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Title:

Comments: I implore you to redeem the moral record of the Forest Service toward our Appalachian Mountains and our climate by rejecting the request to amend the forest plans of the George Washington and Jefferson National Forests to accommodate the 'Mountain Valley Pipeline,' a project that patently and brazenly contradicts the purpose of the National Forests, and the objectives of the existing GW&J Forest Plans in particular. The MVP has already inflicted atrocious damage across a wide swath of forests, streams, and farmland. If construction is completed, MVP will help to lock America into a generation of methane consumption, and raw methane leaks into our atmosphere, that our rapidly deteriorating climate cannot survive.

Fragile and irreplaceable ecosystems, including some of the finest remaining forests in America, lie squarely in the crosshairs of the pipeline. It defies belief that the staff of either MVP or the Forest Service has become so numbed to this cosmic expression of life and beauty, that they would condone its destruction for a giant metal conduit. This pipeline, if allowed to continue construction, will be remembered with hatred and contempt by our children, as will the FERC staff who permitted such a heinously immoral arson of Earth's biological gems. The pipeline will stand as tangible testament to the modern repetition of our sad errors of exploitation, to the historical lessons that the Forest Service has failed to learn, and to this administration's fanatical obsession with pipelines which respects nothing else as valuable or sacred.

The pipeline's breach of the George Washington and Jefferson National Forests is an egregious violation of the public trust placed in our government to protect and steward a national treasure, acquired at great effort and expense by a prior generation. The visionaries who assembled and consecrated the GW&J National Forests for future generations did so with the insight that a future cohort of industrialists might covet the land for a myopic project like a pipeline, and hoped that the National Forest status might preclude exactly such a project as this. The project applicant has not shown that the use of National Forest lands is an absolute necessity for the pipeline to exist, rather than a cost-saving convenience. The Forest Service already has a policy that mere financial efficiency is not sufficient reason for a consumptive, irreversible loss of National Forest lands and resources. Granting a right-of-way for the 'Mountain Valley' pipeline absent such a showing of necessity by the applicant violates Forest Service policy and makes your agency a mere land bank for private developers, not a land manager in the public interest.

Further moral travesty is manifest in the utter lack of physical need for the Mountain Valley Pipeline. Vast margins of waste and inefficiency remain in the use of methane gas, both for heating and in the use of electricity generated by gas-fired plants. So long as this remains true, and as long as the Mid-Atlantic States continue their promising increase in the production of photovoltaic solar and wind electricity, the Mountain Valley Pipeline, with mathematical certainty, cannot be a preferred alternative for meeting any purpose and need regarding energy.

The frenetic expansion of gas infrastructure is deliciously appealing to the future revenues of pipeline companies and electrical companies who can reclaim any capital cost from ratepayers, but they are contrary to the interests of the general public, both among the prospective consumers of the gas, and all Americans with an interest in a habitable climate. By approving these pipelines, the Forest Service acts as a slavish handmaiden to these for-profit interests, and disavows any pretense of acting as a public regulatory agency. By collaborating with MVP and Federal Energy Regulatory Commission's compulsory confiscation of private property, the Forest Service becomes an agent of corporate authoritarianism, and solidifies the alliance of state and corporate power known to political scientists as fascism.

MVP construction to date has already been an ecological catastrophe, with massive destruction of forests and suffocation of streams. Contrary to the euphemistic and Orwellian language of the environmental documentation,

these impacts cannot and will not ever be 'mitigated.' They represent the permanent disassembly of the Earth's life support systems, and the systematic peeling of Earth's biosphere from its surface. This is a moral atrocity that requires an extraordinary level of depravity to propose or license. The value of this ecosystem, both in sustaining a planet habitable to humans, and in fulfilling the right to exist of its resident biodiversity, dwarfs the petty rewards sought by pipeline and electrical companies.

Even the feeble, token requirements of erosion control in the MVP construction permit have been repeatedly violated, with no material consequences for the pipeline operator that might get a company official's attention. Heavy machinery has crushed, excavated, and shredded soils that required decades or centuries to form, including in fragile wetland and riparian habitats left as mud pits. MVP contractors have treated the erosion control requirements as a joke, and are invited to do so by the absolute, unchecked latitude of the 'when practicable' clauses that litter the permit conditions. We may safely predict that MVP will continue cutting the Appalachian landscape to shards, in the interest of construction schedules and cost control, if allowed this torturous, reworked permit by the Forest Service.

Again, I implore you to redeem the legacy of the Forest Service, and mend your gross moral error regarding the Mountain Valley Pipeline, by declining to nullify your Forest Plans, as is plainly a prerequisite for this outrageous pipeline to proceed. The original permits for MVP constituted an act of gross vandalism against the crown jewel of biodiversity of America, and gross violence against our children's prospects for surviving in a habitable climate. Our descendants in future Appalachia will look either upon a hideous metal scar gnawing through a denuded landscape, or a proudly low-carbon energy system. To reissue this permit would indicate that you have learned nothing, and would extend a suicide pact to which our children and our fellow creatures have not consented.