

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
MVP Filename: Attachment DR4 General 2b Part 1			
Document Name: February 2017 DRAFT Plan of Development			
		<p>Include verbiage in the appropriate location (<i>Erosion and Sediment Control Plan, Restoration Plan, or the Vegetation Plan</i>):</p> <p>“Wildlife mortality and entrapment from plastic netting used in Erosion Control Matting (ECM) products has been found to entangle wildlife, including reptiles, amphibians, birds, and small mammals. Use only biodegradable Erosion Control Matting (ECM) products that meet the need to reduce risk to wildlife and are acceptable to USFS.”</p> <p>“Erosion Control Matting (ECM), also known as mulch control netting, erosion control blanket, landscape mesh or netting, is routinely used to stabilize seed and soil in road, stream, or sod projects. However, some ECM products contain a plastic monofilament mesh (same material as fishing line) and pose risks to several wildlife species. Nylon mesh netting of 1” square or more is often embedded in erosion control materials and has been exhibited to entangle wildlife, including mammals, birds, fish, reptiles, and amphibians. Some temporary erosion and sediment control products are commonly left in place permanently, particularly when used with seeding because the new vegetation grows up through the netting. When plastic netting does degrade, plastic fragments may be blown or washed into waterways creating additional hazards to wildlife. Acceptable, cost effective biodegradable products exist that fulfill erosion control functions and do not persist in the environment; certain management practices can reduce the need for non-biodegradable products. A number of states and countries have cautioned, curtailed or prohibited the use of non-biodegradable ECM due to risk and mortality to species. Use only biodegradable ECM products that meet the need to reduce risk to wildlife and are acceptable to USFS.”</p>	<p>As described in Mountain Valley's Project Specific Annual Standards and Specifications, slopes in excess of 30% will be stabilized with steep slope soil stabilization blankets / Erosion control matting (ECM) techniques identified in VADEQ STD & SPEC 3.36 Soil Stabilization Blankets and Matting. All rolled ECM products installed on USFS lands will not contain monofilament mesh backing. As an alternative measure, hydraulically applied ECM (Earthguard Fiber Matrix, Flexterra Flexible Growth Medium, or equivalent) may be used in place of rolled ECM products. The text in the Plan of Development has been updated in Sections 6.1.1.7 and 6.1.1.11.</p>

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iii	TOC	<p>MVP's Responses to FS Comments on the Draft POD refers to Attachments 51, 83, 85, and 135. However, the TOC does not use that Attachment numbering system. For example, MVP's Responses to FS Comments on the Draft POD states, "The Landslide Mitigation Plan has been included as Attachment 135." But the TOC has the Landslide Mitigation Plan as Appendix F. But it is unknown what documents other Attachment numbers refer to in MVP's response, or where they are located in TOC. In response to FS comment 83, MVP response is "See Attachment 83." In response to FS comment 85, MVP response is "Updated figures are included as Attachment 85." In response to FS comment 52, MVP response is "Pipeline inclinations, in profile, are depicted on the second page of each typical drawing included in Attachment 51..." Identify the document title and page number in the TOC for the documents that MVP's Responses to FS Comments on the Draft POD refers to Attachments 51, 83, and 85.</p>	<p>The attachments referenced in the December 22, 2016 response to November 14, 2016 USFS Draft POD comments are numbered in a way that corresponded numerically with the November 14, 2016 USFS comments. Attachments to the June 2017 Plan of Development are numbered sequentially to match the organization of the Plan of Development. The table below shows shows the attachment numbers/names used for the December 22, 2016 submittal compared to the June 2016 Plan of Development.</p> <table border="1" data-bbox="1327 483 2357 1089"> <thead> <tr> <th data-bbox="1327 483 1575 553">December 22, 2016 Attachment</th> <th data-bbox="1575 483 2110 553">Attachment Description</th> <th data-bbox="2110 483 2357 553">June 2017 POD Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="1327 553 1575 735" rowspan="4">Attachment 7</td> <td data-bbox="1575 553 2110 589">Alignment Sheets</td> <td data-bbox="2110 553 2357 589">Appendix A-1</td> </tr> <tr> <td data-bbox="1575 589 2110 662">Maps of Access Roads, Ancillary Sites, Mainline Valves & Launcher/Receiver Sites</td> <td data-bbox="2110 589 2357 662">Appendix A-1</td> </tr> <tr> <td data-bbox="1575 662 2110 696">Aerial Details</td> <td data-bbox="2110 662 2357 696">Appendix A-1</td> </tr> <tr> <td data-bbox="1575 696 2110 735">Site-Specific Plan - ANST</td> <td data-bbox="2110 696 2357 735">Appendix A-2</td> </tr> <tr> <td data-bbox="1327 735 1575 769">Attachment 51</td> <td data-bbox="1575 735 2110 769">Typical Terrain Drawings</td> <td data-bbox="2110 735 2357 769">Not included</td> </tr> <tr> <td data-bbox="1327 769 1575 842">Attachment 54</td> <td data-bbox="1575 769 2110 842">Erosion and Sediment Control Plans (to be provided at a later date)</td> <td data-bbox="2110 769 2357 842">Appendix C</td> </tr> <tr> <td data-bbox="1327 842 1575 915">Attachment 64</td> <td data-bbox="1575 842 2110 915">Site-Specific Water Crossing and Restoration Plans</td> <td data-bbox="2110 842 2357 915">Appendix K</td> </tr> <tr> <td data-bbox="1327 915 1575 950">Attachment 83</td> <td data-bbox="1575 915 2110 950">Response to USFS Comment # 83</td> <td data-bbox="2110 915 2357 950">Table 6-4</td> </tr> <tr> <td data-bbox="1327 950 1575 984">Attachment 85</td> <td data-bbox="1575 950 2110 984">Updated Average Slope Figures</td> <td data-bbox="2110 950 2357 984">Appendix B</td> </tr> <tr> <td data-bbox="1327 984 1575 1018">Attachment 135</td> <td data-bbox="1575 984 2110 1018">Landslide Mitigation Plan</td> <td data-bbox="2110 984 2357 1018">Appendix F</td> </tr> <tr> <td data-bbox="1327 1018 1575 1052">Attachment 136</td> <td data-bbox="1575 1018 2110 1052">Draft Restoration Plan</td> <td data-bbox="2110 1018 2357 1052">Appendix H</td> </tr> <tr> <td data-bbox="1327 1052 1575 1089">Attachment 179</td> <td data-bbox="1575 1052 2110 1089">Brush Mountain Alternative</td> <td data-bbox="2110 1052 2357 1089">Not included</td> </tr> </tbody> </table>	December 22, 2016 Attachment	Attachment Description	June 2017 POD Location	Attachment 7	Alignment Sheets	Appendix A-1	Maps of Access Roads, Ancillary Sites, Mainline Valves & Launcher/Receiver Sites	Appendix A-1	Aerial Details	Appendix A-1	Site-Specific Plan - ANST	Appendix A-2	Attachment 51	Typical Terrain Drawings	Not included	Attachment 54	Erosion and Sediment Control Plans (to be provided at a later date)	Appendix C	Attachment 64	Site-Specific Water Crossing and Restoration Plans	Appendix K	Attachment 83	Response to USFS Comment # 83	Table 6-4	Attachment 85	Updated Average Slope Figures	Appendix B	Attachment 135	Landslide Mitigation Plan	Appendix F	Attachment 136	Draft Restoration Plan	Appendix H	Attachment 179	Brush Mountain Alternative	Not included
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1-1	1.1	<p>The bottom paragraph states that all versions of the POD, its appendices and its supporting documents will include a date of issuance. Numerous appendices do not have the "February 2017" date of issuance on them anywhere. Please make these corrections.</p>	<p>An updated date of issuance has been added to the POD, its appendices, and supporting documents.</p>																																				

Mountain Valley's Responses to the April 27, 2017 U.S. Forest Service Comments on Draft Plan of Development

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1-1 and Thru-out	1.1 and Thru-out	All pages of the POD, and all Attachments, and Appendices to Attachments, and Appendices to Appendices to Attachments, should be numbered in a consistent numbering or combination alpha/numeral system.	The numbering system has been updated and applied to the pages in the POD, its appendices, and supporting documents.
1-3	Figure 1-1	Label Monongahela National Forest lands in West Virginia. Show and label Mountain Lake Wilderness in addition to the two Wildernesses already depicted.	The requested change has been made to Figure 1-1.
1-4	Figure 1-2	Change the shading color of USFS lands because it is very difficult to see on top of base layer of forested lands colored nearly identical.	The requested change has been made to Figure 1-2.
1-7	1.3	ANST conflicts in north south statements: Lines 19 states buffer of 307 feet on the north side and 273 feet on the south; Lines 29, 30 states buffer of 283 feet on the north side and 317 feet on the south side.	The text in section 1.3 has been corrected to accurately reflect the bore locations.
1-7	1.3	Lines 17 through 30 should be clarified. Consider the phrasing: Bore pits will be located X feet to the north of the trail, and X feet to the south of the trail. Protective fencing will be placed ten feet from the bore pits. The trail will be buffered where no activities will occur X feet to the north of the trail, and X feet to the south of the trail.	The text in section 1.3 has been corrected to accurately reflect the bore locations.
1-7	1.3	On the JNF, temporary workspace 0.8 acres for construction, access roads 31.1 acres for construction and 20.4 acres for operations needs to be included within lines 3-11 area. This section should also include feet of boring on the JNF (ANST) and boring 60-feet under the USACE Weston and Gauley turnpike.	Section 1.3 has been updated to reflect the correct acreage
1-7	1.3	Split 2nd paragraph to avoid confusion mixing USACE and USFS lands in 2 states. Begin new paragraph with "In accordance with...." Reexamine the 2nd paragraph and correct the north side and south side distances throughout. On line 19, "buffer" is misused. Consider changing to something like: "conventional bore under the trail, leaving an area of no surface disturbance of XXX feet on the north side....." In this section of the document, explicitly state that the ANST will be kept open for public use at all times throughout both the construction and operation phases of this proposal. No temporary reroute of the ANST is possible or under consideration.	The text in section 1.3 has been corrected to accurately reflect the bore locations.
1-7	1.3	Ensure the dimensions and distances beginning on Line 19 are correct and match the rest of the paragraph, and also the rest of the document, including the PROFILE sheet within Appendix A-2.	The text in section 1.3 has been corrected to accurately reflect the bore dimensions.

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1-8	1.3	Table 1-1. Land Requirements for the Mountain Valley Pipeline Project on Federal Land, under JNF Crossing, add boring.	A line for the ANST Bore has been added to Table 1.1.
1-8	1.4	Table 1-2. Existing Corridors Adjacent to the Proposed Project, define MP	"MP" has been changed to Milepost in Table 1.2.
1-8	1.5	Add "Wilderness Areas", in the sentence: "...including the National Forests, National Parks, Wilderness Areas, and the ANST, while...."	The text in Section 1.5 has been updated.
2-1	Table 2.1	An acronym is used – "apn" or "APN", but is not defined either here or on the Abbreviations and Acronyms table. Two different "Main Contacts" are given for 5 "parcels" of land in this table. Confirm with USFS Surveyor – the address for WV-MO-07.4 is incorrect. Consider changing the "Main Contacts" for all 5 USFS "parcels" to: United States of America, U.S. Forest Service, George Washington & Jefferson National Forests, 5162 Valleypointe Parkway, Roanoke, VA, 24019.	A definition has been added for APN and the address has been changed for the five forest service parcels identified in Table 2.1.
2-2	2.2	Clarify that MVP is responsible for reestablishing all USFS boundary monuments (corners), witness trees (bearing trees), and the boundary (property) line itself between corners as defined by the GWJNF Land Surveyor. The text seems to focus on boundary monuments only.	The text in Section 2.2 has been updated.
2-2	2.2	Line 18 – "as-build" should be "as-built." Line 19 – Incomplete sentence or heading in the wrong location "Maps and Drawings Showing River Crossings."	The text in Section 2.2 has been updated.
3-1	3.1	Lines 16 and 17 states "Temporary work areas on the JNF are shown on figures in Appendix A." Provide additional information here to better define the reference to which sheets in the sub-appendix within Appendix A. Also use the official term "Additional Temporary Work Space (ATWS)" and define total amount (acres) and how much is associated with road access and how much with the pipeline ROW itself.	This text has been removed from Section 3.1. There will be no additional temporary work areas associated with operations of the Project.
4-1	4.0	Line 2 – should "an" be "any" as in "...not connect to any existing pipeline...." Lines 6-7. Clarify if "temporary equipment storage areas" the same or different from "Additional Temporary Work Space." If the same, use "ATWS" but if different, describe and define.	The text in Section 4.0 has been updated.

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5-2	Table 5-1.	<p>The row labelled “National Park Service, Southeast Region, Appalachian Trail” is incorrect and incomplete. The ANST is administered by NPS- APPA, which is within the Northeast Region of the NPS. Correct and change this entry, and add a footnote similar to:</p> <p>Agency: National Park Service (NPS), Northeast Region, Appalachian Trail Park Office (NPS-APPA) for the Appalachian National Scenic Trail.</p> <p>{see Footnote #1} (Other columns in this row are okay.)</p> <p>{Footnote #1: The National Trails System Act (NTSA) of 1968 (Public Law 90-543) designated the Appalachian Trail as the first National Scenic Trail, and designated the National Park Service as the lead federal agency for the administration and management of the ANST. The Appalachian Trail Park Office (NPS-APPA) is the specific NPS administrative-entity. The NTSA also stipulates that the NPS must work cooperatively with the USFS, other public land-managing agencies, the Appalachian Trail Conservancy (ATC), and ATC-affiliated Local A.T. Clubs in the unique Cooperative Management System (CMS) for the ANST.}</p>	Table 5-1 has been updated and a footnote added.
6-1	6.1	Lines 23, 36, 37 buffer of 307 feet on the north side and 273 feet on the south side, totaling 580 conflicts with Lines 29, 30 states buffer of 283 feet on the north side and 317 feet on the south side, page 1-7, section 1.3.	The text in Section 6.1 has been updated.
6-10	6.1.1.7	<p>Topsoil is not commonly found on slopes that are greater than 50 percent, as soils in these areas will naturally wash away; therefore, topsoil will not be placed on slopes that are greater than 50 percent during restoration activities. However, these areas will be treated as soon possible to minimize erosion potential.</p> <p>This statement is not true. Forested soils on these slopes can and do have topsoil (O and A horizons) and depths will vary depending on slope position and aspect. Protecting topsoil on these slopes is very important for maintaining soil productivity. Topsoil will be segregated and replaced on these slopes unless site conditions require a variance, in which case a soil amendment will be applied, such as Proganics, which will help mitigate the loss of the topsoil on these slopes.</p>	The text in Section 6.1.1.7 has been updated.
6-11	6.1.1.8	<p>Line 7 – The phrase “impacts...is” is an incorrect singular/plural use.</p> <p>Line 11+, Table 6-2. Define “PEM and PSS” as used in the 3rd column “Cowardin Class”, and “RPWWD and ISOLATE” and used in the 5th column “Water Type.”</p>	The text in Section 6.1.1.8 has been updated. Definitions of the terms PEM, PSS, and Isolate have been defined as a footnote to table 6-2. RPWWD is not defined because that type of wetland is no longer affected.

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6-14	6.1.1.9	Lines 34-35. During construction, access along roads FR #972 and FR #11080 must be maintained not only to USFS, but also to other non-USFS entities for emergencies (ie: Search And Rescue). Motor vehicle access to the Appalachian National Scenic Trail near Symms Gap via these two roads is traditional, expected, known, and essential. Almost always, initial emergency response is by non-USFS official entities (local rescue squads). Please reword this sentence. Consider: "During the construction phase, motorized access along Pocahontas Road (FR #972) and Mystery Ridge Road (FR #11080) will be maintained at all times for use by USFS and other USFS-authorized official personnel for administrative and emergency response use."	The text in Section 6.1.1.9 has been updated.
6-15	6.1.1.11 Topsoil Segregation	On slopes greater than 50% where topsoil is minimal, disturbed areas will be covered with jute netting or other biodegradable erosion control material compatible with establishing vegetation on these steeper slopes during reclamation. Topsoil will be segregated and replaced on these slopes unless site conditions require a variance, in which case a soil amendment will be applied such as, Proganics, which will help mitigate the loss of the topsoil on these slopes. The Forest Service will provide policies and procedures to be followed when requesting variances on NFS lands.	The text in Section 6.1.1.11 has been updated. However, Mountain Valley is still awaiting variance policies and procedures from the USFS.
6-15	6.1.2.2	"On slopes steeper than 30 degrees..." Put the equivalent slope percent in parenthesis after 30 degrees and verify that it is meant to be 30 degrees rather than 30 percent for stove-pipe construction.	The text has been updated to reflect both degrees and percent slope (30 degrees is approximately 58% slope).
6-15, 6-16	6.1.2.1	This section should include a table summarizing the predicted extent of blasting on the JNF, using industry standard assumptions, at least showing mileages of corridor on JNF with bedrock greater than 60" depth, bedrock less than 60" depth, and hard bedrock less than 60" depth.	A Bedrock Rippability and Possible Extent of Blasting on JNF table has been included as table 6-4.
6-16	6.1.2.1	Lines 9-14. Change "bulletin boards" to "existing USFS information kiosks," and add statement that MVP may construct, install, maintain additional information kiosks and post blasting warning signs there as deemed necessary by USFS.	The text in Section 6.1.2.1 has been updated as requested.

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6-18	6.1.2.2 Stove-Pipe Constr.	This construction technique will reduce the length of pipe that will be handled at any one time and minimize the amount of open trench on steep slopes. MVP will notify the USFS if it applies for a variance from VA DEQ regarding open trench length and will be required to justify such a variance. The Forest Service will provide policies and procedures to be followed when requesting variances on NFS lands. All variances on NFS lands must be approved by the Forest Service.	VADEQ Minimum Standard 16A limits the amount of trench associated with underground utility lines that may be open at any one time to be no more than 500 linear feet. Mountain Valley is requesting a variance from the VADEQ to Minimum Standard 16-A as described below: This Variance is requested due to the length of the Project, the diameter of the pipe involved, the equipment required to facilitate installation, construction techniques utilized, and the desire to create safe working conditions for all employees involved in the Project. A project of this type requires multiple overlapping and sequential activities such as tree felling, clearing, installation of ESC devices, grubbing, grading, trench excavation, pipe stringing, pipe bending, pipe welding, pipe inspection, pipe installation in the trench, backfilling of the trench, hydrostatic testing of the pipeline, and reclamation/final cleanup. Since all of these tasks are dependent on the task before it, a significant length of work area is required to eliminate the conflicts that occur with working in close proximity in order to ensure the safe and timely completion of the work. It is anticipated that Mountain Valley will request a variance from the USFS to open more than 500 linear feet of trench line at one time. Mountain Valley is waiting for the USFS to provide policies and procdures for requesting a variance.
6-18	6.1.2.4	Lines 10-12. Use of the word “heavily” is subjective and inadequate. It implies that any silt-laden water that is “less-than-heavily” silt-laden may flow into waterbodies and wetlands.	The word "heavily" has been removed from Section 6.1.2.4.
6-18	6.1.2.5 Winter Constr.	When snow accumulation is more than one foot, it will be removed from both the working and spoil sides of the construction right-of-way prior to topsoil segregation and grading to prevent mixing of snow with excavated spoil. On NFS lands, do not segregate topsoil segregated when it is frozen or saturated with water.	The text in Section 6.1.2.5 has been updated.
6-19	6.3	It is unclear who the “all parties mentioned above” are.	The text in Section 6.3 has been updated.
6-21	6.4.1.3 Compliance Inspection Contractor	Occasional post-construction inspections to monitor revegetation and ensure restoration success will then be transferred to FERC staff or FERC staff’s general inspection contractor. On NFS lands, the Forest Service will determine the frequency of inspections and whether success of restoration has been met. The Forest Service will have monitors on site.	The text in Section 6.4.1.3 has been updated.
6-22	6.4.4 And throughout document	Line 24, and/or elsewhere: The Forest Service will provide language regarding compliance monitoring and inspections on NFS lands.	Language on compliance monitoring and inspections as dictated in the FERC Plan, FERC Procedures, and other state and federal permits are currently included in the Plan of Development. Mountain Valley is awaiting direction from the USFS regarding compliance monitoring and inspects on NFS lands.

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6-23	6.4.4 Env Inspection	Keeping records of compliance with the environmental conditions of the FERC Order, the BLM Right-of-Way Grant, and other federal or state environmental authorizations during active construction and restoration Forest Service policies and procedures required in the POD should be included in this statement.	The POD has been included in the referenced statement in Section 6.4.4.
6-24	6.5.1	This Road Closures section needs significant additional work and correction. The Appalachian National Scenic Trail (FT #1) is coincident with Pocahontas Road (FR #972) for approximately ¼-mile beginning at the junction with Clendenin Road and public access for ANST hikers must absolutely be maintained at all times during construction and operation phases. There are maps in this document package that erroneously show the ANST as separate from and parallel to FT #972 in this area – this is wrong. Motor vehicle access for emergency response personnel from multiple agencies, and for administrative use by USFS personnel on both FR #972 and FR #11080 must be maintained at all times during both construction and operation phases.	The text in Section 6.5.1 has been updated to reflect that closure orders are not anticipated. The POD has been revised to ensure continued public access for hikers on the ANST along Pocahontas Road during construction. Mountain Valley is working to develop a plan for safe use of the ANST that will be submitted to the USFS for approval.
6-24	6.5.1	Temporary road closures must be submitted to OIG and approved. This process can take between 6 to 12 months. It is important that this process be started early.	Because Mystery Ridge, Brush Mountain, and Pocahontas Roads are closed to public use, Mountain Valley does not anticipate that a closure order will be necessary.
6-24	6.5.3	The Appalachian National Scenic Trail (FT #1) is coincident with Pocahontas Road (FR #972) for approximately ¼-mile beginning at the junction with Clendenin Road and public access for ANST hikers must absolutely be maintained at all times during construction and operation phases. There are maps in this document package that erroneously show the ANST as separate from and parallel to FT #972 in this area which is wrong.	All figures within the Plan of Development have been updated with the ANST file confirmed correct by Andrew Downs on March 21, 2017. The figures now show the ANST coincident with Pocahontas Road for approximately the first 1/4 mile beginning at the junction with Clendenin Road.
6-24	6.5.3	Instead of "undertake grading to level the roadway bed and remove rutting," use "utilize road grading to remove ruts, fill potholes, and ensure proper drainage." Ensuring proper drainage would likely including crowning (not leveling) (i.e., 2% slope from the center to each shoulder).	The text in Section 6.5.3 has been updated.

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6-25	6.5.2	<p>Lines 12-14. This proposed wash rack must be sited so as not to interfere with or diminish the experience of public use of the ANST in this area, in an area approved by USFS. As stated in a prior comment, the Appalachian National Scenic Trail (FT #1) is coincident with Pocahontas Road (FR #972) for approximately ¼-mile beginning at the junction with Clendenin Road and public access for ANST hikers must absolutely be maintained at all times during construction and operation phases. There are maps in this document package that erroneously show the ANST as separate from and parallel to FT #972 in this area – this is wrong.</p> <p>Line 16. The proposed grading from station 7+00 to 18+50 will at least partially be on the section of s Road that is coincident with the ANST and must be done so as not to impact public use of the ANST.</p>	<p>The text has been updated in Section 6.5.3 to state that the wash rack will be located on private property prior to entering NFS lands and within an approved Additional Temporary Workspace. The ANST temporary relocation is discussed in Section 6.5.1.</p>
6-25	6.5.2	<p>264+50 – replace or repair existing 60-inch culvert. Consult with the Forest Service to determine what type of culvert to use for replacement.</p>	<p>Following recent maintenance of Pocahontas Road, it is not anticipated that the existing 60-inch culvert at station 264+50 will need to be replaced.</p>
6-25	6.5.2	<p>There is a second 60” culvert on Kimbalton Branch/tributary that is not indicated here at approximately station 275-280. Verify the site specific location with Forest Service staff and document it on the sheet. This second 60” culvert also needs replacement and upgrading. Consult Forest Service to discuss what type of culvert should be used for replacement.</p>	<p>A 60-inch culvert is now depicted on the Alignment and Erosion and Sediment Control sheets at station 278+00. No repairs or replacements are anticipated for this culvert.</p>
6-25	Lines 1-3	<p>Please correct wording/description of widening of the roadway.</p>	<p>The POD no longer has a Section 6.5.3. Note that the POD has been renumbered, and the text has been revised in Section 6.5.2.1.</p>
6-25	Lines 7-9	<p>The Forest Service would prefer design of culverts to pass a 25 year storm event, where feasible. Consult with the Forest Service to determine the types of culverts that should be used.</p>	<p>Culverts identified on Pocahontas Road currently meet the requirements for a 25-year storm event with the exception of the culvert at station 152+50. Mountain Valley intends to replace the existing 24-inch culvert with a 42-inch culvert.</p>
6-25 and 6-26	6.5.3	<p>“MVP will replace five existing culverts and install three new culverts along the 5 route” and “Location of specific road improvement” list. Comment: new and replacement culverts should be evaluated for fish passage and provide adequate passage as appropriate.</p>	<p>The culvert that will be replaced at 152+50 will be countersunk upon insertion. Countersinking is a common practice requested by the US Army Corps of Engineers to allow for aquatic species passage through culverts.</p>

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6-27	6.7	<p>Line 1 – first sentence is unclear. Possibly add “At” as the first word.</p> <p>Lines 6-7 – as stated in a prior comment, Change “bulletin boards” to “existing USFS information kiosks”, and add statement that MVP may construct, install, maintain additional information kiosks and post blasting warning signs there as deemed necessary by USFS.</p> <p>Lines 9-14. As written, this section implies that the ANST only crosses Pocahontas Road (FR #972) once, when in fact it is coincident with the road for ~ ¼-mile. Develop and submit for approval by the USFS a realistic plan for providing for the safe use of this area by ANST hikers and backpackers. As stated in a prior comment, the Appalachian National Scenic Trail (FT #1) is coincident with Pocahontas Road (FR #972) for approximately ¼-mile beginning at the junction with Clendenin Road and public access for ANST hikers must absolutely be maintained at all times during construction and operation phases. There are maps in this document package that erroneously show the ANST as separate from and parallel to FT #972 in this area which is wrong.</p> <p>Line 16. Add text to define the “construction lay down area” and whether it is on USFS lands.</p> <p>This entire section (6.7 – Safety Requirements during Construction) appears to be rudimentary and very incomplete.</p>	<p>The text in section 6.7 has been updated. The POD has been revised to ensure continued public access for hikers on the ANST along Pocahontas Road during construction. Mountain Valley is working to develop a plan for safe use of the ANST that will be submitted to the USFS for approval.</p>
6-4	6.1.1	<p>Lines 15-21. Make it clear that property boundary line reestablishment includes remarking or reposting the boundary line itself (between corners) to USFS standards, in addition to reestablishing any boundary monuments and associated witness/bearing trees that are disturbed. See prior comment in section 2.2</p>	<p>The text in Section 6.1.1 has been updated.</p>

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
6-5	6.1.1.2	<p>“Merchantable timber will be cut into lengths and stacked as described in the Timber Removal Plan in Appendix I off the edge of the right-of-way. Brush and slash will be windrowed. The windrows will generally range from 10 to 20 feet in width and 6 to 8 feet 26 in height.”</p> <p>The USFS would like logging slash and other organic debris left in place as much as possible during and after clearing. Windrowing this material to the edge of the ROW can possibly remove topsoil along with the windrowed brush. USFS would like to leave the brush and slash in place after harvest and remove what is necessary during initial construction when stumps are removed, topsoil segregated and excavation occurs. This will help protect the cleared ROW during the interval between clearing and construction and minimize windrowing of brush and slash. Minimizing windrowing will protect topsoil, allow for distribution of slash over the area and provided organic matter and nutrients to the soils as it decomposes. The brush will need to be pushed aside in areas where topsoil is segregated, which is generally trench and excavated work areas where stumps are removed and is explained in the topsoil segregation section of the POD. Spreading the brush material after seeding with equipment is not recommended due to possible compaction and reduced germination.</p>	<p>Mountain Valley must windrow the slash and brush prior to topsoil segregation. The entire width of the right-of-way (ROW) must be utilized for slash and brush windrowing, topsoil segregation, and construction work area (travel lane and trench spoil removal storage). Distribution of slash across the ROW does not allow for safe construction practices as the heavy equipment would track over the slash and drag it through the topsoil. Additionally, the brush and slash could be compacted into the soil. Mountain Valley requires windrowing the slash in order to keep it out of the way of construction activities to safely complete the Project. Alternately, Mountain Valley could request that the contractor chip all of the slash and spread the chips across the ROW or blow them off ROW. Blowing the chips off ROW would allow for the most usable workspace to accomplish the construction of the pipeline.</p>

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
6-5, 7-5, Also in App I p4	6.1.1.2, 7.9, 4.1	<p>6.1.1.2 - Lines 23-27 – windrows as a treatment for unmerchantable timber and slash</p> <p>7.9 – Info is lacking about windrows and slash App I, 4.1 - Lines 21-37 – windrows</p> <p>The references to sections 6.1.1.2 in the POD and 4.1 in Appendix I provide a description of windrows comprised of brush and slash that will be 10-20 feet in width, 6-8 feet in height with breaks approximately every 100 feet. A description about how these windrows will be incorporated into Scenery Mitigation in section 4.1 is needed. See other comments regarding windrowing on NFS lands.</p>	<p>Mountain Valley is confident that the use of windrows for brush and slash would not result in any substantive change to the expected visual impact levels documented in the Jefferson National Forest Visual Impact Assessment (VIA) submitted May 10, 2017, and therefore would not result in a need for additional scenery mitigation specific to the windrows. The rationale for that position is based on the limited incremental visual effect from the presence of windrows within the cleared temporary construction right-of-way (ROW) and the temporary duration of potential windrow visibility as a result of the scenery mitigation measures already planned.</p> <p>The visual characteristics of the brush and slash windrows will be such that the windrows would likely be noticeable to people with a clear view of the ROW within a relatively close distance, such as a foreground or near middleground viewing distance, during the initial period immediately following construction. In such viewing locations and circumstances, the dominant source of visual contrast would be the cleared temporary construction ROW itself; if and where the windrows might be visible, they would create little additional contrast, would not change the overall visibility of the ROW, and would not cause a measurable change in the visual impact at the specific location. Table 1 in the Jefferson National Forest VIA summarizes the visual impact results for 36 applicable Key Observation Points (KOPs). Project visibility and visual impact were determined to be low or none for all but two of those KOPs, with KOP-416 and KOP-411 representing the two exceptions. For KOP-416 at Giles High School, the Project was assessed to have high visibility and high visual impact immediately after construction, with moderate visibility and visual impact in the long term. The simulation for this KOP (VIA Appendix B, Figure 13b) indicates that the cleared ROW on the slope of Peters Mountain would be noticeable at a distance of 2.5 miles from the KOP. It is questionable whether windrows within the ROW on JNF lands would be visible from this location; if and to the extent that the windrows were visible immediately after construction, that condition would not change the visibility and visual impact levels associated with the cleared ROW itself. For KOP-411 at Kelly Knob, the Project was assessed to have moderate visibility and moderate visual impact immediately after construction, with low visibility and visual impact in the long term. The simulation for this KOP (VIA Appendix B, Figure 16b) indicates that the cleared ROW on the northwesterly slope of Sinking Creek Mountain would be visible at a distance of 2.1 miles from the KOP. However, the portion of the ROW visible from this location would be on private lands and not on JNF lands. Therefore, windrows on JNF lands would not be visible from this location even in the period immediately after construction, and there would no change to the visibility and visual impact levels associated with the cleared ROW itself.</p>

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
			<p>The potential visibility of brush and slash windrows would be a temporary and relatively short-term condition of as a result of the ROW revegetation plan. The windrows would be left within the temporary construction ROW, which would be subject to revegetation through use of shrub plantings and shrub seed mixes. Seed mixes including woody species would be used in areas where forest regeneration is desired, such as on the JNF lands. MVP expects that shrubs and tree saplings would create sufficient new growth within the temporary construction ROW to provide reasonably effective screening of the windrows. In addition, the feathering of the ROW edges that will be conducted in High SIO areas will result in a tree-cover pattern that will provide opportunities for screening some of the windrows in those areas.</p> <p>In summary, Mountain Valley believes that the use of windrows will not result in incremental visual effects that warrant additional mitigation, and that application of the scenery mitigation measures already planned will avoid</p>
6-6	6.1.1.3	Line 20, 21 Pipe Assembly – incomplete sentence.	"Pipe Assembly" has been removed from Section 6.1.1.3.
6-6	6.1.1.3	Lines 17-18. If there is no colocation with existing infrastructure on USFS lands, then this sentence is unclear. Clarify this sentence. Lines 20-21. Delete "Pipe Assembly"	Mountain Valley is co-locating with Mystery Ridge Road on JNF lands. The text has been updated in Section 6.1.1.3 to clarify. Also, "Pipe Assembly" has been removed from Section 6.1.1.3.
6-6	6.1.1.3	During the open trenching phase, the width and depth of the open trench can entrap wildlife and herpetile species that inadvertently cross the construction area, especially at night, and species that usually live just underground and in adjacent burrows. Injury and potential mortality can occur to individuals, especially if water is present at the bottom of the trench. Develop conservation measures to minimize wildlife and herpetile entrapment.	The text in Section 6.1.1.3 has been updated.
6-7	6.1.1.4	Excess soil will be distributed evenly on the right-of-way, only in upland areas, 40 while maintaining existing contours. Excess soil will distributed prior to topsoil replacement.	The text in Section 6.1.1.4 has been updated to reflect that excess soil will be distributed prior to topsoil replacement.
6-8	6.1.1.6	Lines 22-23 – sentence refers to “temporary extra workspaces.” If this is the same as Additional Temporary Work Spaces (ATWS), change term for consistency. If different, define and describe.	The text in Section 6.1.1.6 has been updated.
6-8	6.1.1.7	<p>Line 40 – Reword sentence – “The use of for temporary.....”</p> <p>Line 41 –Use consistent terminology. It is unclear if “expanded workspace areas” is referring to ATWS.</p> <p>Line 42 and continuing on Lines 1 and 2, next page – states ~ 1 acre of ATWS on south side of Sinking Creek Mtn on USFS. Appendix A-1, sheet 240 of 329 (PA-MOVA-H600-01) defines this as 2 sites totaling 24,000 sq.ft, = 0.55 ac. This is a significant difference. Confirm and clarify.</p>	The text in Section 6.1.1.7 has been updated to reflect that approximately one acre will be utilized for ATWS on USFS property. The reference in Section 6.1.1.7 of ATWS only being along Sinking Creek Mountain was incorrect.

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Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
6-9, 6-10	6.1.1.7	Silt fence and super silt fence will be used to stop rocks from rolling off the right-of-way. Silt fence is not designed to stop rolling rocks.	Mountain Valley will utilize silt fence and super silt fence to control sediment from leaving the right-of-way. Silt fence is not intended to prevent rocks or other debris from rolling off the right-of-way. The text in Section 6.1.1.7 has been updated.
7-1	7.0	Line 9. Change “This” to “The.” “This” document is not the ECMP.	The text in Section 7.0 has been updated.
7-2	7.3	Water Quality section could use another general section. Highlight additional measures that could be implemented to limit impacts to water resources. Examples such as: narrowing LOD where possible to minimize wetland or sensitive areas, limiting construction timing on steep slopes or stream crossings outside of the wettest times of year that typically correspond with July precipitations, or accelerated construction schedule on steep slopes. Expand here with Best in class or Best Management practices.	A new section, 7.3.3 Impact Avoidance and Minimization has been added to the Plan of Development.
7-2	7.3.1	Appendix T is blank currently. This document is currently in review with the Virginia Department of Environmental Quality and will be provided once approved. The Forest Service would like to review this document.	The Project Specific Annual Standards and Specifications is currently awaiting approval from VADEQ. Following approval, Mountain Valley will provide a copy of the approved document to the USFS for their records..
7-3	7.5.1	As stated in a prior comment for section 6.1.2.1, it is appropriate and necessary to quantify an estimate of the amount of blasting planned for USFS lands in this main POD document. This section should include a table summarizing the predicted extent of blasting on the JNF, using industry standard assumptions, at least showing mileages of corridor on JNF with bedrock greater than 60” depth, bedrock less than 60” depth, and hard bedrock less than 60” depth.	A reference to Table 6-4 has been added to Section 7.5.1.
7-5	7.8	OHV Control and Access – Thank you for incorporating the language regarding allowing wheelchair access at appropriate locations in coordination with the Forest Service. This will not be needed very many places – only where a gate, barrier or berm is installed on a road to close it to motorized traffic, but foot travel is encouraged beyond the gate or barrier.	Text has been added to Section 7.8.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
7-5	7.9	<p>The ANST was found eligible for the National Register of Historic Places (Reeve, et al., May 2016). MVP proposes to avoid adverse effects on the ANST by boring under it. However, according to guidelines established under 36 CFR 800.5: Assessment of Adverse Effects, paragraph 2, subpart 5, we find that the MVP would have an adverse effect on the ANST due to the (V) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features.</p> <p>However, this adverse effect would be limited to the construction phase of the project.</p>	Text has been added to Section 7.9.
7-5	7.9	Line 21 from managed vistas. To ensure compliance with SIOs in the Jefferson National, MVP... Jefferson National should say Jefferson National Forest.	The requested change has been made.
7-5	7.9	Line 36 – This states that MVP will maintain a 300 foot vegetative buffer between the ROW and the ANST. Please insert the word “approximately” before 300 foot, or be more specific per the plan to provide 283’ on the north side of the ANST, and 317’ on the south side of the ANST (from the ANST footpath to the bore openings).	The text has been added to Section 7.9.
7-5 and 7-6	7.9	<p>Lines 19-21. Revise this sentence for accuracy. It should be replaced with a sentence or statement supported by the MVP FEIS analysis. Line 21. Missing the word “Forest” after “National.”</p> <p>Line 36. Statement is inaccurate. The vegetative buffer is less than 300’ on the north side of the ANST crossing.</p> <p>Page 7-6, Lines 1-3. This statement is inaccurate. There will be more than “low to no visual impacts” on the JNF and the ANST. Revise statement and incorporate language supported by the MVP-FEIS analysis.</p>	Following the issuance of the Final EIS (anticipated on June 23, 2017) the results of the VIA assessment included in the Final EIS will replace the opening sentence in Section 7.9. Additional text in Section 7.9 has been updated as requested.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
7-5 and 7-6	7.9	<p>See the Forest Service comments filed with FERC on March 31, 2017, regarding MVPs February 2017 Visual Impact Assessment (VIA). In this filing, the Forest Service requested a meeting with MVP to further discuss several aspects of the VIA as well as mitigating measures to reduce impacts to scenery. Per the USFS's conversation with FERC, and in order to reduce the effects of forest fragmentation on NFS lands and also reduce effects on visual resources, the permanent right-of-way should be maintained consistent with FERC's Wetland and Waterbody Construction and Mitigation Procedures (Procedures), for the length of the entire right-of-way on the JNF. Therefore, the ROW would not be cleared for the width of the right-of-way; the permanent right-of-way would be maintained in an herbaceous state for only a 10-foot-wide corridor centered over the pipeline. The remainder of the corridor should be replanted with shrubs or shallow-rooted trees as approved by the USFS and in accordance with FERC's Procedures.</p>	<p>As discussed during the June 5, 2017 USFS/BLM Executive Team Call, Mountain Valley will continue to coordinate with the USFS on revegetation of the temporary construction right-of-way (ROW) and restoration of the permanent pipeline ROW.</p>
8-3	8.5	<p>Lines 5, 7, and 12. Repeated use of "USFS Law enforcement" – either both words Law and Enforcement should be capitalized, or neither. Lines 7-9. This sentence is hard to understand. Please clarify.</p>	<p>The text in Section 8.5 has been updated.</p>
8-3	8.6	<p>Line 18. The phrase "..., existing access roads on JNF...." is unclear. Consider beginning the sentence on Line 17 with, "Two existing USFS roads, Pocahontas Road (FR #972) and Mystery Ridge Road (FR #11080) will be improved for use during construction. " Line 19-24. Clarify if "extending" one or both of these roads considered to be "new road construction" and consult with the Forest Service engineer. FR #972 leads to and connects to FR #11080 on the ground now. Lines 24-25. Rephrase for clarity. Consider something like "MVP does not intend to utilize or perform any work on the northwestern portion of FR #11080 west of milepost XXXXX where the pipelines ROW first intersects with this road from the west.".....</p>	<p>The text in Section 8.6 has been updated. Mountain Valley does not anticipate the need to extend the USFS roads.</p>

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
9-1	9.0	<p>Lines 30-39: This pertains to maintenance of herbaceous vegetation in the permanent ROW of 50' to be mowed. Per the USFS's conversation with FERC, and in order to reduce the effects of forest fragmentation on NFS lands and also reduce effects on visual resources, the permanent right-of-way should be maintained consistent with FERC's Wetland and Waterbody Construction and Mitigation Procedures (Procedures), for the length of the entire right-of-way on the JNF. Therefore, the ROW would not be cleared for the width of the right-of-way; the permanent right-of-way would be maintained in an herbaceous state only in a 10-foot-wide corridor centered over the pipeline. The remainder of the corridor should be replanted with shrubs or shallow-rooted trees as approved by the USFS and in accordance with FERC's Procedures.</p> <p>The FS anticipates that following construction, there will be specific locations identified where the edges of the right-of-way will need to be maintained in such a way as to reduce a hard shadowline in order to meet the Scenic Integrity Objective. Upon determining these specific locations, the POD should incorporate a map or table of these locations and provide instructions for special considerations to retain edge design features such as feathering, undulation, etc.</p>	<p>As discussed during the June 5, 2017 USFS/BLM Executive Team Call, Mountain Valley will continue to coordinate with the USFS on revegetation of the temporary construction right-of-way (ROW) and restoration of the permanent pipeline ROW.</p>
9-2	9.0	<p>In Table 9-1 – specify which of these Pipe Classes apply on NFS lands. Confirm and state it is all Class 2. Line 11, change “USFS NFS trails” to “USFS trails” or similar.</p>	<p>A footnote has been added to Table 9-1 to clarify that Class 2 pipe will be installed on NFS lands. Text in section 9.0 has also been updated.</p>
9-2	9.1	<p>This section on access during the operations and maintenance phase (30-years plus) needs improvement. State the basics that the company will require access during that time, via the established pipeline corridor, and FR #972 and FR #11080 and FR # 188; and that the company will keep access for emergency response use and USFS administrative use of those roads unobstructed at all times. If the company proposes to use any types of motorized vehicles (trucks, UTVs, ATVs, etc.) to access the pipeline or along the pipeline on USFS lands, that should be stated here for review and consideration by the Forest Service.</p>	<p>The text in Section 9.1 has been updated.</p>
9-3	9.4	<p>This section on safety during the operations and maintenance phase should be improved. Lines 14 and 15 should be expanded to include long term monitoring of sensitive areas not only “within” the ROW but also adjacent to and/or in the vicinity of it.</p>	<p>The text has been added to Section 9.4.</p>

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Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
The text in Section 9.9 has been updated. A77:F77	9.9	Revise this section on contingency planning for increased clarity. The first sentence seems counter-intuitive because contingency planning is needed in advance, not “on a situational basis.” The second sentence appears to be missing a word or words and does not make sense as written.	The text in Section 9.9 has been updated.
Document Name: February 2017 DRAFT POD – Appendix A: Map Appendix			
	App A, App A-1, and Others	Beginning with Sheet 11 of 20, Drawing No. MVP-AR-H600-11, the sheets have one or more text boxes that state “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS.” This is unclear because both the darker green shaded and the medium-purple shaded (Wilderness) lands meet this statement. Add to legend the definitions for the colors used. The red “scalped” line is unclear because it appears to be highlighting the areas on each sheet that are part of “revision 4” but the reasoning for this is unclear.	The requested changes have been made.
	App A, App A-1, and Thru-out	Beginning on Sheet 12 of 20, Drawing MVP-AR-H600-12, the sheet does not accurately show the extent and boundaries of USFS lands in Giles and Craig Counties in the upper right quarter/quadrant of the sheet. Add/Correct. Mountain Lake Wilderness (USFS) is not shown on part of the USFS lands in the top center of the sheet, east of the actual “Mountain Lake” waterbody and community that is shown.	The requested changes have been made.
MVP Filename: Attachment DR4 General 2b Part 2			
Document Name: Appendix A-1 Continued			
	App A-1	Please date and number all pages of all documents.	All pages are dated and numbered.
2	App A-1	Please verify the location of the ANST in relation to the beginning of Pocahontas Road. This comment applies to the full POD.	The POD now reflects an ANST location as specified by Andrew Downs of the Appalachian Trail Conservancy. The location of ANST along the first approximately 1/4-mile of Pocahontas Road has been revised to show the ANST coincident with the road.
7	App A-1	Page 7 references 'New Road Construction' between stations 309 and 328 near the intersection of Pocahontas Road and Mystery Ridge Road. Please clarify as	The reference to new road construction has been removed from the alignment sheets. No new road construction is anticipated.
10	App A-1	Sheet 10 appears to show the pipeline crossing Mystery Ridge Road just after the switchback, between 10360+00 and 10370+00. Please clarify if this is accurate. If so, this crossing was not mentioned in the narrative portions of the POD, nor was it identified in the construction plan for this road. Other crossings of Mystery Ridge Road are also shown in A-3, topo maps around M.P. 196.7 and 196.8 but are not shown on the alignment sheets.	The requested changes have been made. Mountain Valley parallels Mystery Ridge Road and then crosses it one time. Sheet 10 and the topo maps in A-3 have been revised to reflect only one crossing.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
Sheet 13	App A-1, Sheet 13.	Sheet 13 of 20 = Drawing MVP-AR-H600-13. See similar comments about the need to clarify “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS.” Add appropriate information to legend – green USFS, purple USFS Wilderness. Remove red scalloped line for Revision 4. “MOUNTIAN” is misspelled in FR-188 BRSH MOUNTIAN ROAD.	The requested changes have been made.
Sheet 78	App A-1	<p>Sheet 78 of 109 = MVP-ADAR-H600-78.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Change “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS” label. <input type="checkbox"/> Lower left corner shows ANST separate from the roads at the junction of Clendenin State Road and FR-972 – this is WRONG. ANST crosses Clendenin Road at this junction and is coincident with and the same location as FR-972 from the junction with Clendenin Road to the point shown at ~ station 6+00. The ANST must be fully considered, and the safely and uninterrupted passage of ANST hikers must be maintained, in this area. The proposed apron ATWS widening WILL impact the ANST as shown. <input type="checkbox"/> Show all current utility line crossings of USFS lands – several are not shown on this and other alignment sheets. <input type="checkbox"/> At ~ 95+00 on FR-972, a spur road exists under a major powerline. Access to this road must be kept open and it should be shown on all maps. <input type="checkbox"/> Existing USFS gates should be shown on this and all maps. 	The requested changes have been made.
Sheet 78	App A-1	Narrow the LOD to minimize impacts to W-HH14 and W-HH15.	Wetland W-HH14 is not impacted by the project. Wetland W-HH15 will be crossed via temporary timber mat placement. No impacts as result of earthen or gravel fill will occur within Wetland W-HH15.
Sheet 78	App A-1,	<p>Sheet 78 of 109 = Drawing MVP-QDAR-H600-78.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Change “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS” label. <input type="checkbox"/> Lower left corner shows ANST separate from the roads at the junction of Clendenin State Road and FR-972 – this is wrong. ANST crosses Clendenin Road at this junction and is coincident with and the same location as FR-972 from the junction with Clendenin Road to the point shown at ~ station 6+00. The ANST must be fully considered, and the safely and uninterrupted passage of ANST hikers must be maintained, in this area. The proposed apron ATWS 	The requested changes have been made.

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Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
Sheet 79	App A-1	<p>Sheet 79 of 109=MVP-QDAR-H600-79.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Change “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS” label. <input type="checkbox"/> At ~ 95+00 on FR-972, a spur road exists under a major powerline. Access to this road must be kept open and it should be shown on all maps. Show all powerlines. <input type="checkbox"/> Existing USFS gates should be shown on this and all maps. 	The requested changes have been made.
Sheet 79	App A-1	<p>Sheet 79 of 109 = MVP-ADAR-H600-79.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Same comments as above for Sheet 79 of 109 = MVP-QDAR-H600-79. 	The requested changes have been made.
Sheet 80	App A-1	<p>Sheet 80 of 109=MVP-QDAR-H600-80.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Change “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS” label. <input type="checkbox"/> Sheet erroneously shows a “P/L” (Property Line) running from nw to se in the upper right quadrant, in the middle of solid USFS ownership. Review and correct. <input type="checkbox"/> Existing USFS gates should be shown on this and all maps. <input type="checkbox"/> Show all existing powerlines. <input type="checkbox"/> This sheet shows temporarily removing the existing gate at 252+10, and some new road construction beginning at 309+00. Because the current FR #11080 joins FR #972 at either 252+10 or 328+00, either all of this is current road “improvements” or all of this is “new road construction.” Please clarify the changes at 309+00. 	The requested changes have been made. However, Mountain Valley did leave the property line exhibited on the mapping. The property line at that location is shown because the parcel shape files have this as a seperate parcel with a unique Tax ID.
Sheet 80	App A-1	<p>Sheet 80 of 109 = MVP-ADAR-H600-80.</p> <p>Same comments as above for Sheet 80 of 109 = MVP-QDAR-H600-80.</p>	The requested changes have been made.
Sheet 80	App A-1	<p>Station 264, related to culvert on Kimbalton Branch. The 60” culvert needs upgrading. This should be replaced with an adequate fish passage structure, such as arch culvert of oversized culvert with stream simulation/appropriate bottom habitat. Please consult with the Forest Service as needed and update the sheet accordingly.</p>	Following recent road maintenance by Mountain Valley, it is no longer anticipated that the existing 60" culvert at 264+00 will need to be replaced.
Sheet 80	App A-1	<p>There is a second 60” culvert on Kimbalton Branch/tributary that is not labeled, approximately at station 275-280. Verify the site specific location and confirm the location on the alignment sheet. This second 60” culvert also needs replacement and upgrading. It should be replaced with adequate fish passage structure, such as an arch culvert of oversized culvert with stream simulation/appropriate bottom habitat. Update the sheet.</p>	Following recent road maintenance, it no longer anticipated that the existing 60-inch culvert at 264+00 will need to be replaced.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
Sheet 80	App A-1	There appears the need for a third culvert on Kimbalton Branch/tributary that is not labeled, approximately station 300-305. Indicate plans for this location as well. Update sheet.	Following recent road maintenance, MVP reopened the road side ditch in this location to allow water run off to drain to existing road drains. It not anticipated that a culvert will be necessary between stations 300+00 and 305+00.
Sheet 216	App A-1	Sheet 216 of 329 = PA-MOWV-H600-24. <input type="checkbox"/> Change “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS” label. <input type="checkbox"/> Red scalloped line denoting revision 5 should be clarified. <input type="checkbox"/> Consider adding a “modified” sheet which includes parts of 216 and parts of 217 and shows the entirety (both ends) of the bore under the ANST on a single sheet.	The requested changes have been made.
Sheet 217	App A-1	Sheet 217 of 329 = PA-GIVA-H600-01. <input type="checkbox"/> Change “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS” label. <input type="checkbox"/> Red scalloped line denoting revision 5 should be clarified. <input type="checkbox"/> Consider adding a “modified” sheet which includes parts of 216 and parts of 217 and shows the entirety (both ends) of the bore under the ANST on a single sheet.	The requested changes have been made.
Sheet 219	App A-1	Sheet 219 of 329 = PA-GIVA-H600-03. <input type="checkbox"/> Change “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS” label. <input type="checkbox"/> Red scalloped line denoting revision 5 should be clarified. <input type="checkbox"/> Explain why the ATWS would be located such that a boundary monument would be destroyed.	MVP-ATWS-1121 was placed in a way that will allow to optimize the available work area. As discussed in the Plan of Development, any boundary or monument markers that are removed during construction of the project will be replaced via civil survey.
Sheet 242	App A-1	Sheet 242 of 329 = PA-MOVA-H600-03. <input type="checkbox"/> Change “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS” label. <input type="checkbox"/> Red scalloped line denoting revision 5 should be clarified. <input type="checkbox"/> Improve the illustration and label FR #188 on this map.	The requested changes have been made.
Sheet 243	App A-1	Sheet 243 of 329 = PA-MOVA-H600-04. <input type="checkbox"/> Change “US NATIONAL FOREST SERVICE (NATIONAL FOREST) LANDS” label. <input type="checkbox"/> Red scalloped line denoting revision 5 should be clarified. <input type="checkbox"/> Better label and illustrate FR #188 on this map.	The requested changes have been made.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
MVP Filename: Attachment DR4 General 2b Part 3			
Document Name: Appendix A-3; Topographic Maps (Listed as Appendix A-2 on sheets)			
Page 1 of 3	Map, average slope of MVP pipeline through the JNF forest.	The legend shows the Appalachian National Scenic Trail but it is not seen on map.	The requested changes have been made.
p.2of4, p. 3 of 149.	App A-2	Remove the black line showing a decommissioned former USFS road within Peters Mountain Wilderness from lower right quadrant of this map. Show Ground Hog Trail (FT #65) on USFS lands on this map.	The requested changes have been made.
p.3of4, p. 4 of 149.	App A-2	Remove the black line showing a decommissioned former USFS road within Peters Mountain Wilderness from upper right quadrant of this map. Show Ground Hog Trail (FT #65) on USFS lands on this map. Correct the location of portion of FR #11080 between mileposts 197.0 and 197.4 on this map. It incorrectly shows as being within Peters Mountain Wilderness. It is near the edge of the orange proposed route, like is shown from 197.0 west and 197.4 east. USFS GIS roads layer was inaccurate, has been previously corrected.	The requested changes have been made.
p 4	Topo Maps	The topo maps show several crossings of Mystery Ridge Road that are not addressed in the construction plan for this road. Please clarify.	Mystery Ridge Road would be crossed once. The topo map set (Appendix A-3) has been revised to more clearly show this.
Document Name: Appendix B: Details Appendix			
p.7 of 149	App B	<p>Figure 1.11-1.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Remove the dashed line showing a decommissioned former USFS road within Peters Mountain Wilderness from upper right quadrant of this map. <input type="checkbox"/> Label/define the ANST bore. <input type="checkbox"/> Correct location of portion of FR #11080 between mileposts 197.0 and 197.4 on this map. It shows as being within Peters Mountain Wilderness. It is NOT. It hugs the edge of the orange proposed route, like is shown from 197.0 west and 197.4 east. USFS GIS roads layer was inaccurate, has been previously corrected. <p>Correct "Access Road" symbol in Legend.</p>	Figure 1.11-1 has been updated as requested

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
p. 9 of 149, "p.1 of 3".	App B	Average Slope map, page 1 of 3. Label the ANST Bore site. Show ANST on map – it is in Legend, but does not show on map. Rectangular chunk of land in upper left quadrant that is shown as a private land inholding is USFS lands (APPCo donation) – change color to match other USFS lands.	The requested changes have been made.
p.11 of 149, "p.3 of 3".	App B	Average Slope Map, page 3 of 3. Show and label FR #188 on this map (Brush Mountain Road), roughly along southern USFS boundary.	The requested changes have been made.
p.12 of 149	App B	Average Slope of Pocahontas Road Map. <input type="checkbox"/> Thank you for showing and labelling the Appalachian National Scenic Trail. <input type="checkbox"/> The rectangular chunk of land in upper left quadrant that is shown as a private land inholding is USFS lands (APPCo donation). Change the color to match other USFS lands. Remove the road shown as the continuation of FR #11080 Mystery Ridge Road from junction with ANST to the northwest. This road ends at the junction with ANST and does not continue on into WV.	The requested changes have been made.
Document Name: Appendix C-2; Virginia Erosion and Sediment Control Plan			
	App C2	Appendix C-2, Virginia Erosion and Sedimentation Control Plan is missing, except for the title page. This is the erosion and sedimentation control plan that would cover the parts of the proposed MVP pipeline that would cross the Jefferson National Forest.	Mountain Valley is currently working with the Virginia Department of Environmental Quality to finalize the Annual Standards & Specifications for the Project. Upon approval, the document will be provided.
MVP Filename: Attachment DR4 General 2b Part 4			
Document Name: VADEQ CONSTRUCTION GENERAL PERMIT; EROSION & SEDIMENT CONTROL PLAN			
C-1, page 3	1.1	This comment applies only if Appendix C-1 will be used on NFS lands. According to the Erosion and Sediment Control plan for West Virginia, Appendix C-1, "Maintained" means smoothing to remove ruts and adding stone. This smoothing that is being referred to actually describe road grading. The current definition for "Graded and Maintained" could include grading and/or widening. It is suggested that (at least for Forest Service owned roads), "Maintained" be updated to include grading and/or the addition of crushed stone, and "Graded and Maintained" be updated to "Widened and Maintained." Please differentiate between grading, which is a maintenance activity, from widening, which is reconstruction.	Mountain Valley has updated the drawings to include specific areas along Pocahontas Road (VA-GI-232) that will require temporary widening and grading.

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Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
MVP Filename: Attachment DR4 General 2b Part 5			
Document Name: Erosion and Sediment Control Plans: Construction Plans			
8	Tables 3.32 D & 3.32 C.	On NFS lands, only seed mixes previously provided by the Forest Service can be used. Update all documents discussing seed mixes accordingly.	Documents discussing seed mixes have been revised to reflect the proposed seed mixes, which are consistent with the guidance provided by USFS.
8	Tables 3.32 D & 3.32 C.	On NFS lands, MVP should only use the list of approved seed mixes and plants provided by the Forest Service.	Documents discussing seed mixes have been revised to reflect the proposed seed mixes, which are consistent with the guidance provided by USFS.
MVP Filename: Attachment DR4 General 2b Part 6			
Document Name: DRAFT Erosion and Sediment Control Plans – Maps with Diagrams			
2	Maps with diagrams	Between station 10301 and 10302, it appears narrowing the LOD could minimize impacts to Stream Crossing S-SS3. Consider narrowing the ROW in this section to avoid impacts to the headwater area.	Mountain Valley has reduced the limit of disturbance from the typical 125-foot-wide construction right-of-way to a 75-foot-wide limit of disturbance between approximate station 103+25 to 10301+75 to minimize impacts to Stream S-SS3 to the greatest extent possible.
2, 3	Maps with diagrams	Make note that potential mitigation measures are dependent on survey results in potentially sensitive environmental resource areas. Edit maps following survey results and mitigation development.	Mountain Valley is currently working with the USFS to establish environmentally and culturally sensitive areas. Mitigation for USFS lands will be established in a document separate from the Plan of Development. Should information need to be depicted on the Erosion and Sediment Control Plans, Mountain Valley will complete that for the final Plan of Development.
MVP Filename: Attachment DR4 General 2b Part 7			
Document Name: JNF Plan of Development - DRAFT Erosion and Sediment Control Plans – Maps with Diagrams			
	Maps and diagrams	It is difficult to follow the specifics in the drawings without mile posts identified. Please add references to mile posts.	Mileposts are exhibited on the Erosion and Sediment Control Plans included as Attachment C-3.
	Maps and diagrams	Several locations say existing culvert, while others say existing culvert to be upgraded. Without mile posts, it is difficult to determine if it would be an existing culvert or upgraded culvert. As such, ensure those culverts associated with access roads across Kimbalton Branch and tributaries need to be upgraded, which shall include improvements for fish passage, near MP 199 off forest and near MP 197 access road west of centerline.	Call outs point to the existing culverts and culvert to be upgraded on the Erosion and Sediment Control Plans included as Attachment C-3. Any culvert upgraded or improved on NFS lands will be countersunk to allow for aquatic species passage.
MVP Filename: Attachment DR4 General 2b Part 9			
Document Name: Appendix D – 1: West Virginia SPCC Plan			
All	All	Number the pages.	Page numbers have been added as requested.
2-4	2.0	West Virginia SPCC Plan, APPENDIX D-1, and Virginia SPCC Plan APPENDIX D-2, Populate Tables 2-1 to 2-5B (states done by contractors).	A column for Spread Number and Contractor have been added to the SPCC tables in both Appendix D-1 and D-2.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
3	2.0	West Virginia SPCC Plan, APPENDIX D-1, and Virginia SPCC Plan APPENDIX D-2, Tables Typo 3 should be 2-3.	The text in Section 2.0 has been updated.
Document Name: Appendix F: Landslide Mitigation Plan			
-	Appendix F	APPENDIX F, Landslide Mitigation Plan, Appendix, Drawing no. MVP-43B misspelling, trough should be through.	Drawing no. MVP-43B has been corrected as requested.
10	5.0	APPENDIX F, Landslide Mitigation Plan, minor route adjustments may require additional review and mitigation measures.	The text in Section 5.0 has been updated.
Document Name: Appendix G: Site Specific Design of Stabilization Measures on JNF			
8	1.0 In Appx G	<p>The Forest Service described JNF Priority Site #1 as: “From Station 10380+00 to 10390+00 on Drawing No. PA-GIVA-H600 -03 in Appendix A of MVP Plan of Development June 2016. Lowest downslope NFS lands on south side of Peters Mountain.”</p> <p>However, the JNF Priority Site #1 in Section 1.0 of Appendix G is described as: “This site is located on private property adjacent to National Forest Service lands, on the lower downslope south side of Peters Mountain, approximately between milepost (MP) 198.15 to 198.35 on the October 2016 Proposed Route.” Cross-section 1A-1A is a useful cross-section, but the cross-section and Slope Map – Figure 2 add the National Forest boundary to see how much of the section is on the National Forest.</p> <p>Also extend the Slope Map and profile if needed and provide a second set of cross-sections for the site specific design for the Forest Service requested JNF Priority Site #1. Display National Forest boundary on all slope maps and drawings where boundary is present.</p>	The slope maps have been updated to show the National Forest boundary. The original boundary was interpreted from a USDA shapefile that is not accurate in the vicinity of Priority Site #1 and #4. The slope maps and the language in the report have been updated. Cross section 1B has been added as Figures 35, 36, and 37.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
23	2.2.6 In Appx G	<p>“Along the ridge where JNF Priority Site #2 is located, sideslopes approach 1:5H:1V. The excavated material will be replaced in compacted lifts not exceeding 12 inches in thickness. The stability of the reclaimed slope was modeled using GSTABL7 software. Slope stability analysis presented in Appendix C show that the backfill is stable with a factor of safety of at least 1.5.”</p> <p>The GSTABL7 slope stability analysis appears to have been conducted on slopes perpendicular to the pipeline. Provide a slope stability analysis for the backfill slopes parallel to the pipeline and sloping down the ridgetop.</p> <p>Construction Phase Section – Figure 10 shows the planar cut surface at the bottom of the excavation between the trench and the “ditch spoil pile”. Such excavated cut surfaces on sloping ridges like Priority Site #2 can create a potential slip surface for failure of restoration backfill. The excavated cut surface creating a potential slip surface also needs to be considered where the corridor is perpendicular (or closer-to-perpendicular- than-parallel) to contours on sideslopes, such as at MP 196.5 in Priority Site #3.</p> <p>Distinguish between trench backfill vs restoration backfill which is all the backfill outside the trench. For example, correct Profile Figure – 8 which labels all backfill as “trench backfill”. Correct the Construction Phase Section – Figure 10 which labels all the spoil as “ditch spoil pile” even though most of the spoil is not from the ditch.</p> <p>Consider the above comments wherever applicable at the other Priority Sites.</p>	<p>GSTABL7 slope stability analyses labeled “Trench Backfill Stability” model slope stability parallel to the pipeline in the steepest portions of the Priority Sites.</p> <p>Concerns regarding the excavated cut surface creating a potential slip surface will be addressed in the field by means of subsurface drains, bonding benches where possible, and if necessary, structural measures. The figures have been updated to reflect a distinction between trench backfill and restoration backfill and “ditch spoil pile” has been changed to “spoil pile.”</p>
33	3.2.6 In Appx G	<p>“The excavated material will be replaced in compacted lifts not exceeding 12 inches in thickness.” When discussing compaction of reclaimed slopes, in addition to lift thickness define the other compaction criteria for soil and rock, such as moisture content and densities for the reclaimed ground.</p>	<p>Fill material should not contain topsoil, organics, frozen materials, or rock fragments larger than 6 inches in diameter. Fill material should be compacted in loose lifts not exceeding 12 inches in thickness. Each lift should be tracked in with a CAT D6 dozer or equivalent making no fewer than three passes per lift. Saturated materials or those exhibiting signs of pumping and rutting during compaction should be amended by mixing with drier materials, spreading and drying, or other drying methods prior to fill placement. This text has been added to Appendix G.</p>
	Appx A In Appx G	<p>Display National Forest boundary on the map and drawing where National Forest boundary is present. This is especially important for Slope Map Figures 2 and 17 (Priority Sites 1 and 4):</p> <p>SLOPE MAP - FIGURE 2 JEFFERSON NATIONAL FOREST PRIORITY SITE 1</p> <p>SLOPE MAP - FIGURE 17 JEFFERSON NATIONAL FOREST PRIORITY</p>	<p>The slope maps have been updated to reflect the National Forest boundary.</p>
	Appx A In Appx G	<p>It would be helpful if the applicable typical drawings in Appendix B were listed as notes on the site-specific drawings in Appendix A.</p>	<p>Notes have been added to the site-specific drawings as requested.</p>

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	Appx C In Appx G	Provide the basis for the soil cohesion values used in the GSTABLE stability analysis.	As discussed in the report, the geologic formations encountered in the area include shales. To account for soil cohesion contributed by the shale component, the average of published parameters was utilized. The parameters were gleaned from Compaction of Mixtures of Hard Rocks and Soft Shales and Non-Durable Shales Using Impact Compactors, Tommy C. Hopkins, Kentucky Transportation Center, 2007. Table 1 of the aforementioned publication exhibits the results of triaxial compression tests of various shales that were remolded using three different compaction energies. The average of the low-energy compaction results (the lowest cohesion results summarized in the table) was rounded down to 250 psf.
Document Name: Appendix H: Restoration Plan			
1-18	all	Appendix H, Restoration Plan, number pages	Page numbers have been added as requested.
	3.7 in Appx H	“A temporary erosion control seed mix will consist of at least two of the non-native species for temporary erosion control listed in the tables above.” A separate table is needed showing a temporary seed mix as described above (as approved by the Forest Service).	Temporary Seed mixes were included in tables 3.7-1, 3.7-2, and 3.7-3 but were not clearly called temporary mixes. Tables 3.7-1, 3.7-2, and 3.7-3 have been updated to exhibit temporary seed mixes at the beginning of each table.
17	4.0	Appendix H, Restoration Plan, restoration activities, reference Attachment D-3	Currently, Attachment D-3 does not exist. Mountain Valley has added a reference to Attachment H-3 to Section 4.0
MVP Filename: Attachment DR4 General 2b Part 10			
Document Name: POD Appendix I: Draft Timber Removal Plan for the Jefferson National Forest			
3	2.0	Typos: cherry (Prunus serotina), cherry should be black cherry, serotina should be serotina; black tuelo (Nyssa sylvatica), tuelo should be tupelo	The text in Section 2.0 has been updated.
3	3.0	The POD states: “The timber cruise will determine the location, volumes, market values, and species compositions of the timber that will be removed from the JNF as part of the Project.” This also re-stated at Line 20 on the same page. The timber cruise does not determine the market values. Please remove references to the market value of timber in the discussion of the timber removal plan. The timber appraisal to be performed by the USFS will determine market values.	The requested text has been removed from Section 3.0.
3	4.0	Typo: All merchantable timber, as define, define should be defined	The text in Section 4.0 has been updated.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
3	4.0	<p>The POD states: “All merchantable timber, as define by the JNF Merchantability Specifications, that is reasonably accessible will be paid for prior to cut and removal, and will be cleared in accordance with Forest Service regulations.”</p> <p>Please revise this paragraph to read: “All merchantable timber, as define by the JNF Merchantability Specifications, that is reasonably accessible will be paid for prior to cut and removal, and will be removed from NFS lands in accordance with Forest Service regulations.”</p> <p>There will be no decking and leaving of merchantable timber on NFS lands. We encourage MVP to utilize this material for the appropriate products (e.g. lumber, pulp chips, fuels chips). This aspect was discussed in our meeting of 12/15/2016 regarding a timber removal plan.</p>	The text in Section 4.0 has been updated.
4	4.1	<p>Please edit the following sentence beginning on line 14 as follows: Once removal has begun, merchantable wood products will be cut into usable lengths and moved to a log landing the same day it is cut and in accordance with the USFS requirements.</p>	The text in Section 4.1 has been updated.
4	4.1	<p>Please edit the following sentence beginning on line 17 as follows: All non merchantable brush and slash will be left on site until actual construction of the pipeline begins, utilized in downslope areas of the right-of-way and/or removed from the area in accordance with USFS requirements (see Appendix C of the Plan of Development). The concept here is to leave as much of the slash to be left in place until such time that construction of the line actually begins. Then it would be windrowed to the side.</p>	Mountain Valley will need to windrow the brush and slash as soon as possible to build the right of way to the proper contour prior to the start of pipeline construction.
4	4.1	<p>Lines 21-37 – Additional information or a reference to the POD visual resource section 7.9 may be required here pertaining to how and where placement of windrows and stacked slash (or removal of slash) are incorporated into the scenery mitigation plan.</p>	A reference to the Plan of Development has been added.
4	4.1	<p>The POD states: “Once removal has begun, timber will be cut into usable lengths and stacked adjacent to the right-of-way in accordance with the USFS requirements.”</p> <p>Please revise this to state “Once removal has begun, timber will be cut into usable lengths and removed from NFS Lands in accordance with the USFS requirements.”</p>	The text in Section 4.1 has been updated.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
5	4.2	<p>The POD states: “MVP will compensate the USFS for all merchantable timber cut on the JNF, based on the market value of the timber determined during the timber cruise,”</p> <p>Please revise this to state “MVP will compensate the USFS for all merchantable timber cut on the JNF, based on the market value of the timber determined during the appraisal to be completed by the USFS.”</p> <p>Rather than repeating this comment further: please perform a word search on the entire POD and remove any reference that timber value is determined by the cruise. Value is determined by and appraisal.</p>	The text in Section 4.2 has been revised as requested.
5	4.2 Timber clearing Methods	<p><i>The exact methods that will be used to clear timber along the portion of the Project on the 13 JNF will be determined by the timber contractor following the Project’s timber cruise (see 14 Section 3.0).</i></p> <p>The methods used to clear the timber will be determined by the JNF Forest Plan Standards and Guides and the Virginia Forestry Best Management Practices Handbook.</p> <p>Please revise this statement in the POD to read “<i>The exact methods that will be used to clear timber along the portion of the Project on the JNF will be proposed by the timber contractor and approved by the USFS following the Project’s timber cruise (see 14 Section 3.0).</i> We can assure consistency with Plan and BMP’s</p>	The text in Section 4.2 has been revised as requested.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
5&6	4.3	<p>The POD states “Timber will be cut and moved to roadside loading areas using methods that are determined by the timber contractor and the USFS to be the best suited to the site-specific Draft conditions in this area”</p> <p>Please revise this to state: “Timber will be cut and removed from NFS lands using methods that are approved by the USFS to be the best suited to the site-specific Draft conditions in this area”</p> <p>Rather than repeating these comments further, this entire section of the POS should be reviewed for references that imply or explicitly state that timber will be decked or stacked and left. The timber will be removed from NFS lands. Likewise, the timber contractor determines nothing on NFS lands. The timber contractor would propose and the USFS would approve. Contractual language uses the term “mutually agreed upon.” Please review this entire section of the POD and remove any references to the timber contractor “determining” anything. Acceptable verbiage would be the contractor proposes and the USFS approves.</p>	The text in Section 4.3 has been revised as requested.
6	5.0 Schedule	<p><i>If conditions require that timber clearing be conducted during the winter months,</i></p> <p><i>15 MVP will implement the measures outlined in their Winter Construction Plan (see 16 Appendix L of the Plan of Development).</i></p> <p>Timber clearing will follow the timber sale contract and JNF Forest Plan standards for timber harvesting.</p>	The text in Section 5.0 has been revised as requested.
Document Name: POD Appendix J: General Blasting Plan			
J-7	Table 7-1	<p>This table lists the contacts and permits to pursue prior to blasting. If blasting is needed for the conventional bore pit on the southeast side of Peters Mountain for the ANST crossing (as stated as a potential need in POD section 6.1.2.1, line 31), Andrew Downs should be added to this table for prior notification (Regional Director, Appalachian Trail Conservancy, Central and Southwest Virginia Regional Office, 540-904-4354).</p>	Andrew Downs' contact information has been added to Table 7.1
J-13	7.5	<p>POD statement: “Congruent with the contractor and MVP EI’s evaluation, temporary emergency contingency measures will be employed to halt the loss of streamflow.”</p> <p>Comment: Define the potential temporary emergency contingency measures and identify where these measures are listed.</p>	No blasting will occur within streams on NFS lands. Contingency measures are not necessary.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
Document Name: POD Appendix K: Waterbody Crossing Drawings			
	Appendix K	The stream crossing exhibit station numbers for S-PP21 do not match the station numbers or contours shown on the profile view for that crossing. Please provide the correct profile view.	The stream crossing exhibit has been updated as requested.
	Appendix K	The stream crossing exhibit station numbers for S-HH18 do not match the station numbers or contours shown on the profile view for that crossing. Please provide the correct profile view.	The stream crossing exhibit has been updated as requested.
	Appendix K	The stream crossing locations are difficult to locate, since they do not correspond to mile posts. Add MP locations.	The stream crossing locations have been updated as requested.
	Appendix K	The spoils from the crossing will be required to be outside of the riparian corridor where the distance varies by flow type and slope (i.e. minimum of 100 ft = perennial, 50 ft =intermittent, 25 ft = channeled ephemeral). Plan to move spoils further away than the identified 10 ft.	Mountain Valley has added a note to each stream crossing drawing and will ensure that stockpile locations on USFS property are outside of the riparian corridor as directed by the USFS.
Document Name: POD Appendix O: Unanticipated Discovery of Paleontological Resources Plan (Note this is now Appendix P in the revised draft POD)			
2	2.0	POD, Attachment DR4 General 2b PART 10,, Appendix O Plan for Unanticipated Discovery of Paleontological Resources West Virginia and Virginia, 2.0 UNANTICIPATED DISCOVERIES OF PALEONTONLOGICAL RESOURCES – misspelling of Paleontological	The title of Section 2.0 has been updated.
Document Name: POD Appendix Q: Framework for Operation, Maintenance, and Emergency Response Plan (Note this is now Appendix R in the revised draft POD)			
Pg. 20		Under APPENDIX Q-1 , Roadways Crossed by the Mountain Valley Project table lists the ANST crossing method as open cut. There are no page numbers in the document, please refer to page 20. Since it is shown as the ANST, they are showing it as an open cut though it should be shown as bored. Correct/Clarify in this document.	There is not an Appendix Q-1 in the Plan of Development entitled Roadways Crossed by the Mountain Valley Project. In the comments received from the USFS on April 25, 2017 on the Primary and Contingency Proposal for the Crossing of the Appalachian National Scenic Trail, Mountain Valley was asked to revise Appendix Q-1 from the FERC prepared Draft EIS. Mountain Valley updated that table to reflect that the ANST will be bored and not open cut. An updated EIS table Q-1 was submitted to the USFS on May 25, 2017 with Mountain Valley's response to the April 25, 2017 letter.
Q-11	5.1	"POD Appendix H – Plant and Wildlife Conservation Measures Plan" Comment: The Plant and Wildlife Conservation Measures Plan is currently Appendix U	The reference in Section 5.1 has been revised. The Plant and Wildlife Conservation Measures Plan is now Appendix V.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
Q-12	5.4	<p>POD statement: “No impacts to water supply or quality are expected due to the limited depth of excavation, the short duration of open trench, and typical depths to groundwater supplies,”</p> <p>Comment: This sentence is incongruent with the effects analysis.</p>	<p>Following the issuance of the Final EIS (anticipated on June 23, 2017) the results of the water supply or quality impacts included in the Final EIS will replace the sentence in Section 5.4. However, it is Mountain Valley's opinion that any impacts to water supply or quality will be limited to construction and no Permanent Impacts are anticipated.</p>
Q-12	5.5	<p>POD Statement: “The VDGIF also recommends that no in-stream work occur in streams containing wild trout (brown and brook trout) from October 1 to March 31 and in streams stocked with trout (rainbow trout) from March 15 to May 15.”</p> <p>Comment: This sentence should read, “The VDGIF also recommends that no in-stream work occur in streams containing wild brown and brook trout from October 1 to March 31 and in streams containing wild rainbow trout from March 15 to May 15.”</p>	<p>The text in Section 5.5 has been revised as requested.</p>
Q-13	5.6	<p>If open trenching is required for emergency pipe repairs, mitigation measures to minimize inadvertent entrapment of wildlife and herpetile species while the trench is open is needed.</p>	<p>Additional clarification has been added to Section 5.6.</p>
<p>Document Name: POD Appendix R: Exotic and Invasive Species Control Plan (Note this is now Appendix S in the revised draft POD)</p>			
R-6	4.1	<p>Appendix R states: certified 18 weed-free mulch and hay bales will be used to construct sediment control devices</p> <p>Comment: Do not use hay bales because hay bales Hay may contain a variety of weed seeds. Use straw bales instead.</p>	<p>All references to hay have been changed to straw</p>
R-7	4.1	<p>Appendix R states: MVP will monitor the right-of-way annually 6 after the first and second growing seasons following construction to allow for early detection of exotic or invasive species infestations or outbreaks.</p> <p>Comment: A temporary vegetative cover may be created to control erosion, and then followed by additional planting to create the permanent vegetative cover. The post construction ROW needs to be monitored for non-native invasive plants until the permanent vegetative cover is fully established (80% cover). The Forest Service will require monitoring of the ROW in perpetuity for the life of the project. Specific monitoring provisions will be provided by the Forest Service.</p>	<p>The text in Section 4.1 has been updated. Mountain Valley is still awaiting monitoring provisions from the USFS.</p>
R-7/8	4.2	<p>This section stipulates washing and cleaning of vehicles during the construction phase. There is also concern for distribution of non- native invasive species during the monitoring phases. Vehicles entering during that time should also be checked and cleaned.</p>	<p>The text in Section 4.1 has been updated.</p>

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Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
R-8	4.5, Line 21	Pesticide Use. Herbicides are a type of pesticide. If only herbicides would be used, then use that term. If the other chemicals including fertilizer, insecticides, etc. would be used, then use the term pesticides. Therefore, because the Forest plans to use insecticides and herbicides in this area, the Title of 4.5 should be Pesticide Use.	There is no section 4.5 in the Exotic and Invasive Species plan. However, the title of Section 4.3 reads the Use of Pesticides.
Document Name: POD Appendix S: Draft Herbicide Use Plan (Note: this is now Appendix T in the revised draft POD)			
S	General	Please read FSM 2150. No record keeping is mentioned.	A record keeping section was added to Section 3.0
S	General	Update page numbering to reflect Appendix Name; i.e. Page S-1 and not Page W-1.	The page numbering has been updated as requested.
S W-9	3.0 Table 2.6	There should be reference to the USFS Human Health and Ecological Risk Assessments. Those are the documents that provide information for pesticide use. Please cite those documents.	A reference has been added to Table 2.6.
W-8	3.0	In the first paragraph, after the sentence: "MVP will coordinate site-specific treatment measures with the Forest Service when an invasive species is located." Please insert: "MVP will complete a Pesticide Use Proposal (form FS-2100-2) for each activity involving the use of herbicides."	The text in Section 3.0 has been updated.
W-9	3.0	The POD reproduces a table from the Forest Plan that lists acceptable herbicides. We strongly suggest that MVP review the risk assessments found at: https://www.fs.fed.us/foresthealth/pesticide/risk.shtml . All herbicides approved for use must have a risk assessment. While not appropriate for the POD, these risk assessments should also be incorporate by reference in the FEIS and effects disclosure in the FEIS should be based upon these risk assessments. A brief summary of the effects disclosed in these risk assessments and citations to the documents in their entirety should satisfy the requirement to disclose effects on humans, non-target plants, and animals.	A reference has been added to Table 2.6.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
W-11	3.2	<p>Herbicide Use Plan states: If noxious or invasive species are found in numbers that are significantly different from existing nearby off right-of- way locations, appropriate control measures will be implemented in an attempt to eradicate the identified weed infestations along the right-of-way and to reduce the spread or proliferation of weeds.</p> <p>Comment: As pointed out in previous comments, this statement is vague and unacceptable. If noxious or invasive species are found in the ROW appropriate control measures will be taken, regardless of the situation in the surrounding area. MVP should coordinate invasive plant species control with the USFS to achieve maximum effectiveness in a given area.</p>	The text in Section 3.2 has been updated.
W-11	3.2	<p>Comment: Clearly state that non-native invasive plant control will take place prior to construction, as necessary, to prevent subsequent infestations of the ROW.</p>	The text in Section 3.2 has been updated.
W-12	4.0	<p>Herbicide Use Plan states: MVP will annually monitor the right-of-way and ancillary facilities that occur on federal land for weeds following construction and reclamation of the Project for a period of two years.</p> <p>Comment: A temporary vegetative cover may be created to control erosion, and then followed by additional planting to create the permanent vegetative cover. The post construction ROW needs to be monitored for non-native invasive plants until the permanent vegetative cover is fully established (80% cover). The Forest Service will require monitoring of the ROW in perpetuity for the life of the project. Specific monitoring requirements will be provided by the Forest Service.</p>	The text in Section 4.0 has been updated.
S pg W-13	5.1	<p>Beware that transporting mixed chemical to the site goes against FS policy. The reason for this policy is to reduce the amount of pesticide to clean up if there is a spill. This is considered hazardous material for transport.</p>	Herbicides will be mixed on-site per manufactures specifications by a certified individual.
S, W-13	5.1	<p>There appears to be no provisions for cleaning equipment, disposal, spill plan etc. for the Herbicide Plan.</p>	Provision for washing equipment were added to section 3.1. MVP will utilize the policies and procedures outlined the the Hazardous Material Management Plan to handle disposal of herbicides. Should a spill occur, MVP would utilize the procedures outlined in the SPCC plan. This was also added to Section 5 of the Herbicide Use Plan.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
Document Name: POD Appendix U: Plant and Wildlife Conservation Measures Plan (Note: this is now Appendix V in the revised draft POD)			
U-5	3.0	<p>POD Statement: “MVP has coordinated with the USFS to determine existing resources in the JNF and to what extent those resources will be impacted by the construction and operation of the Project. These impacts and proposed mitigation are addressed in the biological evaluation for the JNF.”</p> <p>Comment: This statement is not entirely accurate. The Biological Evaluation is specific to Regional Forester Sensitive Species.</p>	The text in Section 3.0 has been updated.
U-6, U-7	3.1.2	<p>POD, Draft Attachment DR4 General 2b PART 10, APPENDIX U, 3.1.2</p> <p>Federally Listed Species Draft Plant and Wildlife Conservation Measures Plan: The federally listed ESA Rusty patched bumblebee (<i>Bombus affinis</i>) was coded “OAR 6 = Species not seen during field survey, but possibly occurs in activity area based on habitat observed, or Field survey not conducted when species is recognizable (time of year or time of day). Therefore assume presence and no additional surveys needed.” Since presence is assumed, it should be addressed within 3.1.2.</p>	Text regarding the Rusty Patch Bumblebee was added to Section 3.1.2.
U-8	3.1.5	<p>Appendix U states: Locally rare species, a term used by the USFS, are species for which representation on a particular forest is a concern although the species is secure range-wide.</p> <p>Comment: This is not entirely accurate. Locally rare species also include species which would qualify for the Regional Forester’s Sensitive Species List, but are not added to that list until it is periodically revised.</p>	The text in Section 3.1.5 has been updated.
U-8	3.1.6	<p>Appendix U states: No live mussels or fish are found during field surveys, mussel/fish removal and relocations will occur immediately prior to in- stream construction activities.</p> <p>Comment: Please rewrite for clarity.</p>	The text in Section 3.1.6 has been updated.
U-8	3.1.6	<p>POD Statement: The Project proposes to cross nine streams on USFS managed lands, including Craig Creek and two unnamed tributaries to Craig Creek in the JNF within the Upper James River watershed management area.</p> <p>Comment: This statement is not entirely accurate. The Craig Creek pipeline and access road crossings are not on JNF land.</p>	The text in Section 3.1.6 has been updated.
U-10 Appendix U	4.1.1	Disturbance and displacement of wildlife includes direct impact and potential mortality due to construction activities such as open trenching, blasting, and vehicle activity on access roads and along the construction corridor.	The text in Section 4.1.1 has been updated.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
U-10	4.1.3	Plant species and wildlife species with limited mobility and those who travel across the construction area could experience injury and/or mortality during vegetation management, clearing, grading, blasting, and trenching operations associate with construction.	The text in Section 4.1.3 has been updated.
U-13	5.2.2	Develop a section to address how inadvertent entrapment of wildlife and herpetile species can be minimized during the open trench phase of construction, especially at night when people/construction activity is halted and wildlife/herpetile movement potential is highest. Re-usable fencing such as silt and/or supersilt fencing, erected near the open trench area or along the edges of the construction zone where the open trench currently exists is an option to consider. Reference the Blasting Plan in this section. Make this section and the Conservation measures listed in the BA and BE consistent with each other.	The text in Section 5.2.2 has been updated.
U-14	5.2.2	Appendix U states: Install erosion control measures once prior to earth disturbance activity. Comment: Delete “once.” Erosion control measures should be installed and maintained as needed prior to earth disturbance activity.	The text in Section 5.2.2 has been updated.
U-14	5.2.2	Appendix U states: Implement the Project’s Exotic and Invasive Species Control Plan during construction, operation, and maintenance of the Project; Comment: The Project’s Exotic and Invasive Species Control Plan should be implemented prior to the start of construction.	The text in Section 5.2.2 has been updated.
U-14	5.2.2	Appendix U states: Establish equipment cleaning stations to thoroughly wash all equipment before transporting it to the next construction spread; Comment: Clearly state that the cleaning stations will not be on USFS land unless provisions are made for the collection and proper disposal of the water, soil, debris, etc. generated by the washing.	The text in Section 5.2.2 has been updated.
U-14	5.2.2	Appendix U states: Use only certified weed-free mulch, straw, and hay bales for sediment control 13 devices; Comment: Do not use hay bales because hay bales are likely to contain weed seeds. Use straw bales only on NFS lands.	The text in Section 5.2.2 has been updated.
U-14	5.2.2	Appendix U states: Do not park, store, or service construction equipment, vehicles, hazardous materials, fuels, chemicals, lubricating oils, and petroleum products within a 100- foot radius of any waterbody. Comment: The Jefferson Forest Plan standard FW-105: Herbicide mixing, loading, or cleaning areas in the field are not located within 200 feet of private land, riparian corridors, open water or wells, or other sensitive areas.	The text in Section 5.2.2 has been updated.

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Document Name: POD Appendix W: Fire Prevention and Suppression Plan (Note: this is now Appendix X in the revised draft POD)			
W	In Entirety	It appears that all previous comments on the Draft POD relating to fire have been incorporated in this latest version.	No response necessary
Document Name: POD Appendix Y: Framework Flagging, Fencing, and Signage Plan			
Y	General	Nothing about signage for pesticide treatment areas. FS policy is requires signage in these areas.	References to herbicide signage has been added to Section 3.2.1.
Y-5	3.2.3	If fencing is deemed the most suitable means of minimizing the potential for inadvertent entrapment of wildlife and herpetile species during the open trench phase of construction, the methodology should be detailed in this section, as well as in Appendix U.	The text in Section 3.2.3 has been updated.
Y-5	3.2.4	Line 26 – This specifies that marking paint may be applied to pavement to identify protected areas. This should be changed to describe available surfaces in the national forest such as the ground, herbaceous vegetation, or on trees, taking care not to paint or otherwise damage the resource to be protected. Marking paint should be applied in such a way that the paint is not visible to users of roads and trails within 100’.	The text in Section 3.2.4 has been updated.
Document Name: POD Appendix Z: Off-Highway Vehicle Management Plan (Note: this is now Appendix AA in the revised draft POD)			
multi	App Z	OHV control and accessibility. Per the comment by Ginny Williams in the main POD, section 7.8, wheelchair access is a required consideration in dealing with OHV control. However, spacing to allow wheelchair passage is not required in all locations where barricades or barriers are placed. It is required when a gate is installed or replaced, or non-gate berms or barriers are placed in areas where foot travel is simultaneously encouraged while motor vehicle travel is not. Consider rewording the several references to accessibility in this Appendix Z for consistency with this and with each other, and consider adding that MVP will work with the USFS to determine on a site-specific basis where wheelchair passage is required.	Text has been added to the OHV Plan in Section 2.0.
Z-2	App Z	Section 2.0. 2 nd paragraph, after the 2 nd sentence, add a statement similar to: MVP recognizes that the installation and maintenance of these barriers may be required both within the ROW and also at points outside of but near the ROW.	Text has been added to the OHV Plan in Section 2.0.
Z-5	App Z	Table 1. The row for SR-621 Craig Creek Road makes it appear that the state road itself is seasonally closed each year. Confirm or change.	Table 1 has been updated to reflect no seasonal restriction on Craig Creek Road.

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Bureau of Land Management Comments			
iii	TOC	Please reflect all sub headings in table of contents. As it is, it doesn't reflect sub-sub-headings	This change has been made as requested.
iv	TOC	BLM, requests that a long- term monitoring plan for the life of the right-of-way is implement to ensure successful restoration.	Following construction, MVP will monitor and record the success of revegetation on USFS-managed lands for up to five growing seasons or until the area is 80 percent revegetated. Following construction, MVP will monitor and record success of stream revegetation on USFS-managed lands for two growing seasons. Inspection will be completed as least annually. MVP will submit a status report to USFS following each inspection. Should a stream banks vegetation not reestablish following two growing seasons, MVP will work with USFS personnel to develop a plan for re-establishment, including monitoring requirements.
1-2		BLM requests that text be added to clarify that the POD will eventually be a document that is incorporated into the Right of Way Grant, if approved.	This text has been added to last paragraph of Section 1.1 as requested.
4-1	5	Will there be any cathodic protection sites on federal lands? If so, please provide details.	The text in Section 4.1 has been updated to reflect that cathodic protection is not proposed on federal lands.
5-3	Table 5-1	Both the Anticipated Authorization Receipt Date for the BLM and the issuance of USFWS' Biological Opinion (BO) are listed in the third quarter of 2017. BLM's authorization is dependent upon, and subsequent to, the BO. BLM's authorization date may change based on the timing and content of the BO	Mountain Valley understands that the BLM's authorization date may depend on the issuance of the BO from the USFWS.
6-1	8	Please provide information here or elsewhere about environmental training being required for all construction and monitoring personnel. The agencies will require input in the development of a training program and will require documentation of training for each participant.	The text in Section 6.1 has been updated as requested.
6-5	8	Please reference Appendix Y- Framework Flagging, Fencing, and Signage Plan	A reference to Appendix Z Draft Framework Flagging, Fencing, and Signage Plan, has been added to Section 6.5
6-8	8	Either reference the Hydrostatic Testing Plan or provide details on where MVP will obtain and discharge water on federal lands.	As stated in Section 6.1.1.5, hydrostatic test water for federal properties will be obtained from a municipal source. No water will be withdrawn from sources on federal lands and no water will be discharged on federal properties.
6-8	31	Please add text about trash clean up. This should not just be done at the end of the project; trash should be collected and disposed of offsite at the end of each construction shift.	Text has been added to Section 6.1.1.6.
6-14	30	The text here says MVP will monitor and record the success of stream revegetation on USFS managed lands for two growing seasons. Please include: Monitoring will occur yearly for a minimum of 5 years. FS/BLM/ACE approval needed to discontinue monitoring, based on whether restoration has occurred satisfactorily.	Following construction, MVP will monitor and record the success of revegetation on USFS-managed lands for up to five growing seasons or until the area is 80 percent revegetated. Following construction, MVP will monitor and record success of stream revegetation on USFS-managed lands for two growing seasons. Inspection will be completed as least annually. MVP will submit a status report to USFS following each inspection. Should a stream banks vegetation not reestablish following two growing seasons, MVP will work with USFS personnel to develop a plan for re-establishment, including monitoring requirements.

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6-16	4	Please add text indicating the FS and BLM project managers must have 24 hours' notice prior to any blasting activities on or in close proximity to federal lands. Avian survey teams should search for nests prior to blasting activities during nesting season (April 1 – August 31). If an active nest is located within the blasting area, a 100 foot buffer area will be marked and the area will be avoided until the nest is no longer active.	Section 6.1.2.1 and the General Blasting Plan (Appendix J) have been updated.
6-16	33	BLM requires text be added for the contingency for encountering any unanticipated karst features (How would this issue be addressed?).	Text has been added to Section 6.1.2.3.
6-18	37	Will there be any snow removal done by MVP on the roads? What actions will be taken to protect open trenches when there is significant snow accumulation?	Text has been added to Section 6.1.2.5.
6-18	41	The text says MVP will notify FS and USACE 15 days prior to any construction on federal lands. MVP is required to submit a request for a Notice to Proceed (NTP) to the BLM prior to the start of any construction on federal lands. The NTP must be reviewed and approved by the BLM, in coordination with the FS or USACE prior to the start of construction. Some of the text is deeply embedded in the Winter Construction Plan section. This text should be moved father up in the document and it should clearly state BLM's role in the NTP issuance process. I'm not sure how or where you want to address this...	This text has been revised and moved to Section 6.1.
6-19	37	This says FERC will fund a 3 rd party compliance program and that FERC will select and manage the third party monitor. BLM/FS want to be involved in the selection process. There needs to be clarification on whether BLM and FS want to require their own third party monitor. If so, that should go here and in Appx M: Environmental Compliance Management Plan. Also, there is reference to this on the next page under section 6.4.1.3. BLM supports and will let the FS take the lead on the third party compliance selection for protection of their resources.	In comments above from the USFS, the USFS has indicated that they will require their own on-site construction monitor. This person is referred to throughout the Plan of Development and in the Environmental Compliance Management Plan as the USFS's Authorized Officer.
6-20	11	This section shows FERC, FS, and USACE roles in the permitting process, but not the BLM. Include text to discuss that BLM would be issuing the NTPs on federal lands on behalf of the land managing agencies.	The text in section 6.4 Roles and Responsibilities, refers to construction monitoring roles during the construction phase of the Project. BLM has expressed above that it supports the USFS taking the lead on the thrid party compliance selection during construction. MVP has added language to Section 6.1 that better describes the BLM's role in the NTP process.
6-21	15	Please reference Appx M (Environmental Compliance) here and perhaps add that authority to approve variances, notices to proceed, and stop work orders will be addressed in Appx M. Then please make sure that is in the Plan.	Additional text has been added to Section 6.4.

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6-24	17	Please summarize protocol for notifying agencies and the public in advance of road closures. Also and what kind of signage will be used?	As discussed in Section 6.5.1, Mountain Valley no longer anticipates that closure of USFS roads will be necessary.
6-25	1	BLM needs the exact locations where the roadway bed will be widened on Pocahontas Road.	These locations are called out on the Alignment Sheets included in Attachment A.
6-27	6	This says MVP will post public announcements on the USFS bulletin board and the JNF website (alerts and warnings). This text needs revising to reflect that MVP will provide a Construction Notice Plan submitted to the BLM/FS/ACE and each agency would post on their public notification sites. MVP would provide notices to the general public via public notifications, such as local papers of general circulation or their internal website.	Text has been added to Section 6.7.
7-2		BLM requests a Long Term Monitoring plan to lay out protocol for establishing the efficacy of restoration and monitoring efforts?	Text has been added to Section 7.4.
8-1	20	BLM requires a Long Term Monitoring plan, pre and post construction to lay out protocol for establishing the efficacy of restoration and monitoring efforts. A minimal of 5 years is considered long term for post construction	Text has been added to Section 8.1.
8-2	12, 26	Please provide references for how/when FS gave you direction on seed mixtures (line 12) and fertilizer (line 26).	On November 21, 2016 the USFS emailed the Restoration See Mix Recommendations and Seeding Techniques Recommendations to Mountain Valley. The text in Section 8.3 has been updated.
9-2	26	Please provide a description of what kinds of vehicles would be accessing the ROW during O&M.	The text in Section 9.1 has been updated.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
SF-299 Page 44	4th paragraph, 3 rd line	This line states that there is no suitable roosting habitat for the eastern small-footed bat available at the project area. Suitable summer roosting habitat for this species includes areas with rip rap, boulder fields, talus slopes, and rock outcrops. If there are any of these habitat types within the project area then there is suitable summer roosting habitat for this species.	<p>The biological evaluation (BE) addresses the eastern small-footed bat (<i>Myotis leibii</i>) in greater detail. With respect to potential summer habitat, the BE states:</p> <p>“The eastern small-footed bat roosts in vertical cracks of cliff faces and horizontal cracks on talus slopes near deciduous or coniferous forest. It may also use man-made structures such as rip-rap and bridges.”</p> <p>The BE goes on to make a May Impact Individuals – Is Not Likely to Cause a Trend Toward Federal Listing or Loss of Viability determination for the eastern small-footed bat, specifically addressing potential summer habitat: “Potential summer habitat for the eastern small-footed bat appeared limited along the proposed alignment and Pocahontas Road on JNF during field surveys (mist netting and portal searches). Four eastern small-footed bats (three adult males and one pregnant female) were captured during survey efforts along the existing Pocahontas Road. The closest captured individual was approximately 0.9-kilometer (0.60-mi) from the western boundary of the construction ROW. No suitable cave openings or portals were observed along the proposed alignment or Pocahontas Road on JNF.”</p> <p>With respect to potential effects to the species from construction:</p> <p>“This species may be temporarily affected by construction of the proposed alignment and modifications to Pocahontas Road if it is using the Project impact area for summer roosting; however, this habitat is considered marginal. It is likely the bats are roosting outside of this area (a limestone quarry was observed south of the Project area) and only using Pocahontas Road as a travel and/or foraging corridor. This species may benefit from additional clearings associated with Project development and operation as this will increase the amount of foraging habitat and may also expose currently marginal rocky outcrops thus increasing their suitability for summer roosting. This is especially important for maternity colonies as roosts with greater solar exposure decrease required energy expenditures and provide more thermal stability for young thus increasing their probability of survival.”</p> <p>The BE also provides recommendations for removing, avoiding, or compensating for adverse effects and impacts. For the eastern small-footed bat:</p> <p>“Notifications will be made to JNF biologists and the appropriate federal and state agencies if undocumented caves, mine openings, or rock outcrops are observed during construction activities. These openings will be assessed for use by bats and conservation measures will be implemented based on coordination with JNF and the respective agencies.”</p> <p>Expanding on the details of the BE, the JNF likely provides ample potential summer roosting habitat for the eastern small-footed bat; however, any potential habitat within the Project area is highly marginal to non-existent. Known potential habitat within the vicinity of the Project area, such as the referenced limestone quarry, is much more likely to provide suitable summer roosting habitat for the species.</p>
POD Appendices I, Z, U	Entire App.	This Appendix addresses biological issues on the federal lands within the project area which is a small portion of the entire project area. Where are biological resources addressed for the majority of the project area located on private property?	Biological resources for private property are addressed in Mountain Valley's Resource Reports in the October 2015 FERC application and supplemental materials requested by FERC. Other resources are discussed in the Project's Biological Assessment.
Appendix D	SPCC	Need language that BLM would have an active role with enforcing the terms and conditions in coordination with the FS.	The text in Section 1.0 has been updated in Appendix D-1 and D-2.

Page #	Line, section or table #	U.S. Forest Service Comment	Mountain Valley Response
Appendix D	3.1.1	Consider adding that MVP will need to submit documentation of all construction personnel who have received environmental training.	Text has been added to Section 3.1.1 in Appendix D-1 and D-2. A log of personnel who received environmental training will be maintained and submitted to the BLM and USFS as requested.