Data Submitted (UTC 11): 2/20/2023 5:00:00 AM First name: Mark Last name: Blumenstein Organization:

Title:

Comments: I am writing to comment on Mountain Valley Pipeline's (MVP) Draft Supplemental Environmental Impact Statement (DSEIS). 1. The US Forest Service (USFS) should choose Alternative 1 - No Action. 2. The USFS should not allow MVP to cross the Appalachian Trail[mdash]officially the "Appalachian National Scenic Trail" (ANST)[mdash]at this location. Making an exception for MVP to cross the ANST in the Jefferson National Forest, especially at this scenic and unsafe location, sets a bad precedent for more of the same. No large pipeline has crossed the ANST on national forest land since the AT was designated as a National Scenic Trail in 1968. Allowing the MVP to cross the ANST, especially in such a high-profile location, degrades the ANST and threatens trails across the country. There are now 11 National Scenic Trails in the U.S. The MVP crossing is not in an out-of-the-way corner of the ANST. It is on top of Peters Mountain close to a prized scenic viewpoint. The original Appalachian Trail did not include this segment. In the 1940s, the Appalachian Trail was detoured nearly 200 miles to provide more scenic views and protection. The route brought hikers to sweeping views into West Virginia from the crest of Peters Mountain at Symms Gap, close to where MVP plans to bore under the AT.1 The MVP's wide, unnatural corridor undermines the JNF's Scenic Integrity Objectives. The MVP corridor can be seen by ANST hikers from multiple viewpoints approaching Peters Mountain on the Virginia side. Looking out into West Virginia from Symms Gap, the MVP corridor can be seen snaking north for at least 15 miles. This ANST crossing is in an ACTIVE EARTHQUAKE ZONE! MVP's entire route through the JNF lies in the Giles County Seismic Zone. Even though MVP plans to bore 90 ft under the ANST, pipeline safety is at risk on both sides. The steep slopes below the bore pits were identified by the Forest Service as High Hazard sites, with landslide risks one of the factors. In 2017, before FERC approved MVP for construction, two earthquakes were recorded within miles of the MVP route[mdash]including a magnitude 3.2 earthquake in Lindside, WV located about 4 miles from the ANST crossing. The blast zone for MVP's 42-inch pipeline is approximately 1,100 feet, but recent evidence suggests the impact radius is greater.2 Building a pipeline across this location is unsafe[mdash]for the environment, for the pipeline, and for anyone hiking across Peters Mountain. 3. The MVP crossing of the ANST may be abandoned! MVP will try to bore for 600 feet through hard ridge rock formations, with the bore channel located 90 feet below the AT. If the bore attempts fail, this crossing route may be abandoned. MVP says that it will not attempt to cross the AT by an open-cut method, but it has not provided any information about alternate plans if the bore attempts fail. MVP must provide its alternate plans and those plans must be part of the Forest Service's Draft Environmental Assessment open to review and comment by the public. With so much unknown, so much at risk, and MVP's record of violations and ineffective controls so far, let the Forest Service know: the NO ACTION ALTERNATIVE is the only responsible choice. 1 Roanoke Appalachian Trail Club letter to FERC, July 21, 2020, p. 2. 2 FERC FEIS, p. 4-561. In a 2022 report, the National Transportation Safety Board (NTSB) says the formula significantly underestimates the danger of gas pipeline explosions and called it "inconsistent" with evidence. The DSEIS has not provided assessment reports, monitoring reports, and other documents that support the conclusions in the DSEIS; therefore, the public cannot review the methodology to determine if DSEIS has any justification to support its conclusions. The analysis of the effectiveness of erosion control devices is severely flawed. The DSEIS claims that MVP's erosion controls are effective at controlling erosion, runoff, and sedimentation under normal conditions when properly installed and maintained. However, MVP has a proven track record of improperly installing and not maintaining erosion controls. West Virginia Department of Environmental Protection has cited MVP with over 250 instances where MVP failed to comply with the requirements of their stormwater construction permit resulting in over 50 violations of water quality standards. Aside from impacts to soil and water, we are in the midst of a climate crisis. The DEIS should analyze MVP's contribution to climate change; however, the DSEIS fails to consider the social cost of greenhouse gases when asserting that there are only beneficial effects from MVP. For these reasons, I request the United States Forest Service (USFS) choose the No Action Alternative. Construction of MVP has already proved to be highly impactful to land and water resources which is inconsistent with the Forest Plan; therefore, I urge USFS to refrain from making the 11 amendments the Jefferson National Forest Plan. Additionally, USFS should not provide

concurrence to the Bureau of Land Management (BLM) to accommodate the MVP with a right of way and temporary use permit to cross the Appalachian Trail, which would degrade the scenic nature of the trail.