



WEST VIRGINIA RIVERS

Below you can find our full suggested comments to the Army Corps of Engineers on the Mountain Valley Pipeline's request to cross waterbodies in West Virginia.

There are two easy ways for you to electronically submit comments. Whichever way you choose to send your comments; we encourage you to customize them for more impact.

1. Send an email to CELRP-MVP@usace.army.mil using the subject line: **LRH-2015-00592-GBRLRP-2015-798, NAO-2015-0898**. You can copy and paste the full suggested comments below.
2. Send an abbreviated version of the comments below using WV Rivers' digital advocacy tool. Send the comments here: <https://wvrivers.salsalabs.org/mvpsarmycorps>

Suggested Comments

Please accept my comments on Mountain Valley Pipeline's application for a Department of the Army (DA) Permit under the provisions of Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act.

Alternatives Analysis: MVP has not demonstrated that continuing construction as proposed is the Least Environmentally Damaging Practicable Alternative. Their route was poorly planned through steep terrain and sensitive environments, sometimes crossing the same stream three times. The application is riddled with inconsistencies and discrepancies in the information provided.

Avoidance and Minimization: MVP has not demonstrated that they have avoided and minimized impacts. They have completed only 150 crossings and incurred approximately 300 water quality violations from WVDEP and VADEQ. Their construction practices have already damaged water quality and habitat and they have only completed a fraction of the waterbody crossings with approximately 600 remaining.

Threatened and Endangered Species: The biological opinion on impacts to endangered species issued by the Fish and Wildlife Service on September 4, 2020 is not sufficient in addressing the Corps Endangered Species Act Action Area. MVP's impact on the endangered Candy Darter was assessed before the critical habitat was finalized and thus was not adequately addressed in the 2020 Biological Opinion. Because MVP has since changed the crossing method within critical habitat watersheds that were not evaluated in the 2020 Biological Opinion, MVP must re-initiate the consultation process to take into account how the changes to MVP's crossing methods would impact the endangered candy darters in the Upper Gauley River and Stony Creek Critical Habitat Units.



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Public Interest Review and Cumulative Effects: The Army Corps issuance of this permit would be contrary to the public's interest.

1. **Economics:** MVP will negatively impact the economies of communities that rely on tourism dollars. Local communities don't stand to benefit from the construction aside from a few tax dollars and short-term transient worker spending.
2. **Aesthetics:** MVP has and will continue to severely degrade the aesthetics of scenic areas such as The Appalachian Trail on Peters Mountain, the Greenbrier River, the Gauley River and the Elk River to name a few.
3. **General Environmental Concerns:** MVP is devastating to the surrounding environment. It will impact habitat of endangered species, degrade water quality, and contribute to the devastating effects of climate change that disproportionately impact underserved and minority populations.
4. **Wetlands:** This project would disturb approximately 10 acres of wetlands which are vital for habitat, flooding reduction and improving water quality. The disturbance of these wetlands will permanently alter the soils and hydrology of the wetland and release additional methane into the atmosphere.
5. **Flood Hazards:** The buried pipeline within streambeds poses an increased risk during flooding. Increased flows will cause scouring of the unconsolidated material in the stream bed where the construction occurred potentially exposing the pipe during extreme flooding.
6. **Water Supplies:** In addition to numerous private wells and springs along the route, MVP has the potential to impact drinking water supplies including the Burnsville Public Utility, Craigsville Public Service District, Summersville Water Works, Big Bend Public Service District, Red Sulphur Public Supply District in WV and Spring Hollow Reservoir, Rocky Mount and Chatham Intakes in VA.
7. **Recreation:** Recreation on popular rivers will be severely disrupted during construction. Construction may occur for up to 4 months on heavily used rivers such as the Gauley, Greenbrier and Elk.
8. **Water Quality:** The MVP has already degraded water quality and they have only completed a small fraction of the waterbody crossings. VADEQ and WVDEP cited them approximately 300 times for violating water quality.
9. **Energy Needs:** This pipeline isn't needed and will contribute significant amounts of methane to the atmosphere accelerating the impacts of climate change. The International Energy Agency states that there is no need to invest in fossil fuel infrastructure.

Solicitation of Comments: Because the public's stake in this project is so high, the Army Corps must host public hearings in impacted communities along the entire route.