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Organization:

Title:

Comments: U.S. Department of Agriculture

c/o Jefferson Nation Forest MVP Project

5162 Valleypointe Parkway

Roanoke, VA 24019

Re: Support for denial and cancelation of Mountain Valley Pipeline and Equitrans Expansion Project
Supplemental EIS #50036

Dear Under Secretary Wilkes:

I have lived in the New River Valley for over 45 years and dedicated my personal and professional life to the conservation of our renewable natural resources. As a research aquatic ecologist (recently retired) my areas of expertise include stream and aquatic community ecology. I also have conducted, summarized, and published the results of applied research on Forestry Best Management Practices for water quality and quantity. I am providing substantial formal comments in my capacity as a private citizen.

I stand in opposition to the issuance of further authorizations that would facilitate completion of the Mountain Valley Pipeline, a project that would negatively influence the quality of life in southwest Virginia region and Appalachia for decades to come. In addition to the direct impacts associated with the construction and maintenance of a 300+ corridor over several mountain ranges and across hundreds of waterbodies, the project is inconsistent with efforts to combat the existential crisis of our lifetime, Climate Change. Methane and its constituents - largely mined at great cost to precious surface and groundwater resources - are among the most potent greenhouse gases. The people of Appalachia should not be forced (via eminent domain) or coerced to support infrastructure that directly contributes to climate change, particularly in light of the fact that the bulk of the transported gas is intended for export. The people along the corridor will bear a grossly disproportionate share of both the indirect and direct costs of the project with little discernable benefit.

We have been provided a preview of what the Mountain Valley Pipeline, in its current uncompleted state, will look like if completed. It is beyond an eyesore and already has foreclosed opportunities for sustainable development in our region. This can - and should - be rectified through the prompt denial of authorizations and the full restoration of the project right-of-way.

Having followed the Mountain Valley project closely since its inception, it has been demonstrated that the Mountain Valley Pipeline cannot be constructed safely, responsibly, and in a manner that protects the property and rights of private landowners near the corridor and our collectively owned precious natural resources of water, soil, and flora and fauna.

I am familiar with the many reviews and analyses of the Mountain Valley's construction impact on the Jefferson National Forest. As competently crafted as these efforts have been, they are inadequate for at least two reasons. First, the original environmental assessment was inadequate and inappropriate, as very little actual sampling for either erosion and sediment transport or aquatic fauna was completed or even contemplated. Estimates for change in both physical and biological attributes resulting from deforestation and ground disturbance were largely derived from models, not on-the-ground sampling. In addition, the published and gray literature intended to bolster the analyses referenced activities (road construction and other utilities including pipelines) is not appropriate as most examples occurred on landscapes of lesser relief than that found on the route of the MVP, where hillslopes frequently exceed 100%.

Second, the analyses and assessments are of limited applicability and inadequate scope, particularly with regards to cumulative effects. While I understand that the analyses and subsequent review were by design confined to the 3+ miles that traverse the George Washington and Jefferson National Forests, this represents at most 1% of the total land appropriated and impacted by the MVP. Very little new information was included in the "New information and Changed Condition Assessment" (Aquatic Biological Resources, including Fisheries and Aquatic TES; September 29, 2022). A more accurate cumulative effects analysis would address the cumulative impact to soil, water, air, and flora and fauna along the entire corridor. There are no comparable analyses for the remaining 99% of impacted land and water. Decision makers and many of the general public will assume that these 'new' analyses will have adequately addressed the concerns that led to the denial and will be led to assume that the results apply to the pipeline corridor in its entirety.

I respectfully request that the U.S. Forest Service recommend denial of authorization for the completion of the Mountain Valley pipeline.