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First name: Elle

Last name: De La Cancela

Organization: Chesapeake Climate Action Network

Title: Campaign Coordinator

Comments: On behalf of the Chesapeake Climate Action Network (CCAN) and our undersigned members, We would like to express our support for Alternative 1 - No Action for the Supplemental Environmental Impact Statement for the Mountain Valley Pipeline (MVP). The MVP has not shown significant enough changes in the Supplemental Impact Statement (SEIS) to warrant amending Forest Plan Standards. This permit has been proposed and vacated twice in the past four years by the Fourth Circuit Court of Appeal. In the first attempt in 2018, the court found that the Forest Service failed to comply with major federal regulations including the National Environmental Protection Act, the National Forest Management Act and the Mineral Leasing Act. In the most recent opinion from January 2021, the court outlined a need to reconcile the real-world data from the United States Geological Survey (USGS) downstream data and the modeling, a need to properly evaluate the environmental impacts of utilizing a conventional boring method on the four stream crossings, and a need to reconcile the amended Forest Plan with the 2012 Planning Rule. The feedback from the Fourth Circuit has not been properly addressed in this revised SEIS, and even still, the Forest Service should consider expanding its SEIS to address factors not specified by the court for a holistic understanding of the impact of the MVP. Firstly, while the Forest Service now takes into account the USGS data, it does not provide an accurate depiction of the breadth of impact. The draft SEIS does not provide the public with all of the necessary intermediary analyses and modeling to make an informed assessment on the Forest Service's conclusions. Even if the modeling methodology was altered, there is still no guarantee that it reflects real-world data (Wild VA et. v USDA). It is still unclear whether additional control measures can prevent the major violations of erosion and sediment standards that MVP has committed in the past, which lead to over 300 violations of water quality standards. Secondly, while the Forest Service now is accounting for the change in the boring method, boring will still have a drastic impact on the wildlife and ecosystems reliant on the water bodies. The draft SEIS lacks information on how to prevent hazardous spills into groundwater should they occur. Lastly, the Forest Service still has not proven that the amendments to the Forest Plan maintain or restore the resources at the project site and elsewhere in the forest, which is the letter of the mission according to the 2012 Planning Rule. It is vital to consider all of the effects that amending these eleven Forest Management Standards will have on the entirety of Jefferson National Forest. As shown by the USGS turbidity rating fifteen miles downstream, the MVP can have impact far beyond the bounds of construction. This draft SEIS does not even consider the threat that this project poses in exacerbating climate change, which will have dire impacts for the resources within the Jefferson National Forest.

CCAN and its undersigned members request that the Forest Service take no action on the amendments of the Forest Plan Standards to allow a destructive body through our public lands. We urge you to not provide concurrence to the Bureau of Land Management if they choose to grant a Right of Way.