



**National Park Service
US Department of the Interior**

Natchez Trace Parkway

RECORD OF DECISION

Tennessee Gas Pipeline Company, LLC

Mississippi Crossing Project

**Federal Energy Regulatory Commission
Environmental Impact Statement EISX-019-20-000-1751972052
FERC Docket Number CP25-514-000
NPS PEPC 138031**

Recommended:

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RECORD OF DECISION

1 INTRODUCTION

The National Park Service (NPS), a bureau and agency within the U.S. Department of the Interior (DOI), issues this Record of Decision (ROD) documenting the NPS decision on the Mississippi Crossing Project (MSX) proposed by Tennessee Gas Pipeline Company, LLC (TGP). The decision concerns TGP's request for federal authorization to construct and operate natural gas pipeline infrastructure that would cross lands administered by the Natchez Trace Parkway (Parkway) via horizontal directional drilling (HDD).¹

This ROD is based on and incorporates by reference the applicable environmental analysis in the Federal Energy Regulatory Commission (FERC) Environmental Impact Statement (EIS) for the Mississippi Crossing and South System Expansion 4 Projects, released June 26, 2026, under identification EISX-019-20-000-1751972052. The EIS is available in FERC Docket Number CP25-514-000.²

In compliance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4321 et seq.), the NPS participated as a cooperating agency during preparation of FERC's EIS. Consistent with the DOI NEPA Implementing Regulations (43 CFR Part 46, as amended February 24, 2026) and the DOI Handbook of NEPA Procedures (February 2026), the NPS independently evaluated the EIS and considered the environmental effects, reasonable alternatives, applicant-proposed measures, and mitigation measures relevant to NPS jurisdiction. Relevant sections of the EIS are summarized and incorporated by reference below.

The decision documented here pertains solely to NPS authorities – specifically, whether to grant the necessary right-of-way (ROW) permit and special use permit (SUP) for the pipeline to cross NPS-managed lands. The NPS considered the EIS analysis, relevant comments received by FERC, and additional information provided by the applicant and cooperating agencies. The ROD

¹ Certification related to Page Limits: The NPS certifies it has considered the factors mandated by NEPA; that this ROD represents its good-faith effort to prioritize documentation of the most important considerations required by the statute within the congressionally mandated page limits; that this prioritization reflects NPS's expert judgement; and that any considerations addressed briefly or left unaddressed were, in NPS's judgement, comparatively not of a substantive nature that meaningfully informed the consideration of environmental effects and the resulting decision on how to proceed.

Certification related to Deadline: The NPS certifies that this ROD represents a good-faith effort to fulfill NEPA's requirements within the congressional timeline; that such effort is substantially complete; that, in NPS's expert opinion, it has thoroughly considered the factors mandated by NEPA; and that, in NPS's judgment, the analysis contained therein is adequate to inform and reasonably explain its decision regarding the proposed Federal action.

² The EIS, along with additional information about the Project, is available from the FERC website (www.ferc.gov). Using the "eLibrary" link, select "General Search" from the eLibrary menu, enter the selected date range and "Docket Number" excluding the last three digits (i.e., CP25-514), and follow the instructions. For assistance with access to eLibrary, the helpline can be reached at (866) 208-3676, TTY (202) 502-8659, or at FERCOnlineSupport@ferc.gov. The eLibrary link on the FERC website also provides access to the texts of formal documents issued by the Commission, such as orders, notices, and rule makings.

reflects current DOI guidance, including the agency's recent updates to NEPA procedures (DOI Handbook of NEPA Procedures February 2026).

2 PURPOSE AND NEED

The purpose of the NPS action is to respond to the applications from TGP for federal authorization to construct and operate a segment of the MSX that would cross lands administered by the Parkway. The NPS action is limited to the review and potential issuance of a ROW permit and related SUP for the construction, operation, and maintenance of the proposed natural gas pipeline within the Parkway boundary.

The need for the NPS action arises from TGP's request for federal authorization under applicable laws and regulations, including 16 U.S.C. § 460a, which provides authority for the Secretary of the Interior to issue revocable permits for rights-of-way across Parkway lands. The MSX is designed to provide additional natural gas transportation capacity to meet regional energy demand and to support system reliability in Mississippi and the broader region. The segment of the MSX proposed to cross the Parkway is a necessary component of the overall pipeline system, as evaluated in the FERC EIS.

According to TGP, the purpose of the MSX is to meet the growing demand for access to multiple, diverse supply basins by providing firm transportation from TGP's existing pipeline system and third-party pipeline connections to markets in the southeast region, which would help lower energy costs and enable gas providers in the southeast to compete for new commercial and industrial loads. The MSX would provide approximately 2.1 billion cubic feet per day (Bcf/d) of firm natural gas transportation capacity by November 1, 2028, with binding agreements for 90 percent of the long-term transportation capacity already in place. The project is anticipated to begin construction in 2027.

3 SELECTED ACTION FOR THE NATIONAL PARK SERVICE

The MSX, proposed by TGP, involves the construction and operation of approximately 208 miles of new natural gas pipeline and associated facilities in Mississippi and Alabama. A 42-inch diameter segment, approximately 1,100 feet in length, would cross NPS lands at Parkway mile post (MP) 157.5 about 3.5 miles south of Kosciusko, MS.³ The crossing would be located at MSX MP 92. Authorization of this use of Parkway lands requires issuance of a ROW permit and

³ The Natchez Trace National Scenic Trail, another unit of the National Park System, is collocated with the Parkway. However, there are no developments associated with the trail at the MSX crossing location, and crossing the scenic trail does not require additional permitting by the NPS. As indicated in FERC's EIS, during coordination with TGP, the NPS noted that while all existing developed scenic trail segments elsewhere are entirely within the Parkway's boundary, the NPS has the option to develop future trail segments outside of the Parkway boundary. One possible opportunity for trail expansion is the Old Natchez Trace segment immediately outside the Parkway boundary near park milepost 157.5. TGP would continue to consult with the NPS regarding the potential development of the Old Natchez Trace segment to ensure MSX does not impede future trail connections.

SUP by the NPS. Under the selected action, the pipeline would be installed beneath the Parkway using HDD.

An additional 484-foot segment would cross a privately owned tract within the boundary of the Parkway where the NPS administers a scenic easement, also via HDD. NPS jurisdiction over this tract is limited and does not include permitting authority for the pipeline.

TGP's ROW permit application to the NPS indicates that, subject to regulatory approvals, the overall construction duration for the Parkway HDD crossing is approximately four months between May 2027 and September 2027. HDD activities will be limited to daytime hours except during the pullback phase of construction, which typically lasts for one to two nights, at most. HDD construction will be a single shift during the pilot and reaming process; during the pullback of carrier pipe, two consecutive 12-hour shifts would be utilized to complete the installation.

The HDD entry and exit locations are sited outside the Parkway boundary, minimizing direct impacts to Parkway surface resources. All equipment staging, drilling operations, and material handling will occur outside the limits of the Parkway. The HDD entry location is approximately 600 feet from the Parkway boundary at the scenic easement, which provides additional distance from federal lands and developments at the Parkway, and the exit location is over 3,000 feet away from the Parkway boundary. Both locations are separated from the Parkway by forests that will not be cleared, avoiding visual impacts and further attenuating noise-related impacts at the Parkway.

No above-ground facilities are proposed within the Parkway boundary. Except for the possibility of minimal, non-mechanized clearing for installation of an HDD guide-wire system and the installation of U.S. Department of Transportation required buried pipeline markers whose placement would be coordinated with the NPS to minimize visual impacts, there will be no access, grading, or clearing within the Parkway. And, though potential guide-wire installation impacts at the Parkway are evaluated in the EIS based on generalized procedures from TGP's FERC application for the MSX, TGP has separately indicated to the NPS that the guide-wire system installation is not anticipated as part of the HDD crossing of the Parkway, which would avoid the related need for access and limited hand clearing of vegetation there.

See Appendix C for the location map and HDD design provided by TGP in their ROW permit application for the MSX.

To mitigate risks associated with HDD, including inadvertent returns (IR) during drilling operations, TGP has developed an HDD Contingency Plan that establishes procedures for addressing potential impacts associated with the release of drilling fluid through hydraulically induced fractures during the HDD process. TGP will notify the NPS if an IR occurs within the Parkway or within a nearby waterway or wetland and address related IR cleanup measures with the NPS on a case-by-case basis. No surface disturbance will be conducted within the Parkway without NPS consultation and approval in the event of an IR.

During operation of the pipeline, TGP will require periodic access to the permitted area for inspection, monitoring, and maintenance or repair activities, as necessary to ensure the integrity and safe function of the pipeline. However, no routine vegetation clearing or surface disturbance will be conducted within the Natchez Trace Parkway boundaries during pipeline operation, unless required for safety or maintenance and coordinated with the NPS in advance.

4 ALTERNATIVES CONSIDERED

4.1 Alternatives Carried Forward

FERC, as the lead agency, evaluated a range of alternatives for the MSX in the EIS. The alternatives analysis included the proposed action, the no-action alternative, system alternatives, major route alternatives, and minor route variations. Each alternative was assessed to determine whether it would meet the project's purpose, be technically and economically feasible, and offer a significant environmental advantage over the proposed action.

For the MSX, FERC carried forward the following alternatives for detailed analysis:

- **Proposed Action:** Construction and operation of approximately 208 miles of new natural gas pipeline and associated facilities, including the crossing of the Natchez Trace Parkway using HDD to avoid surface disturbance.
- **No-Action Alternative:** Under this alternative, the pipeline facilities would not be constructed, and the project's purpose – to provide additional firm natural gas transportation capacity to meet regional energy demand – would not be met.
- **System Alternatives:** FERC evaluated three system alternatives that would have incorporated existing TGP infrastructure and maximized collocation with established ROW. Only two of these alternatives were found to be technically and economically feasible, and neither offered a significant environmental advantage over the proposed action.
- **Major Route Alternatives:** Five major route alternatives were considered to increase collocation or reduce overall pipeline length. None provided a substantial environmental benefit over the proposed alignment.
- **Minor Route Variations:** Several minor route variations were analyzed in response to landowner and stakeholder input. These were incorporated into the proposed alignment where they offered localized benefits without introducing new or greater impacts elsewhere.

4.2 Environmentally Preferable Alternative

The environmentally preferable alternative is the option that would cause the least damage to the biological and physical environment and best protect, preserve, and enhance historic, cultural, and natural resources. For the MSX, the no-action alternative would be environmentally preferable in that it would avoid all project-related impacts. However, it would not meet the project's purpose and need or support regional energy reliability.

Among the action alternatives, the selected action – using HDD to cross the Parkway and implementing robust mitigation measures – was determined to best balance the project’s objectives with the minimization of environmental impacts. No other alternative evaluated in the EIS offered a significant environmental advantage for the segment crossing the Parkway. The proposed action is therefore identified as the environmentally preferable action among the alternatives that meet the project’s purpose and need.

5 MITIGATION, MONITORING, AND REPORTING REQUIREMENTS

5.1 Mitigation Measures

The MSX incorporates a comprehensive suite of avoidance, minimization, and mitigation measures to reduce potential adverse effects on natural, cultural, and recreational resources. These measures are described in detail in FERC’s EIS and are enforceable conditions of any ROW permit or SUP issued by the NPS for the segment crossing the Natchez Trace Parkway.

Mitigation measures applicable to the Parkway segment include, but are not limited to:

- Use of HDD to avoid direct surface disturbance to the Parkway and minimize impacts to the historic travel corridor, scenic integrity, and recreational values.
- Limiting construction workspace and access within the Parkway and eliminating or minimizing clearing.
- Restoration of temporarily disturbed areas to pre-construction contours and revegetation with native species, as necessary.
- Implementation of erosion and sediment control measures consistent with FERC’s Upland Erosion Control, Revegetation, and Maintenance Plan and Wetland and Waterbody Construction and Mitigation Procedures.
- Coordination with the NPS on the placement and design of required underground pipeline markers to minimize visual impacts.
- Adherence to all permit conditions, including timing restrictions, resource protection measures, and monitoring requirements as specified in the EIS and NPS permits.
- No construction within the Parkway boundary until all required NPS permits have been obtained and all mitigation measures are in place.

5.2 Monitoring

Monitoring will be conducted to ensure compliance with all mitigation measures and permit conditions, and to verify the effectiveness of restoration and resource protection efforts.

Monitoring requirements include:

- Regular inspection of construction activities by environmental inspectors and NPS representatives to ensure adherence to mitigation measures and permit conditions.
- Post-construction monitoring of restored areas to confirm successful revegetation, stabilization, and recovery of natural and cultural resources.
- Monitoring of noise levels during HDD activities and at sensitive locations, with implementation of additional mitigation if required to meet established thresholds.
- Ongoing monitoring of wetland and waterbody crossings to ensure restoration performance standards are met, with adaptive management or additional mitigation implemented if necessary.
- Immediate reporting of any unanticipated discoveries of cultural resources or human remains, cessation of work in the affected area, and notification of the appropriate authorities, including the NPS.

5.3 Reporting

The MSX is subject to robust reporting requirements to ensure transparency and accountability throughout construction and operation. Reporting requirements include:

- Submission of an Implementation Plan prior to construction, detailing how mitigation measures and permit conditions will be incorporated into contract documents, construction drawings, and on-site practices.
- Biweekly status reports during construction, documenting progress, compliance with mitigation measures, any instances of noncompliance, corrective actions taken, and the effectiveness of those actions.
- Submission of post-construction monitoring reports, including documentation of restoration success, wetland and waterbody recovery, and any adaptive management actions taken.
- Immediate reporting of any incidents, spills, or unanticipated discoveries to the NPS and other relevant agencies, with follow-up documentation of response actions and outcomes.

All mitigation measures, monitoring, and reporting requirements are enforceable conditions of the ROW permit and SUP. The NPS has the authority to require additional protective measures if unforeseen conditions are encountered and to implement and enforce mitigation measures under the NPS Organic Act of 1916 (54 U.S.C. § 100101 et seq.) and NPS Management Policies 2006, the enabling legislation for the Natchez Trace Parkway (16 U.S.C. § 460 et seq.), the National Historic Preservation Act of 1966 (NHPA, 54 U.S.C. § 300101 et seq.), and the Endangered Species Act (ESA, 16 U.S.C. § 1531 et seq.).

6 PUBLIC INVOLVEMENT SUMMARY

Consistent with NEPA and FERC procedures, the public was provided multiple opportunities to review and comment on the MSX. FERC issued a Notice of Intent to prepare an EIS, opened a public scoping period, and held public scoping sessions to solicit comments from landowners, local governments, Tribes, federal and state agencies, and interested stakeholders. The Draft EIS was then made available for a 45-day public comment period, during which FERC received written submissions addressing concerns such as construction impacts, potential effects on natural and cultural resources, safety, alternatives, and project justification.

FERC reviewed all substantive comments and responded to them in the Final EIS, updating analyses where appropriate. Responses included clarifying construction methods, confirming avoidance and minimization measures, incorporating additional resource-specific information, and evaluating alternative route segments or system alternatives. For comments related to NPS-managed lands, the Final EIS confirmed that the subsurface crossing beneath the Parkway would avoid direct surface disturbance, require no above-ground facilities within the Parkway boundary, and that no construction would be authorized for crossing the Parkway until the NPS ROW permit and SUP have been obtained. These responses and updates informed NPS's independent evaluation and the determinations made in this ROD.

7 CONSULTATION AND COORDINATION SUMMARY

NPS participated as a cooperating agency with FERC, the lead federal agency, in the preparation of the EIS for the MSX. As a cooperating agency, NPS provided subject matter expertise, jurisdictional input, and review of working documents to ensure the analysis addressed potential impacts to resources under NPS management, specifically those associated with the Parkway and Natchez Trace National Scenic Trail (Trail) as well as the Big Black River crossing discussed below in Section 9.4.

NPS participated in FERC's pre-filing process for the MSX and was identified as a cooperating agency in FERC's notice of intent to prepare an EIS due to its jurisdiction and special expertise at the Parkway, Trail, and Big Black River. NPS participated in interagency meetings, provided written comments on the scope and content of the EIS, and reviewed draft and revised EIS documents to ensure the analysis reflected NPS management policies and legal mandates, including the Parkway's enabling legislation.

Through this cooperative process, NPS ensured that the EIS incorporated appropriate avoidance, minimization, and mitigation measures for impacts to Parkway resources, and that the selected action is not inconsistent with the NPS mission to preserve unimpaired the natural and cultural resources and values of the Parkway for the enjoyment of present and future generations.

8 FINDINGS REQUIRED BY OTHER LAWS

8.1 Endangered Species Act

Formal consultation for the MSX was initiated by FERC on June 26, 2026, and acknowledged by the U.S. Fish and Wildlife Service (USFWS) on June 29, 2026. On July 30, 2026, USFWS issued its Biological and Conference Opinion (BO/CO) for the MSX. The USFWS concluded that the project is not likely to jeopardize the continued existence of the northern long-eared bat or the tricolored bat, and concurred that the MSX may affect, but is not likely to adversely affect several additional listed and proposed species identified in the consultation record. The BO/CO includes an Incidental Take Statement based on surrogate acreage of forested habitat removed elsewhere along the project corridor, together with associated monitoring, reporting, and reinitiation triggers.

No tree clearing is proposed within Parkway lands for the HDD crossing. However, in the unlikely event of an IR during HDD operations, limited vegetation clearing or access actions within the Parkway may be necessary to contain and remediate drilling fluids. Any such activity would occur only under NPS direction and approval per TGP's HDD Contingency Plan and would be constrained to the minimum area necessary to ensure resource protection and safe response. Because any IR-related clearing would be small, temporary, and coordinated with NPS, it is not expected to intersect or approach the BO/CO's forest-habitat surrogate thresholds, which apply to planned tree clearing across the broader MSX corridor. If IR-related clearing within the Parkway results in effects not considered in the BO/CO, or could affect acreage amounts relevant to the project-wide take surrogate, NPS will coordinate with FERC and USFWS consistent with the BO/CO's reinitiation provisions.

The National Park Service adopts the BO/CO and will enforce all Parkway-relevant conservation measures and monitoring requirements through the ROW permit and SUP.

8.2 National Historic Preservation Act

As the lead agency, FERC conducted consultation under NHPA Section 106 with the Mississippi Department of Archives and History (MDAH) and other consulting parties, including Tribes. On June 18, 2026, MDAH issued a concurrence letter stating the Project will not adversely affect eligible historic resources, provided agreed upon conditions are met (including immediate cessation of work and notification if cultural materials are discovered, and consultation with descendant communities as appropriate). FERC's EIS documents completion of compliance requirements under Section 106 of the NHPA.

The NPS adopts these Section 106 findings and will enforce discovery/notification procedures and avoidance measures as conditions of the NPS ROW permit and SUP for MSX activities within the Parkway.

8.3 Rivers and Harbors Act / Clean Water Act

The U.S. Army Corps of Engineers (USACE) Section 408 review for the Yazoo River crossing concluded May 5, 2026, per the Federal Permitting Improvement Steering Council's Permitting Dashboard.⁴ That crossing is not within NPS managed lands and does not involve the Natchez Trace Parkway.

TGP proposes HDD construction for the Natchez Trace Parkway crossing by the MSX. The use of HDD avoids direct surface disturbance (no excavation/dredge/fill within waters of the U.S.) and does not trigger USACE permitting for the Parkway crossing.

8.4 Wild and Scenic Rivers Act

Consistent with Section 5(d)(1) of the Wild and Scenic Rivers Act, federal agencies are required to avoid or mitigate the impacts of any action that could affect a Nationwide Rivers Inventory (NRI) river segment to ensure that its Outstandingly Remarkable Values (ORVs) are not adversely affected and consult with the NPS before proceeding with actions that could foreclose or diminish the segment's potential for future Wild and Scenic River designation. The MSX crossing of the NRI-listed Big Black River at MSX MP 77.4 would be accomplished using HDD to avoid direct impacts to the river and its ORVs. The NPS reviewed the proposed crossing and, after consultation and the incorporation of recommended mitigation measures by TGP, determined that the project as proposed would not have an adverse effect on the values for which the Big Black River is listed in the NRI, nor would it preclude the river from future designation into the National Wild and Scenic River System.

8.5 Other Applicable Laws

Compliance with other applicable laws (for example, the Clean Air Act, Natural Gas Act, and state environmental requirements) is documented in FERC's EIS, which NPS incorporates by reference for this decision.

9 DECISION

9.1 Rationale for the Decision

After careful consideration of the MSX as described in FERC's EIS, the NPS has determined that the project, as proposed and conditioned, is not inconsistent with its statutory mission to conserve park resources and values unimpaired for the enjoyment of present and future generations as required by the NPS Organic Act (54 U.S.C. § 100101 et seq.) and the enabling legislation for the Parkway (16 U.S.C. § 460 et seq.). The authority to issue a right-of-way permit for this crossing is provided by 16 U.S.C. § 460a. The authority to issue a special use permit for construction of this crossing is provided by 54 USC 100101.

⁴ <https://www.permits.performance.gov/proj/mississippi-crossing-project/section-408-permit>

The NPS finds that:

- The project's segment crossing the Parkway will be constructed using HDD, avoiding direct surface disturbance to the Parkway's roadway and designed landscape.
- No above-ground facilities will be located within the Parkway boundary, and all activities within the boundary are subject to NPS approval and permit conditions.
- All avoidance, minimization, and mitigation measures identified in the EIS, as well as any additional measures required by the NPS, will be enforceable conditions of the ROW permit and SUP.
- No construction or surface disturbance will be authorized within the Parkway boundary until all required NPS permits have been obtained and all mitigation measures are in place.
- The NPS has independently reviewed the EIS and determined that the analysis is adequate for decision-making under the Department of the Interior's NEPA implementing regulations (43 CFR Part 46, as amended February 24, 2026) and the DOI Handbook of NEPA Procedures (2026).

The NPS has decided to authorize the project because, as described above, the action is not inconsistent with its statutory mission to conserve park resources and values unimpaired for the enjoyment of present and future generations, and there is no practicable alternative that would fulfill the project need. See Section 3 of the EIS and Appendices A and B.

Additionally, as documented in the EIS, none of the alternatives considered would result in fewer environmental impacts on NPS lands than the selected alternative. The chosen crossing method, HDD, substantially avoids direct impacts to Parkway resources, eliminating surface disturbance, preventing vegetation clearing with the possible exception of temporary, non-mechanized clearing associated with HDD guide-wire installation, and maintaining the Parkway's designed landscape, historic corridor, and visitor experience.

The effects of the limited and temporary activities that are features of the MSX crossing of the Parkway are further reduced through avoidance and minimization measures that will be required by FERC for the broader project as described in the EIS and are subject to NPS permit conditions that provide additional protection to Parkway resources and values during construction, operation, and maintenance. Selected applicable mitigation, monitoring, and reporting requirements are summarized in Section 6 of this ROD. With these measures in place, and based on NPS's independent review of the EIS analysis, issuance of the ROW permit and related SUP for construction is not inconsistent with applicable NPS authorities, including the Parkway's enabling legislation.

A description of the alternatives evaluation process and the alternatives considered is provided in Section 3 of the EIS, beginning on page 3-1, and reviewed here in the following section. The No Action Alternative was not selected because it would not meet the project need.

9.2 Decision

Construction and operation of the MSX segment crossing federal land at the Parkway requires a ROW permit under 16 U.S.C. § 460a and a SUP under 54 U.S.C. § 100101. No construction or other surface disturbance may occur within the Parkway boundaries until these NPS permits have been issued and all their conditions have been satisfied.

The NPS received and reviewed ROW permit and SUP applications from TGP, including figures, HDD design and contingency plans, and the results of cultural resources investigations separately permitted by the NPS.

Based on the analysis in the Federal Energy Regulatory Commission Environmental Impact Statement, alternatives considered, mitigation and monitoring measures adopted, and record of agency and public involvement, the National Park Service hereby approves the issuance of a right-of-way permit and special use permit to Tennessee Gas Pipeline Company, LLC, for the construction, operation, and maintenance of the Mississippi Crossing Project segment crossing the Natchez Trace Parkway, subject to all applicable permit conditions and requirements.

APPENDIX A: DETERMINATION OF NO IMPAIRMENT

Compliance with NPS Management Policies 2006 Unacceptable Impact and Non-Impairment Standard

The National Park Service (NPS) Organic Act of 1916 directs the NPS to "conserve the scenery, natural, and historic objects, and wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (54 USC 100101). Guidance for Non-Impairment Determinations and the NPS NEPA Process (April 2025) provides guidance for completing non-impairment determinations for NPS actions requiring preparation of an environmental assessment or environmental impact statement (EIS) pursuant to the National Environmental Policy Act, or NEPA. The NPS has completed a determination of no impairment analysis for the Tennessee Gas Pipeline Company, LLC Mississippi Crossing Project (MSX) and determined that it will not result in impairment of park resources, or in unacceptable impacts as described in § 1.4.7.1 of the 2006 NPS Management Policies.

NPS Management Policies 2006, § 1.4.4, explains the prohibition on impairment of park resources and values:

"While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them."

An action constitutes impairment when its impacts "harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values" (NPS Management Policies 2006, § 1.4.5). To determine impairment, the NPS must evaluate the resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or

- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS Management Policies 2006, § 1.4.5).

NPS non-impairment analysis normally does not include discussion of impacts to visitor experience, socioeconomics, public health and safety, park operations, wilderness, etc., as these do not constitute impacts to park resources and values subject to the non-impairment standard under the Organic Act. See NPS Management Policies 2006 § 1.4.6.

Determination of No Impairment for the Mississippi Crossing Project Crossing of the Natchez Trace Parkway

As a basis for evaluating the potential for impairment on park resources, NPS relied on the EIS prepared in cooperation with the Federal Energy Regulatory Commission (FERC), as well as supporting documentation and consultation records. The EIS includes analysis of impacts to natural and cultural resources, visitor use and experience, and other values fundamental to the purpose and significance of the Natchez Trace Parkway (Parkway). Resources dismissed from detailed analysis in the EIS are not evaluated here, as impacts to those resources are so minor that they cannot result in impairment and do not warrant additional discussion.

The purposes of the Parkway, along with significance statements and a description of its fundamental resources and values, are described in the Parkway Foundation Document (NPS 2014). The purpose statement for the Parkway is as follows:

“The Natchez Trace Parkway commemorates 10,000 years of travel along the Old Natchez Trace corridor and provides a 444-mile journey linking culture, nature, and history along one of the oldest transportation routes on the North American continent.”

Fundamental resources and values at the Parkway include the Old Natchez Trace, American Indian history and culture, early American history and culture, the Parkway’s designed landscape and scenic integrity, and diverse natural resources. The project has broad effects on natural resources, including soils, vegetation, wildlife, water, and threatened and endangered species. However, as described below, none of these effects rise to the level of significant impacts. The impacts would be temporary, very small in scale, and in some cases not noticeable.

The project does not affect the Old Natchez Trace, American Indian history and culture, early American history and culture, or the Parkway’s designed landscape or scenic integrity.

As noted above, the NPS does not complete non-impairment determinations for visitor use and experience. However, the EIS evaluated visitor use and found that the project would not disrupt visitor use, experience, or access to the Parkway.

The EIS evaluated the impacts of the selected action – authorizing the construction and operation of a natural gas pipeline segment crossing the Parkway – on the resources and values of the Parkway summarized below. The analysis considered both direct and indirect effects, as well as cumulative impacts, and incorporated avoidance, minimization, and mitigation measures developed through interagency consultation and public involvement.

Soil and Water Resources

The EIS indicates that horizontal directional drilling (HDD) construction beneath the Parkway will avoid surface disturbance to Parkway soils unless an inadvertent return (IR) of drilling fluid occurs. Any potential disturbance associated with guide-wire installation will be negligible, localized, and temporary as evaluated in the EIS, and TGP has separately indicated that guide-wire installation at the Parkway would not be necessary to the NPS. Buried pipeline marker installation would also create negligible and localized soil disturbance.

During HDD drilling activities, an IR of drilling fluid is a risk that could occur. In the event of an IR, TGP will implement its HDD Contingency Plan to address potential impacts associated with the release of drilling fluid and will coordinate the response to contain, clean up, and dispose of drilling fluids with the NPS. Restoration requirements, including stabilization and revegetation as needed, will ensure no long-term effects on soil structure or hydrology.

No surface water features occur within the project workspace on Parkway lands.

Because HDD avoids trenching, grading, or direct surface modification, MSX effects on soils and water resources are negligible, localized, and temporary, whether from potential guide wire installation or from the placement of required pipeline markers. In the event of an IR, response will be coordinated with the NPS to minimize impacts, and restoration requirements, including stabilization and revegetation as needed, will ensure no long-term effects on soil structure or hydrology. As a result, the selected action will not compromise the integrity of soils or water resources and therefore will not constitute impairment.

Vegetation and Wildlife

Vegetation impacts on Parkway lands will be extremely limited due to the use of HDD, which eliminates the need for clearing or other surface disturbance along the Parkway's surface. TGP has separately indicated to the NPS that guide-wire installation within Parkway lands may not be necessary, further reducing the potential for disturbance. If any non-mechanized guide-wire installation becomes necessary, vegetation effects would be negligible, localized, and temporary. Installation of required buried pipeline markers would similarly result in only minor, localized vegetation disturbance.

Wildlife disturbance would be limited to temporary construction-related noise and human presence that would largely occur outside the Parkway boundary, where HDD entry and exit points are located. No habitat conversion or long-term modification of wildlife use areas within Parkway lands would occur.

In the unlikely event of an IR, response and cleanup actions would follow the Project's HDD Contingency Plan in coordination with the NPS to minimize potential effects on vegetation or wildlife.

Given the negligible extent of vegetation removal, the absence of above-ground facilities, and the limited and temporary nature of any potential disturbances, the selected action will not compromise the integrity of vegetation or wildlife resources and therefore will not constitute impairment.

Threatened, Endangered, and Proposed Species

The EIS indicates that no designated critical habitat occurs within the MSX project area, including the Parkway crossing. HDD allows the pipeline to be installed beneath the Parkway with no surface disturbance. TGP indicates that guide-wire installation within Parkway lands may not be required. Should any non-mechanized guide-wire installation occur, such disturbance

would be negligible, localized, and temporary. Installation of required pipeline markers would also have negligible habitat effects.

On July 30, 2026, the U.S. Fish and Wildlife Service (USFWS) issued its Biological and Conference Opinion (BO/CO) for the Mississippi Crossing Project. The USFWS concluded that the MSX is not likely to jeopardize the continued existence of the northern long-eared bat or the tricolored bat. The Service also concurred that the MSX may affect, but is not likely to adversely affect several additional listed and proposed species. The BO/CO includes an Incidental Take Statement based on surrogate acreage of forested habitat removed elsewhere along the MSX corridor. No tree removal or habitat loss is planned within the Parkway.

In the unlikely event of an IR of drilling fluid during HDD operations, limited vegetation clearing or access actions within Parkway lands may be needed to contain and remediate the release. Any such activity would occur only under NPS direction and approval and would be constrained to the minimum area necessary for safe response. Because any IR-related clearing would be small, temporary, and coordinated with the NPS, it is not expected to intersect or meaningfully approach the BO/CO's forest-habitat surrogate thresholds. If IR-related clearing were to result in effects not considered in the BO/CO, NPS would coordinate with FERC and USFWS consistent with the BO/CO's reinitiation provisions.

Because the Parkway crossing does not involve surface disturbance, habitat conversion, or installation of above-ground facilities – and because any incidental vegetation disturbance associated with guide-wire installation, marker placement, or IR response would be negligible, short-term, and subject to NPS oversight – the selected action will not compromise the integrity of threatened or endangered species or their habitats and therefore will not constitute impairment.

Cultural Resources

Cultural resources at the Parkway include the nationally significant Old Natchez Trace, associated archaeological resources, and the Parkway's designed landscape. HDD installation beneath Parkway lands avoids all surface disturbance to the motor road and adjacent historic landscape features. No above-ground facilities would be located within the Parkway boundary.

TGP indicates that guide-wire installation within Parkway lands may not be needed, and therefore no ground-disturbing activities are anticipated in areas that could contain archaeological resources. If guide-wire installation becomes necessary, disturbance would be non-mechanized, minimal, and subject to NPS review and approval. Required pipeline marker installation would produce only negligible, localized ground disturbance that would not affect cultural resources.

In the unlikely event of an inadvertent return (IR) within or adjacent to the Parkway boundary, work would cease and response actions under the HDD Contingency Plan would be coordinated with NPS, including implementation of unanticipated discovery procedures if any cultural materials are encountered.

Section 106 consultation for the broader project resulted in concurrence from the Mississippi Department of Archives and History that the undertaking would not adversely affect eligible

historic properties, provided agreed-upon monitoring and discovery conditions are followed. Those conditions are incorporated into NPS permitting for the Parkway segment.

Because the selected action largely avoids surface disturbance, introduces no structures into the cultural landscape, and includes protective measures for any potential guide-wire installation, IR response, or marker placement, the project will not compromise the integrity of cultural resources and therefore will not constitute impairment.

Land Use, Parkway Designed Landscape, and Visual Resources

Construction activity within Parkway lands will occur underground using HDD, with no above-ground facilities and no alteration to the Parkway's land use, designed landscape, or scenic integrity. TGP indicates that guide-wire installation within the Parkway may not be required; if guide-wire installation occurs, the temporary presence of personnel would be short in duration, and any non-mechanized clearing would be limited. Required buried pipeline marker installation would be coordinated with the NPS to reduce its visual effects.

Because the MSX largely avoids visible disturbance, requires no surface modification, and introduces no long-term changes to land use or scenic conditions within the Parkway beyond required pipeline marker placement coordinated with the NPS, the selected action will not compromise the integrity of the Parkway's designed landscape or visual resources and therefore will not constitute impairment.

Air Quality, Soundscape, and Night Sky

Air emissions, noise, and lighting associated with HDD activities will be temporary and short in duration, occurring over the approximately four-month overall construction period, confined to areas outside the Parkway boundary at the HDD entry and exit locations, and occur within daylight hours except during the pullback phase, which typically lasts one or two nights. No guide-wire installation is anticipated within Parkway lands, but if guide-wire installation occurs, associated noise or emissions would be negligible. Noise or emissions associated with required buried pipeline marker installation would also be negligible. No operational emissions sources or lighting are proposed within the Parkway.

An inadvertent return (IR), should it occur, would be addressed under TGP's HDD Contingency Plan and coordinated with the NPS. IR response activities would be temporary.

Because construction-related air quality, sound, and night sky effects would be negligible and temporary, and because the action introduces no long-term operational effects within Parkway lands, the selected action will not diminish opportunities for enjoyment of Parkway resources and therefore will not constitute impairment.

Conclusion

This analysis was guided by best available science, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities. The NPS has determined that implementation of the selected action will not constitute impairment of the resources or values of Natchez Trace Parkway. This conclusion is based on

consideration of the Parkway's purpose and significance, fundamental resources and values, a thorough analysis of the environmental impacts described in the FERC EIS, consultation under the ESA and NHPA by FERC, comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies 2006.

APPENDIX B: RIGHT-OF-WAY DETERMINATION FOR THE MISSISSIPPI CROSSING PROJECT

Compliance with 16 U.S.C. § 460a
Not Inconsistent Use Standard

Introduction

This appendix documents the National Park Service (NPS) determination that issuing a right-of-way (ROW) permit and a special use permit (SUP) for construction, operation, and maintenance to Tennessee Gas Pipeline Company, LLC for the Mississippi Crossing Project (MSX) crossing of the Natchez Trace Parkway (Parkway) is not inconsistent with the use of such lands for Parkway purposes under 16 U.S.C. § 460a. The NPS relies on its Record of Decision (ROD), including its other appendices, and the Federal Energy Regulatory Commission Environmental Impact Statement (EIS) evaluating the potential effects of the MSX, and incorporates their analyses and findings by reference.

Project Summary

The portion of the MSX affecting NPS-administered lands consists solely of a subsurface crossing beneath the Parkway completed using horizontal directional drilling (HDD). HDD avoids all direct surface disturbance to the Parkway's motor road and designed landscape. No above-ground facilities are proposed within the Parkway boundary. Construction activity on Parkway lands is temporary, limited in scope, and subject to NPS permit conditions for both construction and operation.

Legal and Regulatory Framework

- **National Park Service Organic Act (54 U.S.C. § 100101 et seq.)**

Establishes the fundamental purpose of National Park System units, including the Parkway, to conserve resources and values while providing opportunities for enjoyment in a manner that leaves them unimpaired for future generations.

- **Parkway Purpose**

The Natchez Trace Parkway commemorates 10,000 years of travel along the Old Natchez Trace corridor and provides a 444-mile journey linking culture, nature, and history along one of the oldest transportation routes on the North American continent (Foundation Document, Natchez Trace Parkway, 2014).

- **Natchez Trace Parkway ROW Authority (16 U.S.C. § 460a)**

Authorizes revocable permits for rights-of-way across Parkway lands when the NPS determines the use is not inconsistent with Parkway purposes. This appendix provides the determination required under the statute.

- **NPS ROW Regulations (36 C.F.R. Part 14)**

Govern processing, issuance, and enforcement of ROW and construction permits, including terms and conditions intended to protect park resources.

Basis for § 460a Determination

- **NEPA Compliance Documentation**

The environmental analysis, mitigation, and consultation supporting this determination are documented in the ROD and EIS for the MSX. These documents conclude that the MSX, as conditioned, will not result in significant effects on Parkway resources.

- **Project Features & Mitigation (Permit Conditions)**

As outlined in the ROD's mitigation section, key protective features – including HDD beneath the Parkway, absence of above-ground facilities, restoration of temporary workspaces, and erosion and sediment control – are incorporated as enforceable permit conditions pursuant to 36 C.F.R. Part 14.

- **Degree and Context of Effects**

The EIS concludes that MSX's effects on Parkway resources are short-term and localized. HDD avoids disturbance to surface features, and the MSX introduces minimal long-term above-ground operational presence within the Parkway boundary.

- **Consultation Outcomes**

The EIS documents the consultation steps completed under the National Historic Preservation Act (NHPA), and the ROD summarizes the final outcomes of Endangered Species Act (ESA) Section 7 consultation for the Mississippi Crossing Project, which occurred after publication of the Final EIS.

NHPA Section 106 consultation is complete. The EIS documents that the Project would not adversely affect eligible historic resources provided agreed-upon conditions for construction monitoring and unanticipated discoveries are followed. For the Parkway segment, these conditions are incorporated as enforceable requirements of NPS permitting.

Formal ESA consultation for the MSX concluded on July 30, 2026, when the U.S. Fish and Wildlife Service issued its Biological and Conference Opinion (BO/CO). As described in the ROD, the Service determined that the MSX is not likely to jeopardize the northern long-eared bat or the tricolored bat and concurred that the project may affect, but is not likely to adversely affect, several additional listed and proposed species. The BO/CO includes an Incidental Take Statement based on surrogate acreage of forested habitat removed elsewhere along the project corridor, but no tree clearing is planned within Parkway lands. In the unlikely event that forested habitat must be cleared during an HDD inadvertent return response, such actions would occur only under NPS direction and would be limited to the minimum necessary. Any Parkway-relevant conservation

measures or coordination requirements associated with the BO/CO are incorporated as enforceable conditions of NPS permitting.

No Impairment Determination

Appendix A of the ROD (Determination of No Impairment) concludes that the MSX would not compromise the integrity of the Parkway's natural, cultural, or scenic resources or values and therefore does not constitute impairment under NPS Management Policies.

Conclusion

Considering the NPS Organic Act, 16 U.S.C. § 460a, the analysis and conclusions in the ROD and EIS, and enforceable permit conditions under 36 C.F.R. Part 14, the NPS determines that issuing a ROW permit and SUP for construction, operation, and maintenance of the MSX Natchez Trace Parkway crossing is not inconsistent with the use of the affected lands for Parkway purposes, as required under 16 U.S.C. § 460a.

The MSX will not compromise the integrity of the Parkway's natural, cultural, or scenic resources or values, and the permit conditions ensure ongoing consistency with Parkway purposes.

APPENDIX C: FIGURES

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