

Data Submitted (UTC 11): 1/28/2023 5:00:00 AM

First name: Ed

Last name: Griffith

Organization: New Progressive Alliance

Title: Liaison Officer

Comments: To: The Honorable Dr. Homer Wilkes

Under Secretary, U.S. Department of Agriculture. George Washington & Jefferson National Forests

Subj: Mountain Valley Pipeline and Equitrans Expansion Project Supplemental EIS #50036

From: New Progressive Alliance

Dear Dr. Wilkes:

The New Progressive Alliance opposes amendments to 11 crucial standards that are essential for protecting the Jefferson National Forest. We urge you to select Alternative (1) "No Action" and reject the proposed 11 changes for two reasons.

The first reason is Mountain Valley Pipeline are not entitled to environmental destruction just to expand fossil fuel infrastructure.

-Mountain Valley Pipeline do not provide sufficient assessment, monitoring, modeling, nor real-world analyses to support changes to the Forest Plan.

- The proposed changes serve as conveniences for the developer of one fossil fuel project to the detriment of lands held in the public trust.

-Mountain Valley Pipeline has a long history of improper and inadequate sediment and erosion control practices during construction resulting in more than 500 violations of permit conditions and environmental standards in Virginia and West Virginia.

-There is no need for the Mountain Valley Pipeline. To equate the damage done to treasured national forest land with "economic benefit" is a false equivalency.

-Look at the big picture. Pipelines worldwide leak and cause damage. There is an ever increasing use of renewable energy. Together these two trends suggest a denial of the proposed changes.

The second reason is damage to the Jefferson National Forest. Remember, the Forest Service's mandate to "sustain healthy, diverse and productive forests and grasslands for present and future generations."

- It is reasonable to expect that new construction would cause additional adverse impacts to riparian zones, which serve an important role as buffers for waterways from sedimentation.

- The lowering or eliminating standards for soil health, old-growth forest, forest edge, and species competition will harm the Jefferson National Forest.
- The loss of old-growth forest, which plays a crucial role creating topsoil, simply cannot be mitigated.
- Allowing the Forest Service to break 11 of its own rules to accommodate Mountain Valley Pipeline sets a bad precedent for similar rule-breaking on national forests across the country.

For these reasons please reject the 11 proposed amendments to prevent unnecessary damage to Jefferson National Forest.

Sincerely,

Ed Griffith

New Progressive Alliance