

*Mr. Troy Anderson*

January 19, 2017

copy of comments sent to FERC as supplemental data on January 19, 2017

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

Received

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Regarding: Supplemental Data FERC Docket Nos.: CP16-10-000 and CP16-13-0000

Virginia Field Office

Dear Ms. Bose;

The following mitigation plans/other plans are listed within FERC Docket Nos.: CP16-10-000 and CP16-13-000. This DEIS fails to chart areas that have many cumulative hazards. How many of the plans listed below are going to be needed and implemented for the same area? How will they effect one another within the same area? Will the action of one plan to correct a hazard have a negative effect on another plan to correct a hazard in the same area? FERC has made recommended measures to mitigate the environmental impacts with most to take effect **prior to construction**. This would be after FERC has given MVP a Certificate of Public Convenience and Necessity, not before. Failure to address multiple hazards within a certain area before giving a certificate to MVP leaves these areas open to questionable outcomes.

*Landslide Mitigation Plan*

*Karst Mitigation Plan*

*Karst-specific Erosion and Sediment Control Plan*

*Upland Erosion Control, Revegetation, and Maintenance Plan*

*Erosion and Sediment Control Plan*

*Organic Farm Protection Plan*

*Draft Blasting Plan*

*Spill Prevention, Containment, and Counter Measure Plans*

*HDD (horizontal directional drill) Contingency Plan*

*Migratory Bird Habitat Conservation Plans*

*Traffic and Transportation Management Plans*

*Fugitive Dust Control Plan*

*Water Resources Identification and Testing Plan*

*Unanticipated Discovery of Contamination Plan*

*Unanticipated Compensatory Wetland Mitigation Plan*

*Exotic and Invasive Species Control Plan*

*Fire Prevention and Suppression Plan*

*Winter Construction Plan*

*Preparedness, Prevention, and Contingency and Emergency Action Plan*

The DEIS for the MVP pipeline lists the following cumulative geological impacts from mile marker **MP165 to MP237**. This area includes Summers & Monroe Counties, West Virginia, Jefferson National Forest and Giles, Craig & Montgomery Counties, Virginia. These are only the geological impacts! There are other impacts within this area within the DEIS.

**4.1.2.3 Seismicity and Potential for Soil Liquefaction** In the area of the GCSZ (Giles County Seismic Zone), between about **MPs 165 to 230**, peak ground accelerations approach 14 percent of the force of g, and the potential for a magnitude 5.8 earthquake exists... The potential for soil liquefaction exists mainly in the area of the GCSZ

**4.1.2.4 Slopes and Landslide Potential** The potential for landslides or slope failure could be triggered by seismicity from the GCSZ or from intense and/or prolonged rainfall events. *Geology 4-41* The areas that would be crossed within the Jefferson National Forest by the MVP contain slopes greater than 30 percent and the potential for landslides within the Jefferson National Forest would be moderate to high..

**4.1.1.7 Jefferson National Forest** Landslides are a dominant geologic process shaping Peters Mountain, Sinking Creek Mountain, and Brush Mountain. The largest known landslides in eastern North America are on the south flank of Sinking Creek Mountain... where the pipeline route would cross the Jefferson National Forest.

**4.2.2.4 Slip-Prone Soils** *Soils 4-68* Certain soil types such as shale or clay soils are more prone to slipping than other soils. Due to this increased potential for slipping, the probability of landslides is increased when constructing through slip prone soils. The Gilpin-Peabody complex, 35 to 70 percent slopes, Carbo, Faywood, Frederick, Nolichucky, Poplimento, and Sequoia soils are considered to be slip-prone. The MVP would affect about 17.5 acres... of these soils between **MP 172 and 196**. In Virginia 290.2 acres... of these soils would be affected from approximately **MP 196 to 235** (my note **MP172 to 235**)

**4.1.2.5 Karst Terrain** Karst features, such as sinkholes, caves, and caverns can form as a result of the long-term action of groundwater on soluble carbonate rocks... The risk of the development of sinkholes along the pipeline is relatively high between about **MPs 171 and 237**.

**4.1.1.5 Karst Topography** In total, 94 instances of karst features were identified within Summers and Monroe Counties, WV and Giles, Craig, and Montgomery Counties, VA.

**4.1.1.2 Bedrock Geology** Karst terrain also occurs in the carbonate (limestone and dolostone) rocks found in the project area from approximate **MPs 170 to 237**.

**4.3.1.1 Groundwater in Karst Terrain** is present along the MVP pipeline route in Summers and Monroe Counties of West Virginia, as well as in Giles and Montgomery Counties of Virginia.

**4.3.1.2 Blasting** Blasting in areas of karst topography can create fractures in the rock, potentially changing groundwater flow, creating the potential for groundwater contamination, and temporarily affecting yield and increasing turbidity in nearby water wells and/or springs....

**4.1.2 Environmental Consequences** Geological hazards, such as seismic activity or landslides, may affect the integrity of the pipelines. The crossing of steep topography would present construction challenges; as would the crossing of shallow bedrock, acid producing rocks, and karst terrain.

MVP rejected their original route (alternative 1) due to insurmountable construction challenges as well as a high risk of slope failure and pipeline slips, once the pipeline was to be in operation. The current proposed route has 120 miles of steep slope, 122.8 miles of side slope and crosses 214.9 miles of shallow bedrock (table 3.4.2-1).

Cumulative geologic hazards and environmental consequences are described in DEIS 4.1.2 and 4.1.1.5. They include **Seismic activity, Landslides, Steep topography, Shallow Bedrock, Karst Terrain, Soil Liquefaction, Flash flooding, Slip-Prone Soils and Blasting**. All of these cumulative geologic hazards and environmental consequences are located between **MP 165 to MP 230**.

MVP should not be allowed to cross **MP 165 to MP 230** due to multiple cumulative hazards. This area covers Summers & Monroe Counties, West Virginia, Jefferson National Forest, Appalachian National Scenic Trail and Giles, Craig & Montgomery Counties, Virginia. Documentation **DEIS 4.1.2, 4.1.1.5, 4.1.2.3, 4.1.2.4, 4.1.1.7, 4.2.2.4, 4.1.1.2, 4.1.2.5**

Sincerely,

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