



April 2, 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: Mountain Valley 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 Mountain Valley Pipeline LLC (MVP LLC) for a special use authorization permit to conduct surveys on forest lands for the Mountain Valley Pipeline (MVP).

The original MVP route is proposed to cross 2.13 miles of the Jefferson National Forest (JNF) in Giles and Montgomery Counties, Virginia and Monroe County, West Virginia. Two additional alternative routes are also proposed to cross the JNF, including Alternative 110J which would occur along a 5.3 mile segment and Alternative 110R which would occur along a 6.1 mile segment. MVP LLC is requesting a planning permit to conduct activities such as civil surveys, wetland and waterbody delineations, rare, threatened and endangered species surveys, and cultural surveys along a 300-foot-wide survey corridor along the original pipeline route (comprised of approximately 77.5 acres of forest lands), the Alternative 110J route (comprised of approximately 193 acres of forest lands) and the Alternative 110R route (comprised of approximately 224 acres of forest lands).

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 forests a place of significant interest for TU. The original MVP route is proposed to cross two native, wild trout and coldwater streams on national forest lands; Alternative 110R will cross 7 native, wild and coldwater resources on national forest lands and Alternative 110J will cross 11 of these streams on national forest lands. TU's primary concerns with the proposed pipeline involve the impact to water resources and aquatic life, construction methods for stream crossings, and potential erosion and sedimentation impacts in trout streams.

Trout Unlimited: America's Leading Coldwater Fisheries Conservation Organization
Eastern Water Project Office: 6281 Cayutaville Rd., Suite 100, Alpine, NY 14805
(607) 703-2056 • email: kdunlap@tu.org • <http://www.tu.org>

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. Based upon our experience with other major natural gas pipelines recently proposed/approved in the east, pipeline companies often fail to collect the necessary information during surveys that will help determine impacts to streams and aquatic life, as well as appropriate mitigation measures—such information is ultimately necessary to determine if the company will file and prepare an application for construction and operation of the pipeline. Consequently, companies are often forced to conduct additional surveys to respond to public and agency concerns. As currently proposed, MVP's survey request, including the types of surveys and methods proposed, is inadequate to provide the baseline information necessary to determine potential impacts to streams and aquatic life. For these reasons, TU recommends that as part of its surveys, MVP 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.

Wetland and Waterbody Delineations

In its application, MVP LLC proposes to delineate wetlands and waterbodies during surveys, but provides little information about what types of information will be collected related to streams and stream crossings. 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. For the original proposed route and the two alternatives, TU recommends that MVP 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.

TU recommends that MVP 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;
- 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 MVP LLC to consider conducting comprehensive stream assessments, as described above, at each stream crossing site for the proposed pipeline.

Schedule

MVP LLC is requesting a 12-month planning permit, and anticipates that the majority of the wetland and waterbody delineation survey work will be completed between March and September 2015. Surveys/assessments of stream crossing corridors and the 300 foot 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 MVP LLC to collect 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