

May 3rd, 2023

Jennifer Granholm  
Secretary, U.S. Department of Energy  
1000 Independence Ave., SW  
Washington, DC 20585

Dear Secretary Granholm,

We are incredibly disappointed with your recent actions to promote the destructive and unneeded Mountain Valley Pipeline (MVP).

Your letter, submitted to Federal Energy Regulatory Commissioners (FERC) on April 21, 2023, unnecessarily inserted the Department of Energy into FERC's purview over a project that has no place in our clean, renewable energy future, and is explicitly incompatible with your administration's climate and environmental justice directives<sup>1</sup>. You also sent this letter on the very same day as the supposed commitment to environmental justice highlighted in the administration's executive order on "Revitalizing our Nation's Commitment to Environmental Justice for All." Your letter to FERC reinforces, with no evidence, the myth that the MVP would bolster national security and snubs frontline communities calling for a just transition off of fossil fuels. President Biden got his job by campaigning on climate, but the recent approvals of the Willow Project, Alaska LNG and this endorsement of the Mountain Valley Pipeline are hypocritical betrayals.

With no business on the pipeline pending before FERC, your endorsement letter is an unprecedented step. Your misguided action attempts to place an erroneous thumb on the scale in support of MVP and betrays the environmental justice communities along the path of the pipeline. The MVP threatens the wellbeing of people, endangered species, streams, rivers, farms, national forests, and the planet.

For communities who are on the frontlines of this project, these decisions have real-world consequences such as impacts to livelihoods, drinking water sources, property values and important cultural resources. Many of the counties traversed by the pipeline are home to low-income, elderly and medically underserved populations, many of whom depend on private wells.<sup>2</sup>

Routed through the traditional homelands of the federally-recognized Monacan Indian Nation, and Occaneechi, Saponi and Tutelo tribes, construction of the MVP has already damaged important cultural sites. This includes a burial mound near Roanoke, Virginia that dates back at least several

---

<sup>1</sup><https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>

<sup>2</sup> Federal Energy Regulatory Commission, Final Environmental Impact Statement, 4-374 (June 2017).

thousand years.<sup>3</sup> Additionally, the MVP and the proposed Southgate extension follow the Native American Great Trading Path through 73 miles of Virginia and North Carolina, and tribal representatives remain concerned the pipelines could desecrate sacred sites.<sup>4</sup>

Contrary to MVP's claims, the pipeline is currently only 55.8% complete to full restoration - a number pulled from MVP's own records.<sup>5</sup> With 429 incredibly complex and fragile water crossings yet to be completed, and much of the steepest, most dangerous terrain, as well as continued destruction of the public Jefferson National Forest remaining, the project cannot be completed quickly. And, construction to date has resulted in over 500 violations of permit conditions, state environmental laws and regulations. Simply put, the project cannot be built safely and in compliance with existing environmental laws. The project's delays are the result of an inability to follow existing environmental laws.

***This project is not inevitable, and is completely counter to the overwhelming evidence that we must stop creating new fossil fuel infrastructure immediately.***

Almost 75% of the project's route slices through "moderately high" or "high" landslide risk terrain, the highest total percentage for any pipeline of its diameter.<sup>6</sup> Slope failure and landslides have already caused slippage and movement of the pipe across West Virginia and Virginia, and raise concerns about future explosions.<sup>7</sup> Part of the route passes through the Giles County, VA, seismic zone where an earthquake registering 2.8 magnitude occurred as recently as July 2021.<sup>8</sup> Destruction of karst formations during construction of the MVP thus far has led to water pollution, sedimentation and flood events on historic farms by irreparably damaging cave structures where water ordinarily flows underground.<sup>9</sup> In addition, sections of pipe for the project have been sitting aboveground for years, which compromises the epoxy coating on the pipe and could lead to cracking and other pipe failures.<sup>10</sup>

---

<sup>3</sup> "Petition For Rehearing and Immediate Stay of the order of The Rosebud Sioux Tribe, The Cheyenne River Sioux Tribe, The Blue Ridge Environmental Defense League, and Affected Individual Landowners." eLibrary 17 U.S. Federal Energy Regulatory Commission.

[https://elibrary.ferc.gov/eLibrary/filelist?document\\_id=14666892&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?document_id=14666892&optimized=false)

<sup>4</sup> Armao, Marc. "North Carolina tribes fear pipeline will damage waterways, burial grounds." Grist. 15 October 2021. <https://grist.org/article/mountain-valley-pipeline-and-indigenous-land/>

<sup>5</sup> Mountain Valley Pipeline, LLC submits Monthly Status Report for the period January 1-31, 2023 under CP16-10, 27 February 2023. Appendix A: Construction Status. eLibrary U.S. Federal Energy Regulatory Commission. [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20230227-5254&optimized=false](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20230227-5254&optimized=false)

<sup>6</sup> U.S. Federal Energy Regulatory Commission. U.S. Final Environmental Impact Statement, Table 4.1.1-10. June 2017. [https://www.ferc.gov/sites/default/files/2020-05/Final-Environmental-Impact-Statement\\_1.16.pdf](https://www.ferc.gov/sites/default/files/2020-05/Final-Environmental-Impact-Statement_1.16.pdf).

<sup>7</sup> <https://jonsokolow.medium.com/photos-of-insanity-active-landslide-threatens-lives-along-route-of-mountain-valley-pipeline-12a1f487da59>

<sup>8</sup> [https://www.bdtonline.com/news/giles-county-slightly-rattled-by-2-8-earthquake/article\\_ea3da290-e590-11eb-b2db-e7206408bf9d.html](https://www.bdtonline.com/news/giles-county-slightly-rattled-by-2-8-earthquake/article_ea3da290-e590-11eb-b2db-e7206408bf9d.html)

<sup>9</sup> <https://appvoices.org/reports/mvp-report/>

<sup>10</sup> <https://insideclimatenews.org/news/07102022/mountain-valley-pipeline-manchin-schumer/>

Asking the commission to proceed “expeditiously” with any further action on the project and misstating the project’s relation to “national security” while providing no evidence undermines the administration’s commitment to advancing environmental justice. An economy tied to fossil fuels during a climate crisis is unpredictable and makes us vulnerable to foreign governments and the greed of corporate CEOs. This country’s energy independence can only come from a swift and just renewable energy transition. This will help protect us from foreign supply chain disruptions and conflicts, as well as deliver lower costs to consumers. The MVP will not assist our allies in Europe, and nor is it needed in the Southeast as you claim.<sup>11</sup> No matter where MVP’s gas is intended to be delivered, sacrificing communities to free up gas to export overseas for corporate profit is not “national security”.<sup>12</sup> Building this project prolongs fracked gas buildout, accelerates LNG infrastructure buildout and export, and sacrifices communities, all of which are counter to the just future we deserve.

Your letter contains open appeals for dangerous distractions that will prop up the fossil fuel industry for decades to come. The dangerous distractions of carbon capture and hydrogen propagate the untrue belief that we can continue wholesale destruction of the earth, continue creating sacrifice zones, release millions of tons of greenhouse gasses from fossil fuel projects and continue massive corporate capture of regulatory agencies while embarking on a just transition off of fossil fuels. Instead, you should be supporting environmental justice as the bedrock of every new policy and piece of infrastructure, advocating for climate reparations,<sup>13</sup> and aggressively promoting distributed, decentralized renewable energy and energy democracy. We cannot have it both ways.

While claiming “the Department takes no position” on agency actions or pending litigation, your letter mistakenly suggests the project would enhance energy reliability, in direct conflict with the National Renewable Energy Laboratory’s 2022 analysis, “Examining Supply-Side Options to Achieve 100% Clean Electricity by 2035” which shows that we can have a reliable grid with 100% renewable energy.<sup>14</sup><sup>15</sup> There is no documented need for gas to be transported by the pipeline,<sup>16</sup><sup>17</sup> and FERC has notoriously considered only a handful of industry self-dealing factors to prove supposed ‘need’ for the project.<sup>18</sup>

Your letter also ignores the forecasted decline in the use of methane gas, and the related decline in the need for methane gas infrastructure. Furthermore, your letter states that MVP is part of the clean energy transition. In reality, MVP would exacerbate the very climate crisis that is causing an increasing number of extreme weather events. Experts estimate annual greenhouse gas emissions from the MVP’s lifecycle would be comparable to the operation of 26 to 37 new coal-fired power

---

<sup>11</sup><https://priceofoil.org/2022/09/08/manchin-wrong-mvp/>

<sup>12</sup> <https://priceofoil.org/2022/09/08/manchin-wrong-mvp/>

<sup>13</sup> <https://rooseveltinstitute.org/publications/the-case-for-climate-reparations-in-the-united-states/>

<sup>14</sup> <https://www.nrel.gov/analysis/100-percent-clean-electricity-by-2035-study.html>

<sup>15</sup> <https://priceofoil.org/2022/09/08/manchin-wrong-mvp/>

<sup>16</sup> <https://www.nrdc.org/experts/amy-mall/5-key-reasons-stop-unneeded-mountain-valley-pipeline>

<sup>17</sup> [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_number=20210629-5242](https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20210629-5242)

<sup>18</sup><https://openyls.law.yale.edu/bitstream/handle/20.500.13051/18204/09.%20Klass%20Article%20Final.%200658-698.pdf?sequence=1&isAllowed=y>

plants.<sup>19</sup> Methane is the primary component of fracked gas. Methane is at least twenty-five times more warming than carbon dioxide.<sup>20</sup> In order to meaningfully account for the emissions it would cause, MVP would have to displace 25-35 coal plants in the Southeast.<sup>21</sup> This is highly unlikely and will not help lower greenhouse gas emissions.

To honor the administration's expressed commitment to environmental justice, please make a genuine commitment to supporting frontline communities, adhering to environmental justice directives and opposing new, harmful fossil fuel infrastructure. We request that you immediately rescind your letter of support for the project, and that you meet with directly impacted communities as soon as possible who live on the route of the project, so you can gain an increased understanding of the destruction and danger that you are promoting.

Sincerely,

Protect Our Water Heritage Rights (POWHR) and 7 Directions of Service

And the Undersigned

1. Action for the Climate Emergency
2. Alliance to Protect the People and Places We Live
3. Animals Are Sentient Beings
4. Appalachian Catholic Workers
5. Arm in Arm
6. ARTivism Virginia
7. Athens County's Future Action Network
8. Bethlehem Farm, Inc.
9. Beyond Extreme Energy
10. Blue Ridge Environmental Defense League
11. Breathe Project
12. California Faculty Association
13. Carrboro Solar Works, LLC
14. Cascadia Climate Action Now
15. CASE Citizens Alliance for a Sustainable Englewood
16. Catholic Committee of Appalachia
17. Center for Biological Diversity
18. Center for Cultural Evolution
19. Chatham Research Group
20. Chesapeake Climate Action Network
21. Clean Water for North Carolina
22. Cleveland Chapter Irish Northern Aid

---

<sup>19</sup> [https://priceofoil.org/content/uploads/2020/11/Mountain\\_Valley\\_Pipeline\\_Update\\_2020.pdf](https://priceofoil.org/content/uploads/2020/11/Mountain_Valley_Pipeline_Update_2020.pdf)

<sup>20</sup> <https://www.epa.gov/gmi/importance-methane>

<sup>21</sup> <https://priceofoil.org/2022/09/08/manchin-wrong-mvp/>

23. Climate Families NYC
24. Climate Hawks Vote
25. Color Brighton Green
26. Common Cause
27. Concerned Citizens of Northampton County
28. Cosmic Poetry Sanctuary
29. Creation Collaborative
30. Cumberland - Harpath Audubon
31. DAMASCUS Citizens for Sustainability
32. Dayenu: A Jewish Call to Climate Action
33. Don't Waste Arizona
34. Earth Ethics, Inc.
35. Earth Ministry
36. Earthworks
37. Eight Rivers Council
38. Endangered Species Coalition
39. équiterre
40. Erin O'Dowd Music
41. Extinction Rebellion Peace
42. Extinction Rebellion San Francisco Bay Area
43. Extinction Rebellion Western Massachusetts
44. Friends of the Earth U.S.
45. Food & Water Watch
46. Forest Recovery Project
47. Fox Valley Citizens for Peace & Justice
48. Franklin County Continuing the Political Revolution Climate Task Force
49. Fridays for Future Orange County
50. Friends of Buckingham
51. Gen-Z for Change
52. Greece Baptist Church Sustainability Team
53. Green New Deal Virginia
54. Greenbrier River Watershed Association, Incorporated
55. GreenFaith
56. Haw River Assembly
57. Healthy Ocean Coalition
58. Honor the Earth
59. Indian Creek Watershed Association, Inc.
60. Indigenous Environmental Network
61. Indivisible Northampton - Swing Left Western Massachusetts
62. Institute for Policy Studies Climate Policy Program
63. Laguna Beach Democratic Club
64. Linnton Neighborhood Association; Portland, Oregon
65. Local Clean Energy Alliance

66. Long Island Progressive Coalition
67. Michigan Environmental Justice Coalition
68. Mothers Out Front Roanoke
69. Movement Rights
70. National Domestic Workers Alliance
71. NC WARN
72. New York Lawyers for the Public Interest
73. Nicaragua Center for Community Action
74. North Carolina Climate Justice Collective
75. North Carolina Third Act
76. Nuclear Information and Resource Service
77. New York Progressive Action Network, Southern Finger Lakes Chapter
78. Occupy Bergen County
79. Ocean Conservation Research
80. Oil Change International
81. Orange County for Climate Action
82. PeaceWorks Brunswick Maine
83. Pennsylvania Interfaith Power & Light
84. Pine Creek Gardens
85. Port Arthur Community Action Network (PACAN)
86. Preserve Bent Mountain, a Chapter of the Blue Ridge Environmental Defense League (BREDL)
87. Preserve Craig, Inc.
88. Preserve Giles County
89. Preserve Monroe
90. Preserve Montgomery County VA
91. Preserve Salem
92. Property Rights and Pipeline Center
93. Resist the Pipeline
94. Rise Up West Virginia
95. Roanoke Group of the Virginia Chapter, Sierra Club
96. Rogue Climate
97. Save Monroe
98. Seven Circles Foundation
99. Shell River Alliance
100. Sierra Club, Virginia Chapter, New River Valley Group
101. SoCal 350 Climate Action
102. South Asian Fund For Education Scholarship and Training Inc
103. Stand.earth
104. Summers County Residents Against the Pipeline
105. Tank the Tanks
106. Taproot Earth
107. Terra Advocati

108. The Border Conservancy
109. The Enviro Show
110. The Friends of the Narrows of Hans Creek
111. The People's Justice Council
112. The Quantum Institute
113. The Rama Tree
114. The Shalom Center
115. Therapists gif Peace and Justice
116. Third Act Ohio
117. Third Act Richmond Virginia
118. Third Act Virginia
119. Turtle Island Restoration Network
120. Unitarian Universalist Church West
121. Unitarian Universalists for Social Justice
122. Unite North Metro Denver
123. Virginia Citizens Consumer Council
124. Virginia Interfaith Power & Light
125. Washington Interfaith Power & Light
126. Washington Physicians for Social Responsibility
127. Waterspirit
128. WE ACT for Environmental Justice
129. Western New York Youth Climate Council
130. Wild Virginia
131. Women's Earth and Climate Action Network (WECAN)
132. Women's International League for Peace and Freedom of the Triangle
133. Zero Hour
134. 1000 Grandmothers for Future Generations
135. 198 methods
136. 350 Bay Area
137. 350 Bay Area Action
138. 350 Conejo / San Fernando Valley
139. 350 Mass
140. 350 Montgomery County
141. 350 Silicon Valley
142. 350 Tacoma
143. 350 Triangle
144. 350 Wisconsin
145. 350.org
146. 350 Brooklyn
147. 350 EUGENE
148. 350 Hawaii
149. 350 PDX