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George Washington & Jefferson National Forests

MVP Project

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Roanoke, VA 24019

Subject: Reject the 11 proposed amendments and protect Jefferson National Forest -- Mountain Valley Pipeline and Equitrans Expansion Project Supplemental EIS #50036

Dear Secretary of Agriculture Tom Vilsack, USDA Under Secretary Dr. Homer Wilkes, U.S. Forest Service Chief Randy Moore, and George Washington & Jefferson National Forests Supervisor Joby Timm,

I strongly oppose the Mountain Valley Pipeline and Equitrans Expansion Project, which is both incompatible with established land management standards and a dire threat to the region. The Draft Supplemental Environmental Impact Statement (Draft SEIS) for the project proposes amendments to 11 crucial standards that are essential for protecting the Jefferson National Forest. The company's newly submitted documents do not provide sufficient assessment, monitoring, modeling, nor real-world analyses to support changes to the Forest Plan. The U.S. Forest Service (USFS) should select the No Action alternative.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."

-- Theodore Roosevelt

Spread between Virginia, West Virginia and Kentucky, Jefferson National Forest provides millions of adventurers with incredible recreational experiences every year. Its hundreds of miles of trails and winding streams welcome plentiful hikers and kayakers. But the construction of the Mountain Valley Pipeline Project would spoil this treasured region for anyone visiting. The pipeline's construction would require clearing entire areas of the forest and digging a trench to let it run underground, which would contaminate soil, plants and streams.

The Mountain Valley Pipeline is a climate and ecological nightmare. The volume of gas that could flow through the Mountain Valley Pipeline each year would be equivalent to the climate emissions of 23 coal-fired power plants. Continued development of the Mountain Valley Pipeline would damage lands and waters in the Jefferson National Forest, causing harmful impacts for communities across Appalachia and wildlife alike. Federal courts have found that the USFS has not properly reviewed the application for the Mountain Valley Pipeline and vacated permits in the past. As the Forest Service reviews the Mountain Valley Pipeline's environmental impacts once again, it must consider the climate disruption it would cause to the Jefferson National Forest-including threats to water resources.

"As we peer into society's future, we-you and I, and our government-must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow."

-- Dwight D. Eisenhower

The applicant has a demonstrated history of improper and 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. 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 within the Jefferson National Forest.

The Jefferson National Forest itself was established to restore and protect water quality and water resources in the region-a major pipeline and its attendant construction is obviously not compatible with this purpose. The proposed changes to standards for soil health, old-growth forest, forest edge, species competition, and scenic viewshed standards would bring significant harmful impacts to the Jefferson National Forest. 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, cannot be mitigated and would impair biodiversity. The proposed changes serve as conveniences for the developer of one fossil fuel project, to the detriment of lands held in the public trust.

The Jefferson National Forest Land and Resource Management Plan prohibits a pipeline as currently written. Amending the forest plan would conflict with the USFS 2012 Forest Planning Rule's mandate "to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area."

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

Additionally, the alleged need for the Mountain Valley Pipeline is speculative and unproven, given existing supply alternatives and market shifts towards non-fossil alternatives. This pipeline's dirty gas is not critical to serve our energy needs. It is inaccurate for the agency to equate the damage done to treasured national forest land with "economic benefit."

I am also disappointed that frontline communities have been repeatedly ignored by those making decisions about the lands surrounding the communities.

"It is horrifying that we have to fight our own government to save the environment."

-- Ansel Adams

For the reasons stated above, I again urge the USFS to select Alternative (1) No for "No Action," and to reject the 11 proposed amendments to prevent unnecessary damage to Jefferson National Forest. Allowing the USFS 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." Pipelines should never be welcome in America's national forests.

Furthermore, the Bureau of Land Management should deny the right-of-way and temporary use permits that would allow the Mountain Valley Pipeline to cross the forest.

"The ultimate test of a moral society is the kind of world that it leaves to its children."

-- Dietrich Bonhoeffer

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA