



**File Code:** 1950; 2720

**Date:** August 24, 2015

Dear Interested Citizen:

On April 27, 2015 the Forest Service decided to issue a temporary special use permit to Mountain Valley Pipeline, LLC (MVP) authorizing them to survey the Jefferson National Forest (JNF) for the proposed Mountain Valley Pipeline. Allowing these survey activities does not mean that the Forest Service is allowing the construction of the pipeline. The information gathered from these surveys is needed to make an informed decision on whether or not to allow construction and operation of the proposed natural gas pipeline.

The Forest Service is currently evaluating a modified special use application from Mountain Valley Pipeline, LLC (MVP) to survey additional areas. These surveys are to conduct civil, wetland and waterbody delineations, cultural resource surveys, rare, threatened and endangered species surveys and soil surveys on National Forest System (NFS) lands within the JNF. These surveys would occur across a small tract of land that the Forest Service recently acquired on Peters Mountain in Giles County, Virginia, along existing Forest Service Road 972 (Pocahontas Road) that would provide access to the Peters Mountain route, and along an alternative route (MVP Alternative 200) that would cross the JNF in Montgomery County, Virginia. The survey corridor would be about 0.5 miles long and 1,000 feet wide on the newly acquired tract on Peters Mountain and about 6 miles long and 100 feet wide along FSR 972. The survey corridor would be about 1.8 miles long and 1,000 feet wide across Sinking Creek and Brush Mountains for Alternative 200. Maps of the additional survey areas are enclosed.

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 294 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 to modify their 12-month planning permit under the U.S. Forest Service's Special Use Authorization regulations (36 CFR Part 251, Subpart B). The proposed modification would allow MVP to conduct field surveys within three additional areas that include a 1,000-foot corridor (500 feet to each side of the centerline) across a recently acquired tract on Peters Mountain, a 100-foot corridor along Forest Service Road 972 (Pocahontas Road), and along Alternative 200 on National Forest System lands. Figures 1 and 2 provide location information for areas where MVP is requesting survey permission in addition to the areas requested in the November 24, 2014 and March 4, 2015 SF-299 application which was executed on May 12, 2015.

Surveys will consist of identifying the centerline, wetland and waterbody delineations, cultural resources surveys (performed by USFS personnel), rare, threatened or endangered species surveys, and soil surveys. Access to NFS lands will be from public roadways or as advised by the USFS. Vehicles will be staged at the entry and exit locations to allow crews greater efficiency during survey.

Crews will walk the route; therefore no ATVs or other motorized equipment will be used to cross NFS lands. Biodegradable flags will be left behind for the wetland and waterbody delineations if features are identified. There will be no ground disturbing activities aside from test pits for wetland surveys, shovel tests for cultural resource surveys and soil logging for soil surveys. Test pits for wetland surveys will be approximately 4-6 inches in diameter and 18 inches deep. Shovel tests for cultural resource surveys will be 11-12 inches in diameter and will be excavated to water, subsoil, bedrock, or 32 inches in depth. A detailed NRCS map of soil types with road crossings (potential road cuts) and other anthropogenic features will be developed. At least 15 locations (number of soil types so far identified) will be marked for intrusive work. These 15 locations could be expanded based on the mapping identified by NRCS mapping or in the field when unique field surface features are identified (road cuts). The field team will consist of one soil scientist and one geologist. The purpose of the field team is to transverse the route digging at the assigned locations or other areas determined by these trained scientists. Soil logging will be done in each location, dug to a depth of 40 inches or refusal by soil spades. Each hole will be evaluated by NRCS protocol and include at a minimum; soil horizon, soil horizon thickness, texture, color, soil pH and slope, as well as to verify or not the mapped soil unit, this data will be recorded in field notebooks. Photographs of the hole highlighting soil horizon will be taken, along with photographs of hole closer. Geologic logging will identify historic landslides, seeps or groundwater breakout. In areas of bedrock outcrop, rock type and fracture patterns will be verified. The holes dug during the surveys will be backfilled after the completion of the field analysis. All test pits and shovel tests will be backfilled immediately after the survey is complete and before crews leave the survey area each day.

Rare, threatened or endangered species surveys potentially required include surveys for bats, mussels, fish, reptiles, and plants. All surveys will be conducted per authorization and consultation with the U. S. Fish and Wildlife Service and Virginia Department of Game and Inland Fisheries. In an effort to reduce the number of site visits, surveys will be made concurrent with one another when possible.

The study corridors comprise approximately 330 acres of NFS lands on Peters Mountain, Sinking Creek Mountain and Brush Mountain. Under the 2004 Revised Land and Resource Management Plan (Forest Plan) for the JNF, the additional study corridors occur within the Management Prescription Areas 8A1-Mix of Successional Habitats (54%), 6C-Old Growth with Disturbance (14%), 4J-Urban/Suburban Interface (29%) and 4A-Appalachian National Scenic Corridor (3%). The Management Area 4J is also in the Brush Mountain Inventoried Roadless Area. The Forest Plan allows the proposed survey activities to occur within these management areas and the inventoried roadless area.

The Brush Mountain Inventoried Roadless Area is managed under the 2001 Roadless Area Conservation Rule (2001 RACR), which supersedes the Forest Plan direction for Management Area Prescription 4J. The 2001 RACR allows the proposed survey activities to occur. It also establishes a prohibition on road construction within Inventoried Roadless 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 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 this management prescription area, 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.

### **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 amend the temporary, (one year or less) special use permit to allow the identified survey activities to occur within the identified 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 September 8, 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].

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,

(FIR) 

H. THOMAS SPEAKS, JR.  
Forest Supervisor

Enclosures

**FIGURE 1**  
**Proposed Pipeline Route**  
**Jefferson National Forest**  
**Crossing**

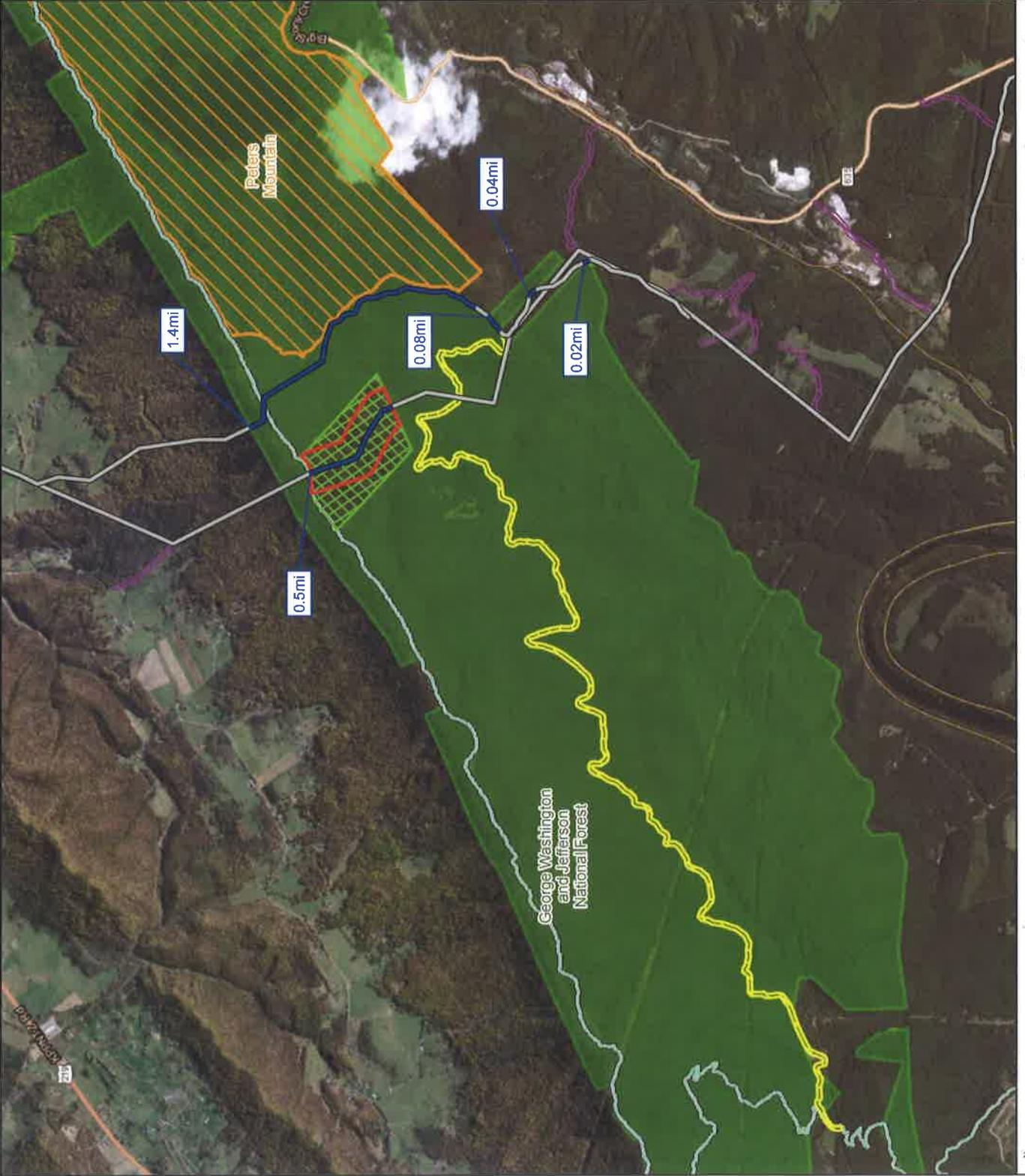
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**Legend**

- Proposed Pipeline Route Crossing Newly Acquired USFS Property
- Proposed Pipeline Route
- Proposed Access Road
- Proposed Pocahontas Road 100ft Survey Corridor
- Proposed 1000ft Survey Corridor
- Newly Acquired USFS Property
- Appalachian Trail
- Peters Mountain
- National Forest Boundary



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



NAD 1983 UTM 17N

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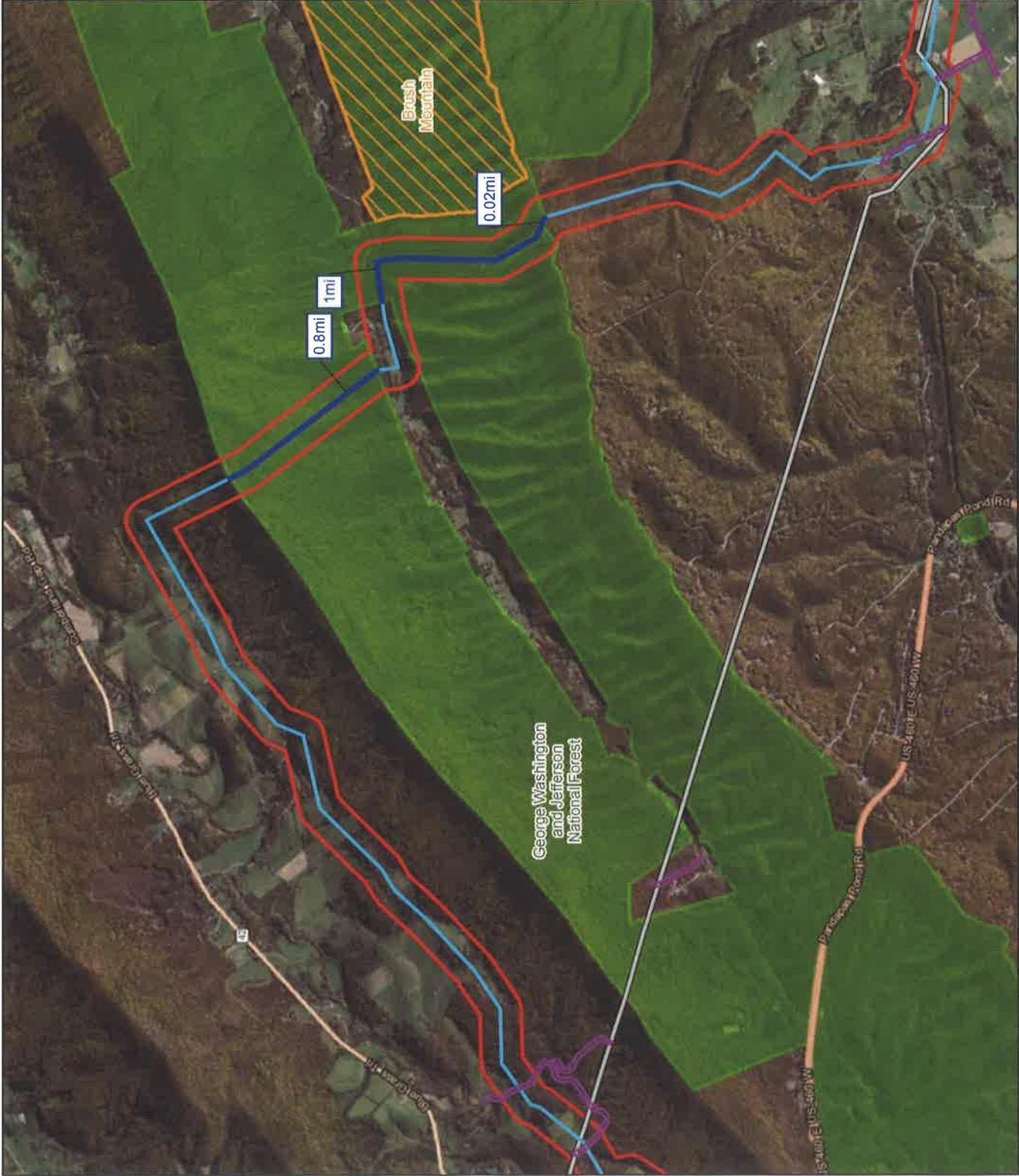
**FIGURE 2**  
Alternative 200  
Jefferson National Forest  
Crossings

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- Legend**
- Proposed Access Road
  - Alternative 200 Crossing USFS Land
  - Alternative 200
  - Proposed Pipeline Route
  - Proposed 1000ft Survey Corridor
  - Conserved Land
  - National Forest Boundary



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



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**Mountain Valley Pipeline  
Proposed Additional Survey Corridors  
JNF Management Prescription Areas**

**Legend**

-  MVP Alternative 200
-  MVP Alt 200 Survey Corridor
-  Brush Mountain Inventoried Roadless Area

