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File Code: 2720
Date: May 13, 2016

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

Subject: Proposed Crossing of the Appalachian National Scenic Trail
OEP/DG2E/GAS3
Mountain Valley Pipeline Project
Docket No. CP16-10

Dear Ms. Bose:

On September 17, 2015, the Forest Service filed comments with FERC regarding the crossing of the Appalachian National Scenic Trail (ANST, Forest Service Trail #1) for the Mountain Valley Pipeline Project (MVP Project) as proposed by Mountain Valley Pipeline, LLC (MVP). The letter documented concerns about the distance between the bore pits and the ANST and recommended further consultation with all three partners in the Cooperative Management System for the ANST (i.e., Forest Service, National Park Service, and Appalachian Trail Conservancy).

A site visit was held at the ANST crossing on April 28, 2016, and attended by MVP, Forest Service, Appalachian Trail Conservancy, and members of the Roanoke Appalachian Trail Club. The site visit discussion focused on the proposed locations for the pipeline crossing of the ANST and sites for bore pits. Forest Service staff assessed the proposal through a site-specific evaluation. Forest Service staff determined that the proposal for the crossing of the ANST is inadequate because it does not meet the scenic integrity objectives (SIO) of the Jefferson National Forest (JNF) Revised Land and Resource Management Plan (LRMP)(January 2004), as discussed below.

The LRMP allocates management prescription area (Rx) 4A-Appalachian National Scenic Trail Corridor to the ANST footpath and those lands mapped as foreground distance zone visible from the footpath. The actual delineation of the foreground distance zone is done at the site-specific level based on surrounding topography and can include lands visible up to ½ mile in all directions. Rx 4A identifies a minimum foreground distance zone of 100 feet on either side of the footpath (page 3-20 LRMP). The minimum width is applicable only when the actual visible foreground is 100 feet or less due to intervening topography (not vegetative screening). MVP's proposed crossing of the ANST is designed using the minimum distance of 100 feet on either side of the footpath and not the foreground distance zone. The proposed conventional bore site on the south (Virginia) side of the ANST would be visible to hikers traveling west (ANST southbound) and the removal of tree canopy associated with the pipeline corridor will be visible to hikers traveling in both directions. The proposed bore site on the north (West Virginia) side of the footpath would be visible to hikers traveling in both directions and the removal of vegetation,

including understory and overstory will be visible to hikers traveling in both directions on the footpath. The proposal is inadequate because it does not identify the foreground distance zone visible from the ANST footpath, and as a result, the proposal is incorrectly based on the minimum distance of 100 feet, which is inadequate in this particular case.

The LRMP includes Standard 4A-020 associated with Rx 4A: "All management activities will meet or exceed a Scenic Integrity Objective of High." Per "Landscape Aesthetics: A Handbook for Scenery Management," (USDA Forest Service, Agriculture Handbook Number 701), for High Scenic Integrity, human activities are not visually evident. Activities may only repeat attributes of form, line, color and texture found in the existing landscape character. The MVP proposal is inadequate because it does not identify the visible foreground area and the proposed activities will be visually evident from the ANST footpath.

The LRMP Forestwide Standard FW-252 specifies that the design of new utility corridors must meet an SIO as high as practicable. MVP's current proposal details a 320-foot-long conventional bore, and fails to include construction alternatives and/or other mitigation measures that could meet the SIO as high as practicable. If approved and constructed on the JNF, the pipeline corridor would be allocated to Rx 5C-Designated Utility Corridors, which has a SIO of Moderate. However, the ANST corridor would still remain as Rx 4A and, as proposed, MVP's ANST crossing would not be consistent with Forestwide Standard FW-252.

In addition, MVP proposes a diagonal crossing of the pipeline under the ANST. The Southern Region Scenery Treatment Guide utilized on the George Washington and Jefferson National Forests to mitigate potential impacts of activities was updated for the revision of the George Washington National Forest LRMP in 2014. It provides guidance for mitigating impacts to scenery including utilizing perpendicular crossings. It includes, at Table 3-3, Guideline AE: "Crossing of forest roads and trails by utility corridors should be at right angles whenever possible. Structures associated with the utility should be set as far back from the crossing as possible. To minimize the duration of view by users of the forest road or trail, the utility corridor and its structures should be screened by vegetation to the maximum extent possible." In most situations, the perpendicular crossing will have less impacts than a diagonal crossing; however, this needs to be determined on a case by case basis.

During the April 28 site visit, MVP discussed details about the proposal that would facilitate a more rapid construction phase to minimize disruption to ANST hikers. Though the disruption to ANST hikers during the construction phase is a significant concern to the Forest Service, the far greater concern is the potential long-term (century or more) impacts to the scenery of this National Scenic Trail. An alternative that reduces the time needed for construction should not take precedence over developing an alternative that better protects the scenic values in the long-term.

Members of the Roanoke Appalachian Trail Club provided a photograph taken from Angels Rest, an overlook on the ANST southwest of Pearisburg. The photograph indicates the proposed pipeline location on the ridge and south face of Peters Mountain, including Mystery Ridge, are likely visible from that popular overlook. Angels Rest should be added as a Key Observation Point for visual analysis. The location is approximately: Latitude 37.309349, Longitude -80.756331.

In summary, MVP should develop and evaluate additional construction alternatives and/or mitigation measures in consultation with the Forest Service and ANST cooperative management partners in order to gain consistency with the scenic integrity objectives of the LRMP.

For questions or concerns, please contact Jennifer Adams, Special Project Coordinator, by phone at (540) 265-5114 or by email at jenniferpadams@fs.fed.us.

Sincerely,

JOBY P. TIMM
Forest Supervisor