



United States
Department of
Agriculture

Forest
Service

George Washington and Jefferson
National Forests

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Roanoke, VA 24019
540-265-5100

File Code: 2720; 1900
Date: August 18, 2015

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

Subject: Comments on Draft Resource Reports
OEP/DG2E/Gas 3
Mountain Valley Pipeline, LLC
Docket No. PF15-3-000

Dear Ms. Bose:

The Forest Service appreciates the opportunity to review the draft resource reports filed by Mountain Valley Pipeline, LLC for the proposed Mountain Valley Pipeline Project (Docket No. PF15-3-000). The proposed project would affect National Forest System (NFS) lands on the Jefferson National Forest.

The Federal Energy Regulatory Commission issued the Forest Service's information and data requests on August 11, 2015. The Forest Service provides additional comments in the attached document.

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

Sincerely,

A handwritten signature in blue ink that reads "H. Thomas Speaks, Jr." with a stylized flourish at the end.

H. THOMAS SPEAKS, JR.
Forest Supervisor



**Comments of the U.S. Forest Service
Mountain Valley Pipeline Project No. PF15-3-000
Draft Resource Reports**

1. Provide a schedule of studies and surveys showing the studies that have been completed to date and dates of completion, and the studies remaining to be conducted with expected dates of completion. Please provide a justification for any study proposed to be conducted post-filing rather than pre-filing.
2. The Forest Service is concerned about any study proposed to be conducted post-filing rather than pre-filing. The Forest Service provided extensive comments regarding study needs in the scoping comments and those comments are reiterated in the Forest Service's comments on the draft resource reports provided to the Federal Energy Regulatory Commission (FERC) and issued by FERC on August 11, 2015. The Forest Service requires the studies to be completed in order to identify and analyze potential effects of the proposed projects on NFS lands. Additionally, the results of the studies, particularly studies of geology and soils, could influence the need for route variations. Please note that Mountain Valley Pipeline, LLC (MVP) should contact the Forest Service to ensure the permit authorizes permission for all proposed studies.
3. The purpose and need described in section 1.1.1 should be expanded to include a discussion of the necessity to cross National Forest System (NFS) lands. Forest Service Manual 2700, Special Uses Management (FSM 2700), §2703.2 describes Forest Service policy relating to the use of NFS lands. §2703.2(2) states to authorize use of NFS lands only if: a) the proposed use is consistent with the mission of the Forest Service to manage NFS lands and resources in a manner that will best meet the present and future needs of the American people; b) the proposed use cannot reasonably be accommodated on non-NFS lands. §2703.2(3) further states not to authorize the use of NFS lands solely because it affords the applicant a lower cost or less restrictive location when compared to non-NFS lands. Therefore, MVP's discussion should clearly articulate why the project cannot reasonably be accommodated off NFS lands. This discussion should not cite lower costs or less restrictive locations as the sole purpose of crossing NFS lands.
4. The final resource reports should include a discussion of why NFS lands have been chosen for the crossing point of the Appalachian National Scenic Trail rather than National Park Service (NPS) lands. The discussion should focus on public interest and include environmental and resource related reasons. A statement indicating a right-of-way grant from NPS requires congressional approval and therefore cannot be obtained within a reasonable timeframe is not consistent with guidance in the Forest Service Manual 2700 §2703.2(3), as discussed above.

5. Any plans proposed for implementation on NFS lands must be approved by the Forest Service. Please note requirements for plans proposed for implementation on NFS lands may exceed the requirements of plans required by the FERC and permits granted by state agencies. MVP should submit plans in writing to the Forest Service for review and comment to ensure compliance with the Land Resource Management Plan for the Jefferson National Forest.
6. Concerning the northern long-eared bat and the Interim 4d rule, consult with the Forest Service to identify management issues and concerns about fragmentation that would result due to the proposed project.

Document Content(s)

Forest Service comments_draft resource reports.PDF.....1-3