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April 1, 2020

Joby P. Timm
Forest Supervisor
George Washington and Jefferson National Forest

Submitted Via Online Portal

Re: Scoping Comments, Mt. Storm to Valley Transmission Line Replacement Project

Board of Directors:

Bette Dzamba

Sarah Fromme

Katie Keller

Leigh Kirchner

David Sellers

Elise Togbe

Jamie Trost

Ryan Wagener

Elizabeth Williams

Dear Supervisor Timm:

I am submitting these comments on behalf of Wild Virginia, in response to the legal notice published on March 2, 2020 for the referenced project, as described in your letter of February 27, 2020. We have some concerns about potential environmental impacts and suggestions about how this power line replacement project can be used to improve certain conditions for wildlife and forest sustainability.

- Your letter and the accompanying maps indicate that the power line work will take place across some very steep slopes. Construction on these mountainsides will pose significant difficulties and work in this terrain presents a high risk of erosion and stream pollution from sediment runoff.

In regard to work across similar mountainous terrain, the U.S. Forest Service designated what it termed “high hazard” areas, where steep slopes, unstable and highly erodible soils, and other factors created questions as to whether plans were adequate to protect resources. The environmental analysis in this case should consider whether areas along this powerline path meet the same criteria and must demand that work plans and pollution control designs be presented to ensure that resources can be properly protected.

Streams that could be affected by runoff from the project include those of high quality or in near-pristine conditions. Antidegradation policies and all parts of the water quality standards for both Virginia and West Virginia must be upheld. To meet these requirements, all designated and existing uses of any affected waterbodies must be fully supported at all times. Therefore, compliance with average annual sediment loading goals or any other long-term values that modeling predicts to be maintained is not sufficient.

For example, Virginia's general criteria prohibit any addition of materials to streams that result in turbidity, color, or other detrimental impacts. These criteria do not allow for violations for any length of time or extent. We assert that analyses of changes in hydrologic flow regimes and discharges of sediments must be done for all time scales, including on daily bases.

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- Given that the power line constitutes a linear barrier bisecting the Forest along the fifteen-mile route through public lands, we believe it is necessary and appropriate for the Forest Service to address fragmentation and wildlife passage impacts during the environmental review. This analysis should include a survey of the species, both plant and animal, whose habitats have been or may be disconnected by the powerline and any possible solutions that may be undertaken to restore connections across the right of way. The project should incorporate such improvements as mitigation for new and continued unavoidable impacts from the power line.
- Because the materials and form of the towers are to be changed during this project, changes to the visual impacts for users of the Forest and for members of the public should be analyzed.
- The scoping letter discusses a variety of road improvements, maintenance, and building activities. During these activities, a survey to assess current water quality and/or aquatic species passage problems on existing roads should be made. Opportunities to repair these problems on any road that will be used for the project should be discussed in the environmental review.

Also, new roads, either temporary or permanent, that involve conversion of natural areas to roadway constitute a cost to the public and a negative impact to the Forest. Projects for improving water quality and aquatic habitats or passage should be required as mitigation for these costs and impacts, whether these improvements are directly related or in proximity to the project work or not.

- The scoping letter states that current forest stands would be cleared to accommodate new locations for towers and for other features associated with construction and maintenance of the power line. If trees need to be removed for new tower locations, it would seem to follow that old tower locations may be available for reforestation. This possibility must be examined in the environmental analysis and, wherever possible, forest habitat should be restored.

Thank you for the opportunity to comment on this project. As a procedural matter, we request that a draft Environmental Assessment be opened for comment and those comments considered before the Forest Service issues a draft decision notice. This allows the public to have a chance to review the more thorough examination of the issues in the draft EA and seek changes in the final EA without having to resort to a formal objection. We believe this method is preferable in all cases and hope that it will be followed in this instance.

Sincerely,
/s/ David Sligh
David Sligh
Conservation Director