



February 22, 2022

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Joby Timm, Forest Supervisor  
George Washington and Jefferson National Forests  
USDA Forest Service  
Submitted via web portal

*Board of Directors:*

Re: Programmatic EA for Forestwide Fiberoptic Telecommunication Lines on  
GWJNF

Dear Supervisor Timm:

I submit these comments on behalf of Wild Virginia, in response to a notice for the referenced environmental review dated January 20, 2022 (Notice). We believe there are serious concerns that must be addressed through an Environmental Assessment (EA) to support decisions as to whether fiberoptic lines may be installed in areas of the George Washington and Jefferson National Forests (GWJNF).

Issues of concern include:

- The Notice states that fiberoptic lines "would mainly co-locate in existing utility" or "road right of ways." We believe co-location with such existing features should be required in every case unless the applicant demonstrates that it is not practicable to do so.
- The Notice states that disturbed areas would be revegetated with a wildlife friendly mix and in accordance with Forest Plan standards, excluding Kentucky 31 tall fescue. We believe that only native species plant mixes should be allowed in stabilizing the disturbed areas.
- While horizontal directional drilling (HDD) will likely be preferable to open cuts through waterbodies, this method is not without risks and should also be avoided where possible. Wherever the lines can be attached to bridges or existing utility structures these methods must be required unless shown to be impracticable.
- In every case HDD should be prohibited unless the nature of the subsurface area to be impacted is known and unless it is shown that boring will not degrade surface waters or groundwater.
- In general, HDD must be prohibited in areas of karst geology. The potential impacts in these areas, where the surface/groundwater interface can be very shallow, could be great, even when the lines and boreholes are small. The EA must assess this concern in detail.

*Bette Dzamba*

*Leigh Kirchner*

*Kate Mallek*

*Allison McClure*

*Jamie Trost*

*Grace Tuttle*

*Ryan Wagener*

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- The EA must provide detailed information about the methods to be allowed in HDD operations, explaining the extent and nature of excavations on the approaches to waterbodies and roads and the methods to be used at these sites to prevent pollution problems and habitat damages.
- The Notice states that the HDD machines "should be small and sit on the ground surface within the right of way." The EA must explain the nature of these machines and their impacts in detail and should mandate the use of equipment and methods that minimize impacts. A statement as to what "should be" done is not adequate to ensure proper protections.
- Following state erosion and sediment control regulations will be inadequate for some areas on the Forest, including some the areas with particularly steep slopes, highly erodible and shallow soils, acidic geology, and other characteristics. Construction and pollution control requirements must be appropriately enhanced to ensure that water quality standards can be met wherever necessary based on these and other conditions that may be encountered. Areas such as those the Forest Service designated "high hazard" zones along the Atlantic Coast and Mountain Valley pipeline routes are examples that must be examined.
- The impact of these types of construction projects on wildlife connectivity and passage, both terrestrial and aquatic must be addressed in the EA.

Thank you for considering our concerns and we look forward to further sharing of ideas through this project review.

Sincerely,

/s/ David Sligh

David Sligh  
Conservation Director