

**File Code:** 1900; 2700  
**Date:** August 16, 2016

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First St., N.E., Room 1A  
Washington, DC 20426

Dear Ms. Bose:

**Subject:** Forest Service Comments on the Revised Crossings of Craig Creek (Route Modification FS71) and the Appalachian National Scenic Trail (Route Modification FS78)  
OEP/DG2E/GAS3  
Mountain Valley Pipeline Project  
Docket No. CP16-10

The Forest Service submits comments and concerns about the revised crossing of Craig Creek proposed by Mountain Valley Pipeline, LLC (MVP) for the Mountain Valley Pipeline Project (MVP Project). The proposed MVP Project would affect 3.4 miles of National Forest System (NFS) lands on the Jefferson National Forest.

The Forest Service stated its concerns about the originally proposed crossing of Craig Creek in comments on resource reports and during a meeting between MVP and the Forest Service on June 16, 2016. On June 24, 2016, MVP filed an alternative (Route Modification FS71) with the Federal Energy Regulatory Commission, which reduced the number of crossings of Craig Creek from three to one. Forest Service staff assessed the alternative crossing on June 28, 2016, and determined that the alternative is inconsistent with Forest Plan standards and desired conditions, as well as best management practices (BMP).

Specifically, for a segment of the modified route that parallels Craig Creek, the location of the pipeline appears to be within the minimum 100-foot riparian corridor buffer. If any segment of the modified route is within the minimum 100-foot buffer, the route modification would not meet the Forest Plan Standards and desired conditions for Riparian Corridors (Management Prescription 11), which require protection at a minimum of 100 feet from ground disturbing activities with an equipment exclusion zone. Further, Route Modification FS71 does not meet the best management practice to cross drainages perpendicularly in order to minimize impacts to riparian corridors and water quality. In addition, there is still an unnecessary crossing of a tributary to Craig Creek at approximately MP 218.5 that should be avoided to minimize effects to better protect riparian/aquatic resources.



Regarding the revised crossing of the Appalachian National Scenic Trail (Route Modification FS78), during the site visit conducted on June 28, 2016, Forest Service staff observed that the modified route angles across a headwater area with undocumented and unnamed perennial springs and associated stream channels, at approximately MP 218.55. We recommend that MVP avoid crossing the head of this drainage to minimize impacts to the riparian corridor and water quality. Lastly, we recommend that MVP use infrared imagery in combination with the GIS layer *Drainage and Flow*, available from the Forest Service, to model watershed data and map stream channels to avoid or minimize impacts to water resources.

Please continue to consult with the Forest Service regarding the proposed MVP Project on NFS lands. For questions, please contact Jennifer Adams, Special Project Coordinator, by phone at (540) 265-5114 or by email at [jenniferpadams@fs.fed.us](mailto:jenniferpadams@fs.fed.us).

Sincerely,



JOBY P. TIMM  
Forest Supervisor

cc: Mountain Valley Pipeline, LLC