



File Code: 1950; 2720

Date: March 13, 2015

Dear Interested Citizen:

This letter updates a letter sent on January 20, 2015 to reflect the addition of two alternative pipeline routes across the Jefferson National Forest. We are extending the comment period to allow people to comment on the proposal since additional areas are being considered for survey. All comments submitted in response to the January 20 letter will be evaluated, so there is no need to resubmit comments.

The Forest Service is currently evaluating a special use application from Mountain Valley Pipeline, LLC (MVP) to conduct civil, wetland and waterbody delineations, cultural resource surveys, and rare, threatened and endangered species surveys on National Forest System (NFS) lands within the Jefferson National Forest (JNF). These surveys would occur along the original proposed route of a 2.13 mile segment that would cross the JNF in Giles and Montgomery Counties, Virginia and Monroe County, West Virginia. In addition, two alternative routes are proposed for surveys. The surveys for Alternative 110J would occur along a 5.3 mile segment and for Alternative 110R would occur along a 6.1 mile segment of the proposed pipeline that would cross the JNF in Craig, Montgomery, and Roanoke Counties, Virginia and Monroe County, West Virginia. Maps of the routes are enclosed.

A third alternative in the area was identified by MVP, but that alternative crosses the Brush Mountain East Wilderness. Forest Plan direction does not allow for survey permits in the Wilderness, so this alternative is not being considered.

At this time, we are seeking comments specifically related to the survey activities identified in their application to decide whether to issue a permit for these activities. Additional information may be found at <http://www.fs.usda.gov/projects/gwj/landmanagement/projects>, under the "Mountain Valley Pipeline" project.

## BACKGROUND

Mountain Valley Pipeline, LLC is a joint venture comprised of EQT Corporation and a subsidiary of NextEra Energy, Inc. that is proposing to construct and operate approximately 286 miles of a natural gas pipeline referred to as the Mountain Valley Pipeline. This interstate pipeline would connect the existing Equitrans transmission system in Wetzel County, West Virginia to Transcontinental Gas Pipeline Company's (Transco) Zone 5 compressor station 165 in Pittsylvania County, Virginia.

MVP has pre-filed (Docket #PF15-3) with the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. FERC will be the lead agency and will conduct an in-depth environmental analysis, with many opportunities for public comment, prior to deciding on the need for the pipeline. If FERC would determine the pipeline is needed, the Forest Service would make a separate determination whether to issue a right-of-way permit to construct, operate and maintain a natural gas pipeline on the JNF.



## PROPOSED ACTION

MVP is seeking a 12-month planning permit under the U.S. Forest Service's Special Use Authorization regulations (36 CFR Part 251, Subpart B) for the purpose of conducting activities such as civil, wetland and waterbody delineations, cultural resource surveys, and rare, threatened and endangered species surveys within a 300-foot-wide study corridor where the planned pipeline route crosses the JNF.

The 300-foot-wide study corridor for the original route comprises approximately 77.5 acres of NFS lands. Under the 2004 Revised Land and Resource Management Plan (Forest Plan) for the JNF, the study corridor occurs within the Management Areas 5C-Designated Utility Corridors (56%), 8A1-Mix of Successional Habitats (36%) and 4A-Appalachian National Scenic Trail Corridor (8%). The Forest Plan allows the survey activities identified below to occur within these management areas.

The 300-foot-wide study corridor comprises approximately 193 acres of NFS lands in Alternative 110J and 224 acres in Alternative 110R. Under the 2004 Revised Land and Resource Management Plan (Forest Plan) for the JNF, the study area in Alternative 110J includes Management Areas 8C-Black Bear Habitat (39%), 8A1-Mix of Successional Habitats (23%), 6C-Old Growth with Disturbance (15%), 7E1-Dispersed Recreation Area-Unsuitable (9%), 4A-Appalachian National Scenic Trail Corridor (7%), 0B-Custodial Management (6%), and 12B-Remote Backcountry (1%). The study area in Alternative 110R includes Management Areas 8C-Black Bear Habitat (33%), 8A1-Mix of Successional Habitats (21%), 5C-Designated Utility Corridor (26%), 6C-Old Growth with Disturbance (13%), 0B-Custodial Management (5%), and 4A-Appalachian National Scenic Trail Corridor (2%). The Forest Plan allows the proposed survey activities to occur within these management areas.

While the Forest Plan allows the proposed survey activities, the Forest Plan states that areas allocated to Management Prescription Areas 6C-Old Growth with Disturbance and 8C-Black Bear Habitat are unsuitable for the designation of new utility corridors or utility rights-of-way. While the current Forest Plan direction would not allow the construction of the pipeline in these alternative routes, we do have the authority to amend the Forest Plan. Any decision on if, and where, a crossing of the JNF could be allowed changes the impacts on resources on private lands. In the interest of allowing for a more complete analysis of potential impacts of the entire line, we believe it is worthwhile to allow the survey of these additional alternatives on the JNF. With the information we would be better able to assess if a Forest Plan amendment would be appropriate in light of the overall impacts of the pipeline.

The purpose of this request is to conduct field surveys for the Mountain Valley Pipeline (MVP). MVP is requesting survey permission for a 300-foot corridor (150 feet to each side of the centerline). Figures 1 through 4 provide location information for areas where MVP is requesting survey permission. Table 1 below outlines surveys potentially required and timing windows.

Surveys will consist of civil, wetland and waterbody delineations, cultural resources surveys, and rare, threatened or endangered species surveys, as required. Weather permitting, MVP plans to begin these surveys in March and continue through October 2015. It is anticipated that each crew

would have 3-4 surveyors, and only one crew per survey type would conduct work on U.S. Forest Service (USFS) lands.

MVP would only use center-line flagging with ribbons to identify the proposed pipeline route within the Jefferson National Forest in advance of field surveys. During civil survey, MVP surveyors would cut vegetation to access survey points. This cutting would be on less than 2" diameter vegetation and trimmed by hand. Crews would walk the route; therefore no ATVs or other motorized equipment would be used to cross USFS lands. Biodegradable flags would be left behind for the wetland and waterbody delineations if features are identified. There would be no ground disturbing activities aside from test pits for wetland surveys and shovel tests for cultural resource surveys. Test pits for wetland surveys would be approximately 4-6 inches in diameter and 18 inches deep. Shovel tests for cultural resource surveys would be 11-12 inches in diameter and would be excavated to water, subsoil, bedrock, or 32 inches in depth in Virginia, and in West Virginia, shovel tests would be 20 inches in diameter. All test pits and shovel tests would be backfilled immediately after the survey is complete and before crews leave the survey area each day. All test pits, shovel tests, and flags would be recorded on a Global Positioning System unit. Rare, threatened or endangered species surveys potentially required include surveys for bats, mussels, fish, reptiles, and plants. Table 1 below outlines surveys potentially required for specific rare, threatened or endangered species.

Survey	Survey	Notes
Wetland and Waterbody Delineations	March-September 2015	Weather permitting.
Cultural Resources Surveys	March-September 2015	Weather permitting.
Indiana Bat/Northern Myotis (if necessary)	November 2014 - October 15, 2015	Habitat Survey/Portal Searches (November 2014- February 2015).
		Portal Sampling/Harp Trapping (April 1-May 2015 or September 15-October 15, 2015); if required.
		Hibernacula Surveys (January-February 2015); if required.
		Mist Netting (May 15-August 15, 2015).
James Spiny Mussel	May 1 - October 1 2015	Presence/Absence surveys and possible relocations prior to the start of construction.
Big Sandy Crayfish	July 1 - October 31 2015	
Northern Pine Snake	February - October 2015	Concurrent with habitat assessments for bats (February- April 2015). Species specific surveys (April-October 2015); If necessary.
Shale Barren Rock Cress	July-October 2015	
Peter's Mountain Mallow	June-August 2015	

All surveys would be conducted per authorization and consultation with the U. S. Fish and Wildlife Service, West Virginia Department of Natural Resources, and/or Virginia Department of Game and Inland Fisheries. In an effort to reduce the number of site visits, surveys would be made concurrent with one another when possible.

### **NEED FOR THE PROPOSED ACTION**

These surveys are collectively necessary to determine the feasibility of the original proposed route and alternative routes and collect the environmental and cultural resources data needed to make future decisions on whether or not to allow the construction and operation of the proposed gas pipeline on the JNF. If construction is allowed, the survey information will also inform us where to avoid or reduce the impacts to sensitive resources on the JNF.

### **DECISION TO BE MADE**

The Forest Supervisor is the responsible official who will decide whether to issue a temporary, (one year or less) special use permit to allow the identified survey activities to occur within the identified study and survey corridors on National Forest System lands within the JNF.

### **PUBLIC INVOLVEMENT**

We welcome your comments on this temporary (one year or less) use of NFS lands on the JNF to conduct these surveys. Allowing these survey activities does not mean that we are allowing the construction of a pipeline across the JNF. FERC is the lead agency who will prepare the environmental analysis for the construction and operation of the MVP and will provide additional opportunities to comment in the coming months. We are currently preparing a categorical exclusion (CE) for the environmental analysis for the permit, in accordance with regulations 36 CFR 220.6(e)(8), subject to public involvement and the determination that no extraordinary circumstances exist for these survey activities.

Please provide your comments by April 2, 2015. There are several options for providing comments. Hand-delivered comments must be received within our normal business hours of 8:00 a.m. to 4:30 p.m. Comments may be faxed to our office at 540-265-5145. Comments may also be mailed to our office. When sending comments through the postal system please use the following address:

USDA Forest Service  
George Washington and Jefferson National Forests  
ATTN: Mountain Valley Pipeline Survey Comments  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Comments may also be mailed electronically to our office at: **[comments-southern-georgewashington-jefferson@fs.fed.us](mailto:comments-southern-georgewashington-jefferson@fs.fed.us)**. When sending electronic comments, please note the name of the project in the subject line of the electronic mailing [i.e. Mountain Valley Pipeline Survey Comments].

Again, if you already sent comments in response to the January 20, 2015 scoping letter, we have those comments and you do not need to submit them again.

More information, including maps and specifics of survey activities can be found on our website at <http://www.fs.usda.gov/gwj> or by calling (540) 265-5100.

Sincerely,

A handwritten signature in blue ink that reads "H. Thomas Speaks, Jr." The signature is written in a cursive style with a large initial "H" and a stylized "S".

H. THOMAS SPEAKS, JR.  
Forest Supervisor

FIGURE 1  
Jefferson National Forest  
Crossing 1  
Proposed Survey Location

November 2014

**Legend**

- Milepost
- Proposed Pipeline Route
- Appalachian Trail
- Peters Mountain
- National Forest Boundary



Data Sources: Appalachian Trail Conservancy, VA DCR, USDA, ESRI Streaming Data



NAD 1983 UTM 17N 1:30,000 0 0.5 1 2 Miles

FIGURE 2  
Jefferson National Forest  
Crossing 2  
Proposed Survey Location

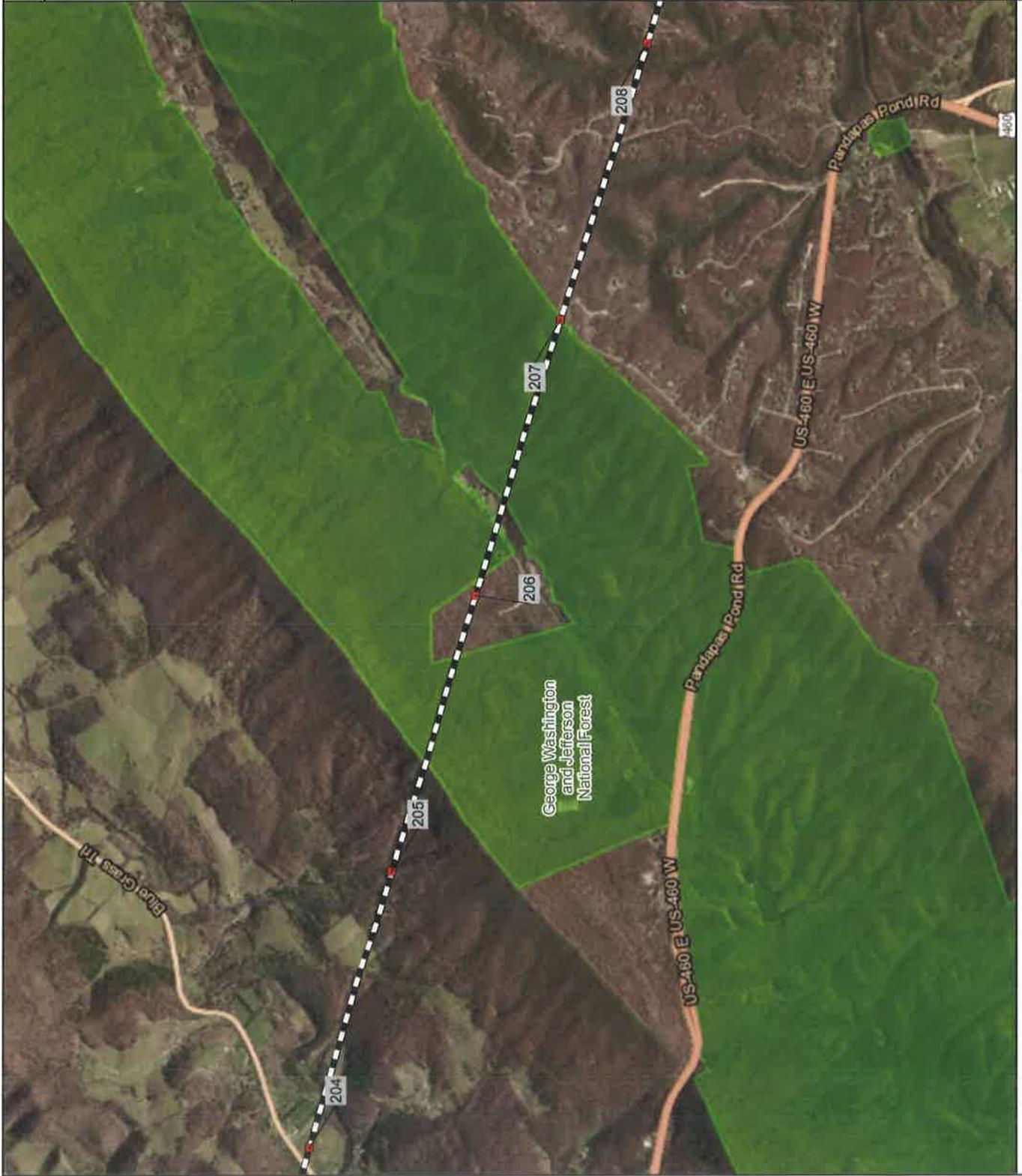
November 2014

**Legend**

- Milepost
- Proposed Pipeline Route
- National Forest Boundary



Data Sources: Appalachian Trail Conservancy, VA DCR, USDA, ESRI, Streaming Data



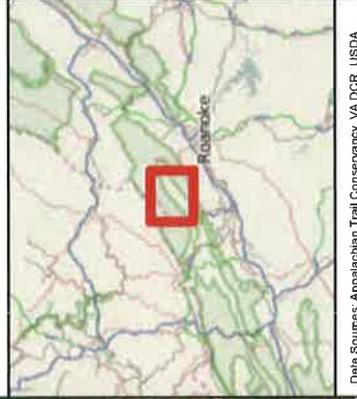
1:30,000 NAD 1983 UTM 17N 0 0.5 1 2 Miles

**FIGURE 1**  
Alternative 110J  
Jefferson National Forest  
Crossings

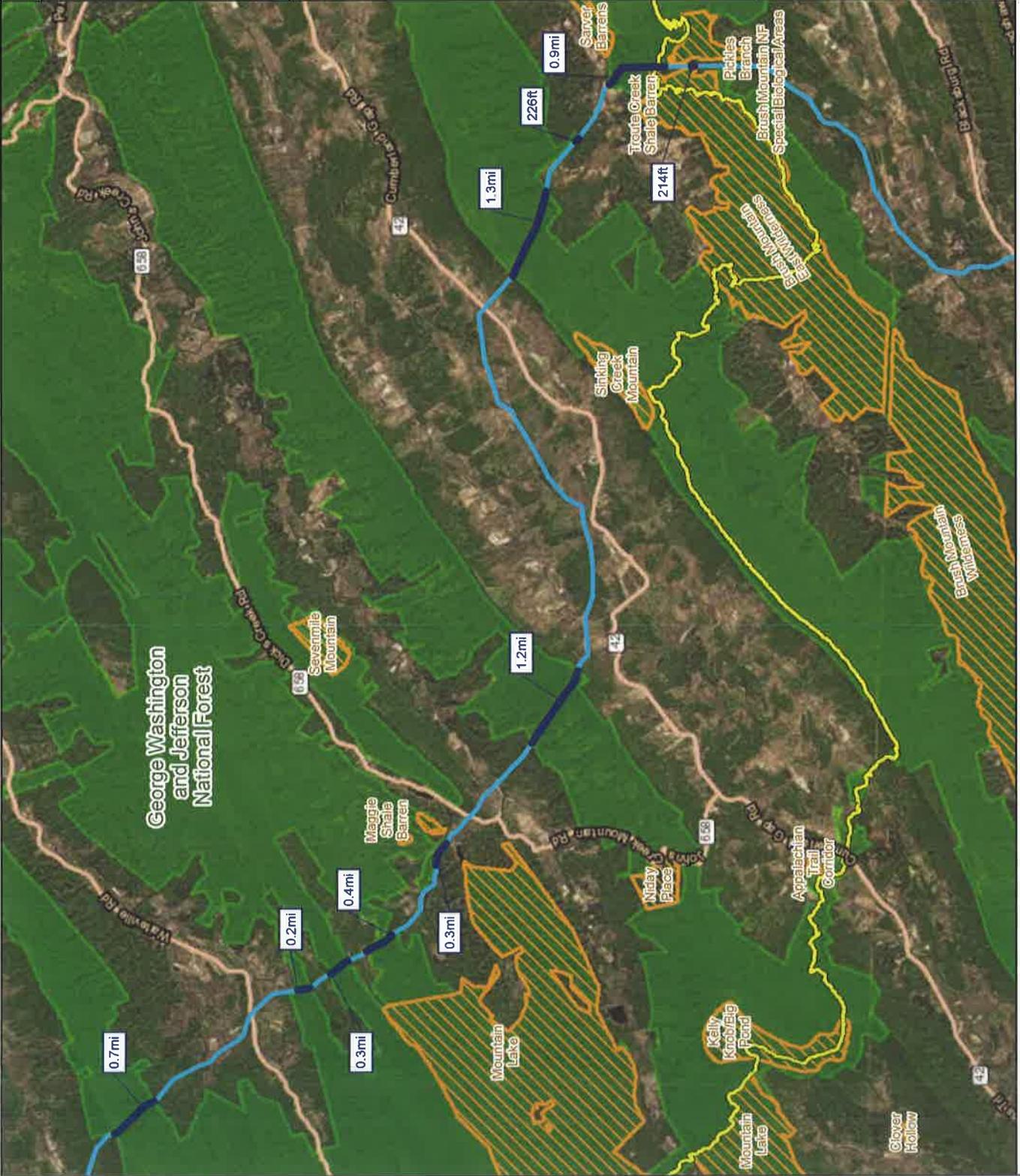
February 2015

**Legend**

- Milepost
- Alternative 110J
- Alternative 110J Crossing USFS Land
- Proposed Pipeline Route
- Appalachian Trail
- Conserved Land
- National Forest Boundary



Data Sources: Appalachian Trail Conservancy, VA DCR, USDA, ESRI Streaming Data, PAD



0 2.5 5 Miles  
NAD 1983 UTM 17N  
1:120,000

**FIGURE 2**  
**Alternative 110R**  
**Jefferson National Forest**  
**Crossings**

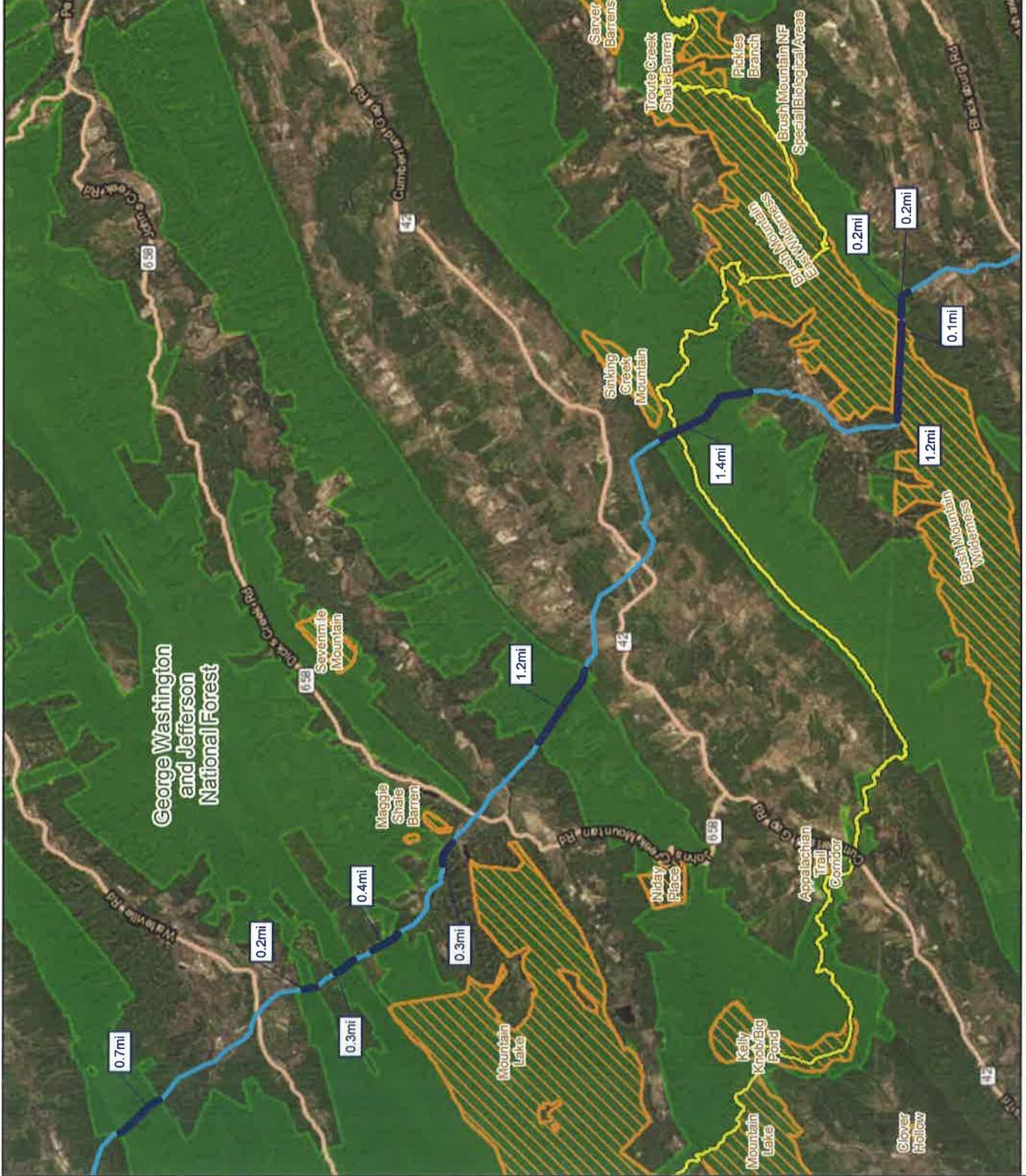
February 2016

**Legend**

- Milepost
- Alternative 110R
- Alternative 110R Crossing USFS Land
- Proposed Pipeline Route
- Appalachian Trail
- Conserved Land
- National Forest Boundary



Data Sources: Appalachian Trail Conservancy, VA DCR, USDA, ESRI Streaming Data, PAD



0 2.5 5 Miles  
 NAD 1983 UTM 17N  
 1:120,000