed to the MVP. I was promised a copy of all the comments submitted to the GW and JNF so that I could forward that to THE FERC as part of this statement. Unfortunately the GW & JNF has not completed this and I have been told that it would not be available in time to get the CD and forward it with this Statement. I will forward it as soon as I get it and request that it be made a part of the record. I have been informed that another opposition group that lives closer to the National Forest Headquarters in Roanoke Va., intends to get the CD and Next Day Express mail it to the FERC.

These comments came from across the United States and even some foreign countries, from people who have a Cultural Attachment and love for this area and the National Forest.

I am also attaching letters from myself and my grown children as part of this statement, which also goes to the Emotional Attachment issue as well as other issues surrounding this project.

My letter to the JNF mentions several YouTube Videos. I request that you view these as part of my comments to the FERC. In addition I wish to add the following YouTube Videos as part of this statement.

Discover Monroe Peters Mountain, Discover Monroe Episode 2, Discover Monroe Episode 3, Discover Monroe Episode 4, Discover Monroe Episode 5, Discover Monroe Episode 6, Discover Monroe Episode 7, and Discover Monroe Episode 8.

Multi- Chemical Sensitivity & Environmental Illness / Allergies

My aunt, who lives very near the pipeline as it crosses my family's farm and other areas of Ellison's Ridge and Hans Creek area, suffers from environment illness and allergies. She has reactions to many chemicals, excessive dust, smoke, and diesel and gasoline engine fumes. Living near her means that I have to be very careful when burning brush or even the wrong types of wood in my wood furnace, especially if the air is moving down the valley. Her Multi- Chemical Sensitivity has kept her isolated in her house for long periods of time in the past. The WV Department recognizes her illness and refrains from spraying near her house to maintain weeds and brush. They had to abandon their house a few years ago and build another one out of natural materials to help to detoxify her. The construction, maintenance and operation of this line near her would affect her health immensely.

Statements from Neighbors

While compiling info for this statement I contacted several neighbors, including but not confined to Warren and Judy Ellison. I included some of their information in my statement. The following section contains all or part of these people's statements.

Statements from Warren and Judy Ellison

"Comments related to the Agricultural past and future aspects on families that have cared for the land for generations. Monroe County itself has relied on this way of life, producing and developing an area of beauty and safety — especially in these valleys and mountains. Families have lived and cared for each other for more than six generations. The adjoining farms have worked together, helping each other in troubled times, celebrating always in good times. One particular concern is of contamination of water resources springs and wells, creeks and ponds..."

Not only families, but livestock, all kinds of wildlife, all kinds of rare plants will be severely devastated. Abandonment of farm lands, area economics, will be changed forever.

Great, great damage to the land where excavations. Severe explosions have caused fires, permanent land damage in other parts of West Virginia."

Warren and Judy are both 91 years old. Warren was raised in the Hans Creek Valley, Judy moved here in the late 1930's. They have been married for almost 71 years. They have raised a family on their Bicentennial Farm, where 8 generations of their family have lived or are currently living. They both have served on numerous boards, county and state committees. Judy was the first woman elected to the Monroe County Board of Education in the 1960's. They are still actively involved in their farm and community.

As I stated in my opening remarks, I do not believe that this pipeline is needed. It is certainly not a good idea to build it or any such pipeline through this area, whether it be the public National Forest or the pristine and sometimes unique private properties of the area. We don't want it. We don't need it. It does us no good—only harm.

YOU CAN NOT MITIGATE THESE PROBLEMS. YOU CAN ONLY DESTROY PROPERTY AND PEOPLE'S LIVES WITH THIS PIPELINE THROUGH MONROE COUNTY AND SURROUNDING AREAS.

Another picture of Peters Mountain where the Proposed Corridor would cross!!!!



My qualification to make these statements and observation are:

I was born in the area and have been a lifelong resident of the area. I have been active all my life in farming activities. I have hiked, rode horseback and explored much of the area, including explorations of local caves. When I was younger I would often lead groups into the Greenville Saltpeter Cave or Laurel Creek Water Cave.

I attended Greenville Elementary and Junior High Schools. I graduated from Union High School. I attended Concord College, entering as a Science Major. I graduated with a BS Degree in Education. I worked in education for over 20 years. I am an avid reader of history, science and nature. I am an avid hiker and I am a member of the Appalachian Trail Conservancy.

I am deeply invested in the area around me and I take great care and expend much energy in educating myself about the facts of any particular issue that comes about that affects the area.

These are just a few of my qualifications to make these comments.

I would like to thank the many people who assisted me with these comments: Nancy Bouldin, Autumn Bryson, Dave Crowe, Warren and Judy Ellison, Irene Larew, Dorothy Larew, Craig Mohler, the people of Preserve Monroe, Save Monroe, The Border Conservancy, Preserve Craig, and Preserve Giles, to name just a few.

Also I would like to thank the following for allowing me to use their photos: Paula Oliver Mann, Novell P. Mann, Nancy Prince and Robert Larew

Bald Eagle Flying near Proposed MVP Corridor over Indian Creek, January 2015 — with Ellison's Ridge and Peters Mountain in the background.



Attachment 1

Letters to Jefferson National Forest Concerning

Surveying / Building the MVP

Through the JNF

Letters from February and April 2015

Comment Period

Letters Submitted by

(b) (6)

February 9, 2015 – Four Pages

March 31, 2015 – Three Pages

(b) (6)

February 5, 2015 – Two Pages

(b) (6)

February 11, 2015 – Two Pages

Attachment 2

United States Department of the Interior

Fish and Wildlife Service, Virginia Field Office

April 3, 2015 letter with notations and comments made by (b) (6)
(b) (6) as part of MVP Scoping Process.

Five Pages

United States Department of the Interior

Fish and Wildlife Service, West Virginia Field Office

April 23, 2015 letter with notations and comments made by (b) (6)
(b) (6) as part of the MVP Scoping Process

Nine Pages