



Comments by Andrew Downs, Appalachian Trail Conservancy Regional Director
3 Nov 2016

RE: Mountain Valley Pipeline Draft Environmental Impact Statement.

The Appalachian Trail is a National Treasure, enjoyed by millions of people each year. The Appalachian Trail Conservancy recognizes the need for smart energy development to fuel growing and diverse economies. We're proud of recent successful partnerships with AEP and Columbia Gas that have led to both energy infrastructure development and enhanced protection for the Appalachian National Scenic Trail. However, after studying the Draft Environmental Impact Statement for the proposed Mountain Valley Pipeline and witnessing the inadequacies of the environmental compliance process as initiated by the Federal Energy Regulatory Commission, we feel the proposed Mountain Valley Project threatens the AT with impact at such an unprecedented scale, we must oppose this project to our greatest ability.

The FERC has issued a severely deficient Draft Environmental Impact Statement which has prematurely started the public comment period. The document calls for new, pertinent information to continue to trickle in as the clock ticks. This tactic undermines the public comment process, which is required by the National Environmental Policy Act, and does not adequately represent impacts to important resources like the Appalachian National Scenic Trail.

Contrary to comments by the Appalachian Trail Conservancy and the United States Forest Service months prior to the publication of the DEIS, FERC claims that the proposed Mountain Valley Project would have no visual impact to the Appalachian Trail. Our own analysis concurs with the statements of the United States Forest Service and suggests that the proposed Mountain Valley project represents a serious threat to the scenic value of the A.T. well beyond the scope of similar projects - as many as 19 prominent AT vistas may be severely impacted from this project, many of them viewing impacts as they occur on USFS land.

As a result, the assessment of cumulative impacts to the AT is drastically insufficient. The scope of cumulative impact must be based on the nature of the impacted resource, not the proposed project. In ascribing an arbitrary geographic scope for this DEIS of 100 miles, FERC avoids properly documenting cumulative impacts to the Appalachian Trail while admitting that other proposed pipeline projects on the National Forest would, without question, contribute to cumulative impacts. The issue of cumulative impacts is especially important to the AT given the nature of long distance hiking.

The depth of inadequacy the DEIS exhibits is further apparent in the fact that FERC does not use the correct centerline of the Appalachian National Scenic Trail, repeatedly admits that coordination with AT management partners has been insufficient, falsely claims that there are no existing areas of impact on the AT in the immediate area of the proposal and fails to analyze impacts to any key observation points along the Appalachian Trail despite the clear and repeated direction of their cooperating agency, the United States Forest Service.



The United States Forest Service has long been one of the greatest champions for the Appalachian Trail in the South. The George Washington and Jefferson National Forest has more miles of Trail than any other National Forest and, as a result, contributes significantly to the preservation of AT experience by honoring their Forest Plan. The DEIS identifies numerous places where the Forest Plan must be amended if this proposed project were to be permitted. These amendments would not only be unprecedented, but would significantly erode the value of the Appalachian Trail which the public has spent millions to protect. Amending the plan in the ways proposed would negatively impact prescription areas protecting the Appalachian Trail, Wilderness, Old Growth Forest, Inventoried Roadless areas and fragile successional habitats. Further, it would require the establishment of a new 5c utility corridor directly adjacent to Federally Designated Wilderness, leading up to the AT's doorstep in a location that is currently wild and pristine.

Given the unprecedented scope of these changes to the Forest Plan, the fact that these changes would have a lasting negative impact to the Appalachian National Scenic Trail and the fact that FERC's assessment of impacts to the AT has been largely non-existent, we urge FERC and our partners at the United States Forest Service to:

- 1) Fully evaluate the visual impacts of the proposed MVP project to the Appalachian National Scenic Trail in a supplemental EIS.
- 2) Properly evaluate the cumulative impact that this and other pipeline projects will have on the AT by establishing the geographic scope of the Appalachian Trail for the purposes of their environmental impact statement as its entire prescription area along the George Washington and Jefferson National Forests.
- 3) And offer a supplemental DEIS for any Forest Plan standard that would not be met by any aspect of the proposed project, also affording the public 90 days to assess and comment.

Soon, the Appalachian Trail Conservancy will be issuing a call to action so all hikers, outdoor lovers and citizens who expect responsible energy development can have their voice heard on this issue. We'll offer information at www.appalachiantrail.org that every citizen can utilize to stop this process and require our energy future to more thoughtfully consider impacts to the landscape and the Appalachian National Scenic Trail.

A handwritten signature in black ink that reads "Andrew Downs". The signature is written in a cursive, flowing style.

Andrew Downs
Appalachian Trail Conservancy
Regional Director
Roanoke, Virginia
(540) 904-4354
adowns@appalachiantrail.org