

# Blue Ridge Environmental Defense League

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November 9, 2020

Jim Hubbard  
Under Secretary  
USDA Forest Service  
c/o Jefferson National Forest  
ATTN: MVP Project  
5162 Valleypointe Parkway  
Roanoke, VA 24019

via webform: <https://cara.ecosystem-management.org/Public/CommentInput?Project=50036>

**RE: Mountain Valley Pipeline DSEIS, USDA Forest Service file: 1950**

Dear Under Secretary Hubbard:

I am submitting comments on behalf of the Blue Ridge Environmental Defense League (BREDL). BREDL is a regional, community-based, non-profit environmental organization. BREDL has been interested in the management of our national forests since the mid -1980's including commenting in 2003 on the current Jefferson National Forest Plan. BREDL has chapters throughout the Southeast, including several in Virginia. Our members depend on the Jefferson National Forest for providing and protecting area drinking water supplies. Our members rely on the recreational use, scientific attributes and life-sustaining benefits of the Jefferson National Forest.

Mountain Valley Pipeline is seeking approval to plow a 42-inch natural gas climate wrecking pipeline through 3.5 miles of our life-sustaining national forest. The Jefferson National Forest Plan would need to be amended to allow this intrusion. Just because FERC rubberstamps projects does not mean that the Forest Service has to go along with the destruction.

**The U.S. Forest Service 1) must not approve amending the 11 Forest Plan standards; 2) must not issue a concurrence letter to BLM for the Right of Way; and 3) must not adopt the FERC FEIS. As stewards of our national forests, the Forest Service must approve Alternative 1 – the no action alternative.**

As we pointed out in our February 9, 2015 comments on this project, allowing MVP to survey national forest land would make it harder for the USDA Forest Service to deny the pipeline crossing the national forest after the process has moved further along. The Forest Service, as caretakers of our land, should have outright denied access over five and a half years ago. We

are now faced with a very important environmental analysis document being tainted by the fact that MVP has pipe in the ground in West Virginia and Virginia.

We are adamantly opposed to amending 11 JNF Forest Plan standards to allow exceptions for the Mountain Valley Pipeline. These standards include: FW-248 (utility corridors); FW-5 (revegetation); FW-8 (soil compaction in water saturated areas); FW-9 (soil effects from heavy equipment use); FW-13 and FW14 (exposed soil and residual basal area within the channeled ephemeral zone); 11-003 (exposed soil within the riparian corridor); 6C-007 and 6C-026 (tree clearing and utility corridors in the old growth management area); 4A-028 (Appalachian National Scenic Trail [ANST] and utility corridors); and FW-184 (scenic integrity objectives).

MVP is a private company and is the only entity that will possibly benefit from this pipeline. In addition to the direct negative environmental impacts to the Jefferson National Forest, the MVP will have negative impacts on area eco-tourism dollars generated by the JNF. People don't visit the national forest and our area to marvel at a carved out path for a pipeline. In 2017 Expedia added Roanoke to its list of 20 Greenest Cities in the Nation. This year, for the second year in a row, Roanoke was named the "Large Top Adventure Town" by Blue Ridge Outdoors Magazine. Roanoke beat out Chattanooga, TN and Asheville, NC as the magazine cited proximity to the Appalachian Trail and George Washington and Jefferson National Forests as key reasons for the honor.

The Forest Service needs to take control of the lands they are entrusted to protect and just say no! The U.S. Forest Service 1) must not approve amending the 11 Forest Plan standards; 2) must not issue a concurrence letter to BLM for the Right of Way; and 3) must not adopt the FERC FEIS. **As stewards of our national forests, the Forest Service must approve Alternative 1 – the no action alternative.** As outlined, Alternative 1 would require MVP to restore our national forest land to pre-project condition.

Respectfully submitted,



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