

September 17, 2015

Via regular U.S. Mail and eFiled with FERC

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**Re: Need for a Comprehensive Regional EIS for Natural Gas Pipelines:
 Atlantic Coast Pipeline (FERC Docket Nos. PF15-5 & PF15-6);
 Mountain Valley Pipeline (FERC Docket No. PF15-3);
 Appalachian Connector;
 WB XPress Project (FERC Docket No. PF15-21)**

Dear Supervisor Speaks:

The Forest Service’s July 30, 2015, comments on the proposed Atlantic Coast Pipeline show that the agency is deeply engaged in evaluating the impacts of this project and committed to fulfilling its mission to manage the national forests of Virginia and West Virginia to best meet the present and future needs of the American people.¹ This pipeline is proposed through some of the best remaining forest habitat in the eastern United States—what the Forest Service called “the wildland core of the central Appalachians”—and a rigorous NEPA process is critical to ensure a careful and deliberate decision that is protective of these special lands. We strongly agree with the central theme of the agency’s comments that a thorough analysis of the pipeline’s impacts and the alternatives that avoid or minimize those impacts must not be sacrificed in favor of expediency.

The Forest Service’s comments underscore the need for a comprehensive EIS that addresses all of the pipelines proposed through the central Appalachians.² This would be a region-wide study of pipeline capacity, the need for new pipelines, and their impacts. In

¹ See Letter from T. Speaks, U.S. Forest Serv., to K. Bose, FERC (July 30, 2015) (on file with FERC, eLibrary No. 20150730-5223) (“Forest Serv. Comments”).

² The Southern Environmental Law Center recently joined Appalachian Mountain Advocates and other organizations to bring this issue to FERC’s attention during the scoping periods for the Atlantic Coast and Mountain Valley pipelines. See eLibrary No. 20150428-5504 (April 28, 2015); eLibrary No. 20150617-5044 (June 16, 2015).

this letter, we explain why a regional EIS—also called a programmatic EIS—is the only suitable course of action for the four pipeline projects proposed through the central Appalachians. Section 1 shows that a regional EIS is necessary for FERC, the Forest Service, and other agencies to meet their legal obligations under the National Environmental Policy Act (“NEPA”). Section 2 discusses the ways in which a regional EIS would be useful to Forest Service planners. And Section 3 explains why a regional EIS would also be compatible with FERC’s duties under the Natural Gas Act (“NGA”).

We are aware of four projects slated to cross the central Appalachians between Giles County, Virginia, in the south and Shenandoah County, Virginia, in the north: the Atlantic Coast Pipeline, the Mountain Valley Pipeline, and the Appalachian Connector, which are proposed new interstate pipelines; and the WB XPress Project, which is an upgrade to the existing WB pipeline operated by Columbia Gas.³ All four projects cross national forest lands and, together, represent a large-scale expansion of gas transmission infrastructure through this region. Decisions made now about how and where to locate pipelines will resonate for decades, but there is no plan to guide this build-out.

A comprehensive, regional EIS is the available tool for FERC, the Forest Service, and other federal agencies to plan for pipeline development in this region. Specifically, the agencies can use the regional EIS to evaluate how many, if any, new pipelines are necessary through the central Appalachians to meet demand elsewhere. Then, if that analysis shows that some new pipeline infrastructure is needed, it is the tool to identify the route or routes that are the most protective of local communities and the environment for the entire region.

We are not the only voices asking for a deliberate plan for pipelines in the central Appalachians. In a July letter focused on the Mountain Valley Pipeline, Senator Kaine asked FERC to determine “[w]hether a programmatic EIS for all four projects would capture the environmental impact throughout the region better than four separate ones.”⁴ Senator Kaine also asked FERC to evaluate whether the demand for natural gas justified building all four projects.⁵ Then in an August letter, the Senator raised the same issues in connection with the Atlantic Coast Pipeline.⁶

³ The Atlantic Coast Pipeline, the Mountain Valley Pipeline, and the WB XPress Project are in the pre-filing phase with FERC. See FERC Docket Nos. PF15-6, PF15-3, & PF15-21. Williams held an open season for the Appalachian Connector in September 2014. See Williams, Expansion Projects: Appalachian Connector, <http://co.williams.com/expansionprojects/appalachian-connector/> (last viewed Aug. 24, 2015).

⁴ Letter from The Honorable T. Kaine, U.S. Senate, to Chairman N. Bay, FERC, re the Mountain Valley Pipeline, at 2 (July 28, 2015) (on file with FERC, eLibrary No. 20150729-0052).

⁵ *Id.*

⁶ Letter from The Honorable T. Kaine, U.S. Senate, to Chairman N. Bay, FERC, re the Atlantic Coast Pipeline, at 4-5 (Aug. 24, 2015) (on file with FERC, eLibrary No. 20150826-0031).

EPA has also asked FERC to evaluate a “one pipe-one right-of-way” alternative, exactly the kind of alternative that would minimize the impacts for the entire region and could be evaluated in a comprehensive, regional EIS. And in a recent editorial, the Roanoke Times endorsed a regional analysis for Virginia pipelines.⁷

We, the undersigned organizations, strongly urge the Forest Service to request a comprehensive, regional EIS for the Atlantic Coast Pipeline, the Mountain Valley Pipeline, the Appalachian Connector, and the WB XPress Project.

1. NEPA requires a comprehensive, regional EIS for the Atlantic Coast, Mountain Valley, and other pipelines proposed through the central Appalachians.

NEPA authorizes—and in our view, mandates—a regional EIS for pipelines proposed through the central Appalachians. As you know, NEPA requires federal agencies to prepare an EIS on major actions significantly affecting the quality of the human environment.⁸ The Supreme Court has held that “[a] comprehensive impact statement may be necessary in some cases for an agency to meet this duty.”⁹ Thus, “when several proposals for [] actions that will have cumulative or synergistic environmental impact upon a region are pending concurrently before an agency, their environmental consequences must be considered together.”¹⁰ Quoting the Fifth Circuit, FERC has also recognized that “[p]roposed actions with potential cumulative impacts may mandate the preparation of a regional or comprehensive impact statement.”¹¹

The authority for a comprehensive, regional EIS is found in NEPA’s implementing regulations. Section 1508.25 requires agencies to consider cumulative actions and similar actions in defining the scope of an EIS.¹² “Cumulative actions” have “cumulatively

⁷ Editorial, Our view: The big picture on pipelines, Roanoke Times, July 5, 2015, http://www.roanoke.com/opinion/editorials/our-view-the-big-picture-on-pipelines/article_5401cd7c-7f35-5dd7-b74c-43e4bdcd0455.html.

⁸ See 42 U.S.C. § 4322(2)(C).

⁹ See *Kleppe v. Sierra Club*, 427 U.S. 390, 409-410 (1976).

¹⁰ *Kleppe* at 410; see *Churchill Cnty. v. Norton*, 276 F.3d 1060, 1077 (9th Cir. 2001) (“[A]n agency must prepare both a programmatic EIS and a site-specific EIS where there are large scale plans for regional development. At least when the projects in a particular geographical region are foreseeable and similar, NEPA calls for an examination of their impact in a single EIS.”) (internal quotations and citations omitted); *Nat’l Wildlife Fed’n v. Appalachian Reg’l Comm’n*, 677 F.2d 883, 888 (D.C.Cir. 1981) (“the environmental consequences of proposed actions must all be considered together in a single, programmatic EIS when their impacts will have a compounded effect on a region.”).

¹¹ *Columbia Gas Transmission, LLC*, 148 FERC ¶ 61,138, P 27 (Aug. 22, 2014) (emphasis omitted) (citations and quotations omitted).

¹² 40 C.F.R. § 1508.25. See also *id.* at § 1508.27(7) (“Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment.”)

significant impacts” when considered with “other proposed actions.”¹³ And “[s]imilar actions, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography.”¹⁴ In recent guidance, the CEQ provided the following examples that justify the preparation of a regional or programmatic EIS: “[s]everal similar actions or projects in a region or nationwide (e.g., a large scale utility corridor project),” and “[a] suite of ongoing, proposed or reasonably foreseeable actions that share a common geography or timing, such as multiple activities within a defined boundary (i.e., Federal land or facility).”¹⁵ Relatedly, section 1508.18 defines “major federal action” requiring an EIS to include the “[a]doption of programs, such as a group of concerted actions to implement a specific policy or plan.”¹⁶

Here, the question is not merely what the permitting agencies *may* do, but what they *must* do. NEPA requires a regional EIS because the pipeline projects are “proposals for . . . actions that will have cumulative or synergistic environmental impact upon a region [and] are pending concurrently” before FERC. FERC is in the process of evaluating the Atlantic Coast Pipeline, the Mountain Valley Pipeline, and WB Xpress Project, and Williams has announced its intent to pursue the Appalachian Connector. These pipelines would impact the same geographic region on the same schedule.¹⁷ Furthermore, they would all cross the defined boundaries of the Jefferson, George Washington, or Monongahela national forests. The potential cumulative impacts of a large-scale pipeline build-out through national forest lands in the central Appalachians warrants a regional EIS.

2. Forest Service planners can use a regional EIS to address the four pipeline projects proposed across national forest lands.

In *Sierra Club v. Kleppe*, the Supreme Court recognized that a key purpose of NEPA’s requirement for a comprehensive, regional EIS is the identification and evaluation of alternatives that lessen cumulative impacts for the entire region.¹⁸ “*Only* through comprehensive consideration of pending proposals can the agency evaluate different course of action.”¹⁹ When multiple proposals are pending for the same region,

¹³ *Id.* at § 1508.25(a)(2).

¹⁴ *Id.* at § 1508.25(a)(3).

¹⁵ Michael Boots, CEQ, Memorandum: Effective Use of Programmatic NEPA Reviews at 14 (Dec. 18, 2014).

¹⁶ 40 C.F.R. § 1508.18(b)(3).

¹⁷ *See Peshlakai v. Duncan*, 476 F. Supp. 1247, 1258 (D.D.C. 1979) (recognizing that “space and time” are important considerations in evaluating a request for a regional EIS).

¹⁸ *See Kleppe* at 410; *see also Churchill Cnty* at 1080 (holding that the purpose of the cumulative impacts analysis is “to assist the decisionmaker in deciding whether, or how, to alter the program to lessen cumulative impacts”) (quotations omitted).

¹⁹ *Kleppe* at 410 (emphasis added).

separate environmental review for each project presents the serious risk that a federal agency will overlook important alternatives that could avoid or minimize impacts for the region as a whole.

A comprehensive, regional EIS for pipelines in the central Appalachians would provide three important benefits for the Forest Service's alternatives analysis. First, the EIS could evaluate whether all four pipeline projects are necessary to move natural gas to markets in the Southeast and Mid-Atlantic. Second, it could identify and evaluate alternatives that would avoid or minimize impacts for the entire region. And third, with future proposals for more interstate pipelines likely, it would allow the Forest Service to plan for pipeline development in a careful and deliberate manner.

a. A regional EIS could evaluate whether all four projects are needed.

A comprehensive, regional EIS for pipelines could evaluate whether all four projects are necessary to move natural gas across the central Appalachians to markets in the Southeast and Mid-Atlantic. We know that the four pipeline projects share at least one similar objective—connection with the existing Transco interstate pipeline east of the Blue Ridge Mountains.²⁰ This pipeline runs from the Gulf Coast to New York, allows or soon will allow bi-directional flow, and is a major natural gas conduit through the region. In addition to delivering gas directly to the Transco line, the Atlantic Coast and Mountain Valley pipelines would also deliver gas to the existing Columbia WB line which then connects to the Transco line in Fairfax County, Virginia.²¹

All four proposed projects may not be necessary to deliver gas to the Transco line. If enough gas can reach this pipeline with (1) existing pipelines already in the ground, (2) upgrades to those existing pipelines, or (3) fewer than four new interstate pipeline projects, many impacts to national forest lands may be avoided altogether.²² However, the Forest Service can only achieve a complete understanding of the need for these

²⁰ All four projects will deliver gas to the existing Transco interstate pipeline east of the Blue Ridge Mountains: the Atlantic Coast Pipeline will have the capacity to deliver 1.4 bcf/d in Buckingham County, Virginia; the Mountain Valley and the Appalachian Connector will each have the capacity to deliver 2.0 bcf/day in Pittsylvania County, Virginia; and the WB Express Project will connect with the Transco line in Fairfax County, Virginia. *See* Atlantic Coast Pipeline, LLC & Dominion Transmission, Inc., Resource Report 1, General Project Description, eLibrary No. 20150520-5023, at 1-17 (May 2015); Mountain Valley Pipeline, LLC, Resource Report 1, General Project Description, eLibrary No. 20150327-5320 at 1-7 (Mar. 2015); Williams, Expansion Projects: Appalachian Connector, <http://co.williams.com/expansionprojects/appalachian-connector/> (last viewed Aug. 24, 2015); Columbia Gas Transmission, LLC, Draft Resource Report 10, WB Xpress Project, eLibrary No. 20150522-5422, at 10-7 (May 2015).

²¹ *See* Columbia Gas Transmission, LLC, Resource Report 10, *supra*, at 10-7.

²² *See, e.g.*, U.S. Dep't of Energy, Natural Gas Infrastructure Implications of Increased Demand from the Electric Power Sector at vi (Feb. 2015) (reporting that “[h]igher utilization of existing interstate natural gas pipeline infrastructure will reduce the need for new pipelines”) *available at* http://energy.gov/sites/prod/files/2015/02/f19/DOE%20Report%20Natural%20Gas%20Infrastructure%20V_02-02.pdf.

projects within a regional context—the capacity of each pipeline must be weighed against the capacity of existing pipelines and of the other proposed projects.

b. A regional EIS could identify alternatives that would avoid or minimize impacts for the central Appalachians as a whole.

Alternatives are the heart of the NEPA process, and the Forest Service has raised serious questions about the depth and validity of the alternatives analysis presented by the Atlantic Coast proponent.²³ The company cursorily rejected system and colocation alternatives describing them as infeasible or simply longer than its preferred route, including alternatives that would avoid national forest lands entirely. But the agency recognized that this cursory evaluation did not capture the “uniquely sensitive environmental resources that would be impacted by the proposed ACP, which would cross the wildland core of the central Appalachians.”²⁴ We agree. In order to identify and evaluate alternatives that avoid or minimize impacts to the central Appalachians as a whole, the proper analytical framework is the entire region.

The existence of alternatives that might minimize pipeline impacts for the entire region is not simply speculation on our part—the Forest Services’ comments show that each project has the potential to be an alternative for one or more of the others. For the Atlantic Coast Pipeline, the agency requested a more thorough investigation of system and colocation alternatives, including colocation along both the Mountain Valley route and the existing Columbia WB pipeline route.²⁵ It also asked for a more complete analysis of increasing the capacity of the Columbia WB line as a potentially viable alternative.²⁶ A comprehensive, regional EIS could unravel these overlapping alternatives and help the Forest Service identify the route or routes that are the most protective of national forest lands.

Separate environmental review runs the risk that important alternatives will be overlooked and, thus, will not fulfill the Forest Service’s NEPA obligations. We offer the following hypothetical example: the combination of colocation of a second pipeline along the existing Columbia WB line coupled with the increased capacity of the Columbia WB line itself might eliminate the need for the greenfield rights-of-way for the Atlantic Coast and Mountain Valley lines.²⁷ But the agencies can only evaluate that alternative or others like it that minimize the impacts for the entire region in the context of a complete

²³ See Forest Serv. Comments, *supra* n. 1, at ¶¶7, 36, 128, 137, 140, 152, 285, 286, 294, 295, 297, 299, 300, 302, 303, 304, 305, 308, 310, 311, 316, 326, 327, 328, 330, 331, 333, 334, & 335.

²⁴ *Id.* at ¶¶ 299, 332.

²⁵ See *id.* at ¶¶ 299, 300, 308.

²⁶ See *id.* at ¶¶ 304, 310.

²⁷ We are not advocating this as a preferred alternative to the proposed projects but offering it only as an example of the kind of alternative that could be overlooked in a more constrained analysis.

understanding of the demand for natural gas, the capacity of existing pipelines, and the proposed capacity of new pipelines—in other words, a regional EIS.

c. A regional EIS will allow the Forest Service to plan for pipeline development now and in the future.

Finally, these projects may be only the first wave of a series of new pipelines proposed across national forest lands to bring gas from the Marcellus region to the Mid-Atlantic and Southeast. Over the last five years, natural gas production from the Marcellus shale jumped dramatically from less than 2 to more than 16 billion cubic feet per day, making this region the largest source of natural gas in the U.S.²⁸ Not surprisingly, a spate of pipeline proposals has accompanied this growth.²⁹ While we believe that new pipeline infrastructure may be unnecessary,³⁰ the Forest Service should anticipate future pipeline proposals through the central Appalachians.

The decisions that the Forest Service makes now about pipeline routing will likely reverberate for decades. For example, approval of the proposed routes for the Atlantic Coast and Mountain Valley projects could prompt the co-location of future projects in these same corridors. Or if these projects are approved, we may learn that steep slopes or other features make their routes unsuitable for expansion, and future pipelines would cut wholly new corridors across the forest. Under either scenario, choices made now will operate as de facto planning decisions about where pipelines should be located on national forest lands. A better approach would be to identify the route or routes that will avoid and minimize harm to forest resources now and, if necessary, could accommodate future projects. A comprehensive, regional EIS can provide the broad, planning-level information that the Forest Service needs to address pipeline development in a deliberate and responsible manner.

3. A comprehensive, regional EIS would complement FERC's activities under the Natural Gas Act.

Some Forest Service officials have expressed concern that FERC does not have authority to conduct a comprehensive, regional EIS for pipelines in the central Appalachians. But this type of analysis would be fully compatible with FERC's duties under the Natural Gas Act. Under Section 7 of the NGA, like the analysis of a proposal's impacts under NEPA, FERC may impose conditions on proposed projects and must

²⁸ See U.S. Energy Info. Admin., Marcellus Region production continues growth (Aug. 5, 2014) available at <http://www.eia.gov/todayinenergy/detail.cfm?id=17411>; U.S. Energy Info. Admin., Marcellus Region, Drilling Productivity Report (July 2015) available at <http://www.eia.gov/petroleum/drilling/pdf/marcellus.pdf>.

²⁹ See U.S. Energy Info. Admin., Marcellus Region production continues growth, *supra* n. 27.

³⁰ See U.S. Dep't of Energy, Natural Gas Infrastructure Implications of Increased Demand from the Electric Power Sector, *supra* n. 22, at vi.

consider “reasonable alternatives.”³¹ And the agency can reject a proposal in favor of an alternative that better serves the “public convenience and necessity” even if it lacks the power to insist that the applicant pursue that other option.³² A regional EIS would only improve FERC’s evaluation of the Atlantic Coast, the Mountain Valley, and the other pipeline projects under the NGA. It would ensure that FERC’s decision to approve, deny, or condition each pipeline proposal is “fully informed and well-considered,” and made with a clear understanding of any regional alternatives and cumulative impacts.³³

FERC’s guidance for how the agency evaluates natural gas pipeline proposals—called the Certificate Policy Statement—does not prohibit review in a comprehensive, regional EIS.³⁴ Instead, that statement describes a flexible process that could easily incorporate information about contemporaneous pipeline proposals. It clarifies FERC’s “intent to evaluate specific proposals based on the facts and circumstances relevant to the application and to apply the criteria on a case-by-case basis.”³⁵ And it explains that “the Commission will consider *all relevant factors* reflecting on the need for the project.”³⁶ In other words, FERC will consider the unique circumstances of each case rather than taking a rigid, formalistic approach. This does not mean that pipeline applications must be placed in silos. To the contrary, the existence of other proposals for the same region is one of the “facts and circumstances relevant to [an] application.” It would be arbitrary and capricious for FERC to ignore a key factor in this case: the proposals’ combined effects on the region and the market.³⁷

³¹ *Minisink Residents for Envtl. Preservation and Safety v. FERC*, 762 F.3d 97, 107 (D.C. Cir. 2014). See also, e.g., *Millennium Pipeline Co., L.L.C.*, 141 FERC ¶ 61,198, P 43 (2012) (citing *Texas Eastern Transmission, LP*, 141 FERC ¶ 61,04, P 26 (2012)) (“The Commission considers alternatives when determining whether a particular proposal would serve the public convenience and necessity.”).

³² See *City of Pittsburgh v. FPC*, 237 F.2d 741, 751 n. 28 (D.C. Cir. 1978) (“The existence of a more desirable alternative is one of the factors which enters into a determination of whether a particular proposal would serve the public convenience and necessity. That the Commission has no authority to command the alternative does not mean that it cannot reject the proposal.”).

³³ *Vermont Yankee Nuclear Power Corp. v. NRDC*, 435 U.S. 519, 558 (1978). See also *Millennium Pipeline Co., L.L.C.*, 141 FERC ¶ 61,198, P 29 (“NEPA alternatives analysis “provides context for the agency’s assessment of the impacts of its actions” that might lead FERC to deny authorization).

³⁴ Certification of New Interstate Natural Gas Pipeline Facilities, 88 FERC ¶ 61,227 (1999), *clarified*, 90 FERC ¶ 61,128 (2000), *further clarified*, 92 FERC ¶ 61,094 (2000) (“Certificate Policy Statement”).

³⁵ Certificate Policy Statement at 61,737.

³⁶ *Id.* at 61,747 (emphasis added).

³⁷ See *Motor Vehicle Mfrs. Ass’n of the U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983) (action is arbitrary and capricious where the agency “entirely failed to consider an important aspect of the problem”).

4. Conclusion

Careful planning is central to the Forest Service's role in managing the national forests.³⁸ Among other things, this means managing various resources "so that they are utilized in the combination that will best meet the needs of the American people," "making the most judicious use of the land," and promoting "harmonious and coordinated management."³⁹ Authorizing several different pipeline projects in the same region, without a comprehensive analysis of alternatives and long-term impacts, would work against the principles of effective planning, judicious land use, and coordinated management. We urge the Forest Service to seek an outcome that is more consistent with its own statutory mission.

In addition to fulfilling the agencies' legal obligations, a regional EIS would be a powerful tool for the Forest Service as it evaluates the remarkable series of pipeline projects affecting national forest lands in the central Appalachians. We strongly urge the Forest Service to proactively engage in the NEPA process with FERC and request a comprehensive, regional EIS on the Atlantic Coast Pipeline, the Mountain Valley Pipeline, the Appalachian Connector, and the WB XPress Project.

Thank you for your attention to these important matters. Please contact us if we can provide more information.

Sincerely,



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³⁸ See, e.g., 16 U.S.C. § 1604; 36 C.F.R. § 219.1.

³⁹ 16 U.S.C. § 531(a). See also 36 C.F.R. § 219.10.

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