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Comments: To: United States Forest Service, Department of Agriculture

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From: Anita Puckett, Ph.D.

Blacksburg, Virginia

Re: Mountain Valley Pipeline (MVP) and Equitrans Expansion Project Draft Supplemental Environmental Impact Statement (DSEIS) #50036

Date: 21 February 2023

This comment letter supplements a January 25 letter submitted by Dr. Elizabeth Malbon in which she provided strong evidence for taking "no action" on Alternative 1 with respect to Mountain Valley Pipeline's (MVP's) DSEIS #50036. As she notes, the "Mountain Valley Pipeline is inconsistent with the Jefferson National Forest Plan and would require 11 changes to be made to re-issue a permit to the MVP." She then offers 11 well-argued general reasons as to why no change should occur (Malbon 25 January 2023). I agree with each of her points and find them comprehensive. I also agree with her five amendment-specific reasons for not changing the Forest Service Plan that would permit access by MVP. To augment her various points, I offer the following:

I was an associated professor in the Appalachian Studies Program at Virginia until 2021 when I retired. In the Spring semester of 2020, while still working, I designed the Program's senior seminar around the impact of the constructed portion of the MVP on the environment and pipeline-affected residents. Focus was on the North Fork Valley Rural Historic District (NFVRHD) located only a few miles from that portion of the Jefferson National Forest the MVP proposes to cross. Ecology, geography, and geology of the two areas are nearly identical; one known variation, however, is in the presence of the Roanoke Log Perch in the North Fork branch. However, other endangered species, such as the Candy Darter, are present in both locations. Consequently, what is happening in the North Fork with respect to relevant MVP environmental damage is an indicator of what is likely to happen in the Jefferson National Forest should the Forest Service implement Alternative 1.

Relevant Student Findings:

Methods of student research included landscape epidemiology, physical and human geography, forest ecology, and oral history interviews. Their focus was on researching disease and cultural attachment issues in a manner not captured by other ecological impact studies done by organizations such as the Sierra Club and Mountain Valley Watch or individuals such as Dr. Carl Zipper and Dr. Elizabeth Malbon.

*Students noted that, because of the width and extent of the clear-cut right of way, interviewees indicated that the invasive gypsy moth population is increasing, killing more deciduous native trees, thus restricting the reproduction of certain tree species such as oak, hemlock, poplar, and mountain laurel.

*Similarly, students indicated that interview data proposed that, through the creation of large, open field-like areas in the MVP right of way, the habitat of the white footed mouse has increased. While a very common species in rural areas of North America, increasing its population in the Ridge and Valley area of Appalachia is not warranted, especially since the mouse is a primary vector of Lyme disease as transmitted by the black-legged tick. More Lyme disease in local populations using the National Forest and/or other areas transversed by the MVP should not be encouraged, especially since the New River Valley is already in a Lyme high risk zone (Montgomery County, Virginia, Department of Public Health: Phone Conversation 2023).

*Based on student reports of increases in the black-legged tick, which is the main transmitter of Lyme from deer host to humans, this tick should not be encouraged. Ticks like to rest on grasses or other meadow flora, waiting for a suitable host, such as the white-legged mouse, to come by so they can become attached. Increasing meadows through MVP clear-cutting and subsequent maintenance of the right of way thus increases the production of ticks and Lyme bacteria.

*Interviewees noted that the Indiana bat has been lost in the NFVRHD. Their loss is most likely due mainly to other causes, such as white-nose syndrome. However, continued loss of more and more of the forest removes their roosting areas, contributing to their decline. Action supporting Alternative 1 will contribute this loss of habitat through construction of the 150' wide right of way requiring periodic maintenance. A deeply endangered species will suffer more habitat degradation.

*Also discussed in interviews was an increase in the death of ash trees. The parasite that is killing them, which is the Emerald Ash Borer (EAB), can come into an area by way of construction itself. Laborers and material brought in from elsewhere could be carrying in EAB and then infest what ash trees are still remaining. Residents of the NFVRHD have indicated that the ash near the MVP right of way have died at greater numbers than in the past, suggesting the MVP right of way scenario described here is actually happening. Significant funding and help from sources outside the NFVRHD will be needed to save this vital tree population, especially if the Forest Service permits right of way construction.

*Attachment to place, including the Jefferson National Forest, was very strong among the 15 NFVRHD residents interviewed. Several commented on how "who they were," that is, their identity, has been severely compromised by the construction of the MVP on or close to their properties, or in the pipeline view shed. In addition, as reported by Malbon, their well water and creeks had been altered to the point of non-use. New wells, cisterns, and delivery of potable water have been needed for many residents. While no residents live in the impacted Jefferson National Forest area, these impacts on human populations are likely to occur through contiguity to surrounding properties. Similarly, water pollution impacting animal life is likely to occur.

While student reports on the impact of the MVP right of way on NFVRHD are limited in terms of their findings, they indicate significant negative outcomes are likely should the Jefferson National Forest take action on Alternative 1, outcomes that other comments have not reported. In combination, the evidence that Alternative 1 should not be enacted are strong, given the Forest Service mission to "To sustain the health, diversity, and productivity of the mission of the Nation's forests and grasslands to meet the needs of present and future generations" (<http://www.fs.usda.gov/about-agency>). I therefore strongly encourage United States National Forest Service to select Alternative 1 - No Action and not to make any changes to the Jefferson National Forest Plan.

As a post script, I also would suggest that making the proposed 11 changes in the Jefferson National Forest Plan to permit construction of the MVP in the Forest sends a message to citizens that the National Forest Service, specifically the Jefferson National Forest office, is unable to support the National Forest Service's mission in a consistent manner. The impact of this potential distrust is likely to have lasting implications. To quote Dr. Malbon's letter, "I have a stake in trying to preserve this corner of our shared environment for my children and grandchildren-and so does the UFSF" (Malbon January 8, 2023:8)