

To: Dr. Homer Wilkes, Under Secretary, U.S. Department of Agriculture. George Washington and Jefferson National Forests

From: Carolyn Buckner, P.E., Chapel Hill, North Carolina.

Dear Dr. Wilkes:

On December 23, 2022, the U.S. Forest Service issued a revised Mountain Valley Pipeline and Equitrans Expansion Draft Supplemental Environmental Impact Statement that proposes new construction guidelines that allow the fracked gas Mountain Valley Pipeline to be built within the Jefferson National Forest. I am writing to ask you and the Forest Service to protect the Jefferson National Forest and select the Alternative (1) No for "No Action" alternative. The Mountain Valley Pipeline is inconsistent with the Forest Plan, and I urge you to reject the proposed amendments and exceptions to 11 crucial standards meant to protect our public lands and waters.

Allowing the Forest Service to break 11 of its own rules to accommodate Mountain Valley Pipeline, LLC, sets an alarming precedent for similar rule-breaking on national forests across the country. These exceptions run counter to the Forest Service's mandate to "sustain healthy, diverse and productive forests and grasslands for present and future generations."

The applicant for this project has a documented history of inadequate sediment and erosion control practices during construction, leading to more than 500 violations of permit conditions and environmental standards in Virginia and West Virginia. As a Professional Engineer who has worked in watershed management, stormwater management, and stream restoration this greatly concerns me. Sediment is the top pollutant of concern for most of the southeast, smothering the benthic life that supports aquatic food chains and interfering with natural stream processes. Based on my experience, new construction will cause serious adverse impacts to riparian zones as well, which serve a vital role as buffers for waters from sedimentation and other pollutants within the Jefferson National Forest.

According to studies, natural gas pipelines in the U.S. experience an average of one leak every 40 hours (Udasin, 2022). As someone who has witnessed and filed regulatory reports for a gas spill that made its way to a local stream, I can say these leaks are catastrophic to aquatic environments.

The SEIS continues to minimize the severity of impacts on scenic viewsheds and vulnerable forest ecosystems. The loss of old-growth forest, which plays a crucial role creating topsoil and reducing impacts of climate change, cannot be mitigated and would impair biodiversity and climate goals.

The alleged need for the Mountain Valley Pipeline is speculative and unproven, given existing supply alternatives and consumer demand and market shifts towards non-fossil alternatives. It is inaccurate for the agency to equate the damage done to treasured national forest land with "economic benefit." This does not take into account the true cost of the project in terms of irreversible negative impacts to our lands and waters, climate, and local communities.

Please protect the Jefferson National Forest and select Alternative (1) No for "No Action," and reject the 11 proposed amendments to prevent unnecessary damage to Jefferson National Forest. Thank you.

Reference: Udasin, S. (2022, June 23). U.S. gas pipeline leaks occur every 40 hours: Report. *The Hill*. <https://thehill.com/policy/equilibrium-sustainability/3533849-us-gas-pipeline-leaks-occur-every-40-hours-report/#:~:text=U.S.%20natural%20gas%20pipelines%20are,a%20new%20report%20has%20found>