



Comment to FERC on Environmental Impacts

The Federal Energy Regulatory Commission (FERC) has released the Draft Environmental Impact Statement (DEIS) for the Mountain Valley Pipeline (MVP). FERC failed to address critical impacts within the DEIS. A Supplemental Environmental Impact Statement is needed that includes the missing information. Unless FERC has all of the facts, they cannot conclude that the MVP will have no significant impacts. The public has an opportunity to comment on the DEIS until December 22, 2016. Use this opportunity to voice your concerns!

ISSUES TO RAISE DURING THE FERC DEIS COMMENT PERIOD

These are some of the many issues that were not adequately addressed within the DEIS:

- River Crossings: The DEIS states that MVP plans to cross the Elk, Gauley and Greenbrier Rivers using the open-cut wet crossing method. Open-cut wet crossing use no water diversion and is the most invasive and impactful crossing method available. FERC must require MVP to minimize impacts during river crossings including reducing the construction area to a minimum. FERC must require additional analysis of crossing methods to reduce impacts.
- Wetland Crossings: The DEIS claims that there is no net loss of wetlands, but then states that MVP has not supplied information regarding their proposal to permanently fill 44 wetlands along access roads. The permanent filling of 44 wetlands is a significant impact. If MVP has not supplied FERC with enough information to assess impacts in the DEIS, then a supplemental EIS must be issued when MVP provides this information to FERC.
- Drinking Water Resources: Private and domestic drinking water wells within the pipeline route have not yet been identified. FERC cannot determine the impact of blasting on water wells without this information. All water wells within the impact zone must be identified in a supplemental EIS.
- Aquatic Resources: The DEIS does not adequately assess impacts of construction on aquatic life. MVP has not submitted the results of their analysis on sedimentation and turbidity from wet crossing methods. FERC is not able to draw conclusions regarding the effects of turbidity and sedimentation on fisheries and aquatic life.
- Geology: The DEIS identifies 94 karst features, or caves, to be crossed by MVP. FERC has requested route variations to avoid some of these features. Results of a study to determine the interconnection between karst and water resources has not been completed. FERC must issue a supplemental EIS with the final route and the study results before concluding that the pipeline construction will not significantly impact karst geology.
- Soils: The DEIS states that 78% of the pipeline route is highly susceptible to landslides; however, MVP has not supplied a detailed *Landslide Mitigation Plan*. FERC has requested route adjustments, additional information on landslide prone areas, and additional Best Management Practices (BMPs) to mitigate hazards from potential landslides. This information is critical in evaluating the impacts of pipeline construction and must be included in a supplemental EIS.