Data Submitted (UTC 11): 2/17/2023 8:51:54 PM First name: Basav Last name: Sen Organization: Institute for Policy Studies Title: Climate Policy Director Comments: I am writing to strongly urge you to select Alternative 1 - No Action on the Forest Plan Amendment that would be the basis for allowing the Mountain Valley Pipeline the right of way to cross 3.5 miles of the Jefferson National Forest.

The Mountain Valley Pipeline will create the following unacceptable risks:

1. Water quality: Pipeline construction poses serious risks to water quality in a sensitive ecosystem. Further, the 4th Circuit decision in Wild Virginia et. al. vs. USFS makes clear that, by relying on water quality modeling by MVP for the supplemental EIS, the USFS and BLM effectively ignored water quality monitoring data from the US Geological Survey which showed significantly higher sedimentation rates than what MVP modeling showed. The Court concluded:

"The Forest Service and the BLM erroneously failed to account for real-world data suggesting increased sedimentation along the Pipeline route. There is no evidence that the agencies reviewed the USGS water quality monitoring data from the Roanoke River, which may indicate a significant increase in sedimentation beyond that predicted in the modeling used for the supplemental EIS. At the very least, the supplemental EIS should have acknowledged this disparity and explained its impact on the agencies' reliance on the sedimentation data in the hydrological analyses."

2. Climate change impacts: The MVP will cause an additional 89 million metric tons of greenhouse gases annually in carbon-dioxide equivalent units. Approving a project with this magnitude of emissions is inconsistent with President Biden's stated goal of a 50-52% reduction in US GHG emissions from 2005 levels by 2030. Particularly, climate change impacts will have serious ecological consequences for forests in the Appalachian region (such as the Jefferson National Forest) that USFS is tasked with conserving, because of increased precipitation and growing insect pest populations.

3. Biodiversity impacts: Construction of the MVP will pose undue risks to the old growth forest ecosystem of the Jefferson National Forest, one of relatively few remaining old growth forests in the Eastern United States.

For all of these reasons, I strongly urge you to select Alternative 1 - No Action, and not make the 11 amendments that would be needed to the Forest Plan to make MVP consistent with the plan.

Sincerely, Basav Sen