

MVP 401 Talking Points

Mountain Valley Pipeline 401 Virginia Water Protection Permit

Comment *now through October 27, 2021 at 11:59pm* on Mountain Valley Pipeline's request for a new 401 Water Protection Permit, to cross streams and wetlands in Giles, Craig, Montgomery, Roanoke, Franklin and Pittsylvania Counties.

HOW DO I MAKE A COMMENT?

Email: MVP@DEQ.Virginia.gov

- Please BCC: commentssummarymvp@gmail.com so we can track comments coming in.

Mail: DEQ, P.O. Box 1105, Richmond, VA 23218

Delivery address: 1111 E. Main St, Suite 1400, Richmond, VA 23219.

Fax: (804) 698-4032

*A full comment guide is available [here](#). More information about the permit can be found [here](#).

WHAT DO I TALK ABOUT?

Use the below talking points to form your own individualized comment. Please write your comment in your own words and do not copy and paste this list into your comment, thank you!

Main Talking Points:

- The permit lacks information to prove that it will adequately protect streams and wetlands
- MVP has a track record of environmental violations
- Focus on your personal stories/use of waterways, and emphasize why additional pollution from the pipeline will lessen your ability and willingness to use these waters (which is a violation of water quality standards)

More detailed talking points are below:

Share Personal Impacts from Mountain Valley Pipeline

- Have the creeks, streams or wetlands near you, or where you recreate, been impacted?
 - Share details about what you've seen on your own property, or in waterways that you care about.
- Have your land, farm or business been affected?
 - Your personal experiences will help inform the Board members about long-term, real world impacts they may not be considering.
- If you experienced sedimentation on your property
 - Firsthand accounts of sedimentation, mud or debris on your property from construction efforts are important to give Board members the full context.
- Concerns about private wells and springs & the need for water testing

Water Quality Concerns

- Virginia has [antidegradation laws](#) that protect water quality to ensure that Virginia's waterbodies can maintain their current uses as well as other protections. These protections cannot be verified without baseline data on each waterbody, yet MVP's application does not have baseline data.
- Cumulative impacts have not been sufficiently addressed in the permit.
 - [Example Comment to SWCB, Radford Hearing](#)
 - A [peer-reviewed study on cumulative impacts from pipeline construction](#) noted that there can be permanent impacts on streams that are crossed multiple times
 - Cumulative impact concerns do not only affect individual streams, but entire watersheds that are to be crossed hundreds of times.
- The over 300 violations have produced lasting, damaging impacts to water bodies, karst topography, private drinking wells, and water sources for farm operations.
- MVP continues to understate the negative impacts on endangered/ threatened fish and shellfish, and aquatic ecosystems that are likely to continue or increase.
- Some rare and highly sensitive aquatic wildlife are found exclusively in waters impacted by this project, and the cumulative sedimentation impairs their critical habitat.
- Impacts from construction would further degrade wetlands and riffle and pool complexes, which provide water filtration and oxygenation for sensitive wildlife habitats.
- There is no reason to believe that construction efforts would be less harmful than before.
 - Any remaining water crossings would be rushed, and through some of the steepest slopes on the route.
- Other states have appropriately taken action to deny 401 permits & unnecessary harm to our waters like North Carolina (MVP Southgate) and New Jersey (Penn East)

Climate Change Concerns

- In our current 'red alert' climate emergency, "global warming of 1.5°C and 2°C will be exceeded during the 21st century unless deep reductions in CO₂ and other greenhouse gas emissions occur in the coming decades." Methane emissions (near 80 times more powerful than CO₂ at trapping heat in our atmosphere) must be slashed in order to have a chance at limiting warming to 1.5°C above pre-industrial levels ([IPCC Climate Report](#)). Given that the MVP would lead to nearly 90 million metric tons of greenhouse gas emissions annually, this project would doom the planet to decades of unnecessary GHG emissions and lower our chances of avoiding climate catastrophe.
- A [scientific paper by Ilissa B Ocko et al 2021](#) found: "pursuing all mitigation measures now could slow the global-mean rate of near-term decadal warming by around 30%...given that fast methane action can considerably limit climate damages in the near-term, it is urgent to scale up efforts and take advantage of this achievable and affordable opportunity as we simultaneously reduce carbon dioxide emissions."

Reinforcing the EPA's concerns

[In a letter](#) from May 27, 2021 to the U.S. Army Corps of Engineers (USACE), the U.S. Environmental Protection Agency (EPA) expressed that MVP's permit application is incomplete, saying "at this time, EPA recommends that the permit not be issued until modifications described in the attachment, including the recommended special conditions, have been

addressed and incorporated into the project.” Their concerns apply to the Clean Water Act Section 404 permit before the USACE **AND the Clean Water Act Section 401 permit before the Virginia State Water Control Board** (‘board’).

The EPA’s concerns:

- Lack of adequate alternatives analysis and avoidance and minimization of impacts
- Lack of baseline assessments (biological, physical, and chemical parameters) on each waterbody proposed to be impacted
- Lack of an analysis of combined impacts from multiple crossings, especially in smaller watershed
- Lack of restoration plan for temporary impacts, post-construction monitoring and adaptive management

Economic Impacts from MVP

- Mountain Valley Pipeline’s construction has resulted in negative economic impacts to local communities.
 - Loss of livelihoods has occurred, as damage has ruined farms.
 - Personal wells and springs have been impacted, yet there is no recompense.
 - The economic “benefits” are unsupported claims, as the DEQ does not require MVP to provide supporting data. Data needed: Which manufacturers have committed to relocating to SWVA, how many permanent positions in each county, how equitable are the hiring practices, etc.
- There is no assurance that the project will be completed, so any economic “benefits” are eclipsed by the risk of MVP abandonment.
 - Multiple court challenges are remaining
 - PennEast (New Jersey) and ACP (WV, VA, NC) are canceled
- Economic “benefits” are eclipsed by the social cost of climate change
 - MVP locks in decades of reliance on gas impeding shift to renewable energy.
 - Tax revenue does not outweigh costs associated with recovery from climate chaos, floods, fires.
 - Significant costs associated with extreme weather fall to local governments and communities
 - <https://www.ncdc.noaa.gov/billions/overview>
 - <https://web.stanford.edu/~mburke/climate/map.php>
 - <https://www.science.org/doi/full/10.1126/science.aal4369>