



WEST VIRGINIA RIVERS

December 22, 2016

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

Re: Draft Environmental Impact Statement, Docket No. CP16-10-000

Dear Secretary Bose,

West Virginia Rivers Coalition, along with the organizations signed below, respectfully submit the following comments on the Draft Environmental Impact Statement (DEIS) for the Mountain Valley Pipeline (MVP), Docket No. CP16-10-000.

We found the DEIS lacking of the critical information needed to fully analyze the significant impacts of the project. Due to the lack of adequate information, we are unable to provide a comprehensive analysis of the DEIS. According to a statement made by a FERC representative at the public meeting in Summersville, WV on November 2, 2016, "the DEIS is 80% complete". However, the other 20% is vital to assess the adverse environmental impacts of the project and ensure that the mitigation measures proposed are adequate. Because of this deficiency, we request a revised DEIS to be issued for the proposed project with all the necessary information to meet the requirements of the National Environmental Policy Act (NEPA). Specifically, the regulation explains that "NEPA procedures must ensure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA."

Additionally, we request the following to be addressed in the revised DEIS:

Executive Summary

While the intent of the Executive Summary (ES) is to articulate the main findings of the document. We found several statements within the ES to be misleading, contain contradictory information, and use vague generalizations often marginalizing the impacts of the project.

1. **Groundwater, Surface Waterbody Crossings, and Wetlands, page ES-5:** The DEIS states, "there will be no net losses of wetlands"; however, on page 4-89 the DEIS states that MVP has not supplied information regarding their proposal to permanently fill 44 wetlands along access roads. This discrepancy must be clarified in the DEIS.
2. **Land Use and Visual Resources, page ES-8:** The DEIS states, "Most of the facilities are located in rural areas, some distance from residences. This statement is vague and needs to be more

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descriptive of the actual impacts. The term “most” should instead be specified as a percentage. “Some distance” should instead list the distance range. The percentage of aboveground facilities and their distance from residences should not be described with such vague generalizations.

3. **Land Use and Visual Resources, page ES-8:** Visual impacts for the aboveground structures would generally be reduced by topography and vegetation surrounding the sites, which screen the facilities from most viewers.” Visual impacts of aboveground facilities will still be significant in rural areas. Because these rural areas are not industrialized, the impacts will be even more significant. Visual impacts should not be marginalized merely because the area is rural; this statement alludes to larger environmental justice issues in rural areas. The statement should be re-phrased in the DEIS to account for visual impacts in rural areas.
4. **Socioeconomics and Transportation, page ES-9:** The Environmental Justice analysis is flawed. The DEIS uses county wide poverty rates; however, the proposed route goes through some of the poorest communities in the counties. Using county-level poverty rates skews the data analysis. Instead, demographics should be analyzed by the affected communities along the proposed route.
5. **Socioeconomics and Transportation, page ES-9:** The DEIS references a study conducted by the industry FERC is tasked with regulating for the effect on property values. “One recent study conducted for the Interstate Natural Gas Association of America found that there was little difference in adjusted sale prices for houses adjacent to a pipeline easement and those further away in the same subdivision.” The DEIS must reference studies conducted by an independent third party before drawing conclusions; referencing a biased report is not a sufficient analysis.
6. **Air Quality and Noise, page ES-11:** The DEIS states, “Noise from planned or unplanned blowdown events could exceed the noise criteria but would be infrequent and of relatively short duration.” This statement is vague; the frequency of blowdown events based on other compressor station operations should be defined. Additionally, the approximate duration in a measured increment should also be defined.
7. **Cumulative Impacts, page ES-13:** Cumulative impacts should be assessed for all 12-16 proposed pipeline projects under FERC’s jurisdiction. Examining only two other pipeline projects for cumulative impacts is not adequate, all pipelines under FERC’s jurisdiction must be assessed for cumulative impacts. Impacts should be assessed on a watershed scale.

2.4.4.2 Post-Approval Variance Process

1. We request that public notice and comment period be included in the procedures used for variance requests involving route realignments, shifting or adding new extra workspaces or staging areas, adding additional access roads, or modifications to construction methods that have not been evaluated in the DEIS.

4.1.1.5 Geologic Hazards

1. **Soil Liquefaction, page 4-25:** Table 4.1.1-9 of the DEIS identifies flood zones crossed by MVP where soil liquefaction due to saturated soils is a potential. Recent flooding in WV raises a great concern and has significant potential to compromise the integrity of the pipeline during

flooding. The DEIS must analyze the severity of this issue and require the Class 3 pipe with the thickest walls in these flood prone areas.

2. **Karst Topography, page 4-35:** The DEIS identifies 94 karst features within the project area and states, "Construction over karst features could result in damage to natural resources, differential settlement, and pipeline instability. Due to underground stream flow, the potential to inadvertently discharge to groundwater exists." The DEIS must include final route adjustments that avoid karst features.

4.1.2.4 Slopes and Landslide Potential

1. **Mountain Valley Project, page 4-47:** Because the revised *Landslide Mitigation Plan* has not been completed and is unavailable for public comment, we request that the Plan be included in a revised DEIS with an additional a 90-day comment period and opportunity for public meetings.
2. **Mountain Valley Project, page 4-47:** The DEIS states, "Technical experts would be onsite during construction in areas of steep slopes and would be hired based on target skill sets. Mountain Valley would conduct additional analysis of a work area should an inspector document tension cracks, slumping, erosion, or seeps during construction or restoration." With 78% of the pipeline route being highly susceptible to landslides, the DEIS must specify how many technical experts will be hired for each 20-40 mile spread of pipeline to have an expert onsite for each construction area on steep slopes.
3. **Mountain Valley Project, page 4-47:** The DEIS must also provide an analysis of how landslides will be prevented along fill slopes.

4.1.2.5 Karst Terrain

1. **Mountain Valley Project, page 4-48:** The DEIS states, "Mitigation of sinkholes would involve reverse gradient backfilling of the sinkhole to stabilize the sinkhole from collapse." WV Rivers does not agree with this method to mitigate sinkholes. Sinkholes may develop from underground flows or springs. The DEIS should specify a plan for investigating sinkholes to determine if there is flowing water that is associated with the sinkhole. Additional measures may be needed to control the water flow and reroute it to a suitable area to avoid additional erosion.
2. **Mountain Valley Project, page 4-48:** The DEIS list BMPs associated with the *Karst-specific Erosion and Sediment Control Plan*. The BMPs listed are either already required sediment and erosion control measures, such as placing BMPs around staging areas, or do not provide adequate protection, such as placing straw bales upslope of karst features. Straw bales are not a suitable form of erosion control. Additional measures above and beyond those already required must be defined to address sediment and erosion control specifically for karst features. If additional measures cannot be identified that minimize impacts, then karst features should be avoided.

4.2.2.1 Soil Limitations

1. **Erosion Potential, page 4-65:** The DEIS states that MVP would follow BMPs to prevent soil erosion. In table 4.2.1-1 over 5,000 acres have an erosion hazard criteria as severe or very severe; however, the BMPs listed are standard erosion control measures for any soil type. Straw

bales are not considered adequate erosion control measures. The DEIS must identify additional measures, above and beyond standard practices, that will be used to control severely erodible soils.

4.3.1 Groundwater

4.3.1.1 Affected Environment

1. **Groundwater in Karst Terrain, page 4-73:** Table 4.3.1-2 of the DEIS identifies 9 springs and swallets within 500 feet of the project work area. No springs were identified in Monroe County. The information on springs in the DEIS is grossly inadequate. One landowner has identified 11 springs within a one-mile section of the pipeline route on his property alone. A thorough investigation of springs within 500 feet of project work area must be included in a revised DEIS.

4.3.1.2 Environmental Consequences

1. **Aquifers, page 4-78:** The DEIS states, "If disturbed by construction, wells completed in near-surface aquifers would typically quickly re-establish equilibrium, and turbidity levels would rapidly subside, such that impacts would be localized and temporary." The description provided is inadequate using relative terms such as 'typically quickly re-establish equilibrium' and 'rapidly subside'. The DEIS must provide actual data on the time it will take for groundwater to equilibrate and turbidity levels to subside. The DEIS must cite peer-reviewed studies to back up these statements.
2. **Karst Terrain, page 4-80:** The DEIS does not contain the results of the fracture trace/lineament analysis. This information is necessary to understand the connectivity between the karst terrain and impacts to drinking water sources. The analysis must be included in the revised DEIS. We request a 90-day comment period to have adequate time to review this analysis and additional public meetings to provide ample opportunity for the public to comment on the analysis.
3. **Water Supply Wells, Springs, and Swallets, page 4-80:** The DEIS does not contain the location of all private domestic water supply wells within 150 feet (500 feet in karst) of the construction work areas. This information must be included in the DEIS. If MVP cannot acquire this information for the DEIS due to lack of access, then a supplemental EIS containing this information must be provided.
4. **Water Supply Wells, Springs, and Swallets, page 4-80:** The DEIS states, "If suitable potable water is no longer available due to construction-related activities, Mountain Valley and Equitrans would provide adequate quantities of potable water during repair or replacement of the damaged water supply." The DEIS must specify how the company plans to replace a damaged water supply.
5. **Wellhead and Source Water Protection Areas, page 4-81:** The DEIS states in the previous section that "The MVP would be within 0.1 mile of two wells for public supplies: one in Greenbrier County, West Virginia (the Greenbrier County Public Supply District #2) and the other in Pittsylvania County, Virginia (the Robin Court Subdivision)." Then the DEIS states, "The projects would not cross any source water protection areas for groundwater resources, therefore impacts on these resources are not expected." While the project does not directly

cross the source water protection area, it comes within close proximity. The DEIS must provide an analysis of how it comes to the conclusion that impacts to the resources are not expected.

6. **Groundwater Use, page 4-83:** The DEIS states, "Mountain Valley would obtain water from municipal, surface water, or groundwater sources for dust-control purposes." The DEIS must specify the exact locations where MVP plans to withdrawal water for dust control.

4.3.2 Surface Water Resources

4.3.2.1 Affected Environment

1. **Surface Waters, page 4-89:** The DEIS states, "Mountain Valley is currently evaluating using permanent fill at 44 wetlands along permanent access roads." The DEIS must include alternatives to avoid and minimize the permanent filling of all wetlands. A detailed mitigation plan for any permanent impacts to wetlands must be included in the DEIS.
2. **Surface Water Use Classifications, page 4-89:** The DEIS states, "Neither the MVP nor the EEP would cross Tier III waterbodies in West Virginia." While the MVP may not directly cross Tier III waterbodies, Tier III waterbodies will still be impacted from construction. The DEIS must include an analysis of impacts to Tier III waterbodies in close proximity to MVP AOI, for example where stormwater runoff will enter a Tier III stream. When Tier III streams are identified within the impact area, the DEIS must also identify additional measures to avoid or minimize impacts to Tier III streams.
3. **Water Appropriations, page 4-101:** Discharges associated with hydrostatic testing water must receive an NPDES permit issued by the WVDEP. The DEIS states, "There are no actionable levels for oil and grease, TSS, or pH." WVDEP's NPDES General Permit establishes discharge limitations for permittees, including pH. The DEIS should reflect the discharge limitation for pH.
4. **Water Appropriations, page 4-101:** The DEIS states, "In the event that a waterbody is not capable of supplying the requisite volume of water, Mountain Valley would purchase water from a municipal source." There are additional discharge limitations in WVDEP's NPDES permit if chlorinated potable water is used as the source water for hydrostatic testing. The DEIS must include the additional monitoring and treatment needed for municipal sources.
5. **Water Appropriations, page 4-101:** The DEIS states, "Mountain Valley has not yet determined whether water for dust control would be obtained from surface water, groundwater, or municipal sources." The DEIS must identify the sources of water for dust control and the approximate amount of the withdrawal from each water source.

4.3.2.2 Environmental Consequences

1. **General Impacts and Mitigation, page 4-109:** The DEIS states, "The hydrostatic test water would be discharged through an energy dissipation device, typically in the same watershed as the source from which it was obtained." Table 4.3.2-10 in the DEIS shows the withdrawal and discharge watersheds for the hydrostatic testing water and identifies at least 7 instances of out-of-basin discharges for the 17 testing segments in WV. The term 'typically' does not apply in this scenario where almost have of the withdrawals are not 'typically' discharged into the same watershed. The impacts of the out-of-basin transfers, where millions of gallons of water are transferred to another watershed, must be analyzed in the DEIS.

- 2. Wet Open-Cut Crossings of Major Waterbodies, page 4-110:** MVP is proposing to cross the Elk, Gauley and Greenbrier using the wet crossing method. The DEIS states, “Mountain Valley performed a quantitative modeling assessment for each of the three crossings to quantify the amount of turbidity and sediment that would be expected downstream of the crossings. Results of the assessment estimate that monthly sediment loads would increase by 49 to 81 percent, 15 to 26 percent, and 19 to 52 percent for the Elk River, Gauley River, and Greenbrier River, respectively.” The DEIS contains no analysis of why this is the preferred method of crossing. FERC must require this type of analysis for each crossing method and select the least environmentally damaging method to reduce impacts.
- 3. Wet Open-Cut Crossings of Major Waterbodies, page 4-110:** The DEIS states “Mountain Valley’s analysis does not quantify the duration, extent, or magnitude of estimated turbidity levels”. FERC has requested this information and additional information prior to construction; however, this information is critical for assessing the impacts of this crossing method and must be included in the DEIS.
- 4. Blasting, page 4-110:** The DEIS states, “Mountain Valley would obtain all necessary permits if blasting were required within streams.” The DEIS must identify streams where blasting is likely to occur based on shallow bedrock. FERC cannot allow blasting in karst streams. All efforts to avoid blasting in karst streams must be specified in the DEIS.
- 5. Scour, page 4-111:** MVP has not provided updated information on the scour analysis. This information is critical when assessing the impact of the stream crossing. The updated analysis must be provided in the DEIS.
- 6. Surface Water Protection Areas and Public Supply Intakes, page 4-111:** The DEIS states, “Due to the short-term nature of construction activities and with the implementation of our recommendation above, impacts on surface water protection areas are not anticipated for the MVP.” There was no recommendation listed above as to how MVP will avoid impacting the source water for Red Sulphur Public Service District (PSD). Also, there was no mention of the other water systems potentially impacted; Burnsville PSD, Craigs ville PSD, Summersville PSD, Big Bend PSD, Red Sulphur PSD, Sistersville Municipal Water, and Pine Grove Water.
- 7. Surface Water Protection Areas and Public Supply Intakes, page 4-111:** FERC recommends that “Mountain Valley should file with the Secretary contingency plans outlining measures that would be taken to minimize and mitigate potential impacts on public surface water supplies with intakes within 3 miles downstream of the crossing of the MVP pipeline, and ZCC within 0.25 mile of the pipeline. The measures should include, but not be limited to, providing advance notification to water supply owners prior to the commencement of pipeline construction.” We agree with this recommendation with a request for additional information to include a contingency plan in the event of water contamination where the water system is unable to provide water to its customers. MVP and EEP must specify how they plan to provide temporary or permanent alternate water supplies. This information must be included in the DEIS.
- 8. First-order Streams, page 4-112:** The DEIS states, “The Applicants would minimize impacts on first-order streams by adhering to the Mountain Valley and Equitrans Procedures.” This statement does not adequately address the issue. First-order or headwater streams are vitally important to the health of the watershed. The overall health of a watershed is dependent on its

network of tributaries. Further analysis is needed to understand the impacts to headwater streams. A project of this magnitude that impacts multiple watersheds must be assessed at a regional scale. The DEIS must contain an analysis on the projects total impacts within each watershed to determine the overall impacts of the project. MVP must provide an analysis for each watershed including information on the number of headwater stream crossings by watershed and the number of stream crossings on each stream if waterbodies are crossed multiple times. At the landscape level, impacts from the ROW are exacerbated by the cumulative impacts of the proposed access roads. There is a negative correlation between road miles within a watershed and water quality. An analysis of the pre-construction vs. post-construction ratio of roads within a basin must be included in the DEIS to adequately assess the impacts from the proposed project.

- 9. Modification to the Procedures, page 4-114:** In multiple instances the DEIS states that impacts will be minimized by following FERC's procedures. One of those procedures being that Alternative Temporary Workstations be located at least 50 feet from waterbodies and wetlands. The DEIS states that "366 ATWS that Mountain Valley has proposed within 50 feet of a waterbody and wetland" and that "We have reviewed these and find them acceptable." We find this decision unacceptable. These procedures are in place to protect our water resources. Accepting 366 ATWS to be placed within 50 feet of a stream does not minimize impacts. The DEIS should include an analysis of how ATWS have been strategically placed to minimize impacts to streams.

4.3.3 Wetlands

4.3.3.2 Environmental Consequences

- 1. General Impacts and Mitigation, page 4-127:** A wetland function and value that the DEIS fails to mention is water storage for flood prevention. The DEIS must provide an analysis of the disruption of water storage for flood control. The analysis must include watershed-based wetland impacts with details on the acres of impacted wetlands by watershed to determine whether flooding within the watershed has the potential to significantly increase as a result of the loss of wetland functions during construction and operation of the pipeline.

4.3.3.3 Compensatory Mitigation

- 1. Mitigation Plan, page 4-129:** The DEIS mentions that MVP "submitted their compensatory mitigation plan to the COE in February 2016"; however, the plan is not included in the DEIS. The mitigation plan must be included in the DEIS to ensure that the mitigation proposed adequately addresses the impacts from the project. Mitigation must be initiated in the watershed where the impacts occur.

4.6 Fisheries and Aquatic Resources

4.6.1.1 Fisheries of Special Concern

- 1. Mountain Valley Project, page 4-172:** Table 4.6.1-1 of the DEIS should include the Candy Darter and Diamond Darter fish in WV.
- 2. Mountain Valley Project, page 4-172:** The DEIS does not assess impacts on crayfish and methods to avoid impacts. The *Cambarus Pauleyi* is a new species of crayfish endemic to the

high elevation wetlands in the Meadow and Greenbrier River Watersheds in Greenbrier and Monroe counties, West Virginia. *Cambarus pauleyi* has an extremely narrow geographic distribution and has possibly experienced a significant range reduction due to the conversion of wetlands into pastures, and should be considered "Endangered" according to American Fisheries Society listing criteria. Impacts to this species and avoidance and minimization of impacts must be described within the DEIS.

4.6.2.1 Sedimentation and Turbidity

1. **Sedimentation and Turbidity, page 4-176:** The DEIS states, "conclusions cannot be drawn regarding the effects of sedimentation and turbidity on fisheries and aquatic resources due to the wet open-cut crossings." This information is vital for understanding the impacts to aquatic resources. Without this information FERC and the public cannot assess the wet crossing method impacts on aquatic resources. Because of this lack of critical information in the DEIS, we request a revised DEIS to be issued with this information included.

4.6.2.2 Loss of Stream Bank Cover

1. **Loss of Stream Bank Cover, page 4-177:** The DEIS states, "Mountain Valley and Equitrans would minimize impacts on riparian vegetation by narrowing the width of its standard construction right-of-way at waterbody crossings to 75 feet, and by locating as many ATWS as possible at least 50 feet from waterbody banks." Previously, it was mentioned that 366 ATWS will be within 50 feet of waterbodies. This increased impact of loss of stream bank cover on aquatic resources should be addressed within the DEIS.
2. **Loss of Stream Bank Cover, page 4-178:** The DEIS should include an analysis of stream bank cover on a watershed scale to determine the % loss of stream bank cover by watershed to provide a better understanding of the potential impacts of the project.

4.6.2.4 Hydrostatic Testing and Water Withdrawals

1. **Hydrostatic Testing and Water Withdrawals, page 4-178:** The DEIS does not address the out-of-basin water withdrawals and the impact on aquatic life. Permanently removing millions of gallons of water from a watershed may impact aquatic life and should be analyzed within the DEIS.

4.6.2.7 Fisheries of Special Concern

1. **Mountain Valley Project, page 4-180:** The DEIS should state how MVP plans to adhere to recommended work windows for in-water construction since requesting a work-window modification does not necessarily mean that it will be granted. Requesting work window modifications will increase impacts to aquatic resources and must be avoided.

4.6.2.8 Conclusion

1. **Conclusion, page 4-181:** The DEIS states, "Based on our review of the potential impacts discussed above, we conclude that constructing and operating the MVP and the EEP would not significantly impact fisheries and aquatic resources". Based on the issues mentioned above, this conclusion is adequate because it is not drawn with completed information. Until the issues

mentioned above are addressed within the DEIS, FERC is unable to draw a conclusion on the impacts to aquatic resources.

4.7.1 Federally Listed Threatened, Endangered, and Other Species of Concern

4.7.1.1 Mountain Valley Project

1. **Fish, page 4-187:** The DEIS states, “The candy darter, a federal species of concern, is known to occur in a single stream along the MVP in Virginia (Stony Creek).” This statement is incorrect. The Candy Darter is also known to occur in WV within the New River Watershed and its tributaries, specifically the Gauley and Greenbrier drainages. The DEIS should include reference to this oversight and include these river systems in the construction restriction window.
2. **Fish, page 4-187:** The DEIS fails to address the Diamond Darter. On July 26, 2013, the United States Fish and Wildlife Service formally designated the diamond darter as an endangered species. As of 2008, the fish is only known to live in the Elk River. An open cut wet crossing is currently proposed for the Elk River. Any potential impacts on the Diamond Darter must be assessed within the DEIS.

4.8 Land Use, Special Interest Areas, and Visual Resources

4.8.1.2 Land Use Types

1. **Cathodic Protection, page 4-210:** The DEIS states, “According to alignment sheets filed by Mountain Valley, many of the cathodic protection groundbeds would be located outside of Mountain Valley’s environmental survey corridor.” Water Resource impacts for cathodic beds are not addressed in the DEIS. “Of the 31 locations, 27 would be surface groundbeds that would run perpendicular to the pipeline and require a construction area 25 feet wide and 500 feet long. The remaining four locations would be deep well groundbeds”; the impacts of the surface and deep well groundbeds must be addressed in the DEIS.

4.8.2.4 Recreational and Special Interest Areas

1. **Weston and Gauley Bridge Turnpike, page 4-248:** The DEIS states, “Mountain Valley has not documented communications with the COE about impacts on the trail.” The DEIS must include consultations with federal agencies with jurisdiction over the project. The consultation with the COE on the Turnpike must be included in the DEIS.
2. **Appalachian National Scenic Trail, page 4-249:** The DEIS contains conflicting information as to the location of the ANST crossing. In table 4.8.1-10 the crossing is listed as within Monroe County, WV; however, on page 4-249 the crossing is listed as Giles County, VA. The description of the crossing location should be consistent throughout the DEIS. Additionally, visual impacts of the selected crossing location have not been completed. The visual simulations of the crossing must be included in the DEIS.
3. **North Bend Rail Trail, page 4-252:** The DEIS states, “Mountain Valley has not documented that it provided its North Bend Rail Trail and Highway 50 Crossing Plan to appropriate state agencies for review.” The review and approval of crossing plans by state agencies is critical information and must be included in the DEIS.

4.8.2.6 Land Use on Federal Lands

1. **Land Use Impacts on Jefferson National Forest, page 4-259:** -The DEIS fails to meet the regulatory standard to justify crossing the Jefferson National Forest. The applicant is required to show that there is no reasonable alternative to crossing Forest Service lands or the request must be denied. The applicant and FERC have given the opinion that the route crossing the Forest is preferable which does not satisfy the law.
2. **Proposed Amendment 1, page 4-261:** We oppose the amendment to reallocate 186 acres to a 500-foot wide designated utility corridor. The amendment would permanently remove 19 acres of designated Old Growth Forest habitat.
3. **Proposed Amendment 2, page 4-262:** We oppose the amendment to remove restrictions on soil and riparian corridor conditions. These restrictions are in place to protect the resources within the National Forest and they should be strictly enforced, not removed to accommodate the project.
4. **Proposed Amendment 3, page 4-263:** We oppose the amendment to allow the removal of old growth trees within the construction corridor. There are only a few places where old growth remains; these areas should be preserved for future generations.
5. **Proposed Amendment 4, page 4-264:** We oppose the amendment to allow MVP to cross the ANST on Peters Mountain. Peters Mountain is an ecologically sensitive area where groundwater resources are not fully understood. This area should be avoided.

4.9.1.4 Tourism

1. **Mountain Valley Project, West Virginia, page 4-277:** Table 4.9.1-5 incorrectly lists the Carnifex Ferry Battlefield State Park as the Carbufax Ferry Battlefield State Park. This discrepancy should be corrected in the DEIS.

4.13.1.2 FERC-jurisdictional Natural Gas Interstate Transportation Projects

1. **FERC-jurisdictional Natural Gas Interstate Transportation Projects, page 4-495:** The cumulative impacts analysis for the FERC-jurisdictional projects should also include the Leach Xpress, the Mountaineer Xpress, Line WB2VA Integrity, Utica Access, Clarington, Monroe to Cornwell, Ohio Valley Connector, and Broad Run Expansion.

In conclusion, for the reasons outlined above, we request a revised DEIS to be issued with complete and accurate information in order to comply with the NEPA requirements. We appreciate the opportunity to submit these comments and look forward to further participation in this proceeding.

Respectfully Submitted,

Angie Rosser & Autumn Crowe
West Virginia Rivers Coalition