



June 11, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Docket PF15-3
Mountain Valley Pipeline

Dear Ms. Bose,

We are writing on behalf of the Roanoke Appalachian Trail Club (RATC) with regard to the Mountain Valley Pipeline and its proposed crossing of the Appalachian Trail. RATC is one of 31 Appalachian Trail clubs operating under a Memorandum of Understanding with the Appalachian Trail Conservancy (ATC) to ensure the protection and stewardship of the natural, cultural and experiential resources of the Appalachian National Scenic Trail (the ANST, the AT or "the Trail"). In addition, RATC has a Volunteer Services Agreement with the US Forest Service for coordination and consultation on trail reconstruction, maintenance, and relocation projects; trail maintenance and management practices as outlined in the current local management plan for the Appalachian Trail; and other duties in coordination with USFS.

Established in 1932 by Myron Avery, one of the AT's founders, RATC maintains and protects 120.2 miles of the Appalachian Trail between Virginia Route 611 in Bland County and Black Horse Gap on the Blue Ridge Parkway. RATC is incorporated under the provisions of Chapter 2 of title 13.1 of the Code of Virginia (Articles of Incorporation, November 1, 1985). Our bylaws identify our purpose, which includes developing and maintaining trails, campsites and shelters; encouraging hiking of the AT; educating the public about proper camping methods; preparing maps and data about the trail and the following responsibilities most directly related to the construction of large disturbances to the Trail:

- to collect data of interest to users of the Trail concerning scenery, history, geology, botany, forestry, and wildlife of the Appalachian Mountains.
- to provide support to the Appalachian Trail Conference (ATC) in monitoring and managing the National Park Service lands within its assigned sector of the Trail which were purchased for the purpose of Trail Protection.
- to participate in and encourage the development of laws and regulations that protect the Appalachian Trail and its related interests.
- to use all legal means to protect and defend the Appalachian Trail and its related interests.

As such it is our responsibility to help uphold, within our region, provisions of the National Park Service Organic Act of 1916 to administer national parks “to conserve the scenery and the natural and historic objects ... and to provide for the enjoyment of the same in such manner ... as will leave them unimpaired [emphasis added] for the enjoyment of future generations.”

RATC has significant concerns about the proposed Mountain Valley Pipeline and asks the Federal Energy Regulatory Commission (FERC) to evaluate a broad range of build and no-build alternatives to this project within the Environmental Impact Statement (EIS).

FERC’s environmental impact statement must seriously consider the no-build alternative as well as the cumulative impacts of the many pipelines proposals that will cross the AT. Co-alignment with transportation corridors should be considered as an alternative preferable to destruction of this forested area, which has been cited by The Nature Conservancy as the most biodiverse in the nation.

We particularly wish to comment on the following points and further comment on each item as follows:

- 1. Necessity of compliance with the National Environmental Policy Act of 1970 and the Endangered Species Act of 1973 to examine cumulative impact of all proposed major natural gas pipeline crossings of the Appalachian Trail.**
- 2. Avoidance of threats to regional air quality and human health**
- 3. Satisfaction of criteria in the Appalachian Trail Conservancy’s 2015 Policy on Pipeline Crossings of the Appalachian Trail.**
- 4. Avoidance of threats to regional water supplies and to drinking water for Appalachian Trail hikers**
- 5. Avoidance of karst topography and active seismic zones in the proposed AT crossing locations**
- 6. Avoidance of specific impacts, including scenic impacts, likely with currently proposed AT crossing alternatives**

- 1. Necessity of compliance with the National Environmental Policy Act of 1970 and the Endangered Species Act of 1973 to examine cumulative impact of all proposed natural gas pipeline crossings of the Appalachian Trail in this region.** As noted by the Appalachian Trail Conservancy comments regarding the Atlantic Coast Pipeline and by Dr. Rupert Cutler (who was involved in the authorship of these laws) in a May 13, 2015 commentary to the Roanoke Times,¹ NEPA and ESA require:

- Preparation of a single, regional environmental impact statement incorporating all four pipeline projects proposed for our region — the Mountain Valley Pipeline, the Atlantic Coast Pipeline, the Western Marcellus/Appalachian Connector Pipeline, and the EB Express Project — and providing a comprehensive evaluation of cumulative impacts of each pipeline’s respective development in our region;
- An assessment of the market demand for the gas to be carried by each of these projects as a basis to potentially reject unnecessary projects;
- An evaluation of alternatives including the use of existing pipeline capacity and co-location in existing utility and road corridors; and
- Prohibition of pipeline construction that would jeopardize the continued existence of federally protected endangered plant or animal species
- Demonstrated proof that any suggested mitigation will be effective.

2. **Avoidance of threats posed to regional air quality and human health.** The Roanoke Valley region already faces increased threats from ozone and particulate pollution because it is surrounded by mountains that tend to keep pollution in the valley once it arrives here. Hikers and other people who spend time exercising in the outdoors risk increased exposure to methane emissions, particulates, and other hazardous air-borne substances which threaten their cardiovascular and pulmonary health. RATC urges FERC to examine potential air quality degradation from this project in relation to health impacts to these user groups and to the public, both independently and cumulatively along with other projects with open FERC dockets.

Potential air pollution associated with the Mountain Valley Pipeline includes methane, ethane, benzene, toluene, xylene, carbon monoxide and ozone from the compressor station and pipeline; and diesel emissions from construction vehicles. NOx and VOCs contribute to ozone formation, which can travel downwind. The project's proximity to the AT and other recreation areas makes these areas vulnerable for increased levels of ozone pollution. This is particularly dangerous for children and young adults who have higher ventilation rates.

It is important to note that if the EPA's proposal to reduce the current ozone standard to between 65-70 ppb becomes law, the counties within the region traversed by the pipeline may be pushed into non-attainment, even without the additional emissions of VOCs and NOx which would be contributed by this project. Already in May 2015, while the weather is still relatively cool, the Roanoke region has experienced multiple days of ozone pollution outside the healthiest range, including one day that would likely have been an ozone alert day under the new standards.

We are especially concerned about the project's proximity to public lands, where air quality may not be currently monitored, but where it could be negatively impacted. The EIS should include requirements for air quality monitoring that ensure these areas are monitored. We would also strongly urge other requirements that ensure that the pipeline and associated storage tanks and compressor stations can meet or exceed the standards set in EPA's new regulations controlling volatile organic compound emissions from the oil and gas industry, which apply to all projects starting after January 2015.

3. **Satisfaction of criteria in the Appalachian Trail Conservancy's Policy on Pipeline Crossings of the Appalachian Trail.** We submit that FERC and MVP must demonstrate, at a minimum, that the proposed pipeline crossing addresses climate change issues by satisfying all of the first set of criteria in the policy, that:

"The proposed pipeline represents the only prudent and feasible alternative to meet an over-riding public need, as demonstrated in a thorough and detailed analysis of alternatives, including, but not limited to:

- energy conservation;
- use of renewable energy;
- increasing the capacity of existing pipelines; and
- modification of the pipeline route to reduce its impact."

FERC should include climate change as a discussion item, demonstrating due diligence by including the topic of climate change impacts and opportunities for mitigation within the draft EIS. The EIS

should also include evaluation of the best practices for minimizing methane emission that can contribute to climate change.

In addition, FERC and MVP should demonstrate that the project addresses the remainder of the criteria in the Appalachian Trail Conservancy's 2015 Policy on Natural Gas Pipelines:

"The proposed pipeline crosses the A.T. landscape at a point already subject to significant impact, such as an existing pipeline, road, and/or power-line crossing, provided that the existing crossing is in an acceptable location.

"The pipeline proposal includes use of best practices to minimize its impact on the A.T., including:

- crossing the A.T. landscape only once using the shortest feasible path;
- using horizontal directional drilling (HDD);
- minimizing the width of cleared area for the pipeline where HDD is not feasible;
- narrowing the cleared area after installation;
- eliminating or minimizing new roads and other infrastructure within the A.T. landscape;
- designing compression and pumping stations to eliminate or minimize visual, light, and noise impacts;
- combining metering and regulation stations with compression or pumping stations;
- taking all feasible steps to minimize landscape fragmentation;
- developing a plan to restore the A.T. landscape to its prior condition when the pipeline is abandoned;
- providing a bond or escrow account to pay for the cost of restoration when the pipeline is abandoned.

"The proposed pipeline does not cross an area unsuitable for such development, including:

- Wilderness Areas and wilderness study areas;
- National Recreation Areas;
- old growth forests and habitat for rare species or exemplary natural communities;
- unbroken blocks of forest that can provide habitats for interior forest species, such as black-throated blue warblers, salamanders, and many other flora and fauna that require a forest habitat;
- alpine zones, balds, and wetlands;
- cultural resource sites or historic landmarks;
- unique or important ecological or recreational sites identified by state, regional, or township land-use plans;
- highly used and popular sections of the A.T.; and
- Trail-related facilities, such as shelters and campsites.

"The proposal for the pipeline, the Federal Energy Regulatory Commission's (FERC) Certificate of Convenience and Necessity, and all other authorizations that include mitigation or offsets for any loss of natural, cultural, scenic, and recreational values of the A.T. should ensure that there is no net loss of these values. The determination of 'no net loss' should be made by the land-managing agency for the impacted section of the A.T. in consultation with the NPS' Superintendent for the ANST. At the conclusion of this

determination, the public should have the opportunity to provide comments via public hearings and/or a public comment period.

“Habitat restoration within the A.T. landscape is an example of mitigation. Examples of offsets include:

- acquisition of additional conservation land;
- removal of other developments and restoration of the landscape; and
- protection of land through conservation easements.

“To the extent possible, mitigation should be on-site or adjacent to the area of impact, unless it is clear that a greater benefit would be derived from offsets at a more distant location. Offsets, such as land acquisition, should be in the vicinity of the area of impact and within the A.T. landscape.

“The pipeline proposal includes using best practices to reduce the impacts of maintenance on the aesthetic values of the A.T. Such techniques include:

- hand-clearing of vegetation;
- ‘feathering’ of vegetation along the edges of the right-of-way;
- leaving low-growing vegetation; and
- minimizing the use of herbicides and preventing the introduction of invasive or exotic species.

“The pipeline proposal, FERC’s certification, and all other authorizations clearly acknowledge the pipeline owner and operator’s affirmative duty to protect the environment and ensure the health and safety of A.T. users and the communities in the vicinity of the Trail. These responsibilities include, but are not limited to:

- protecting against fire, explosion, or release of toxic substances;
- avoiding damage to, or contamination of, the environment, including soil, vegetation, animal life, surface water, and groundwater;
- protecting cultural and historic artifacts; and
- retaining liability for any negative impacts or damages resulting from the pipeline.

“The pipeline proposal adheres to best practices for minimizing methane emission that can contribute to climate change.”

- 4. Avoidance of threats posed to regional water supplies and drinking water for Appalachian Trail hikers.** The Weeks Act of 1911 authorized the federal government to purchase private lands to regulate the flow of navigable streams (minimize flooding) and to maintain those lands as national forests. It made possible creation of the Jefferson National Forest, which is the location of all 3 proposed crossing alternatives for the Mountain Valley Pipeline, in 1936. A primary reason for its existence is to serve as an intact watershed to provide clean drinking water downstream. In combination with karst topography and the Giles County Seismic Zone (see Section 5), the possibilities for leakage of toxic substances from the pipeline into regional water supplies must be taken very seriously.

All three proposed AT crossings present threats to local and regional water quality, both during and after construction. FERC should consider, for example, water quality threats posed by:

- Erosion
- Runoff
- Loss of protective cover
- Threats from use of herbicides
- Leakage of toxic materials into the watershed
- Disturbance of the land during construction, which can permanently divert water sources

We particularly note that the Clean Water Rule released by the Environmental Protection Agency and the US Army Corps of Engineers on May 27, 2015 applies to streams that would be impacted by this project. The EPA's press release states that, "The Clean Water Act protects navigable waterways and their tributaries. The rule says that a tributary must show physical features of flowing water – a bed, bank, and ordinary high water mark – to warrant protection. The rule provides protection for headwaters that have these features and science shows can have a significant connection to downstream waters." All 3 of the AT crossings proposed by MVP would impact tributaries that fall under this rule; some of these tributaries are identified in Section 6 of these comments.ⁱⁱ

Threats to drinking water, even without the potential for toxic runoff, were demonstrated by timbering operations on West Virginia's Peters Mountain Springsⁱⁱⁱ: "The recharge area above Gap Mills PSD's spring was originally delineated for the WV BPH in 1992, by geologists Kulander and Dean, of the WV Geological Survey. A timbering operation in September of 2005, directly above this spring was begun without regard to the need to avoid the spring's recharge area. This spring was made turbid, and the PSD was required to issue a boil-water advisory." Erosion on steep slopes during logging also contaminated other springs in the region.

More specific threats to water quality at the proposed AT crossings are identified in Section 6, where each crossing is discussed in detail.

5. **Avoidance of karst topography and the Giles County Seismic Zone in the proposed AT crossing locations.** All of the AT pipeline crossings suggested by MVP occur in areas characterized by karst topography, where rainwater percolates through carbonate bedrock such as limestone or dolomite, becoming slightly acidic and slowly dissolving the carbonate bedrock, creating extensive systems of underground fissures and caves. The Virginia Department of Mines, Minerals and Energy (DMME) notes that 27 counties in Virginia are in the karst region, which generally runs from Interstate 81 to the West Virginia and Kentucky borders. iv DMME also states that "Groundwater contamination is a universal problem in populated areas overlying karst terrain" and that "A significant concern is the vulnerability of karst aquifers to contamination along the I-81 corridor, where hazardous materials are regularly transported and accidents are increasingly routine. For some chemicals that do not readily mix with water, contamination can be widespread and remain in the groundwater for many years."

Presence of karst and sinkholes can magnify disturbance of the land during construction and potentially cause permanent diversion of water sources.

In addition, all of the AT pipeline crossings suggested by MVP appear to occur within the Giles County Seismic Zone, one of three significant seismic zones in the state and location of the largest earthquake in Virginia's recorded history.^v According to the US Geologic Survey, the 1897 earthquake had a magnitude of 5.9, was centered in the Narrows/Pearisburg area (near the proposed Peters Mountain crossing of the AT), and was felt from Georgia to Pennsylvania and from the Atlantic Coast to Indiana, taking down chimneys from Bedford, Virginia to Bristol, Tennessee and damaging chimneys in locations as distant as Charlotte, North Carolina and Knoxville, Tennessee.^{vi}

We urge FERC to consider the potentially calamitous impact of heavy rains, sinkholes and seismic events on a 42", high pressure pipeline full of volatile and hazardous materials.

- 6. Avoidance of specific impacts, including visual (scenic) impacts as defined on official maps of the Appalachian Trail that are likely with currently proposed AT crossing alternatives.** The official name of the AT is the Appalachian National Scenic Trail [emphasis added]. The ATC's 2015 natural gas pipeline policy opens by noting that:

"The Appalachian Trail Conservancy (ATC) seeks to preserve and protect the scenic, cultural, and natural resources of the Appalachian Trail (A.T.) and the A. T. experience, as defined by the National Trails System Act and ATC policy. ATC's goal is to '... ensure that the A.T.'s vast natural beauty and priceless cultural heritage can be shared and enjoyed today, tomorrow, and for centuries to come.' To that end, ATC seeks to avoid, minimize, or eliminate the visual and experiential impacts of all utilities, including oil, gas, and petroleum products pipelines, on the Trail and its surrounding landscapes."

In addition, the ATC notes that, "These landscapes are defined by the viewshed from scenic overlooks along the Trail..." We therefore submit that views from the Appalachian Trail, including but not limited to views that have been formally identified as "Scenic Views" on sources such as official ATC maps of the Trail, should be a major consideration in siting of any proposed pipelines, incorporating views more than "middle ground" distances (3 to 5 miles) from the pipeline. We note that the AT in the region of the MVP routes includes portions of the AT from Angel's Rest on Pearis Mountain in Giles County Virginia to the Sawtooth Ridge of Catawba Mountain between Beckner Gap and state highway 311 in Roanoke County, Virginia. That area is characterized by a ridge-valley topography that features distinct views from the AT extending far beyond 3 miles, particularly for a linear project such as a gas pipeline.

For instance, we would specifically note that the well-known view from Angel's Rest is a line of sight distance of 8 to 9 miles from the "Proposed Route" crossing on Peters Mountain and the pipeline route down the slope of Peters Mountain in Giles County. The proposed pipeline crossing of the AT and the right-of-way (ROW) on Peters Mountain would be distinct from and would have an adverse impact on the view from Angel's Rest. From Dragon's Tooth, another remarkable and highly popular AT viewpoint, the point at which MVP Alternate 110J crosses Sinking Creek Mountain is about 7 miles distant line-of-sight and would be very visible from and have a severe visual impact on that viewpoint.

Given the actually visibility environment of that portion of the AT, RATC requests that visual analysis from AT viewpoints be based on visual impact on viewpoints of at least 10 miles line-of-sight distance and extending beyond 10 miles for particularly popular scenic views on the AT.

RATC believes it is necessary and important that the DEIS include realistic visual simulations of the project from particularly notable key observation points along the AT. That analysis should be conducted by first identifying key observation points along the AT that would have views of the pipeline. Both the number and location of AT viewpoints chosen for visual simulation should be decided in consultation with and participation of AT representatives.

We further request that visual impact analysis of the MVP be based on:

- The construction method that will actually be used on each crossing site and ROW in the AT viewshed, including techniques that flatten ridgetops and “plumb” springs and seeps into pipes to drain them away from trenching.
- The appearance of the ROW one year after completion of the pipeline, after the temporary activities of construction have been completed rather than after a lengthy projected recovery time.

Such requirements would give a more accurate assessment of the visual impact of the project on AT use and maintenance. As discussed above, both the number and location of AT viewpoints chosen for visual simulation should be decided in consultation with and participation of AT representatives.

As a maintaining club consisting entirely of volunteers, we work with hand tools and occasionally a chain saw (all of which we carry by hand to the work site) to keep the narrow pathway of the trail clear of blown down trees and brush, to install steps and dig sidehill to prevent erosion, to keep shelters repaired and occasionally redig a privy. The concept of bulldozers and heavy equipment tearing into the forest that we work so hard to maintain for the enjoyment of hikers is alien to us. We question whether MVP would maintain any pipeline right-of-way based on these criteria in the ATC Policy for Pipeline Crossings of the Appalachian Trail:

“The pipeline proposal includes using best practices to reduce the impacts of maintenance on the aesthetic values of the A.T. Such techniques include:

- hand-clearing of vegetation;
- ‘feathering’ of vegetation along the edges of the right-of-way;
- leaving low-growing vegetation; and
- minimizing the use of herbicides and preventing the introduction of invasive or exotic species.”

The pipeline is proposed to cross the Appalachian Trail at one of three possible sites in our area. Here are more specific concerns regarding each of those crossings:

- **“Proposed Route” on Peters Mountain near the West Virginia border** is on a ridgeline with long views into West Virginia to the west and toward Johns Creek Mountain to the east. There are existing gas pipelines on the AT today; although they are much smaller, they are an interruption of the natural experience. Peters Mountain is a remote area, where such a pipeline corridor would be a serious intrusion.

Need for Cumulative Impact Study

- All of the comments below would also apply to a second large natural gas transmission line already announced – the Transco Western Marcellus/Appalachian Connector line proposed by Williams. This is a perfect example of the importance of complying with NEPA and the ESA by preparing a single, regional environmental impact statement incorporating all four pipeline projects proposed for our region — the Mountain Valley Pipeline, the Atlantic Coast Pipeline, the Western Marcellus/Appalachian Connector Pipeline, and the EB Express Project (See Section 1).

Water Quality

- This route threatens springs on both slopes and several tributaries of the New River, including Rich Creek in West Virginia and Kimballton Branch of Stony Creek In Virginia. Both are tributaries of the New River.

Visual Impact

- From the south on the AT, the scars from construction would be highly visible from Angel’s Rest, one of the most scenic viewpoints maintained by the RATC.
- The proposed crossing would virtually coincide with one of the most scenic locations on Peters Mountain, the view from Symms Gap Meadow, which is marked on official ATC maps as a “Scenic View.”
- From both the east and west, the view would be impaired by the sight of the 125-foot-wide (and in places, more) pipeline corridor extending down Peters Mountain into the valleys and onto Johns Creek Mountain, which the proposed route would also cross.
- During construction, the view would be of exposed dirt, noisy and pollution-producing vehicles and equipment. Forever after construction is completed, there would be a scar on the landscape.

Additional

- Mitigation is not feasible: old-growth trees would not be replaced, and trees would not be permitted to grow in the path of the pipeline.
 - Invasive species and ATV access would be constant dangers.
- **Alternate 110 crosses the AT at the top of Sinking Creek Mountain**, a long ridge walk through forest with frequent rock overlooks toward Johns Creek Mountain and the pastoral Sinking Creek valley to the west, and Brush Mountain wilderness to the east.

Water Quality

- Depending on the exact location of the crossing, both the Niday Shelter and spring and the Sarver Shelter and spring could be threatened or destroyed. Water sources are essential to AT hikers, and the Sarver shelter contains a springhouse dating back to the days when the Sarver family farmed this site.
- This route threatens the drainages of both Sinking Creek and Craig Creek as well as springs on both sides of the slope, including but not limited to the following tributaries of Craig Creek: Adaline Branch, Sandy Branch, Bone Hollow, California Hollow and Ruben Springs Hollow.

Visual Impact

- The valley between Johns Creek Mountain and Sinking Creek Mountain is quite narrow here (generally 3 to 4 miles wide), with three scenic viewpoints on the ridge of Sinking Creek Mountain according to the official ATC map. Much of the course of

the pipeline in the Sinking Creek valley would likely be visible from these Sinking Creek Mountain viewpoints.

- Continuing northbound on the AT, Alternate 110 would be visible from the crest of Sinking Creek Mountain as it splits away from Alternate 110R.
- Still further north, it is possible that the pipeline would be visible from two scenic viewpoints in Brush Mountain Wilderness East, including the Audie Murphy Memorial Monument. Detailed maps of the proposed route were not available in time to allow inspection of this possibility, but it must be noted.

Additional

- Alternate 110 appears to traverse the Brush Mountain East Wilderness, a federally designated wilderness area where no motorized equipment is permitted by law. In clearing blown down trees, we are not even allowed to use a chain saw.

- **Alternate 110R** crosses the top of Sinking Creek Mountain at the same location as Alternate 110 before breaking off to the southwest.

Water Quality

- Like Alternate 110, this route threatens the drainages of both Sinking Creek and Craig Creek as well as springs on both sides of the slope.
- This crossing could threaten Niday Shelter and its spring-fed water supply for AT hikers.

Visual Impact

- Alternate 110R would have all of the negative viewshed impacts of Alternate 110.
- The land between Brush Mountain Wilderness and East Brush Mountain Wilderness would become a large scar, visible from Sinking Creek Mountain at a distance of approximately 3.6 miles and from other locations on the AT.

Additional

- It would parallel very close to the trail as both pipeline and trail begin their descent down the east side of the mountain, with all of the dangers that such proximity brings.
- It then sideslopes southwestward, then south, then shoots east as it approaches the top of Brush Mountain, apparently in an effort to follow the very narrow power line corridor between the Brush Mountain Wilderness and the Brush Mountain East Wilderness. It seems unlikely that the pipeline could be constructed within the power line corridor without straying into one or the other of the two wilderness areas, and in any case the construction of the pipeline would be a serious intrusion to the wilderness values of two such close neighbors.
- In this section, the power line passes above the forest floor and leaves large trees, the understory and a rich habitat between the Brush Mountain Wilderness and the Brush Mountain East Wilderness largely untouched. Construction of a pipeline would destroy this corridor on the ground, essentially fragmenting what is now a joined habitat. It would also require a massive amount of earth moving on steep side slopes, followed by flattening of the corridor for construction – basically destruction of an intact mature forest, to be replaced by a grassy area that would devastate biodiversity and encourage invasive species.
- The globally rare *Buckleya distichophylla* (pirate bush) has been documented on the Appalachian Trail in this area by an RATC volunteer as part of a study on threatened and endangered plants in the AT corridor. It is listed as threatened in Virginia and,

according to the Virginia Department of Conservation and Recreation, “is being studied for its promise in treating cancer. Every time a wild species becomes extinct, a storehouse of genetic information is lost.”^{vii}

- **Alternate 110J** goes further east, crossing the AT on **Brush Mountain** just after the trail turns to descend Brush Mountain, then sidesloping the east side of Brush Mountain.

Water Quality

- This route crosses the AT on Trout Creek. It appears to run directly through the drainage in an area with very steep upslopes on both sides and appears to be a major threat to water quality on this drainage

Visual Impact

- Alternate 110J crosses through the Craig Creek Valley between Sinking Creek Mountain and the Brush Mountain/Cove Mountain gap at a very narrow point, where the valley is less than 3 miles wide. The pipeline would potentially be visible as it crosses the valley from scenic viewpoints on the AT, including 4 scenic viewpoints in the Brush Mountain East Wilderness (including the Audie Murphy Monument). Detailed maps of the proposed route were not available in time to allow inspection of this possibility, but it must be noted.
- Continuing northbound on the AT, the pipeline would be visible from scenic overlooks on Cove Mountain and on Dragon’s Tooth, which is part of Virginia’s Triple Crown (Dragon’s Tooth, McAfee Knob, Tinker Cliffs) a destination hike for both dayhikers and backpackers from a multi-state region. This is one of the most scenic locations on the AT in Virginia.

Additional

- Alternate 110J also appears to pass through the Brush Mountain East Wilderness, where no motorized equipment is permitted by law.
- This option would cause even more erosion than a direct mountain crossing.

In summary, all three proposed routes offer serious threats to the Appalachian National Scenic Trail and those who find joy, challenge and respite there. Large natural gas transmission pipelines must not be constructed through any of these routes until the concerns expressed here have been thoroughly, properly and effectively addressed.

Thank you for your consideration of our comments. We look forward to a comprehensive analysis of this proposal that will result in protection of the Appalachian National Scenic Trail for generations to come.

PLEASE DIRECT ALL CORRESPONDENCE TO RATC PIPELINE TASK FORCE, 907 GREENBRIER COURT, SALEM, VA 24153

Sincerely,

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ⁱ http://www.roanoke.com/opinion/commentary/cutler-will-the-conservation-law-firewall-to-protect-parks-wildlife/article_78d61e88-112b-528f-b0bf-246a35b119a8.html

ⁱⁱ <http://yosemite.epa.gov/opa/admpress.nsf/0/62295CDDD6C6B45685257E52004FAC97> accessed June 11, 2015

ⁱⁱⁱ "Peters Mountain Springs, West Virginia – Water Protection Plan," prepared by West Virginia Rural Water Association, 2005, p. 14-15.

^{iv} <http://www.dmme.virginia.gov/dgmr/sinkholes.shtml>

^v http://dmme.virginia.gov/DGMR/images/epicenters_density.JPG

^{vi} http://earthquake.usgs.gov/earthquakes/states/events/1897_05_31.php

^{vii} http://www.dcr.virginia.gov/natural_heritage/documents/nhwhy.pdf accessed June 3, 2015