



# Preserve Craig ~ Sustaining the Quality of Life We Value

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February 21, 2023

Dr. Homer Wilkes, Under Secretary U.S. Department of Agriculture  
c/o Jefferson National Forest  
MVP Project  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Submitted via Internet Website:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=50036>

RE: Mountain Valley Pipeline and Equitrans Expansion Project  
Draft Supplemental EIS December 2022

Dear Mr. Wilkes:

Please find the attached report by Nan Gray, Licensed Professional Soil Scientist. We urge you to consider in the subject decision Ms. Gray's opinion about the post-construction soil condition and its capacity to restore the forest and riparian ecosystems disturbed by the construction of the Mountain Valley Pipeline.

The analysis in the December 2022 Draft Supplemental Environmental Impact Statement (DSEIS) for the Mountain Valley Pipeline (MVP) assumes that various grass seed and transplanted saplings will "restore" the pipeline construction corridor. But the Forest Service has not recognized that what was once a productive forest soil will be a mix of eroded construction soil and therefore has unrealistic expectations about restoration.

Restoration of the disturbed ecosystems is not only required by the National Forest Planning Rules it is of vital importance to Preserve Craig and our community's Cultural Attachment to our landscape. The Forest Service treatment of Cultural Attachment in the prior decision-making processes has been a disservice to our community. And so is the assumption that transplanting trees and sowing grass seed will restore the forest and riparian ecosystems in the pipeline corridor.

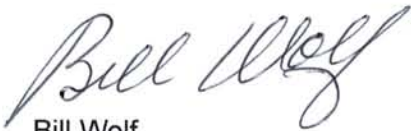
Even though the plans include fertilizer application, the proposed fertilizer application is excessive by agricultural production standards and we are concerned that fertilizer will runoff the corridor and accumulate downslope or even be washed into surface waters. The Forest Service also acknowledges that the saplings will need water to survive the transplant process, but there are no plans to water the saplings and by construction-design, the slopes will be dewatered, meaning that the natural hydrologic process that would help saplings survive will be directed away from the corridor. The Forest Service has not taken a hard look at the post-construction soil conditions in its assumption that the corridor will be restored to anything that resembles the pre-existing forest ecosystem.

***Preserve Craig, Inc. is a 501(c)(3) nonprofit corporation formed in 1991 using volunteers and donations to protect our natural, historical, and cultural resources. Tax Identification Number: 54-1597979***

We believe that the best indicator of the restoration capacity of the post construction soils is the condition of the Columbia gas pipeline corridor that crosses Peter's Mountain through the Jefferson National Forest, which line serves the Celco manufacturing plant in Giles County. Oddly, the Forest Service compares the post-construction soil conditions of the MVP corridor to that of logging operations instead of the condition on the Columbia pipeline right of way. Our members regularly observe the condition which appears barren. Soil amendments may have aided some grass growth after the Columbia line was constructed in 2014, but the subsided and rocky corridor is nothing but an ugly scar on our landscape at this point.

We ask you to choose the No Action Alternative.

Respectfully,



Bill Wolf  
President  
Preserve Craig, Inc.

Attachment: Soil Productivity Assessment of the Mountain Valley Pipeline Corridor on the Jefferson National Forest by Nan Gray, Licensed Professional Soil Scientist, February 16, 2023, with references