



File Code: 2700

Date: December 21, 2018

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

Dear Ms. Bose:

The Forest Service provides additional comments in response to the Federal Energy Regulatory Commission's (FERC) notice soliciting comments on the preliminary permit application for the Big Run Pump Storage Hydroelectric Project (Big Run Project) No. 14889-000, filed with the Federal Energy Regulatory Commission (FERC) on October 15, 2018. The Big Run Project preliminary permit would allow FreedomWorks, LLC (FreedomWorks) to study the feasibility of a proposed project that would affect National Forest System (NFS) lands within the Monongahela National Forest (MNF).

The Forest Service's comments filed with FERC on November 16, 2018 indicated the resources that must be considered when planning to study the feasibility of a project on NFS lands. Any project studied for feasibility or proposed on NFS lands must be consistent with the standards and guidelines in the applicable Forest land and resource management plan (Forest Plan) (36 CFR 251.54(e)(ii)). Therefore, a cursory consistency review of the Forest Plan was conducted based on the amended preliminary permit application that FreedomWorks filed with FERC for the Big Run Project. These subsequent comments are based on the Forest Service's review.

According to the maps and figures provided in the preliminary permit application, four management prescriptions would be affected: 1) 3.0 – Vegetation Diversity; 2) 4.1 – Spruce and Spruce-Hardwood Ecosystem Management; 3) 6.1 – Wildlife Habitat Emphasis; and 4) 8.2 – National Natural Landmarks.

Section 1.1, General Project Description, of Freedom Works' preliminary permit application notes two estimates of acreage that would be required for the lower reservoir that would occur on the MNF: 1) "preliminary estimates indicate both the new upper and lower reservoirs will each have a total surface area of approximately 1200 acres" and 2) "one approximately 1061-acre lower reservoir." The complete loss of 1,061-1,200 acres of land that is managed according to the aforementioned Management Prescriptions would likely have adverse effects on vegetation diversity, wildlife habitat, streams, and fish and wildlife species that occur within those Management Prescription areas.



## **Management Area Prescriptions (Rx) Affected**

**Rx 3.0-Vegetation Diversity Emphasis** covers a diversity of landforms and ecosystems across the forest. These areas are managed to provide age class diversity and sustainable timber production; a variety of forest scenery; habitat for a variety of wildlife species; and a primarily motorized recreation environment.

**Rx 4.1-Spruce and Spruce-Hardwood Ecosystem Management** areas focus on restoration and management of disjunct red spruce and spruce-hardwood communities of the central Appalachians. This community has been greatly reduced and altered from its former extent, composition, and structure, primarily due to exploitative management that occurred prior to the establishment of the MNF. The forest now contains most of the remaining acreage of central Appalachian spruce and spruce-hardwood forest, as well as most of the acreage upon which it formerly occurred. Therefore, the forest bears primary responsibility for the restoration and management of this unique community. These areas emphasize restoration of the spruce and spruce-hardwood communities, and the recovery of federally threatened and endangered species and other species of concern associated with them.

**Rx 6.1-Wildlife Habitat Emphasis** are areas where vegetation management is used to enhance a variety of wildlife habitat. These areas are managed to provide a sustainable production of mast and other plant species that benefit wildlife, restore pine-oak and oak-hickory communities, restrict motorized access and provide a network of security areas reduce disturbance to wildlife, provide a primarily non-motorized recreational setting, and provide a mix of forest products.

**Rx 8.2-National Natural Landmarks** retain the values and qualities for which they were originally designated. These areas contribute to the diversity of the Forest by preserving rare species, communities, habitats, and features. These areas also provide opportunities for scientific research and public enjoyment.

The potential effects to Management Prescription 8.2 are noteworthy because the project, as proposed in the preliminary permit application, would adversely affect the Big Run Bog National Natural Landmark. The Big Run Bog is one of seven National Natural Landmarks within the MNF. The objective of the National Natural Landmarks program is to assist in the preservation of a variety of significant ecological and geological natural areas which, when considered together, will illustrate the diversity of the country's natural heritage. Though the Department of Interior, National Park Service (NPS) administers the National Natural Landmark Program, the Forest Plan addresses National Natural Landmarks.

The management goal for the Big Run Bog on the MNF is to maintain and study the bog community in its natural state. To support the management goal of maintaining and studying the bog community in its natural state, the Forest Plan includes standards that protect the Big Run Bog. Per Forest Plan Standard 8205, "vegetation manipulation shall not be allowed within the bog." Per Forest Plan Standard 8018, "special uses may be authorized as long as they do not adversely affect the overall values and qualities for which the special area was established."

The potential effects to Management Prescription 4.1 are also noteworthy because the proposed project would adversely affect areas that emphasize restoration of the spruce and spruce-hardwood communities, and the recovery of federally threatened and endangered species and other species of concern associated with them. To support the management of these areas per Forest Plan Standard TE07, "special uses may be authorized in TEP species habitat if the uses do not adversely affect populations or habitat."

In summary, the Freedom Works' 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 Freedom Works submit an application 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 N. THOMPSON  
Forest Supervisor

Cc: Tim Williamson