



## SMITH MOUNTAIN LAKE ASSOCIATION

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*PROTECTING THE INVESTMENT OF SML RESIDENTS*

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June 8, 2015

Federal Energy Regulatory Commission  
ATTENTION: Kimberly D. Bose, Secretary  
PO Box 2021  
888 First Street NE., Room 1A,  
Washington, DC 20426.

Re: Project Docket # PF15-3-000 Potential Environmental Issues  
regarding the Mountain Valley Natural Gas Pipeline.

The Smith Mountain Lake Association (SMLA) is hereby filing  
comments regarding potential environmental issues with the proposed  
Mountain Valley Natural Gas Pipeline, Project Docket # PF15-3-000.

Thank you,

*Larry Iceman*

Larry Iceman  
SMLA Chairman, Water Quality Monitoring

Copy: Peter Lewis, SMLA President

**Smith Mountain Lake Association's (SMLA)**  
**Comments on Potential Environmental Issues with**  
**The Proposed Mountain Valley Pipeline Project**

**FERC Project Docket # PF15-3-000**

**June 8, 2015**

The Smith Mountain Lakes Project (SMLP) is a two-reservoir pumped storage hydroelectric generation project facility near Roanoke, Virginia, completed in the mid-1960s. SMLP is operated by Appalachian Power Company (APCO) which is owned by American Electric Power (AEP). SMLP has 600 miles of shoreline and 25,000 surface acres of water. The project is also used for recreation and a source of potable water for two of the surrounding four counties comprising Bedford, Campbell, Franklin, and Pittsylvania. It is a major tourism attraction for the region and an important source of tax revenue for the surrounding counties.

The SMLP has a larger upper reservoir -- Smith Mountain Lake (SML) -- and a smaller lower reservoir-- Leesville Lake (LVL). Water stored in SML first passes through turbine-generators in the powerhouse to produce electricity and is discharged into LVL. Much of the water is retained in (LVL) and pumped back into the SML for re-use. A portion of the water goes through the turbine-generators at the Leesville powerhouse to generate additional electricity and to meet the minimum discharge requirements of the project's operating license. Three significant rivers flow into the project. The Roanoke and Blackwater Rivers flow into the SML project above the SML Dam and the Pigg River flows into LVL above the LVL Dam. Via the pump-back feature of the project, some of the water from the Pigg River and LVL also co-mingles with the SML waters.

The MVP as planned will pass the SMLP to the south, mainly in Franklin County, and then into Pittsylvania County where it crosses under the Pigg River and continues to terminate at the existing Transcontinental Gas Pipeline Company LLC's existing Zone 5 Compressor Station 165 in Pittsylvania County, Virginia. The pipeline as planned will pass four miles north of the town of Rocky Mount, Virginia, the Franklin County seat. Franklin County currently has no access to natural gas.

These SMLA comments pertain to the potential environmental impact on the SML project and Franklin County, Virginia. It should be noted that water released from the LVL dam flows into the downstream Virginia Department Game and Inland Fisheries Hatchery and past the Dominion Power Plant then into Lake Gaston and eventually the Albemarle-Pamlico Sounds in North Carolina.

The Smith Mountain Lake Association (SMLA) represents the interests of owners of 1,300 properties around SML. One of SMLA's most important programs is to monitor and improve the water quality of the Smith Mountain Lake.

**The proposed MVP project as currently planned would pass through the Smith Mountain Lake Watershed and at the closest point would pass one mile south of SML at the south side of the intersection of highways Route 40 and Route 834.**

**SMLA's comments follow by the prescribed subject category.**

**I. Geology and Soils**

- a. There is an abundance of clay based soil in the area. Franklin County is known for its red clay. This clay-based soil is susceptible to being compacted by heavy construction equipment which may result in increased surface water runoff from rain and storms-- runoff which carries sediment, nutrients, pollutants into the rivers and streams that flow into the SML Project. Techniques should be required to reduce runoff, clean up contamination, and de-compact soil where possible during and post construction.
- b. The removal of trees, underbrush, vegetation and soil during pipeline construction will also increase water runoff from the pipeline construction and operation area.
- c. There is Karst terrain, sinkholes and caves that geological surveys should help define. Pipeline construction should either avoid these and/or use appropriate construction techniques to avoid water runoff contaminates including sediment flowing into these geological structures and polluting the water that flows into and out of them.
- d. There are areas surrounding the SML Project where the ground has high levels of mica, referred to as "isinglass" soil, which can make the ground unstable, especially on a slope. If isinglass soil is encountered, appropriate construction techniques should be employed.
- e. There have been earthquake tremors and minor damage within the SML project area. The concern is that the ground disturbance could cause a pipeline rupture and possibly an explosion. MVP operations should utilize earthquake monitoring technology and shut down the pipeline when tremors are detected. This ground disturbance occurs very infrequently. Many years or even decades pass between tremors. Regardless, the risk is real.

**II. Water resources and wetlands**

- a. The SMLA Water Management Committee found the following facts during its prior study of water flow into SML:
  1. The majority of the SML drainage area lies in Roanoke, Franklin and Pittsylvania counties.
  2. Major localized storms covering 100 sq. miles or more in area can drop 6 to 8 inches of rain in a 24 hour period and are not an infrequent occurrence. Such heavy rain events may result in significant erosion from construction sites.
  3. The rainfall for these storms may not be accurately recorded on the historical rain gages (those installed before about 2010), and the runoff from these storms may not be observed by the USGS stream flow gages.
  4. Given the findings above, the most accurate method that SMLA found for estimating net inflow to SML was by using Leesville outflow data from the Corps of Engineers and SML/Leesville lake level data from AEP.

Much of the proposed MVP pipeline route through Franklin County lies below the USGS gage on the Blackwater at Rocky Mount. Consequently, estimates of significant erosion events

based on historical rainfall and streamflow may significantly underestimate the erosion effects and resulting biological impact generated by the pipeline construction and reclamation activities on streams feeding SML in Franklin County.

SMLA suggests that MVP project planners be required to use actual inflows to SML, as stated in #4 above, and not inferred inflows from historical rainfall and streamflow gages.

Additionally, it must be determined that the erosion-control efforts proposed for the MVP project are indeed adequate to control water and sediment runoff from large rainfall events. Members of SMLA are willing to meet with MVP project planners and/or their consultants to discuss further our water flow study results and suggestions.

- b. If proper pipeline construction techniques are not used, soil and water contamination will result. The Smith Mountain Lake project, including the rivers and streams which flow into it, could be negatively impacted by one or all of the following: increased turbidity, sedimentation, decreased dissolved oxygen concentrations, releases of chemical and nutrient pollutants from sediments, and introduction of chemical contaminants, such as fuels and lubricants.
- c. If wells and aquifers are contaminated during construction and/or operation, a disruption for use as potable water for local people, farm animals and pets could occur. Providing an alternate source of potable water may be required in addition to conducting mitigation.
- d. Potential negative impact upon fish and aquatic vegetation could occur as a result of any increased turbidity, sedimentation, decreased dissolved oxygen concentrations, releases of chemical and nutrient pollutants from sediments, and introduction of chemical contaminants, such as fuels and lubricants. It is expected that if proper construction and operation procedures are followed, this will be temporary and limited to a localized construction or operational issue that can be corrected and not become a long-term concern.
- e. SMLA recommends that the MVP project be required to put some groundwater monitoring wells in Franklin County and provide SMLA access to the data to help monitor possible contamination.
- f. The negative impact upon wildlife resulting from reduced access to clean water and healthy vegetation due to construction or operational issues should hopefully be short-term. The impact of the above mentioned water resource issues should be reduced by the required use of the Best Pipeline Construction Management Practices. We recommend that swales be used on the edges of the construction boundaries to help prevent runoff of sediment, oils and grease from construction equipment and other contaminants spreading to land and waters beyond the construction area. If the swales do become contaminated, their cleanup is limited to a smaller area.
- e. Temporary construction and permanent access roads and parking areas should be constructed from permeable substrate and surface materials to minimize altering water flow into the ground and creating runoff issues. Materials like coarse stone and permeable top surfaces such as permeable concrete should be utilized where possible. This is especially important when dealing with slopes and increased surface water runoff issues.

### **III. Vegetation and wildlife**

- a. As stated in II f. above, there is potential negative impact upon wildlife resulting from reduced access to clean water and healthy vegetation.
- b. There is the negative impact of both temporary and permanent loss of wildlife habitat from the clearing for construction. Where loss of habitat endangers specific wildlife, they should be relocated as soon as possible and prior to the actual onset of construction.
- c. Very minimal to no impact on the fish in SMLP and downstream fish hatchery is expected and would be short-term, if surface water runoff and any resulting contamination are handled properly.
- d. There will be temporary disruption of the wildlife normal routes for access to water, grazing land and trails. Wildlife relocation may be required where the disruption is pronounced and/or prolonged to the degree they are endangered.
- e. There will be temporary loss of vegetation from the construction area and permanent loss from some of the operating area and permanent access roads and parking lots.
- f. Re-vegetation and re-forestation of disturbed lands should be required where feasible including periodic application of water and nutrients during the first three years to facilitate growth. If vegetation and trees are not watered and given nutrients for the first few years, they will most likely die. Virginia native trees, plants and seeds should be used to increase the survival rate.
- g. Restoring of compacted soil should be required prior to application of top soil, grass seed, planting of vegetation and or trees.
- h. Top soil conservation and reapplication should be utilized wherever possible.

### **IV. Cultural resources**

- a. A survey of culturally significant resources in the path of the pipeline construction area and appropriate measures should be taken to preserve these resources before construction begins. Likewise, if unknown cultural resources are discovered during construction, appropriate mitigation measures should be taken to preserve these resources.
- b. Appalachian Power Company should be contacted with regard to their knowledge of any cultural resources within the SML Project. They were required to define these for their SML Project operation relicensing.

## V. Land use, recreation and visual resources

- a. Agriculture is a very important industry in Franklin County including the growing of crops, the grazing of dairy cows, and raising of beef cattle on both large commercial farm operations and small family farms. There will be a temporary loss of some agricultural land use during MVP construction. This loss of use of agricultural land should be minimized by prompt restoration of these lands to their former condition upon completion of pipeline construction. Farmers will have to move their grazing herds to other portions of a farm where construction is not under way. Cooperation with some farmers will be required to enable dairy cows access to the milking facilities when needed. This may include use of temporary crossway bridge decking and/or staggering construction schedules to complete one section before starting the adjacent section to enable herds to transgress the planned pipeline when needed.
- b. When clear cutting a construction path through forest land, every effort should be made to minimize the construction area to preserve the trees and wildlife habitat, and to minimize surface water runoff from the area. Additionally, every effort should be made to reduce the visual impact of the clear cutting where possible.
- c. Tunneling under all waterways, the Blue Ridge Parkway and other significant roads should be required so that the flow of water and traffic is not disrupted. For example, no housing development, emergency vehicle, farm, business, school or hospital should be without access.
- d. Likewise, appropriate setbacks for construction right-of-way boundaries should be used to enable continued short- and long-term use of homes, businesses, and other buildings near the construction pathway.
- e. The pipeline as currently planned will, at its closest point, pass one mile from the Smith Mountain Lake (SML), south of the intersection of highways VA Route 40 and 834. The direct impact upon the SML should be minimal from both an environmental and visual perspective. The risk to SML is from water contamination by runoff of sedimentation and contaminants into the rivers and smaller streams that flow into the SML Project as previously discussed in section II Water resources and wetlands.
- f. Recreation at SML should minimally impacted from the pipeline construction and operation. Tourists may have to take an alternate route to access SML. The risk may come from negative media reporting and “hype” causing tourists to stay away from the area.

## VI. Socioeconomics

- a. Franklin County currently has no access to natural gas. The MVP officials have told the County Supervisors that a distribution company would be permitted to tap into the pipeline. Roanoke Gas has offered to be the distribution company. This enables the county to supply existing businesses with natural gas and to compete for large manufacturing companies to locate to the county.
- b. FTI consulting has estimated that ongoing operation of the pipeline would support a total of 34 jobs across the state with average annual wages and benefits of almost \$67,000.

- c. The MVP project could generate up to \$1.9 million in annual county *ad valorem* taxes (property taxes) once in service, per FTI consulting.
- d. Local labor and other resources could be utilized during the construction as a direct benefit. Secondly, the support businesses in the food and hospitality industries can benefit.
- e. As stated in V f. above, recreation at SML should have minimal impact from the pipeline construction and operation. The risk may come from negative media reporting “hype,” causing tourists to stay away from the area.
- f. In response to any media negative reporting, the SML Chamber of Commerce, SMLA, realtors and the hospitality industry will need to increase their SML advertising and promotional spending for a couple of years to try to counteract any impact from negative reporting regarding the pipeline.

## **VII. Air quality and noise**

- a. There will be noise from the construction equipment; air quality will decline from exhaust fumes and the dust created by pipeline construction. This should be temporary.
- b. There are no compressor stations planned for the SML project area. The only post-construction noise should be from the vehicles used periodically during routine pipeline operations.
- c. With the incorporation of frequent shutoff valves in the pipeline and use of the latest leak-detection technology and equipment, any leaks of natural gas should be temporary and minor. The impact on air quality should be minimal, if these valves function properly. Prompt leak repair response from the MVP operator must also be required.
- d. The air quality and noise impact of periodic operational vehicles required for mowing or inspection of the pipeline should be minimal.

## **VIII. Cumulative impacts**

- a. The impact of construction of MVP on the SML Project waters including rivers, streams and the lakes should be minimal, temporary and recover quickly, if adequate measures to control runoff and to handle any contamination are utilized.
- b. There should be little to no impact to the SML Project view-shed as the pipeline is buried underground. There will be long-term view-shed damage from the cutting of large hardwood trees within the pipeline construction path which will take 20 years or more to grow back to significant size. There will be no large trees growing within the narrower operational right-of-way or the permanent roads and parking areas.
- c. Any adverse media reporting during construction and longer-term negative reporting of any impact should be countered by the increased advertising and positive impact articles from the stakeholder organizations. There should be no lasting impact on tourism or other business.
- d. The negative impact on air quality is temporary as is construction noise.
- e. The rerouting of any traffic is temporary.
- f. The economic benefits to Franklin County from the access to natural gas from the MVP is a positive and cumulative benefit.

- g. The negative impact on wildlife should be temporary, if managed properly.
- h. Geology and soil should have minimal long-term cumulative impact, if any, from MVP.
- i. The cumulative impact on cultural resources is unknown and requires further study.
- j. No alternatives were addressed in this document, as none are anticipated in the plan for Franklin or Pittsylvania Counties.

## **IX. Public safety**

- a. The biggest concern is the potential for a major gas leak and explosion, however remote a possibility. This concern requires added training of local Fire, EMS, Public Safety and Hospital personnel. Communication protocol between these organizations and MVP operators and safety personnel needs to be created, documented and understood.
- b. Potentially, additional equipment may be required for some of these local Fire, EMS and Public Safety and Hospital organizations.
- c. MVP must be required to use the best construction materials, welding, coating, testing technologies and pipeline construction methods combined with rigid and the most up-to-date inspection standards and inspection technology to minimize the possibility of an explosion and fire incident.