January 23, 2015

Via email: comments-southern-georgewashington-jefferson@fs.fed.us

H. Thomas Speaks, Jr.
Forest Supervisor
USDA Forest Service
George Washington and Jefferson National Forests
ATTN: Atlantic Coast Pipeline Survey Comments
5162 Valleypointe Parkway
Roanoke, VA 24019

Dear Forest Supervisor Speaks, Jr.:

Trout Unlimited and its Virginia Council (collectively "TU") offer the following comments on the request by Atlantic Coast Pipeline LLC (ACP LLC) for a special use authorization permit to conduct surveys on forest lands for the Atlantic Coast Pipeline (ACP). The ACP is currently proposed to cross 12.6 miles of the George Washington National Forest (GWNF) in Highland and Augusta counties. ACP LLC is requesting a planning permit to conduct activities such as field routing, environmental, cultural resources, and civil surveys along a 300-foot-wide survey corridor within a 2,000-foot-wide study corridor where the planned pipeline route crosses the GWNF.

TU is the nation's largest coldwater conservation organization focused on conserving, restoring and protecting America's salmon and trout fisheries. Approximately 60% of Virginia's native brook trout streams are located in the George Washington and Jefferson National Forests, making the forest a place of significant interest for TU. Currently, the ACP route is proposed to cross 8 native, wild trout and coldwater streams. Additionally, all 12.6 miles of the GWNF portion of the proposed route passes through watersheds that support native and wild trout. TU's primary concerns with the proposed pipeline involve the route selected, construction methods for stream crossings, and potential erosion and sedimentation impacts in trout streams.

Based upon information provided in the Resource Reports submitted to FERC on December 12, 2014, TU strongly believes that ACP LLC has failed to fully evaluate alternatives to its current proposed route, including pipeline routes that avoid the George Washing National Forest altogether, or that at a minimum, follow a different, less invasive path through the forest. ACP LLC's selection of its primary route, and its determination that alternative routes are not

feasible, is based largely upon a desktop analysis and minimal survey work. TU urges the Forest Service to require a more comprehensive evaluation of alternative routes that will avoid or minimize impacts to natural resources, including trout streams, prior to issuing a special use authorization permit for survey work. Additionally, infrastructure needs—such as proposed temporary and permanent work spaces, staging areas, roads, ditches, sediment basins, etc.—should be identified and assessed as part of ACP LLC's proposed survey work. These currently unassessed features will also impact drainage ways, fragment habitat and increase sediment deposition in streams.

TU recognizes that, generally, environmental surveys are the first assessment step in the environmental review process for pipeline permitting. However, information collected during the environmental surveys should inform the more detailed Resource Reports (specifically Resource Reports 2-9) and the Environmental Impact Statement that are required under the Federal Energy Regulatory Commission's regulations. Thus, TU recommends that as part of its surveys, ACP LLC gather as much information as possible about current environmental conditions, to limit future disturbance to forest lands and recreational activities. TU offers the following specific recommendations for information that should be collected during the survey process.

Routing Survey/Civil Survey

ACP LLC proposes to survey the centerline of the proposed 300 ft. route corridor, identifying major feature crossings such as fences, streams, utilities, roads, access roads, occupation lines, property lines and land use lines. TU recommends that additional potential alternative routes that are nearby and co-located with other infrastructure such as roads, pipelines, power/transmission lines, etc. also be surveyed, for future alignment consideration to avoid, if necessary, sensitive natural resources within the currently proposed route.

Environmental Surveys

In its application, ACP LLC provides little information about what types of information will be collected during environmental surveys of streams and stream crossing areas. In order to determine if information collected will provide a comprehensive picture of water resource conditions, TU recommends that more focus be placed on streams and stream crossing areas, with a special emphasis on headwater streams, and that photographs be taken at all stream crossing areas.

Dominion proposes to demark stream crossing areas, by tying a flag to each bank of the crossing along the pipeline centerline. TU recommends that ACP LLC comprehensively assess and document conditions in 300 feet of stream section that is both upstream and downstream of the proposed crossing corridor, to determine if the route could be moved minimally to avoid sensitive areas in the proposed pipeline corridor.

ACP LLC suggests that it will document visual observation of physical, chemical and biological integrity of each waterbody and wetland feature, but does not go into detail about what specific data will be collected. TU recommends that ACP LLC collect the following data/measurements at each stream crossing corridor and 300 feet upstream/downstream of the proposed crossing corridor:

- Slope/gradient, soil type, and vegetation type/density for areas within the pipeline corridor at least 300 feet above and below each stream crossing;
- Identification and evaluation of all perennial, intermittent and ephemeral drainages that might be impacted by pipeline grubbing, transportation and construction activities and associated infrastructure;
- Stream discharge, channel gradient, channel sinuosity, stream substrate, cross-sectional surveys, channel debris and sediment storage, and stream order;
- Geomorphological data, including complete fluvial geomorphic characterization of the stream's hydraulic geometry, plan form, and profile, and information about bed and bank stability, scour depth and depth of pools;
- Stream classification, fish population/density data, benthic macroinvertebrate surveys and basic water quality parameters, including pH, temperature, alkalinity, conductivity, total suspended solids, suspended solid concentrations, and nutrients such as nitrogen and phosphorus; and
- Other information that will help determine the feasibility and appropriateness of stream crossing methods types, including horizontal directional drilling, Direct Pipe or conventional bore methods.

While TU recognizes that the Forest Service does not have the authority to require that the above criteria be assessed for the entire length of the pipeline, especially for those areas outside of forest land boundaries, this information is critical to understanding landscape-scale environmental conditions and constraints both on forest lands and on non-forest lands. Thus, TU urges ACP LLC to consider conducting comprehensive stream assessments, as described above, at each stream crossing site for the proposed pipeline.

Schedule

ACP LLC is requesting a 12-month planning permit, and had anticipated that the majority of the field surveys would be completed in fall 2014. Surveys/assessments of stream crossing corridors and the 300 ft. upstream and downstream sections should be timed to capture seasonal variations, including low-flow and high flow conditions. Additional desktop analysis to evaluate historical flow records and chemical, biological and physical data should be conducted to address annual changes in stream conditions (i.e. dry v. wet year).

In conclusion, TU urges the Forest Service to require ACP LLC to more thoroughly evaluate alternative routes that will avoid or minimize impacts on natural resources on forest lands,

prior to granting a special use authorization permit for survey work. As part of future survey work, TU strongly recommends as much detailed information as possible be collected to inform future resource reports and the National Environmental Policy Act process. Thank you for your consideration of TU's comments. Please do not hesitate to contact Katy Dunlap, kdunlap@tu.org or 607-703-0256, if you require additional information or have questions.

Sincerely,

Graham Simmerman
Chair
Virginia Council of Trout Unlimited

Katy Dunlap
Eastern Water Project Director
Trout Unlimited