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Date: January 3, 2019

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Office of Energy Projects
888 1st Street NE
Washington, DC 20426

Subject: Project No. 14889-000 – West Virginia
Big Run Pump Storage Hydroelectric Project
FreedomWorks, LLC

Dear Ms. Bose:

The Forest Service submits comments on the amended preliminary permit application and response to comments filed with the Federal Energy Regulatory Commission (FERC) by FreedomWorks, LLC (FreedomWorks) on December 27 (accession nos. 201812275208 and 201812275209) and December 28, 2018 (accession no. 201812285254), respectively, for the Big Run Pump Storage Hydroelectric Project (Big Run Project) No. 14889-000. Any preliminary permit issued by FERC for the Big Run Project would allow FreedomWorks to study the feasibility of a proposed project that would affect National Forest System (NFS) lands within the Monongahela National Forest (MNF).

We acknowledge that FreedomWorks' amended preliminary permit application broadened the draft study plan. The results of studies, regardless of study breadth, could not alleviate the project effects caused by the complete loss of 1,061-1,200 acres of NFS lands needed for the project. The construction of a new temporary access road would increase the vegetation loss. Moreover, it would not be prudent to permit the construction of a new temporary access road for site survey and testing of a project that would be inconsistent with the management goals, objectives, and standards identified in the Forest Land and Resource Management Plan (Forest Plan). The amended preliminary permit application includes a proposal to mitigate timber loss, but the effects caused by vegetation loss in the Big Run Bog would surpass that of timber value. The Big Run Bog is ecologically unique because it is a high elevation relict community of diverse habitats that makes it possible for plants and animals to occur at the periphery of their ranges. Such a unique community cannot be recreated through "reforesting additional acreage of new spruce restoration" as proposed by FreedomWorks.

FreedomWorks' response to comments was neither a list of comments submitted by intervenors and stakeholders nor a corresponding response to each comment. The inclusion of the email exchanges is appreciated nonetheless. In the email exchange with the Forest Service, FreedomWorks attempted to address Forest Goal LS17 of the MNF Forest Plan. Forest Goal LS17 is actually written as follows: Proposed special uses of NFS lands—such as hydroelectric development, wind energy development, communication sites, water developments, and utility



corridors—are considered that meet public needs, are consistent with direction for other Forest resources and management prescriptions, and cannot be accommodated off the National Forest. The Forest Service’s comments filed on December 21, 2018 (accession no. 201812215393) specifically discuss how the project would not be consistent with direction for other resources and management prescriptions. Also in the email exchange, FreedomWorks asserts that the Big Run Project would not affect the Big Run Bog, a National Natural Landmark and ecologically significant community occurring on the MNF. FreedomWorks’ assertion is contrary to the comments and map filed by the National Park Service on December 21, 2018 (accession no. 201812215105) as well as the maps contained in FreedomWorks’ preliminary permit application filed with FERC in October 15, 2018 (accession no. 201810155045).

Based on a cursory review of Freedom Works’ amended preliminary permit application, we reiterate comments provided in comments filed on December 21, 2018 (accession no. 201812215393). Our assessment remains unchanged; the Big Run Project is not consistent with the management goals, objectives, and standards identified in the Forest Plan for Management Prescriptions 8.2 and 4.1. Therefore, should FreedomWorks apply for a special use permit to the MNF, it is unlikely that a special use permit would be issued for the Big Run Project.

Sincerely,



CLYDE THOMPSON
Forest Supervisor

cc: Tim Williamson