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Comments: To: Dr. Homer Wilkes, Under Secretary, U.S. Department of Agriculture. George Washington & Jefferson National Forests

From: Stephen G. Sizemore

Dear Dr. Wilkes:

The Mountain Valley Pipeline and Equitrans Expansion Project Draft Supplemental Environmental Impact Statement 50036 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 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 proposed changes serve as conveniences for the developer of one fossil fuel project, to the detriment of lands held in the public trust.

Allowing the Forest Service 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."

I implore the U.S. Forest Service to select Alternative (1) "No Action" and reject the proposed 11 changes.

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 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.

Additionally, the alleged need for the Mountain Valley Pipeline is speculative and unproven, given existing supply alternatives and market shifts towards non-fossil alternatives. It is inaccurate for the agency to equate the damage done to treasured national forest land with "economic benefit."

For the reasons stated above, I again ask that the U.S. Forest Service select Alternative (1) No for "No Action," and reject the 11 proposed amendments to prevent unnecessary damage to Jefferson National Forest.