

APPENDIX VI

DEQ COORDINATION RESPONSES

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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Molly Joseph Ward
Secretary of Natural Resources

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David K. Paylor
Director

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January 20, 2016

Mr. Joel H. Peck, Clerk
State Corporation Commission
Document Control Center
Tyler Building-First Floor
1300 E. Main Street
Richmond, Virginia 23219

RE: Virginia Electric and Power Company, Haymarket 230 kV Double Circuit
Transmission Line and 230-34.5 kV Haymarket Substation, Prince William and
Loudoun Counties, Virginia, Application No. 272, State Corporation Commission
Case No. PUE-2015-00107 (DEQ# 15-185S)

Dear Mr. Peck:

As requested in Ms. Alisson Klaiber's letter of November 10, 2015, the Department of Environmental Quality (DEQ) has coordinated the review of the above-referenced application, focusing on the environmental information found in the DEQ Supplement. The purpose of the review is to develop information for State Corporation Commission (SCC) staff about potential impacts to natural and cultural resources associated with the proposed project. Based on comments submitted by reviewers, we are providing a summary of potential impacts to these resources from construction and operation of the electric transmission lines and substation, as well as recommendations for minimizing those impacts and for compliance with applicable legal requirements. This report includes copies of the comments submitted by reviewers.

Thank you for the opportunity to review the application for SCC certification. We trust that you will find our report helpful in your review process. If you have any questions, please feel free to call me at (804) 698-4204 or John Fisher at (804) 698-4339.

Sincerely,

Bettina Sullivan, Program Manager
Environmental Impact Review and Long-Range
Priorities

Attachments

160120157

Joel H. Peck
DEQ # 15-185S
PUE-2015-00107

Ec: Robbie Rhur, DCR
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Tony Watkinson, VMRC
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Roger Kirchen, DHR
David Spears, DMME
Brian Henshaw, Town of Haymarket
Tim Hemstreet, Loudoun County
Melissa Peacor, Prince William County
Mark Gibb, Northern Virginia Regional Commission

Cc: Alisson Klaiber, SCC

150120157



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COMMENTS OF THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Concerning the Application of Virginia Electric and Power Company for a Certificate of Public Convenience and Necessity for the Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket Substation in Prince William and Loudoun Counties, Virginia, Application No. 272, State Corporation Commission Case No. PUE-2015-00107 (DEQ# 15-185S).

The following comments are intended to provide technical assistance to the State Corporation Commission in evaluating the project. The following agencies and locality joined in this review:

Department of Environmental Quality
Department of Game and Inland Fisheries
Department of Conservation and Recreation
Marine Resources Commission
Department of Health
Department of Aviation
Virginia Outdoors Foundation
Department of Historic Resources
Prince William County

In addition, the Department of Agriculture and Consumer Services, Department of Forestry, Department of Transportation, Department of Mines, Minerals and Energy, Loudoun County, Town of Haymarket and the Northern Virginia Regional Commission were invited to comment on the proposal.

The information considered in this review includes the *Application, Appendix, DEQ Supplement, Direct Testimony and Exhibits of the Virginia Electric and Power Company, before the State Corporation Commission of Virginia, Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket Substation, Application No. 272, Case No. PUE 2015-00107, Filed: November 6, 2015, focusing on the DEQ Supplement.*

160120157

PROJECT DESCRIPTION

Virginia Electric and Power Company (aka Dominion Power) has submitted an application to the State Corporation Commission (SCC) for a Certificate of Public Convenience and Necessity to:

- (i) convert its existing 115 kV Gainesville-Loudoun Line #124, located in Prince William and Loudoun Counties, to 230 kV operation;
- (ii) construct in Prince William County and the Town of Haymarket a new 230 kV double circuit transmission line to run approximately 5.1 miles from a tap point approximately 0.5 mile north of Dominion's existing Gainesville Substation on the converted Line #124 (Haymarket Junction) to a new 230-34.5 kV Haymarket Substation (Haymarket Loop); and
- (iii) construct a 230-34.5 kV Haymarket Substation on land in Prince William County to be owned by Dominion.

The Line #124 conversion, Haymarket Loop and Haymarket Substation, are collectively referred to as the Project.

Eight route alternatives were identified within the study area for the proposed Project and include:

- I-66 Overhead Alternative Route
- I-66 Hybrid Alternative Route
- Railroad Alternative Route
- Carver Road Alternative Route
- Madison Alternative Route
- New Road Alternative Route
- Northern Alternative Route
- Wheeler Alternative Route

During analysis of these alternatives, three routes (New Road Alternative Route, Northern Alternative Route, and Wheeler Alternative Route) were determined to have more technical nuances to make them electrically viable, and greater construction obstacles, permitting uncertainty, and environmental impacts and were removed from further consideration.

The Proposed Route (I-66 Overhead Alternative Route) is 5.1 miles long between Haymarket Junction and the proposed Haymarket Substation. The Proposed Route originates at the proposed tie-in location on the converted 230 kV Line #124 near the end of Cushing Road (SR 781) and extends for 5.1 miles through Prince William County and the Town of Haymarket, terminating at the proposed Haymarket Substation. It generally crosses commercially/industrially developed and forested land adjacent to existing transportation rights-of-way. The Proposed Route was developed to provide an opportunity to maximize co-location with existing infrastructure (I-66 and Norfolk Southern Railroad) and provides the shortest and most direct route to the proposed

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Haymarket Substation. From the tie-in location the route travels northwest for about 0.3 mile, crossing I-66, before heading in a westerly direction for another 1.7 miles paralleling the north side of I-66. This segment of the route crosses multiple on/off ramps of the interstate, Lee Highway, and University Boulevard. The route then continues heading northwest 1.9 miles following the northern side of I-66 and crossing Catharpin Road (SR 676). The route then crosses I-66 and heads in a southwest direction for 0.3 mile crossing James Madison Highway (U.S. 15). After crossing James Madison Highway (U.S. 15), the route follows the western side of the highway for about 0.1 mile, crosses John Marshall Highway (SR 55), and then continues northwest on the south side of John Marshall Highway for approximately 0.4 mile before heading south and terminating at the proposed Haymarket Substation. In addition, two minor route variations, the Jordan Lane Variation and the Walmart Variation, were identified for consideration as potential improvements to the Proposed Route.

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LIST OF PERMITS OR APPROVALS

The following permits and approvals are likely to be necessary as prerequisites to project construction. The details of these requirements appear in the "Regulatory and Coordination Needs" section of these comments.

1. **Water Permits (see "Regulatory and Coordination Needs," item 1, page 28).**
 - a. Section 404 permit (e.g. Nationwide Permit 12, if appropriate). Required pursuant to the federal Clean Water Act and issued by the U.S. Army Corps of Engineers (Corps) for impacts to jurisdictional wetlands and/or waters of the United States.
 - b. Virginia Water Protection (VWP) Permit (9 VAC 25-210 *et seq.*). Issued by the Department of Environmental Quality (DEQ) for impacts to waters and jurisdictional wetlands, including isolated wetlands.
2. **Subaqueous Lands Management (see "Regulatory and Coordination Needs," item 2, page 28).**
 - a. Subaqueous Lands Permit pursuant to Section 28.2-1204 of the Code of Virginia. Issued by the Virginia Marine Resources Commission for encroachments in, on or over state-owned subaqueous beds.
3. **Erosion and Sediment Control Plan (see "Regulatory and Coordination Needs," item 3(a), page 28).**
 - a. General erosion and sediment control specifications pursuant to Virginia Code § 62.1-44.15:55. General erosion and sediment control specifications are subject to annual approval by the DEQ.
 - b. Erosion and sediment control plans for construction of facilities not covered under Virginia Code § 62.1-44.15:55 are subject to approval by the appropriate plan approving authority.
4. **Stormwater Management Permit (see "Regulatory and Coordination Needs," item 3(b), page 28).**
 - a. Virginia Stormwater Management Program (VSMP) General Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-880-70 *et seq.*) of the Virginia Stormwater Management Program Permit Regulations (9 VAC 25-870 *et seq.*) involving land disturbance of one acre or more. Coverage under this general permit is approved by the locality.
5. **Chesapeake Bay Preservation Act Compliance (see "Regulatory and Coordination Needs," item 4, page 28).**

- a. The conditions set out in 9 VAC 25-830-150 B apply to the exemption of transmission lines.
6. **Air Quality Permits or Approvals (see “Regulatory and Coordination Needs,” item 5, pages 28 and 29).**
 - a. Open Burning Permit (9 VAC5-130 *et seq.*). For open burning involving vegetative and demolition debris.
 - b. Fugitive dust emissions (9 VAC5-50-60 *et seq.*). Governs abatement of visible emissions.
7. **Solid and Hazardous Waste Management (see “Regulatory and Coordination Needs,” item 6, page 29).**
 - a. Applicable state laws and regulations include:
 - Virginia Waste Management Act (Code of Virginia Section 10.1-1400 *et seq.*);
 - Virginia Hazardous Waste Management Regulations (VHWMR) (9 VAC 20-60 *et seq.*);
 - Virginia Solid Waste Management Regulations (VSWMR) (9 VAC 20-81); and
 - Virginia Regulations for the Transportation of Hazardous Materials (9 VAC 20-110).
 - b. Applicable Federal laws and regulations include:
 - Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and
 - U.S. Department of Transportation Rules for Transportation of Hazardous materials (49 CFR Part 107).
8. **Historic Preservation (see “Regulatory and Coordination Needs,” item 8, page 30).**
 - a. Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation 36 CFR 800 requires that federally licensed and permitted projects consider its effects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 applies if there is federal involvement such as the issuance of a Section 404 Clean Water Act permit, including Nationwide Permits. The applicability of Section 106 to the entire project or any portion thereof must be determined by the responsible federal agency.

SUMMARY OF RECOMMENDATIONS

Based on the information and analysis submitted by reviewing agencies, we have several recommendations for consideration by the SCC in its deliberations on the approval and certification of electric transmission facilities. These recommendations are in addition to requirements of federal, state or local law or regulations listed above. The rationale for these recommendations is discussed in the remainder of these comments, specifically in the "Environmental Impacts and Mitigation" section. A summary of recommendations follows.

(i) Alternative Recommendations

- The DEQ Office of Wetlands and Stream Protection recommends the I-66 Overhead Route, as it has a significantly lower probability of wetlands than the remaining alternatives (Environmental Impacts and Mitigation, item 1(d), page 10).
- The Department of Historic Resources finds that the I-66 Hybrid Alternative appears to have the least overall potential impact to recorded historic resources (Environmental Impacts and Mitigation, item 9(d), page 22).
- Prince William County concludes that the I-66 Hybrid alternative is the only alternative that adequately minimizes negative impacts to the County's cultural resources and to existing and planned residential communities and businesses (Environmental Impacts and Mitigation, item 13(e), page 26). In addition, on August 4, 2015, the Board of County Supervisors adopted resolution 15-508 declaring that any proposal to install new or re-fit high-voltage transmission lines shall be supported only if the lines are buried in the right-of-way of I-66 from its intersection with US Route 29 through Haymarket and beyond (Environmental Impacts and Mitigation, item 13(b), page 25).

(ii) Summary of General Recommendations

If the SCC decides to grant the CPCN, irrespective of the alternative selected, we offer the following recommendations which are not listed in any order of priority.

- Conduct an on-site delineation of wetlands and streams within the project area with verification by the U.S. Army Corps of Engineers, using accepted methods and procedures, and follow DEQ's recommendations to avoid and minimize impacts to wetlands and streams (Environmental Impacts and Mitigation, item 1(b), pages 9 and 10).
- Take all reasonable precautions to limit emissions of oxides of nitrogen and volatile organic compounds, principally by controlling or limiting the burning of fossil fuels (Environmental Impacts and Mitigation, item 5(c), page 14).

- Reduce solid waste at the source, reuse it and recycle it to the maximum extent practicable, and follow DEQ's recommendations to manage waste, as applicable, (Environmental Impacts and Mitigation, item 6(d) (ii), page 16).
- Coordinate with the Department of Conservation and Recreation for updates to the Biotics Data System database (if the scope of the project changes or six months passes before the project is implemented) (Environmental Impacts and Mitigation, item 7(c) (v), page 19).
- Coordinate with the U.S. Fish and Wildlife Service and Department to ensure compliance with federal guidelines for the protection of the Northern long-eared bat (Environmental Impacts and Mitigation, item 8(c) (i), page 20).
- Coordinate with the Department of Game and Inland Fisheries regarding its general recommendations to protect wildlife resources (Environmental Impacts and Mitigation, item 8(c) (ii), page 20).
- Coordinate with the Department of Historic Resources regarding recommendations to conduct comprehensive architectural and archaeological surveys to evaluate identified resources for listing in the Virginia Landmarks Register and National Register of Historic Places; and to avoid, minimize, or mitigate for adverse impacts to VLR- and NRHP-eligible resources (Environmental Impacts and Mitigation, item 9(c), page 22).
- Coordinate with the Virginia Outdoors Foundation regarding its recommendation to consider alternatives of less visual impact to avoid or minimize any adverse impacts to open space properties (e.g. Bull Run Mountain Natural Area Preserve) and their public values (Environmental Impacts and Mitigation, item 10(c), page 23).
- Coordinate with Prince William County in its discussion with the Virginia Department of Transportation on an I-66 Hybrid alternative that includes the installation of buried transmission lines (Environmental Impacts and Mitigation, item 13(c), page 26).
- Follow the principles and practices of pollution prevention to the extent practicable (Environmental Impacts and Mitigation, item 14, pages 26 and 27).
- Limit the use of pesticides and herbicides to the extent practicable (Environmental Impacts and Mitigation, item 15, page 27).

ENVIRONMENTAL IMPACTS AND MITIGATION

1. Water Quality and Wetlands. The DEQ Supplement (B. Water Source, pages 5-6) states that the Proposed Route has five waterbody crossings, all of which are intermittent streams. Crossings include Young's Branch, a tributary to Rocky Branch, and multiple tributaries to Little Bull Run. Crossing widths are expected to be minimal (approximately 5 feet) and are not visible on aerial photography. The Proposed Route and Alternative Routes would likely have an effect on surface waters along these routes due to the removal of forested riparian areas adjacent to streams. Increased turbidity and localized sedimentation of the stream bottom may occur as a result of the runoff. However, these impacts would be significantly reduced by the implementation of Dominion Virginia Power's erosion control measures, including the installation of erosion control structures and materials.

According to the DEQ Supplement (D. Tidal and Non-tidal Wetlands, page 7), based on Desktop Wetland Analysis data, the Proposed Route will cross about 0.5 mile of wetland habitat and will require the clearing and/or disturbance of up to approximately 5.9 acres of wetland area. Of the 5.9 acres of wetland habitat that could be disturbed along this route, about 3.9 acres consist of forested wetlands (66%), 1.4 acre consists of emergent wetlands (24 %), and 0.6 acre consists of unconsolidated wetland (10%). Tidally-influenced wetlands do not occur in the Project area. While most wetlands will be spanned, forested wetlands will be cleared but allowed to return to scrub-shrub wetlands after construction is completed. All wetlands will require protective matting to be installed to support construction vehicles and equipment and materials during construction. In addition, the document finds that no wetlands were identified on or immediately adjacent to the lands that will be utilized for construction and operation of the proposed Haymarket Substation.

1(a) Agency Jurisdiction. The State Water Control Board promulgates Virginia's water regulations covering a variety of permits to include the Virginia Pollutant Discharge Elimination System Permit regulating point source discharges to surface waters, Virginia Pollution Abatement Permit regulating sewage sludge, storage and land application of biosolids, industrial wastes (sludge and wastewater), municipal wastewater, and animal wastes, the Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit regulating impacts to streams, wetlands, and other surface waters. The VWP permit is a state permit which governs wetlands, surface water, and surface water withdrawals and impoundments. It also serves as §401 certification of the federal Clean Water Act §404 permits for dredge and fill activities in waters of the U.S. The VWP Permit Program is under the Office of Wetlands and Stream Protection, within the DEQ Division of Water Permitting. In addition to central office staff that review and issue VWP permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities:

- Clean Water Act, §401;
- Section 404(b)(i) Guidelines Mitigation Memorandum of Agreement (2/90);

- State Water Control Law, Virginia Code section 62.1-44.15:20 *et seq.*; and
- State Water Control *Regulations*, 9 VAC 25-210-10.

1(b) Agency Recommendations. The DEQ Office of Wetlands and Stream Protection (OWSP) recommends that all wetlands and stream crossings within the proposed project alignment to be field delineated prior to detailed engineering, clearing activities, and construction. Structures should be sited to avoid wetlands to the extent practicable and should be sited outside of stream channels. Timbering debris should not be placed in wetlands or streams.

In addition, DEQ-OWSP recommends the following:

1. Prior to commencing project work, all wetlands and streams within the project corridor should be field delineated and verified by the U.S. Army Corps of Engineers (Corps), using accepted methods and procedures.
2. Wetland and stream impacts should be avoided and minimized to the maximum extent practicable. Stream impacts should be minimized or avoided by spanning the transmission line across each stream. No foundations should be placed within streambeds. Where access is required across a wetland, removable mats should be used to reduce compaction and rutting. Towers should be placed avoid wetlands, wherever possible. To the extent where any footings must be installed in wetlands, each footing should occupy the minimum space necessary. When excavation for a structure is necessary in a wetland, excess spoil should not be disposed of in adjacent wetland areas unless authorized by a state or federal wetland permit.
3. If the scope of the project changes, additional review will be necessary by DEQ-OWSP.
4. At a minimum, compensation for impacts to State Waters, if necessary, should be in accordance with all applicable state wetland regulations and wetland permit requirements, including the compensation for permanent conversion of forested wetlands to emergent wetlands.
5. Any temporary impacts to surface waters associated with this project should require restoration to pre-existing conditions.
6. No activity may substantially disrupt the movement of aquatic life indigenous to the water body, including those species, which normally migrate through the area, unless the primary purpose of the activity is to impound water. Culverts placed in streams must be installed to maintain low flow conditions. No activity may cause more than minimal adverse effect on navigation. Furthermore the activity must not impede the passage of normal or expected high flows and the structure or discharge must withstand expected high flows.
7. Erosion and sedimentation controls should be designed in accordance with the *Virginia Erosion and Sediment Control Handbook, Third Edition, 1992*. These controls should be placed prior to clearing and grading and maintained in good working order to minimize impacts to state waters. These controls should remain in place until the area is stabilized and should then be removed. Any exposed slopes and streambanks should be stabilized immediately upon completion of

work in each permitted area. All denuded areas should be properly stabilized in accordance with the *Virginia Erosion and Sediment Control Handbook, Third Edition, 1992*.

8. No machinery may enter surface waters, unless authorized by a VWP permit.
9. Heavy equipment in temporarily impacted surface waters should be placed on mats, geotextile fabric, or other suitable material, to minimize soil disturbance to the maximum extent practicable. Equipment and materials should be removed immediately upon completion of work.
10. Activities should be conducted in accordance with any Time-of-Year restriction(s) as recommended by the Department of Game and Inland Fisheries, the Department of Conservation and Recreation, or the Virginia Marine Resources Commission. The permittee should retain a copy of the agency correspondence concerning the Time-of-Year restriction(s), or the lack thereof, for the duration of the construction phase of the project.
11. All construction, construction access, and demolition activities associated with this project should be accomplished in a manner that minimizes construction materials or waste materials from entering surface waters, unless authorized by a permit. Wet, excess, or waste concrete should be prohibited from entering surface waters.
12. Herbicides used in or around any surface water should be approved for aquatic use by the United States Environmental Protection Agency (EPA) or the U.S. Fish and Wildlife Service (USFWS). These herbicides should be applied according to label directions by a licensed herbicide applicator. A non-petroleum based surfactant should be used in or around any surface waters.
13. Consider mitigating impacts to forested or converted wetlands by establishing new forested wetlands within the impacted watershed.

1(c) Requirements. If the project qualifies for a Nationwide Permit 12 (NWP 12) from the Corps, then a VWP permit is not necessary. If the applicant does not obtain a NWP 12, then a VWP permit may be necessary. The DEQ Piedmont Regional Office (PRO) will make the final permitting decisions.

1(d) Conclusion. The DEQ-OWSP recommends the I-66 Overhead Route, as it has a significantly lower probability of wetlands than the remaining alternatives.

For questions or additional information regarding these comments, contact DEQ-OWSP, Hannah Schul at (804) 698-4074 hannah.schul@deq.virginia.gov.

2. Subaqueous Lands Impacts. According to the DEQ Supplement (B. Water Source, page 5), waterways crossed by the Project would be maintained for proper drainage through the use of culverts or other crossing devices, according to Dominion Virginia Power's standard policies.

2(a) Agency Jurisdiction. The Virginia Marine Resources Commission (VMRC) regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to Virginia Code §28.2-1200 through 1400. For nontidal waterways,

VMRC states that it has been the policy of the Habitat Management Division to exert jurisdiction only over the beds of perennial streams where the upstream drainage area is 5 square miles or greater. The beds of such waterways are considered public below the ordinary high water line.

2(b) Agency Findings. VMRC performed a desktop review of the Haymarket 230 kV Double Circuit Transmission line and finds that a VMRC permit may be required for the proposal. VMRC notes that the narrative lists a number of non-tidal streams including Little Bull Run, to be crossed by this project.

2(c) Requirement. A Joint Permit Application (JPA) should be submitted to VMRC for a formal review.

3. Erosion and Sediment Control and Stormwater Management. According to the DEQ Supplement (G. Erosion and Sediment Control, page 14), Dominion is required to submit annual erosion and sediment control specifications and an anticipated list of transmission line projects to DEQ for review and approval. Dominion's submittal for 2016 will follow DEQ guidelines, and the Project will be included in the submittal. These specifications are given to the Dominion's contractors and require erosion and sediment control measures to be in place before construction of the line begins and specify the requirements for rehabilitation of the right-of-way.

3(a) Agency Jurisdiction. The DEQ Office of Stormwater Management (OSWM) administers the following laws and regulations governing construction activities:

- Virginia Erosion and Sediment Control (ECS) Law (§ 62.1-44.15:51 *et seq.*) and Regulations (9 VAC 25-840);
- Virginia Stormwater Management Act (§ 62.1-44.15:24 *et seq.*);
- Virginia Stormwater Management Program (VSMP) regulation (9 VAC 25-870); and
- 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-880).

In addition, DEQ is responsible for the VSMP General Permit for Stormwater Discharges from Construction Activities related to Municipal Separate Storm Sewer Systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program (9 VAC 25-890-40).

3(b) Requirements.

(i) Erosion and Sediment Control

In accordance with §62.1-44.15 *et seq.*, electric, natural gas, and telephone utility companies, interstate and intrastate natural gas pipeline companies, and railroad companies shall, and authorities created pursuant to § 15.2-5102 may, file general

erosion and sediment control and stormwater standards and specifications annually with DEQ for review and approval. Such standards and specifications shall be consistent with the requirements of this article and associated regulations and the Erosion and Sediment Control Law and Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) and associated regulations where applicable. The specifications shall apply to:

1. Construction, installation, or maintenance of electric transmission, natural gas, and telephone utility lines and pipelines, and water and sewer lines; and
2. Construction of the tracks, rights-of-way, bridges, communication facilities, and other related structures and facilities of the railroad company.

(ii) General VPDES Permit for Discharges of Stormwater from Construction Activities (VAR10)

The operator or owner of a construction project involving land-disturbing activities equal to or greater than one acre is required to register for coverage under the VAR10 permit and develop a project-specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit, and it must address water quality and quantity in accordance with the *VSMP Permit Regulations*. General information and registration forms for the General Permit are available on DEQ's website at <http://www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPermits/ConstructionGeneralPermit.aspx>. [Reference: Virginia Stormwater Management Act 62.1-§44.15 *et seq.*] *VSMP Permit Regulations* 9 VAC 25-870-10 *et seq.*]

4. Chesapeake Bay Preservation Areas. The DEQ Supplement (I. Chesapeake Bay Preservation Areas, page 20) states that the construction, installation, operation and maintenance of electric transmission lines are conditionally exempt from the Chesapeake Bay Act as stated in the exemption for public utilities, railroads, public roads and facilities in 9 VAC 25-830-150. The document concludes that Dominion will meet those conditions.

4(a) Agency Jurisdiction. The DEQ Office of Local Government Programs (OLGP) administers the Chesapeake Bay Preservation Act (Virginia Code §62.1-44.15:67 *et seq.*) and *Chesapeake Bay Preservation Area Designation and Management Regulations* (9 VAC 25-830-10 *et seq.*). Each Tidewater locality must adopt a program based on the Bay Act and *Regulations*. The Act and *Regulations* recognize local government responsibility for land use decisions and are designed to establish a framework for compliance without dictating precisely what local programs must look like. Local governments have flexibility to develop water quality preservation programs that reflect unique local characteristics and embody other community goals. Such flexibility also facilitates innovative and creative approaches in achieving program objectives. The regulations address nonpoint source pollution by identifying and protecting certain lands called Chesapeake Bay Preservation Areas. The regulations use a resource-based approach that recognizes differences between various land forms and treats them differently.

4(b) Agency Findings. DEQ-OLGP finds that the proposed project includes the construction and installation of a new double circuit 230 kV overhead transmission line within existing rights-of-way in Prince William County. In Prince William County, the areas protected by the Bay Act, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Area (RPA) and Resource Management Area (RMA) as designated by each locality. RPAs include tidal wetlands, certain non-tidal wetlands, tidal shores and a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. All areas of the County not included in the RPA are designated as RMA.

4(c) Requirements. The construction, installation, operation and maintenance of public facilities and their appurtenant structures within a RPA are conditionally exempt from the *Regulations* provided they are constructed in accordance with:

1. regulations promulgated pursuant to the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act;
2. an erosion and sediment control plan and a stormwater management approved by DEQ; and
3. local water quality protection criteria at least as stringent as the above state requirements.

4(d) Conclusion. This activity would be considered consistent with the Bay Act and *Regulations*, provided it adheres to the above requirements.

5. Air Quality. The DEQ Supplement (A. Air Quality, page 5) states that Dominion does not expect to burn cleared material, but, if necessary, Dominion will coordinate with the responsible locality to obtain these permits and will comply with any conditions set forth by the locality. Equipment and vehicles that are powered by gasoline or diesel motors will be used during the construction of the line so there will be exhaust from those motors. During construction, if the weather is dry for an extended period of time, there will be airborne particles from the use of vehicles and equipment within the right-of-way. However, minimal earth disturbance will take place and vehicle speed, which is often a factor in airborne particulate, will be kept to a minimum.

5(a) Agency Jurisdiction. The DEQ Air Division, on behalf of the State Air Pollution Control Board, is responsible for developing regulations that implement Virginia's Air Pollution Control Law (Virginia Code §10.1-1300 *et seq.*). DEQ is charged with carrying out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate DEQ regional office is directly responsible for the issuance of necessary

permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance. The Air Division regulates emissions of air pollutants from industries and facilities and implements programs designed to ensure that Virginia meets national air quality standards. The most common regulations associated with major State projects are:

- Open burning: 9 VAC 5-130 *et seq.*
- Fugitive dust control: 9 VAC 5-50-60 *et seq.*
- Permits for fuel-burning equipment: 9 VAC 5-80-1100 *et seq.*

5(b) Agency Findings. The DEQ Air Division finds that the project is located within an ozone nonattainment and emission control area for oxides of nitrogen (NO_x) and volatile organic compounds (VOCs).

5(c) Recommendation. Dominion should take all reasonable precautions to limit emissions of NO_x and VOCs, principally by controlling or limiting the burning of fossil fuels.

5(d) Requirements.

(i) Fugitive Dust

During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 *et seq.* of the *Regulations for the Control and Abatement of Air Pollution*. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

(ii) Open Burning

If project activities include the open burning or use of special incineration devices for the disposal of land clearing debris, this activity must meet the requirements of 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100 of the *Regulations* for open burning, and it may require a permit. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. Dominion should contact the appropriate local officials to determine what local requirements, if any, exist. Some applicable provisions of the regulation include, but are not limited to:

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;

- The material to be burned shall consist of clean burning demolition material;
- The burning shall be at least 500 feet from any occupied building unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;
- The burning shall be conducted at the greatest distance practicable from highways and air fields;
- The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
- The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and
- The burning shall be conducted only when the prevailing winds are away from any city, town or built-up area.

6. Solid and Hazardous Waste Management. According to the DEQ Supplement (E. Solid and Hazardous Waste, page 10), five petroleum facilities and one Resource Conservation and Recovery Act Corrective Action site are located immediately adjacent to or are crossed by the Proposed Route and/or Alternative Route centerlines. The document finds that no further evaluation is recommended for the sites in proximity to the Proposed Route as groundwater flow from these sites do not have the potential to impact the route.

6(a) Agency Jurisdiction. On behalf of the Virginia Waste Management Board, the DEQ Division of Land Protection and Revitalization (DEQ-DLPR) is responsible for carrying out the mandates of the Virginia Waste Management Act (Virginia Code §10.1-1400 *et seq.*), as well as meeting Virginia's federal obligations under the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response Compensation Liability Act (CERCLA), commonly known as Superfund. DEQ-DLPR also administers laws and regulations on behalf of the State Water Control Board governing Petroleum Storage Tanks (Virginia Code §62.1-44.34:8 *et seq.*), including Aboveground Storage Tanks (9 VAC 25-91 *et seq.*) and Underground Storage Tanks (9 VAC 25-580 *et seq.* and 9 VAC 25-580-370 *et seq.*), also known as 'Virginia Tank Regulations', and § 62.1-44.34:14 *et seq.* which covers oil spills.

Virginia:

- Virginia Waste Management Act, Virginia Code § 10.1-1400 *et seq.*
- *Virginia Solid Waste Management Regulations*, 9 VAC 20-81 (9 VAC 20-81-620 applies to asbestos-containing materials)
- *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60 (9 VAC 20-60-261 applies to lead-based paints)
- *Virginia Regulations for the Transportation of Hazardous Materials*, 9 VAC 20-110.

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- Resource Conservation and Recovery Act, 42 U.S. Code sections 6901 *et seq.*
- U.S. Department of Transportation *Rules for Transportation of Hazardous Materials*, 49 *Code of Federal Regulations*, Part 107
- Applicable rules contained in Title 40, *Code of Federal Regulations*.

6(b) Agency Findings. DEQ-DLPR conducted a cursory review of its database files in the project area and identified petroleum release sites in close proximity to the project corridors.

6(c) Requirements.

(i) Solid and Hazardous Waste

Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. Hazardous material should be handled according to the hazardous waste regulations. It is the generator's responsibility to determine if a solid waste meets the criteria of a hazardous waste and managed appropriately.

(ii) Asbestos-Containing Materials and Lead-Based Paint

If applicable, all structures to be modified or demolished should be checked as appropriate for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If these materials and paint are found, in addition to the federal waste-related regulations mentioned above, state regulations 9 VAC 20-81-620 for ACM and 9 VAC 20-60-261 for LBP must be followed.

6(d) Agency Recommendation.

(i) Hazardous Waste Investigation

When applicable, DEQ-DLPR recommends that Dominion conduct an environmental investigation on affected properties to identify any solid or hazardous waste sites or issues related to the project area. The report should analyze the data in DEQ-DLPR's web-based databases to determine if the project would affect or be affected by any sites identified in the databases. The databases include the Permitted Solid Waste Management Facilities, Virginia Environmental Geographic Information Systems (Solid Waste, Voluntary Remediation Program, and Petroleum Release sites), CERCLA Facilities, and Hazardous Waste Facilities databases. Details on accessing the data bases are included in DEQ-DLPR's comments (attached).

(ii) Pollution Prevention

DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. Minimize the generation of hazardous wastes and handle it appropriately.

7. Natural Heritage Resources. The DEQ Supplement (F. Natural Heritage, Threatened and Endangered Species, page 12) states that the Department of Conservation and Recreation's Division of Natural Heritage determined that the Proposed Route would not adversely impact natural heritage resources based on the scope of activity and distance to resources.

7(a) Agency Jurisdiction.

- (i) The Virginia Department of Conservation and Recreation's (DCR) Division of Natural Heritage (DNH).

DNH's mission is conserving Virginia's biodiversity through inventory, protection and stewardship. The Virginia Natural Area Preserves Act (Virginia Code §10.1-209 through 217), authorizes DCR to maintain a statewide database for conservation planning and project review, protect land for the conservation of biodiversity, and protect and ecologically manage the natural heritage resources of Virginia (the habitats of rare, threatened and endangered species, significant natural communities, geologic sites, and other natural features).

- (ii) The Virginia Department of Agriculture and Consumer Services (VDACS).

The Endangered Plant and Insect Species Act of 1979 (Virginia Code Chapter 39 §3.1-1020 through 1030) authorizes VDACS to conserve, protect and manage endangered and threatened species of plants and insects. Under a Memorandum of Agreement established between VDACS and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species.

7(b) Agency Findings. DCR-DNH has searched its Biotics Data System for occurrences of natural heritage resources in the project area. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

(i) Broad Run Stream Conservation Unit

According to the information currently in DCR files, the Broad Run Stream Conservation Unit (SCU) is located downstream from the project. The Broad Run SCU has been given a biodiversity significance ranking of B3, which represents a site of high significance. The natural heritage resources of concern associated with this SCU are:

Alasmodonta varicose
Elliptio lanceolata

Brook floater
Yellow lance

G3/S1/NL/LE
G2G3/S2S3/SOC/NL

Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. In addition, Broad Run has been designated by the Department of Game and Inland Fisheries as a Threatened and Endangered Species Water for the Brook floater.

(ii) Northern Long-Eared Bat

There is potential for the Northern long-eared bat (*Myotis septentrionalis*, G1G3/S3/LT/NL) to occur within the project area. Hibernation occurs in caves, mines and tunnels from late fall through early spring and bats occupy summer roosts comprised of older trees including single and multiple tree-fall gaps, standing snags and woody debris. Due to the decline in population numbers, the Northern long-eared bat has been federally listed as threatened by the United States Fish and Wildlife Service (USFWS).

(iii) Ecological Landscape Corridor

DCR-DNH finds that the Railroad, I-66 Overhead, I-66 Hybrid, Carver Road and Madison alternatives bisect an Ecological Landscape Corridor that could diminish the value of the corridor by fragmentation. An Ecological Landscape Corridor connects two unfragmented blocks of land (ecological cores) and allows movement of wildlife, including genetic exchange, from one core to the next conserving metapopulations and facilitating dispersal of pollens and seeds. However, as the bisection appears to occur within an existing right-of-way for Route 66, DCR does not anticipate that the proposed project route in this location would adversely impact the landscape corridor.

(iv) Threatened and Endangered Plant and Insect Species

DCR finds that the proposed project will not affect any documented state-listed plants or insects. However, open maintained areas within the project rights-of-way with diabase derived soils may have the potential to support rare plants.

(v) Natural Area Preserves

DCR-DNH indicated it has no concerns regarding potential project impacts to natural heritage resources at the Bull Mountain Natural Area Preserve. However, see Virginia Outdoor Foundation comments (Section 10. Bull Run Mountain Natural Area Preserve, pages 22-23) regarding potential scenic impacts to the preserve.

7(c) Agency Recommendations.

(i) Protection of the Aquatic Ecosystem

DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control and stormwater management laws and regulations to minimize adverse impacts to the aquatic ecosystem from proposed activities.

(ii) Northern Long-Eared Bat

Due to the legal status of the Northern long-eared bat, if tree removal is proposed for the project DCR recommends coordination with the USFWS to ensure compliance with protected species legislation.

(iii) Ecological Landscape Corridor

DCR recommends using existing rights-of-way to avoid fragmenting intact deciduous forests.

(iv) Right-of-Way Maintenance

DCR recommends the development and implementation of a maintenance plan that specifies the use of mechanical means for maintenance and avoids the use of herbicides within the right-of-way to avoid impacts to natural heritage resources.

(v) Biotics Data System

Contact the DCR DNH for updated information on natural heritage resources in the project area should the scope of the project change and/or six months passes before the project is implemented. New and updated information is continually added to the Biotics Data System.

8. Wildlife Resources. The DEQ Supplement (F. Natural Heritage, Threatened and Endangered Species, page 12) states that four state- and federally-listed species have been documented within the proposed Project counties. These species include the Northern long-eared bat, Dwarf wedgemussel, Harperella, and Brook floater. The Dwarf wedgemussel has been documented within Fauquier County, the Harperella and Brook floater have been documented in Prince William County, and the Northern long-eared bat has been documented within Fauquier and Prince William Counties. If identified, Dominion will work with the appropriate regulatory agencies to minimize any impacts on listed species and/or listed habitat(s).

8(a) Agency Jurisdiction. The Virginia Department of Game and Inland Fisheries (DGIF), as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state- or federally-listed endangered or threatened species, but excluding listed insects (Virginia Code, Title 29.1). DGIF is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S. Code §661 *et seq.*) and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce or compensate for those impacts. For more information, see the DGIF website at www.dgif.virginia.gov.

8(b) Agency Findings. DGIF does not currently document any listed wildlife or designated resources under its jurisdiction from the project area (any Alternative). Therefore, DGIF does not anticipate that the project will result in adverse impacts upon listed species or designated resources under its jurisdiction.

8(c) Agency Recommendations.

(i) Northern Long-Eared Bat

DGIF recommends coordination with the USFWS regarding potential impacts upon federally-listed threatened Northern long-eared bat associated with tree removal.

(ii) General Protection of Wildlife Resources

DGIF offers the following general recommendations to minimize the adverse impacts of linear utility project development on wildlife resources:

- Avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable.
- Maintain naturally vegetated buffers of at least 100 feet in width around wetlands and on both sides of perennial and intermittent streams, where practical.
- Conduct significant tree removal and ground-clearing activities outside of the primary songbird nesting season of March 15 through August 15.
- Implement and maintain appropriate erosion and sediment controls throughout project construction and site restoration.

DGIF understands that adherence to these general recommendations may be infeasible in some situations. DGIF is available to work with Dominion to develop project-specific measures as necessary to minimize project impacts upon wildlife resources.

9. Historic and Archaeological Resources. According to the DEQ Supplement (H. Archaeological, Historic, Scenic, Cultural or Architectural Resources, page 13) Dominion initiated coordination of the Project with the Virginia Department of Historic Resources (DHR) in a consultation letter dated July 11, 2014. Eleven historic resources evaluated for the Proposed Route include the National Register of Historic Places (NRHP)-eligible Buckland Mills Battlefield (030-5152), the NRHP-eligible Manassas Station Operations Battlefield (076-5036), the unevaluated Thoroughfare Gap Battlefield (030-5610), the unevaluated Second Battle of Manassas (076-5190), the NRHP-listed St. Paul's Episcopal Church (233-0002), the NRHP-listed Old Town Hall and Haymarket School (233-0006), the NRHP-listed Manassas National Battlefield Park Historic District (076-0271), the NRHP-eligible Masonic Temple (233-5015), the NRHP-eligible Haymarket Post Office (233-0005), the NRHP-eligible Winterham (233-0008), and the NRHP-eligible Gainesville District School (076-5381).

The Proposed Route may have no impact on St. Paul's Episcopal Church, Masonic Temple, Winterham, and Manassas Station Operations Battlefield. The Proposed Route, depending on final pole placement, may have a moderate impact on the Second Battle of Manassas. For the remaining six resources it is recommended that the route may have a minimal visual impact, depending on final pole placement, due to distance from the proposed line, changes in elevation, and/or vegetative cover between the resource and the proposed transmission line corridor. It is recommended that the proposed construction will not have a severe impact on any of the resources associated with the Proposed Route.

There are three previously identified historic archaeological sites in the right-of-way that could be affected by the Proposed Route (44PW0985, 44PW0986, and 44PW1121). Sites 44PW0985 and 44PW0986 have been determined not eligible for listing in the NRHP. Site 44PW1121 has not been formally evaluated for NRHP eligibility.

9(a) Agency Jurisdiction. The Virginia Department of Historic Resources conducts reviews of both federal and state projects to determine their effect on historic properties. Under the federal process, DHR is the State Historic Preservation Office, and ensures that federal undertakings-including licenses, permits, or funding-comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation at 36 CFR Part 800. Section 106 requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. For state projects or activities on state lands, DHR is afforded an opportunity to review and comment on (1) the demolition of state property; (2) major state projects requiring an EIR; (3) archaeological investigations on state-controlled land; (4) projects that involve a landmark listed in the Virginia Landmarks Register; (5) the sale or lease of surplus state property; (6) exploration and recovery of underwater historic properties; and (7) excavation or removal of archaeological or historic features from caves. Please see DHR's website for more information about applicable state and federal laws and how to submit an application for review: <http://www.dhr.virginia.gov/StateStewardship/Index.htm>.

9(b) Agency Findings. DHR notes that it received directly from Dominion the report entitled *Pre-Application Analysis for Cultural Resources of the Haymarket Substation and 230kV Transmission Line Project, Virginia*. The pre-application analysis considers the potential impact of the proposed project on recorded archaeological sites and on known historic architectural properties listed or previously determined eligible for listing in the Virginia Landmarks Register (VLR) and the NRHP within a tiered study area.

DHR analyzed the five alternatives: Carver Alternative; I-66 Hybrid Alternative; I-66 Overhead Alternative; Madison Alternative; and Railroad Alternative. DHR's detailed analysis of each alternative is attached. With respect to the I-66 Overhead Alternative (Proposed Route), DHR finds that the pre-application analysis identifies 12 VLR/NRHP listed/eligible architectural resources and three previously identified archaeological sites within the tiered study area for this alternative. These numbers include seven historic districts/landmarks and five battlefields. Based upon a review of the information

provided, it is DHR's opinion that this section would have minimal impacts on four resources, moderate impacts to two resources, and no impacts on six resources. Moderate impacts are considered adverse and mitigation is requested.

9(c) Agency Recommendations. DHR offers the following recommendations for consideration by DEQ and the SCC in the review of the application:

1. DHR recommends selection of the I-66 Hybrid Alternative to minimize potential impacts to recorded significant historic resources.
2. The Madison Alternative appears to have the most overall potential for negative impact to recorded historic resources and is not recommended.
3. Comprehensive archaeological and architectural surveys should be conducted in accordance with DHR guidelines by qualified professionals prior to construction of any SCC-approved alternative.
4. Evaluation should be made of all identified resources for listing in the VLR/NRHP.
5. Assessment of potential direct and indirect impacts to all VLR/NRHP-eligible resources should be conducted.
6. Avoidance, minimization, and/or mitigation of moderate to severe impacts to VLR/NRHP-eligible resources by Dominion is recommended in consultation with DHR and other stakeholders.

9(d) Conclusion. DHR notes that Dominion has identified the I-66 Overhead Alternative as its Proposed Route in the SCC application. Based on the sum of the information provided, it is DHR's opinion that the I-66 Hybrid Alternative appears to have the least overall potential impact to recorded historic resources.

10. Conservation Easements.

10(a) Agency Jurisdiction. The Virginia Outdoors Foundation (VOF) is a public organization created by the Virginia General Assembly in 1966 under Virginia Code § 10.1-1800 to promote the preservation of open-space lands and to encourage private gifts of money, securities, land or other property to preserve the natural, scenic, historic, scientific, open-space and recreational areas of the Commonwealth. The primary way VOF protects land is by holding conservation easements, which are voluntary agreements with landowners that restrict certain types of development on land in perpetuity. VOF also accepts donations of land, which it either protects with an easement and transfers to another landowner, or owns and manages for public benefit.

10(b) Agency Findings. The Bull Run Mountains Natural Area Preserve, held in easement by VOF, is comprised of 2,500 acres in Fauquier and Prince William Counties. By means of the easement, VOF has an interest in specific conservation values of the property and a legal obligation to protect these values. The preserve protects unique ecosystems that have more similarities with western mountains than with the surrounding Piedmont lowlands. The preserve provides visitors an opportunity

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to enjoy sweeping views of the Piedmont to the east and west and an uninterrupted and relatively undisturbed gradient of changing communities.

Although VOF finds that the proposed project does not directly encroach onto protected land, VOF is concerned about the potential impact that large-scale utility development may have on the scenic viewsheds and pastoral settings provided by these protected properties, especially for the driving public along I-66. As such, VOF requests that full consideration be given to the importance of these open space properties and their extensive conservation values in the selection of the appropriate route. VOF finds that the preferred route along I-66 would be a significant visual intrusion for the traveling public.

10(c) Recommendations. VOF recommends that alternatives of less visual impact should be fully considered and modifications to siting, location, materials and height in the design of the transmission line should be made to avoid or minimize any adverse impacts to these open space properties and their public values. If a CPN is issued by the SCC, it should require implementation of all industry best practices, including, but not limited to:

- minimal removal of vegetation through use of a clearing plan; and
- use of non-reflecting or de-glared conductors and dulled steel for structures.

For additional information, contact VOF, Martha Little at (804) 577-3337.

11. Water Supply. According to the DEQ Supplement (B. Water Source, page 5), no water source is required for transmission lines.

11(a) Agency Jurisdiction. The Virginia Department of Health (VDH) Office of Drinking Water (ODW) reviews projects for the potential to impact public drinking water sources (groundwater wells, springs and surface water intakes). VDH administers both federal and state laws governing waterworks operation.

11(b) Agency Findings. VDH-ODW finds the following public groundwater wells appear to be located within a 1-mile radius of the project site:

PWSID	District	CNYCTY	SYSNAME	FACNAME
6153062	DISTRICT 16	PRINCE WILLIAM	CAMP SNYDER	WELL
6153037	DISTRICT 16	PRINCE WILLIAM	BRAWNER FARM	WELL #1

The following surface water intakes are located within a 5-mile radius of the project site:

PWSID	SYSNAME	FACNAME
6685100	MANASSAS, CITY OF	LAKE MANASSAS DAM

13. Local Comments.

13(a) Agency Jurisdiction. Virginia Code §15.2-2202.A requires that the DEQ distribute a copy of the submitted Environmental Impact Report to the chief administrative officer of every locality in which each the project is proposed to be located. The purpose of the distribution is to enable the locality to evaluate the proposed project for environmental impact, consistency with the locality's comprehensive plan, local ordinances adopted pursuant to this chapter and other applicable law and to provide the locality with an opportunity to comment. DEQ is required to distribute the reports to localities, solicit their comments and consider their responses in substantially the same manner as the department solicits and receives comments from state agencies.

13(b) Agency Findings. Through resolution 15-508, dated August 4, 2015 (attached), the Prince William Board of County Supervisors declared that any proposal to install new or re-fit high-voltage transmission lines for Dominion's Haymarket 230kV Line and Substation Project shall be supported only if the lines are buried in the right-of-way of I-66 from its intersection with US Route 29 through Haymarket and beyond. In addition, the Board reaffirmed and renewed its commitment to the Comprehensive Plan Long Range Land Use strategy (LU3.14) which designates corridors that should be followed for all future electric utility lines of 150 kilovolts or more and to contain high-voltage transmission lines in designated corridors to protect private property and preserve the County's distinctive cultural and historic inheritance, including, but not limited to:

- the 52 county registered historic sites;
- Historic and Prehistoric High-Sensitivity Areas identified in the Comprehensive Plan including those in residential areas;
- high quality open space, such as existing and planned off-road trails, open space easements, conservation easements, public school open space, and resource protection areas; and
- both the County's designated Rural Crescent urban growth boundary and unique Historic Overlay District.

The County finds that the proposed transmission line is not within one of these corridors.

In addition, the County finds that, within the proposed project area, three battlefields are directly and indirectly affected including, the Buckland Mills Battlefield (030-5152), the Thoroughfare Gap Battlefield (030-5610) and the Manassas Station Operations Battlefield (076-5036). While the direct effects of tower construction can be mitigated through archaeology Phase I, II, and III/Data Recovery and subsequent landscape restoration, the adverse effect to each Battlefield's viewshed and all indirect adverse effects are best mitigated by installing the transmission lines underground to the greatest extent possible.

13(c) Recommendations. Prince William County recommends that Dominion work proactively with the County to achieve an acceptable alternative. Accordingly, the Board of County Supervisors has directed County staff to evaluate the I-66 Hybrid alternative and to coordinate with the Virginia Department of Transportation, in furtherance of the County's express goal of supporting the installation of buried transmission lines. The underground alternative provides a unique opportunity to collocate a major public utility project with the widening of I-66, a major transportation project, with minimum disturbance to residents and businesses and to cultural and environmental resources. This would allow for efficiencies and economies of scale and would significantly reduce negative impacts to the community while allowing the project to proceed in a timely manner.

13 (d) Requirement. In addition to the proposed transmission line, any proposal to construct a new electric substation shall first be submitted to the Prince William County Planning Commission for consideration and public hearings, as required by Section 15.2-2232 of the Code of Virginia.

13(e) Conclusion. The County concludes that the I-66 Hybrid alternative is the only alternative that adequately minimizes negative impacts to the County's cultural resources and to existing and planned residential communities and businesses. The County finds the negative impacts to cultural resources and to existing and planned communities and businesses associated with each of the other alternatives, including Dominion's Proposed Route (I-66 Overhead), are unacceptable. The County will continue to review and comment on the application as it proceeds through the public hearing process.

Contact the County Archaeologist, Justin Patton at (703) 792-5729 or jspatton@pwcgov.org with any questions or requests for additional information.

14. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects. Effective siting, planning and on-site best management practices will help to ensure that environmental impacts are minimized. Pollution prevention techniques also include decisions related to construction materials, design and operational procedures that facilitate the reduction of wastes at the source. We have several recommendations regarding pollution prevention:

- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.

The project is within the watershed of the following public surface water sources (intakes where the project falls within 5 miles into their watershed are formatted in **bold**):

PWSID	SYSNAME	FACNAME
6685100	MANASSA, CITY OF	LAKE MANASSAS DAM
6059501	FAIRFAX COUNTY WATER AUTHORITY	OCCOQUAN RESERVIOR INTAKE

11(c) Requirement. Potential impacts to public water distribution systems must be verified by the local utility.

11(d) Recommendations. VDH recommends the following:

- Best Management Practices should be employed on the project site including erosion and sediment controls as well as Spill Prevention Controls and Countermeasures.
- Care should be taken while transporting materials in and out of the project site, as to prevent impacts to surface water intakes within 5 miles.

11(e) Conclusion. VDH-ODW concludes that there may be impacts to public drinking water sources due to this project if the mitigation efforts outlined above are not implemented.

For additional information, contact VDH-ODW, Arlene Fields Warren at (804) 864-7781.

12. Aviation Impacts.

12(a) Agency Jurisdiction. The Virginia Department of Aviation (DoAv) is a state agency that plans for the development of the state aviation system; promotes aviation; grants aircraft and airports licenses; and provides financial and technical assistance to cities, towns, counties and other governmental subdivisions for the planning, development, construction and operation of airports, and other aviation facilities.

12(b) Agency Findings. DoAv finds that it does not appear as though any portion of the proposed project is within 20,000 linear feet of a public-use airport nor does it appear as though any of the proposed structures will exceed 200 feet above ground level. Therefore, the project does not require submission of a 7460 to the Federal Aviation Administration for review.

12(c) Conclusion. DoAv has no objection to the project as proposed.

For additional information, contact DoAv, Scott Denny at (804) 236-3638.

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DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques. For more information, contact DEQ's Office of Pollution Prevention, Meghann Quinn at (804) 698-4021.

15. Pesticides and Herbicides. In general, when pesticides or herbicides must be used, their use should be strictly in accordance with manufacturers' recommendations. In addition, to the extent feasible, we recommend that Dominion use the least toxic pesticides or herbicides effective in controlling the target species to the extent feasible. For more information on pesticide or herbicide use, please contact VDACS at (804) 786-3501.

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REGULATORY AND COORDINATION NEEDS

1. Water Quality and Wetlands. A Virginia Water Protection permit may be required should the project not qualify for a Nationwide Permit 12 from the Corps. If applicable, permitting action commences with the receipt of a complete JPA. Questions on the applicability and fulfillment of VWP permit requirements may be addressed to DEQ-NRO, Trisha Beasley at (757) 518-2166. To obtain a JPA form, contact VMRC at (757) 247-2252.

2. Subaqueous Lands Impacts. Pursuant to section 28.2-1204 of the Code of Virginia, the VMRC has jurisdiction over any encroachments in, on or over any state-owned rivers, streams or creeks in the Commonwealth. Accordingly, project encroachment channelward of ordinary high water along natural rivers and streams, may require a permit from VMRC. For additional information, contact VMRC, Mark Eversole at (757) 247-8028.

3. Erosion and Sediment Control and Stormwater Management.

3(a) Erosion and Sediment Control. Power line construction must comply with Dominion's annual specifications for erosion and sediment control in accordance with § 62.1-44.15:55 of the *Virginia Erosion and Sediment Control Law (VESCL)* for land-disturbing activities equal to or greater than 2,500 square feet in a Chesapeake Bay Preservation Area. Construction of company buildings, facilities, and other structures are not regulated at § 62.1-44.15:55, and therefore, must comply with the requirements of the appropriate local ESC program. Assistance with ESC specifications implementation may be requested by contacting DEQ, Kelly Vanover at (804) 837-1073.

3(b) General VPDES Permit for Discharges of Stormwater from Construction Activities (VAR10). For land-disturbing activities of equal to or greater than one acre, the applicant is required to apply for registration coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-880-1 *et seq.*). Specific questions regarding the Stormwater Management Program requirements should be directed to Prince William County Land Development Division at (703) 792-6930.

4. Chesapeake Bay Preservation Areas. Project impacts to Prince William County's designated Chesapeake Bay Preservation Areas, including Resource Management Areas and Resource Protection Areas, are conditionally exempt under Section 9 VAC 25-830-150 B 2 of the *Regulations*. To ensure compliance with the criteria of the local CBPA program, coordinate with the Prince William County Land Development Division at (703) 792-6930.

5. Air Quality Regulations. This power line proposal is subject to air pollution control regulations administered by DEQ. The state air pollution regulations that may apply to the project are:

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- fugitive dust and emissions control (9 VAC 5-50-60 *et seq.*); and
- open burning restrictions (9 VAC 5-130 *et seq.*).

For additional information, contact DEQ-NRO, James LaFratta at (703) 583-3928. Also, Dominion should contact Prince William County fire officials to determine any local requirements for open burning.

6. Solid Waste and Hazardous Substances.

6(a) Solid and Hazardous Waste. All solid waste, hazardous waste and hazardous materials must be managed in accordance with all applicable federal, state and local environmental regulations. Contact DEQ-NRO, Richard Doucette at (703) 583-3813, concerning the location and availability of suitable waste management facilities in the project area or if free product, discolored soils, or other evidence of contaminated soils are encountered.

6(b) Asbestos-Containing Material. If applicable, it is the responsibility of the owner or operator of a demolition activity, prior to the commencement of the demolition, to thoroughly inspect the affected part of the facility where the operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos-containing material. Upon classification as friable or non-friable, all asbestos-containing material shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-81 *et seq.*) and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 *et seq.*). Contact the DEQ-NRO, Katherine Perszyk at (703) 583-3856 and the Department of Labor and Industry, Ronald Graham at (804) 786-0574 for additional information.

6(c) Lead-Based Paint. If applicable, this project must comply with the U.S. Department of Labor Occupational Safety and Health Administration (OSHA) regulations and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements, contact the Department of Professional and Occupational Regulation, David Dick at (804) 367-8595.

7. Natural Heritage Resources.

(i) Northern Long-Eared Bat

Coordinate with the USFWS Virginia Field Office, Cindy Schulz at (804) 824-2426 or cindy.schulz@fws.gov regarding any potential impacts upon the federally-listed Threatened Northern long-eared bat that may be associated with tree removal.

(ii) Right-of-Way Maintenance

Information and development of a maintenance plan that specifies the use of mechanical means for maintenance and avoids the use of herbicides within the right-of-

Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket Substation
PUE-2015-00107
DEQ # 15-185S

way to avoid impacts to natural heritage resources by be obtained by contacting DCR-DNH, Rene Hypes at (804) 371-2708.

(iii) Biotics Data System

Contact DCR-DNH, Rene Hypes at (804) 371-2708, to secure updated information on natural heritage resources if the scope of the project changes and/or six months passes before the project is implemented, since new and updated information is continually added to the Biotics Data System.

7. Wildlife Resources and Protected Species.

(i) Northern Long-Eared Bat

Coordinate with the USFWS Virginia Field Office, Cindy Schulz at (804) 824-2426 or cindy.schulz@fws.gov regarding any potential impacts upon the federally-listed Threatened Northern long-eared bat that may be associated with tree removal.

(ii) General Protection of Wildlife Resources

Contact DGIF, Amy Ewing at (804) 367-2211 for the development of project-specific measures to minimize project impacts upon wildlife resources.

8. Historic and Archaeological Resources. To ensure compliance with Section 106 of the *National Historic Preservation Act*, as amended, and its implementing regulations at 36 CFR 800, Dominion should continue to coordinate with DHR with regard to conducting comprehensive archaeological and architectural surveys prior to construction of any SCC-approved alternative; evaluating all identified resources for listing in the VLR/NRHP; assessing potential direct and indirect impacts to all VLR/NRHP-eligible resources; and consulting with DHR and stakeholders on the avoidance, minimization, and/or mitigation of moderate to severe impacts to VLR/NRHP-eligible resources. For additional information and coordination, contact Roger Kirchen, DHR at (804) 482-6091.

9. Local Coordination. To coordinate with Prince William County and VDOT on the development of an I-66 Hybrid Alternative Route that includes buried transmission lines, contact the County Archaeologist, Justin Patton at (703) 792-5729 or jspatton@pwccgov.org. In addition, the proposed transmission line and substation must be submitted to the Prince William County Planning Commission for consideration and public hearings, as required by Section 15.2-2232 of the Code of Virginia.

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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

November 30, 2015

Diana T. Faison
Dominion Virginia Power
701 E. Cary Street
Richmond, VA 23219

RE: Wetland Impact Consultation; Proposed Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket Substation, Prince William County, Virginia

Dear Ms. Faison:

In accordance with the Department of Environmental Quality-State Corporation Commission *Memorandum of Agreement Regarding Wetland Impact Consultation* (July 2003), we have reviewed the information submitted by Dominion Virginia Power (here after, Dominion) regarding potential wetland impacts on the above referenced project. The purpose of the project is to (i) convert its existing 115 kV Gainesville-Loudoun Line #124, located in Prince William and Loudoun Counties, to 230 kV operation; (ii) construct in Prince William County, Virginia, and the Town of Haymarket, Virginia, a new 230 kV double circuit transmission line to run approximately 5.1 miles from a tap point approximately 0.5 mile north of the Company's existing Gainesville Substation on the converted Line #124 ("Haymarket Junction") to a new 230-34.5 kV Haymarket Substation (the "Haymarket Loop"); and (iii) construct a 230-34.5 kV Haymarket Substation on land in Prince William County. The new construction will require new 100- right-of-way for the proposed transmission line routes. Dominion has identified eight alternative routes for further investigation.

Summary of Findings

According to an offsite wetland impact consultation report, prepared for Dominion by Natural Resource Group and dated September 2015, both wetland areas and stream corridors were identified within the proposed routes. The approximate extent of these resources was derived from review of USGS topographic quadrangles, National Wetland Inventory (NWI) maps, published soil surveys for the localities within the proposed corridor, USGS digital stream and river data, USGS digital infrared orthophotography, and aerial photography.

Eight route alternatives (New Road Alternative Route, Northern Alternative Route, Railroad Alternative Route, Carver Road Alternative Route (the Proposed Route), Madison Alternative Route, Wheeler Alternative Route, I-66 Overhead Alternative Route, and I-66 Hybrid Alternative Route) were identified within the study area for the proposed Project. During

11/24/15

analysis of these alternatives, three routes (New Road Alternative Route, Northern Alternative Route, and Wheeler Alternative Route) were removed from consideration. Therefore the report provides information evaluating the five remaining alternative routes. The report identifies a High to Medium/High probability of 14.43 acres of wetlands for the Carver Road Route; 9.16 acres of wetlands for the I-66 Hybrid Route; 9.32 acres for the I-66 Overhead Route; 15.12 acres for the Madison Route; and 26.24 acres for the Railroad Route. The I-66 Hybrid Route has the lowest probability of wetlands. However, this route has a significantly higher cost and longer construction schedule. For these reasons, the I-66 Overhead Route was identified as the proposed route. DEQ recommends the I-66 Overhead Route, as it has a significantly lower probability of wetlands than the remaining alternatives.

DEQ recommends all wetlands and stream crossings within the proposed project alignment to be field delineated prior to detailed engineering, clearing activities, and construction. Structures should be sited to avoid wetlands to the extent practicable and should be sited outside of stream channels. Timbering debris should not be placed in wetlands or streams.

The DEQ Northern Regional Office (NVRO) will make the final permitting decisions.

Recommendations

Based upon review of all the information provided by Dominion Virginia Power, we offer the following recommendations:

1. Prior to commencing project work, all wetlands and streams within the project corridor should be field delineated and verified by the U.S. Army Corps of Engineers (the Corps), using accepted methods and procedures.
2. Wetland and stream impacts should be avoided and minimized to the maximum extent practicable. Stream impacts should be minimized or avoided by spanning the transmission line across each stream. No foundations should be placed within streambeds. Where access is required across a wetland, removable mats should be used to reduce compaction and rutting. Towers should be placed avoid wetlands, wherever possible. To the extent where any footings must be installed in wetlands, each footing should occupy the minimum space necessary. When excavation for a structure is necessary in a wetland, excess spoil should not be disposed of in adjacent wetland areas unless authorized by a state or federal wetland permit.
3. If the scope of the project changes, additional review will be necessary by this office.
4. At a minimum, compensation for impacts to State Waters, if necessary, should be in accordance with all applicable state wetland regulations and wetland permit requirements, including the compensation for permanent conversion of forested wetlands to emergent wetlands.
5. Any temporary impacts to surface waters associated with this project should require restoration to pre-existing conditions.
6. No activity may substantially disrupt the movement of aquatic life indigenous to the water body, including those species, which normally migrate through the area, unless the primary purpose of the activity is to impound water. Culverts placed in streams must be installed to maintain low flow conditions. No activity may cause more than minimal adverse effect on navigation. Furthermore the activity must not impede the passage of normal or expected high flows and the structure or discharge must withstand expected high flows.
7. Erosion and sedimentation controls should be designed in accordance with the Virginia Erosion and Sediment Control Handbook, Third Edition, 1992. These controls should be placed prior to clearing and grading and maintained in good working order to minimize impacts to state waters. These

Fisher, John (DEQ)

From: Burstein, Daniel (DEQ)
Sent: Monday, December 14, 2015 3:25 PM
To: Fisher, John (DEQ)
Subject: Re: SCC: Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket Substation, PUE 2015-00107, DEQ #15-185S - Review

11/6/2015 7:57

NRO comments regarding the SCC Application for the SCC: Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket Substation, PUE 2015-00107, located in Loudoun and Prince William Counties, Virginia are as follows:

Land Protection Division – The project manager is reminded that if any solid or hazardous waste is generated/encountered during construction or implementation of the plans, DCR would follow applicable federal, state, and county regulations for their disposal.

Air Compliance/Permitting - The project manager is reminded that during the construction phases that occur with this project; the project is subject to the Fugitive Dust/Fugitive Emissions Rule 9 VAC 5-50-60 through 9 VAC 5-50-120. In addition, should any open burning or use of special incineration devices be employed in the disposal of land clearing debris during demolition and construction, the operation would be subject to the Open Burning Regulation 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100.

Virginia Water Protection Permit (VWPP) Program – Based on the SCC Application, all construction alternatives have the potential to impact surface waters and any activities in those wetlands will require a Joint Permit Application (JPA) and review. Upon receipt of a Joint Permit Application for the proposed surface water impacts, DEQ VWP Permit staff will review the proposed project in accordance with the VWP permit program regulations and current VWP permit program guidance. DEQ VWP staff recommends that the avoidance and minimization of surface water impacts to the maximum extent practicable as well as coordination with the US Army Corps of Engineers.

Water Permitting/VPDES Program/Stormwater: The project manager is reminded to follow all applicable regulations related to stormwater management and erosion and sediment controls.

Daniel Burstein
Regional Enforcement Specialist, Senior II
Virginia Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193
Phone: (703) 583-3904
daniel.burstein@deg.virginia.gov

160120157

Fisher, John (DEQ)

From: Eversole, Mark (MRC)
Sent: Monday, January 11, 2016 11:08 AM
To: Fisher, John (DEQ)
Subject: RE: NEW PROJECT SCC 15-185S

Thanks John, a desktop review of the Haymarket 230 kV Double Circuit Transmission line reveals that a permit may be required from the Marine Resources Commission for this proposal. The narrative lists a number of non-tidal streams including Little Bull Run, to be crossed by this project. The Marine Resources Commission issues permits for encroachments in, on, over, or beneath State owned submerged land (stream bottoms) for streams with a drainage area of greater than 5 square miles upstream of the impact location. A Joint Permit Application (JPA) should be submitted to this agency for a formal review.

Thank you for the opportunity to comment on this project.

Mark Eversole
Virginia Marine Resources Commission
2600 Washington Avenue, 3rd Floor
Newport News, Virginia 23607
Office: (757)-247-8028
email: mark.eversole@mrc.virginia.gov



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Director

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Molly Joseph Ward
Secretary of Natural Resources

MEMORANDUM

TO: John Fisher, DEQ Environmental Impact Review Coordinator

FROM: Daniel Moore, DEQ Principal Environmental Planner

DATE: November 19, 2015

SUBJECT: DEQ #15-185S: SCC: Dominion Virginia Power-- Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket Substation

We have reviewed the Consistency Determination (CD) application for the above-referenced project and offer the following comments regarding consistency with the provisions of the *Chesapeake Bay Preservation Area Designation and Management Regulations* (Regulations):

The proposed project involves the construction and installation of a new single circuit 230 kV overhead transmission line within existing rights of way in Prince William County. In Prince William County, the areas protected by the *Chesapeake Bay Preservation Act*, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by each locality. RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores. RPAs also include a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. All areas of the County not included in the RPA are designated as RMAs.

Construction, installation, operation and maintenance of public facilities and their appurtenant structures within a RPA are conditionally exempt from the Regulations provided they are constructed in accordance with:

1. regulations promulgated pursuant to the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act;
2. an erosion and sediment control plan and a stormwater management approved by the Virginia Department of Environmental Quality and
3. local water quality protection criteria at least as stringent as the above state requirements.

Provided adherence to the above requirements, the proposed activity would be consistent with the *Chesapeake Bay Preservation Act* and the Regulations.

160120157

STANDARD

TO: John E. Fisher

DEQ - OEIA PROJECT NUMBER: 15 - 185S

PROJECT TYPE: ☒ STATE EA / EIR ☐ FEDERAL EA / EIS ☒ SCC

☐ CONSISTENCY DETERMINATION

PROJECT TITLE: HAYMARKET 230 KV DOUBLE CIRCUIT TRANSMISSION LINE AND
230 – 34.5 KV HAYMARKET SUBSTATION, PUE 2015-00107

PROJECT SPONSOR: STATE CORPORATION COMMISSION

PROJECT LOCATION: ☒ **OZONE NONATTAINMENT
AND EMISSION CONTROL AREA FOR NOX & VOC**

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: ☒ CONSTRUCTION
☐ OPERATION

STATE AIR POLLUTION CONTROL BOARD RESOLUTION NO. _____

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I

2. ☐ 9 VAC 5-45-760 et seq. – Asphalt Paving operations

3. ☒ 9 VAC 5-130 et seq. – **Open Burning**

4. ☒ 9 VAC 5-50-60 et seq. **Fugitive Dust Emissions**

5. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to _____

6. ☐ 9 VAC 5-60-300 et seq. – Standards of Performance for Toxic Pollutants

7. ☐ 9 VAC 5-50-400 Subpart _____, Standards of Performance for New Stationary Sources, designates standards of performance for the _____

8. ☐ 9 VAC 5-80-1100 et seq. of the regulations – Permits for Stationary Sources

9. ☐ 9 VAC 5-80-1605 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the _____

10. ☐ 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas

11. ☐ 9 VAC 5-80-800 et seq. Of the regulations – State Operating Permits. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:
All precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO_x).

H. S. Sargent

(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: November 19, 2015



100120157

MEMORANDUM

TO: John Fisher, Environmental Program Planner

FROM: Steve Coe, Division of Land Protection & Revitalization Review Coordinator

DATE: December 7, 2015

COPIES: Sanjay Thirunagari, Division of Land Protection & Revitalization Review Manager; file

SUBJECT: Environmental Impact Review: EIR Project #15-185S Dominion VA Power Haymarket 230 kV Transmission Line and Substation PUE 2015-00107, Haymarket, VA 20155

The Division of Land Protection & Revitalization (DLPR) has completed its cursory review of the Dominion VA Power Haymarket 230 kV Transmission Line and Substation PUE 2015-00107, Haymarket, VA 20155.

The Department offers the following comments concerning potential waste issues associated with this project.

Solid and hazardous waste issues were addressed in the submittal. DLPR staff conducted a cursory search of solid and hazardous waste databases for waste sites in the project area, and identified possible sites in close proximity to the project corridors which might impact the project activity. The DEQ DLPR staff has reviewed the submittal and offers the following comments concerning possible waste issues associated with this proposed project:

RCRA sites: none in close proximity to the project corridors.

CERCLIS sites: none in close proximity to the project corridors.

FUD sites: none in close proximity to the project corridors.

VRP sites: none in close proximity to the project corridors.

Petroleum Release sites: The submittal identified multiple sites to be considered. DEQ also identified multiple sites in possible close proximity to the project corridors in its database search. Project engineers should be aware of possible petroleum contaminated soils depending on the route selected. (See **GENERAL COMMENTS - Soil, Sediment, and Waste Management**)

When the environmental impact report is written or compiled for specific sites, it should include an environmental investigation on and near the properties selected in order to identify any solid or hazardous

waste sites or issues related to the (project area). The report author should analyze the data in the web-based Waste Division databases to determine if the project would affect or be affected by any sites identified in the databases. The databases include the Permitted Solid Waste Management Facilities, Virginia Environmental Geographic Information Systems (Solid Waste, Voluntary Remediation Program, and Petroleum Release sites), CERCLA Facilities, and Hazardous Waste Facilities databases.

The Permitted Solid Waste Management Facilities Database

A list of active solid waste facilities in Virginia.

CERCLA Facilities Database

A list of active and archived CERCLA (EPA Superfund Program) sites.

Hazardous Waste Facilities Database

A list of hazardous waste generators, hazardous waste transporters, and hazardous waste storage and disposal facilities. Data for the CERCLA Facilities and Hazardous Waste Facilities databases are periodically downloaded by the Waste Division from U.S. EPA's website.

Virginia Environmental Geographic Information Systems (VEGIS)

The "What's in My Backyard" application displays cross-media geographical features in proximity to a selected site/address for different facility search parameters.

Accessing the DEQ Databases:

The report author or project engineers should access this information on the DEQ website at <http://www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx>, and click on "What's in my backyard?" link to access search page.

The **Voluntary Remediation Program (VRP)**, **Solid Waste Facilities**, and **Petroleum Release Sites** GPS databases can be accessed from this search page. On the web map page, click on the "Pick a Quick Search Here" drop down arrow, and select "Address Search". In the adjacent block enter the zip code or address for the project site. Click on "Search". On the map you will see a green "balloon" indicating the site.

On the map area click on the "Tools" drop down arrow, and the select "Identify". A normal search looks like this: In the "Radius" block, type in [.5], and in the adjacent block select [miles] from the drop down options. Click on the "Layer" drop down arrow, select "Petroleum Release Sites", and then click on the green balloon. All Petroleum Release sites within the indicated range will appear in the Map/Results block to the left. Clicking on the block by the identified site will result in a second green balloon on the map. With multiple sites identified by the search, you can select/unselect each site to visualize its location, or change the radius of the search as needed.

At this time you can also search for "Solid Waste" sites and "VRP" information for the project area by selecting these topics from the "Layer" options and then clicking on the green balloon on the map after each selection.

RCRA and Cerclis site information can be accessed from www.deq.virginia.gov, following links Programs - Land Protection and Revitalization - Reports and Publications - Real Estate Search Reports - then separate search links - CERCLA (Search EPA's CERCLIS database - includes archive sites, and RCRA Hazardous Waste (Hazardous Waste Facilities).

Scroll down to the databases which are listed under Real Estate Search Information heading.

Initially, the *solid waste information* can be accessed by clicking on the Permitted Solid Waste Management Facilities link and opening the file. You can search by city/county or region (zip code) for active permitted waste facilities.

The *Superfund information* will be listed by clicking on the Search EPA's CERCLIS database tab and clicking on the **Search Superfund Site Information** button (blue box). On this form, enter either 1) the zip code for the project site, or, 2) the name of the city or county and select Virginia in the State drop down box. Click "Search" at the bottom of the form. A facilities list will be appear.

The *hazardous waste* information can be accessed by clicking on the Hazardous Waste Facilities link. Go to the Geography Search section and fill in the 1) zip code of the project, or 2) the name of the city or county and VA in the state block, and click on "Search". The hazardous waste facilities in the locality will be listed.

These database searches will include most waste-related site information for each locality based upon the radius of the address selected (such as .5 miles, .25 miles, or .1 mile). In many cases, especially when the project is located in an urban area, the database output for that locality will be extensive. This information is important to identify possible environmental concerns that may impact a new project.

GENERAL COMMENTS

Soil, Sediment, and Waste Management

Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-81); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous Materials, 49 CFR Part 107. Contact the DEQ Northern Virginia Regional Office at 703-583-3800 (Tanks Program) with questions.

Asbestos and/or Lead-based Paint

All structures being demolished/renovated/removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-81-620 for ACM and 9VAC 20-60-261 for LBP must be followed. For questions contact DEQ's Northern Virginia Regional Office, Ms. Katherine Perszyk at 703-583-3856.

Pollution Prevention – Reuse - Recycling

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Steve Coe at (804) 698-4029.

Molly Joseph Ward
Secretary of Natural Resources

Clyde E. Cristman
Director



COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

Joe Elton
Deputy Director of Operations

Rochelle Altholz
Deputy Director of
Administration and Finance

David Dowling
Deputy Director of
Soil and Water and Dam Safety

15012015

MEMORANDUM

DATE: December 14, 2015
TO: Jon Fisher, DEQ
FROM: Roberta Rhur, Environmental Impact Review Coordinator
SUBJECT: DEQ 15-185S, Gainesville to Haymarket 230 kV Transmission Line

Division of Natural Heritage

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, the Broad Run Stream Conservation Unit (SCU) is located downstream from the project site. SCUs identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Broad Run SCU has been given a biodiversity significance ranking of B3, which represents a site of high significance. The natural heritage resources of concern associated with this SCU are:

Alasmodonta varicosa
Elliptio lanceolata

Brook floater
Yellow lance

G3/S1/NL/LE
G2G3/S2S3/SOC/NL

The Brook floater, a small freshwater mussel species, is known from the northeastern United States primarily in the Atlantic Slope drainages (NatureServe, 2009). In Virginia, it is recorded from the Potomac River basin with a possible record from the James River. Of 14 documented records in Virginia, only two are thought to be viable. Population declines have been documented throughout its range (NatureServe, 2009). The Brook floater typically inhabits flowing-water habitats in and near riffles and rapids of smaller creeks with rocky or gravelly substrates (Nedean et al., 2000 per NatureServe, 2009). Many facets of its life history are unknown including its fish host. Threats for the Brook floater in particular include poor water quality as this species does not tolerate silt or nutrient pollution well (Stevenson and Bruenderman, 1995). Please note that this species is currently listed as endangered by the Virginia Department of Game and Inland Fisheries (VDGIF).

The Yellow lance occurs in mid-sized rivers and second and third order streams. To survive, it needs a silt-free, stable streambed and well-oxygenated water that is free of pollutants. This species has been the subject of taxonomic debate in recent years (NatureServe, 2009). Currently in Virginia, the Yellow lance is recognized from populations in the Chowan, James, York, and Rappahannock drainages. Its range also

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Please note that open maintained areas within the project rights-of-way with diabase derived soils may have the potential to support rare plants. DCR recommends the development and implementation of a maintenance plan that specifies the use of mechanical means for maintenance and avoids the use of herbicides within the ROW to avoid impacts to natural heritage resources.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dgif.virginia.gov.

The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.

Cc: Amy Ewing, VDGIF

Troy Andersen, USFWS

160120157

Fisher, John (DEQ)

From: Hypes, Rene (DCR)
Sent: Wednesday, January 13, 2016 5:37 PM
To: Fisher, John (DEQ)
Cc: Baird, Alice (DCR)
Subject: RE: Ecological Landscape Corridor and Gainesville to Haymarket 230 kV Transmission Line Project

John,

I spoke to Tom Smith, DCR Operations Acting Deputy Director about the Gainesville to Haymarket 230kV Transmission Line project. We do not have any comments for impacts to the Bull Mountain Natural Area Preserve and associated natural heritage resources from a Natural Heritage perspective. However, our comments are not to diminish or take away from the comments that were made by VOF in regards to potential impacts to the scenic viewshed.

Please let me know if you have any additional questions.

Rene'

S. Rene' Hypes
Project Review Coordinator
Department of Conservation and Recreation
Division of Natural Heritage
600 East Main Street, 24th Floor
Richmond, Virginia 23219
804-371-2708 (phone)
804-371-2674 (fax)
rene.hypes@dcr.virginia.gov



Conserving VA's Biodiversity through
Inventory, Protection and Stewardship
www.dcr.virginia.gov/natural_heritage
[Virginia Natural Heritage Program on Facebook](#)

From: Fisher, John (DEQ)
Sent: Wednesday, January 13, 2016 2:28 PM
To: Hypes, Rene (DCR)
Cc: Baird, Alice (DCR)
Subject: RE: Ecological Landscape Corridor and Gainesville to Haymarket 230 kV Transmission Line Project

Rene:

Thank you for the additional information on ELC.

One other matter. The Virginia Outdoors Foundation provided comments (attached) concerning project impacts on the Bull Run Mountains Natural Area Preserve and recommended mitigation. The DCR response does not indicate any concerns. Let me know if you would like to amend DCR comments in light of VOF comments or vice versa. Does VOF hold the Preserve in easement, in part or in whole?

John

John E. Fisher
Virginia Department of Environmental Quality
Division of Environmental Enhancement
Office of Environmental Impact Review
629 East Main Street, #634
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For program updates and public notices please subscribe to the OEIR News Feed

From: Hypes, Rene (DCR)
Sent: Wednesday, January 13, 2016 1:12 PM
To: Fisher, John (DEQ)
Cc: Baird, Alice (DCR)
Subject: Ecological Landscape Corridor and Gainesville to Haymarket 230 kV Transmission Line Project

John,

As mentioned in the letter some the of the proposed alternatives for the above referenced project intersect an "ecological landscape corridor" which connects two ecological cores (unfragmented blocks of land) as discussed on the phone. By connecting the large patches of unfragmented natural land, an ecological corridor allows movement of wildlife including genetic exchange from one core to the next conserving metapopulations and facilitating dispersal of pollens and seeds (Tewksbury et al. 2002). The width of ecological landscape corridor is important in creating interior cover and decreasing the impacts of edge effects such as predation and harassment.

Tewksbury, Joshua J., Douglas J. Levey, Nick M. Haddad, Sarah Sargent, John L. Orrock, Aimee Weldon, Brent J. Danielson, Jory Brinkerhoff, Ellen I. Damschen, and Patricia Townsend. 2002. Corridors affect plants, animals, and their interactions in fragmented landscapes. *Proceedings of the National Academy of Sciences* 99:12923-12926.

I have included the link to Virginia ConservationVision Natural Landscape Needs Assessment webpage for further information. Let me know if you have any additional questions.

Rene'

S. Rene' Hypes
Project Review Coordinator
Department of Conservation and Recreation
Division of Natural Heritage
600 East Main Street, 24th Floor
Richmond, Virginia 23219
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Inventory, Protection and Stewardship
www.dcr.virginia.gov/natural_heritage
[Virginia Natural Heritage Program on Facebook](#)

160120157

12/07/2015

Fisher, John (DEQ)

From: Fulcher, Valerie (DEQ)
Sent: Monday, December 07, 2015 2:26 PM
To: Fisher, John (DEQ)
Subject: FW: PUE-2015-00107--Haymarket 230kV double circuit transmission line

From: Little, Martha (VOF)
Sent: Monday, December 07, 2015 1:37 PM
To: Fulcher, Valerie (DEQ)
Cc: Hallock-Solomon, Michael (VOF); Richardson, Erika (VOF)
Subject: PUE-2015-00107--Haymarket 230kV double circuit transmission line

Valerie,
I don't think we have received a request to review this project from DEQ yet, but we have received some updates on this project from Dominion. Here are VOF's comments for the coordinated review. Let me know if you have any questions.

The Virginia Outdoors Foundation, an agency of the Commonwealth, was established by the General Assembly in 1966 to promote the preservation of Virginia's natural and cultural resources by encouraging private philanthropy in fulfillment of state policy. As a result of Virginia's commitment to ensure a vibrant natural environment for today and future generations, VOF owns thousands of acres managed for public access (Bull Run Mountains and House Mountain) and holds more than 3600 easements across the Commonwealth, which easements protect in perpetuity over 750,000 acres of open-space.

The Bull Run Mountains Natural Area Preserve is comprised of 2500 acres in Fauquier and Prince William Counties. The preserve protects unique ecosystems that have more similarities with western mountains than with the surrounding Piedmont lowlands. Reaching an elevation of 1377 feet, the Bull Run Mountains are the eastern most mountains in Virginia and an outlier within the Piedmont. The mountains are largely covered in broadleaf deciduous forests. From the mountain's highest rocky, dry ridges and down its forested slopes and lowlands, the preserve provides visitors with a wonderful opportunity to enjoy sweeping views of the Piedmont to the east and west and an uninterrupted and relatively undisturbed gradient of changing communities.

An easement is a legal interest in real property that creates a relationship between the holders of the easement and the property owner. By means of the easement, VOF has an interest in specific conservation values of the property and a legal obligation to protect these values. VOF easements provide important public benefits by protecting in perpetuity significant tracts of mostly undeveloped land which may contribute to the protection of water quality, productive soils, natural heritage resources, historic resources, and scenic viewsheds. VOF easements represent over \$1 billion of public investment and fulfillment of Title XI of the Virginia Constitution and other public policies to ensure conservation of natural and cultural resources. These investments in conservation and future conservation opportunities may be jeopardized if large scale utility development impairs the protected resources and their character-defining setting. Degradation of protected resources may result in a loss of confidence in the effectiveness of conservation easements by the public.

Although the proposed project does not directly encroach onto protected land, VOF is concerned about the potential impact that large-scale utility development may have on the scenic viewsheds and pastoral settings provided by these protected properties, especially for the driving public along I-66. As such, VOF requests that full consideration be given to the importance of these open space properties and their extensive conservation values in the selection of the appropriate route. The preferred route along I-66 would be a significant visual intrusion for the traveling public. Therefore, alternatives of less visual impact should be fully considered and modifications to siting, location, materials and height in the design of the transmission line should be made to avoid or minimize any adverse impacts to these

open space properties and their public values. If the certificate is issued, the permit should require implementation of all industry best practices, including, but not limited to, (1) minimal removal of vegetation through use of a clearing plan and (2) use of non-reflecting or de-glared conductors and dulled steel for structures.

Thanks, Martha Little

2025

160120157

Fisher, John (DEQ)

From: Ewing, Amy (DGIF)
Sent: Tuesday, January 05, 2016 1:27 PM
To: Fisher, John (DEQ)
Cc: nhreview (DCR)
Subject: ESSLog# 34955_15-185S_Haymarket to Gainesville TL and Substation

We do not currently document any listed wildlife or designated resources under our jurisdiction from the project area (any alternative). Therefore, we do not anticipate this project to result in adverse impacts upon such species or resources.

This project is located within 2 miles of a documented occurrence of a state or federal threatened or endangered plant or insect species and/or other Natural Heritage coordination species. Therefore, we recommend coordination with VDCR-DNH regarding the protection of these resources.

We recommend coordination with the USFWS regarding potential impacts upon federally Threatened northern long-eared bats associated with tree removal.

To minimize the adverse impacts of linear utility project development on wildlife resources, we offer the following general recommendations: avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable; maintain naturally vegetated buffers of at least 100 feet in width around wetlands and on both sides of perennial and intermittent streams, where practicable; conduct significant tree removal and ground clearing activities outside of the primary songbird nesting season of March 15 through August 15; and, implement and maintain appropriate erosion and sediment controls throughout project construction and site restoration. We understand that adherence to these general recommendations may be infeasible in some situations. We are happy to work with the applicant to develop project-specific measures as necessary to minimize project impacts upon the Commonwealth's wildlife resources.

Thanks, Amy

Amy Ewing

Environmental Services Biologist/FWIS Manager
VA Dept. of Game and Inland Fisheries
7870 Villa Park Dr., Henrico, VA 23228
804-367-2211 @ www.dgif.virginia.gov

 Please consider the environment before printing this email.



COMMONWEALTH of VIRGINIA

Molly Joseph Ward
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

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December 18, 2015

Mr. John E. Fisher
DEQ – OEIR
629 East Main Street, Sixth Floor
Richmond, VA 23219

Re: Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket Substation, PUE-2015-00107
Prince William County, VA
DHR File No. 2014-0713

Dear Mr. Fisher:

We have received for review the State Corporation Commission (SCC) application for the project referenced above. We have also received directly from Virginia Electric and Power Company (Dominion) the report entitled *Pre-Application Analysis for Cultural Resources of the Haymarket Substation and 230kV Transmission Line Project, Virginia* prepared by Dutton + Associates (Dutton) for the Virginia Electric and Power Company (Dominion) and included as Appendix B to the Routing Study. This pre-application analysis was prepared in accordance with Section I of DHR's *Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia* (2008). The below comments are provided as assistance to DEQ and the SCC in the review of this application. We have not been notified by any Federal agency of their involvement in this project; however, we reserve the right to provide additional comment pursuant to the National Historic Preservation Act, if applicable.

Dominion's pre-application analysis consider the potential impact of the proposed project on recorded archaeological sites and on known historic architectural properties listed or previously determined eligible for listing in the Virginia Landmarks Register (VLR) and the National Register of Historic Places (NRHP) within a tiered study area. DHR's comments on the pre-application analyses are provided in the attached tables and utilize the following scale in describing impacts:

- **None** – Project is not visible from the property
- **Minimal** – Occur within viewsheds that have existing transmission lines, locations where there will only be a minor change in tower height, and/or views that have been partially obstructed by intervening topography and vegetation.
- **Moderate** – Include viewsheds with expansive views of the transmission line, more dramatic changes in the line and tower height, and/or an overall increase in the visibility of the route from the historic properties.

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20151218

- **Severe** – Occur within viewsheds that do not have existing transmission lines and where the views are primarily unobstructed, locations where there will be a dramatic increase in tower visibility due to the close proximity of the route to historic properties, and viewsheds where the visual introduction of the transmission line is a significant change in the setting of the historic properties.

DHR's comments are presented in five (5) sections – Carver Alternative, I-66 Hybrid Alternative, I-66 Overhead Alternative, Madison Alternative, and the Railroad Alternative.

Carver Alternative (Attachment 1)

To summarize, the pre-application analysis identifies 12 VLR/NRHP listed/eligible architectural resources and three (3) previously identified archaeological sites within the tiered study area for this alternative. These numbers include seven (7) historic districts/landmarks and five (5) battlefields.

Please see Attachment 1 for our specific comments on impacts. Based upon a review of the information provided, it is our opinion that this section would have minimal impacts on four (4) resources, moderate impacts on two (2) resources, and no impacts on six (6) resources. Moderate impacts are considered an adverse and mitigation is requested.

I-66 Hybrid Alternative (Attachment 2)

To summarize, the pre-application analysis identifies 10 VLR/NRHP listed/eligible architectural resources and two (2) previously identified archaeological sites within the tiered study area for this alternative. These numbers include seven (7) historic districts/landmarks and five (5) battlefields.

Please see Attachment 2 for our specific comments on impacts. Based upon a review of the information provided, it is our opinion that this section would have minimal impacts to four (4) resources, moderate impacts to one (1) resource, and no impacts to seven (7) resources. Moderate impacts are considered an adverse and mitigation is requested.

I-66 Overhead Alternative (Attachment 3)

To summarize, the pre-application analysis identifies 12 VLR/NRHP listed/eligible architectural resources and three (3) previously identified archaeological sites within the tiered study area for this alternative. These numbers include seven (7) historic districts/landmarks and five (5) battlefields.

Please see Attachment 3 for our specific comments on impacts. Based upon a review of the information provided, it is our opinion that this section would have minimal impacts on four (4) resources, moderate impacts to two (2) resources, and no impacts on six (6) resources. Moderate impacts are considered an adverse and mitigation is requested.

Madison Alternative (Attachment 4)

To summarize, the pre-application analysis identifies 13 VLR/NRHP listed/eligible architectural resources and three (3) previously identified archaeological sites within the tiered study area for this alternative. These numbers include eight (8) historic districts/landmarks and five (5) battlefields.

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20151218

Please see Attachment 4 for our specific comments on impacts. Based upon a review of the information provided, it is our opinion that this section would have minimal impacts on four (4) resources, moderate impacts to three (3) resources, and no impacts on four (4) resources. Moderate impacts are considered an adverse and mitigation is requested.

Railroad Alternative (Attachment 5)

To summarize, the pre-application analysis identifies 13 VLR/NRHP listed/eligible architectural resources and three (3) previously identified archaeological sites within the tiered study area. These numbers include eight (8) historic districts/landmarks and five (5) battlefields.

Please see Attachment 5 for our specific comments on impacts. Based upon a review of the information provided, it is our opinion that this section would have minimal impacts on four (4) resources, moderate impacts on two (2) resources, and no impacts on seven (7) resources. Moderate impacts are considered an adverse and mitigation is requested.

Conclusion and Recommendations

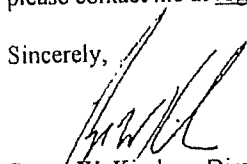
Dominion has identified the I-66 Overhead Alternative as its Proposed Route in the SCC application. Based on the sum of the information provided, it is our opinion that the I-66 Hybrid Alternative appears to have the least overall potential impact to recorded historic resources. The Madison Alternative appears to have the most overall potential for negative impacts to recorded historic resources. This alternative crosses the potentially NRHP-eligible boundaries for three (3) historic battlefields in Prince William County, and has the potential for permanent, negative visual impacts to these battlefield resources.

We offer the following as recommendations to be considered by DEQ and the SCC in the review of this application:

1. DHR recommends selection of the I-66 Hybrid Alternative to minimize potential impacts to recorded significant historic resources.
2. The Madison Alternative appears to have the most overall potential for negative impact to recorded historic resources and is not recommended.
3. Comprehensive archaeological and architectural surveys in accordance with DHR guidelines by qualified professionals prior to construction of any SCC-approved alternative.
4. Evaluation of all identified resources for listing in the VLR/NRHP.
5. Assessment of potential direct and indirect impacts to all VLR/NRHP-eligible resources.
6. Avoidance, minimization, and/or mitigation of moderate to severe impacts to VLR/NRHP-eligible resources by Dominion in consultation with DHR and other stakeholders.

Thank you for the opportunity to review this application. If you have any questions concerning these comments, please contact me at roger.kirchen@dhr.virginia.gov.

Sincerely,



Roger W. Kirchen, Director
Review and Compliance Division

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ATTACHMENT 1 – Carver Alternative
December 18, 2015
DHR File No. 2014-0713

160120157

DHR ID #	Resource Name/Address	VLR/NRHP Status	Segments/ Substation - Distance	Dutton Recommended Impacts – Oct. 2015	DHR Recommended Impacts – Dec. 2015
233-0002	St. Paul's Episcopal Church	VLR/NRHP-Listed	0.2-miles	Minimal	Minimal
233-0006	Old Town Hall and Haymarket School	VLR/NRHP-Listed	0.4-miles	Minimal	None
030-5152	Buckland Mills Battlefield	VLR/NRHP-Eligible	Within ROW (study area and POTNR)	Minimal	Moderate
030-5610/ 030-1016	Thoroughfare Gap Battlefield	Unevaluated/ VLR-NRHP-listed	Within ROW (POTNR)	Minimal	Minimal
076-0271	Manassas National Battlefield Park Historic District & Expansion	VLR/NRHP-Listed	0.1-miles	Minimal	Minimal
076-5036	Manassas Station Operations Battlefield (Bristoe Station)	VLR/NRHP-Eligible	Within ROW	None	Minimal
076-5190	Second Battle of Manassas	Unevaluated	Within ROW	Moderate	Moderate
076-0122	Woodlawn	VLR/NRHP-Eligible	0.16-miles	None	None
076-0147	Monroe House	Demolished	0.2-miles	None	None
233-0005	Haymarket Post Office	VLR/NRHP-Eligible	0.4-miles	None	None
233-0008	Winterham	VLR/NRHP-Eligible	0.3-miles	None	None
233-5015	Masonic Temple	VLR/NRHP-Eligible	0.4-miles	None	None
44PW1636	20 th Century Domestic	Not eligible	Within ROW	TBD	TBD
44PW1853	Historic	Unevaluated	Within ROW	TBD	TBD
44PW1854	Prehistoric	Unevaluated	Within ROW	TBD	TBD

ATTACHMENT 2 – I-66 Hybrid Alternative
December 18, 2015
DHR File No. 2014-0713

150120157

DHR ID #	Resource Name/Address	VLR/NRHP Status	Proposed Alt. - Distance	Dutton Recommended Impacts – Oct. 2015	DHR Recommended Impacts – Nov. 2015
233-0002	St. Paul's Episcopal Church	VLR/NRHP-Listed	0.4-miles (underground)	None	None
233-0006	Old Town Hall and Haymarket School	VLR/NRHP-Listed	0.2-miles (underground)	None	None
030-5152	Buckland Mills Battlefield	VLR/NRHP-Eligible	Within ROW (underground)	None	Minimal
030-5610/030-1016	Thoroughfare Gap Battlefield	Unevaluated/VLR-NRHP-listed	Within ROW (underground)	None	None
076-0271	Manassas National Battlefield Park Historic District & Expansion	VLR/NRHP-Listed	0.1-miles	Minimal	Minimal
076-5036	Manassas Station Operations Battlefield (Bristoe Station)	VLR/NRHP-Eligible	Within ROW (study area)	None	Minimal
076-5190	Second Battle of Manassas	Unevaluated	Within ROW (POTNR)	Moderate	Moderate
076-5381	Gainesville District School	VLR/NRHP-Eligible	0.1-miles (underground)	None	Minimal
076-0147	Monroe House	Demolished	0.1-miles (underground)	None	None
233-0005	Haymarket Post Office	VLR/NRHP-Eligible	0.2-miles (underground)	None	None
233-5015	Masonic Temple	VLR/NRHP-Eligible	0.3-miles (underground)	None	None
233-0008	Winterham	VLR/NRHP-Eligible	0.2-miles (underground)	None	None
44PW0986	Historic, Domestic	Not eligible	Within ROW	TBD	TBD
44PW1121	Historic, Domestic	Unevaluated	Within ROW	TBD	TBD

ATTACHMENT 3 – I-66 Overhead Alternative

December 18, 2015

DHR File No. 2014-0713

DHR ID #	Resource Name/Address	VLR/NRHP Status	Proposed Alt. - Distance	Dutton Recommended Impacts – Oct. 2015	DHR Recommended Impacts – Nov. 2015
233-0002	St. Paul's Episcopal Church	VLR/NRHP-Listed	0.4-miles	None	None
233-0006	Old Town Hall and Haymarket School	VLR/NRHP-Listed	0.2-miles	Minimal	None
030-5152	Buckland Mills Battlefield	VLR/NRHP-Eligible	Within ROW (POTNR)	Minimal	Moderate
030-5610/030-1016	Thoroughfare Gap Battlefield	Unevaluated/VLR-NRHP-listed	Within ROW (study area)	Minimal	Minimal
076-0271	Manassas National Battlefield Park Historic District & Expansion	VLR/NRHP-Listed	0.1-miles	Minimal	Minimal
076-5036	Manassas Station Operations Battlefield (Bristoe Station)	VLR/NRHP-Eligible	Within ROW (study area)	None	Minimal
076-5190	Second Battle of Manassas	Unevaluated	Within ROW (study area and POTNR)	Moderate	Moderate
076-0147	Monroe House	Demolished	0.1-miles	None	None
076-5381	Gainesville District School	VLR/NRHP-Eligible	0.1-miles	Minimal	Minimal
233-0005	Haymarket Post Office	VLR/NRHP-Eligible	0.2-miles	Minimal	None
233-0008	Winterham	VLR/NRHP-Eligible	0.2-miles	None	None
233-5015	Masonic Temple	VLR/NRHP-Eligible	0.3-miles	None	None
44PW0985	Historic Quarry	Not eligible	Within ROW	TBD	TBD
44PW0986	Historic Domestic	Not eligible	Within ROW	TBD	TBD
44PW1121	Historic Domestic	Unevaluated	Within ROW	TBD	TBD

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ATTACHMENT 4 – Madison Alternative
December 18, 2015
DHR File No. 2014-0713

DHR ID #	Resource Name/Address	VLR/NRHP Status	Proposed Alt. - Distance	Dutton Recommended Impacts – Oct. 2015	DHR Recommended Impacts – Nov. 2015
076-0313	Buckland Historic District and Expansion	VLR/NRHP-Listed	0.75-miles	Minimal	None
233-0002	St. Paul's Episcopal Church	VLR/NRHP-Listed	0.4-miles	Minimal	Minimal
233-0006	Old Town Hall and Haymarket School	VLR/NRHP-Listed	0.45-miles	Minimal	None
030-5152	Buckland Mills Battlefield	VLR/NRHP-Eligible	Within ROW (study area and POTNR)	Minimal	Moderate
030-5610/030-1016	Thoroughfare Gap Battlefield	Unevaluated/VLR-NRHP-listed	Within ROW (POTNR)	Minimal	Minimal
076-0271	Manassas National Battlefield Park Historic District & Expansion	VLR/NRHP-Listed	0.1-miles	Minimal	Minimal
076-5036	Manassas Station Operations Battlefield (Bristoe Station)	VLR/NRHP-Eligible	Within ROW (study area)	None	Minimal
076-5190	Second Battle of Manassas	Unevaluated	Within ROW (study area and POTNR)	Moderate	Moderate
076-0147	Monroe House	Demolished	0.1-miles	None	None
076-0122	Woodlawn	VLR/NRHP-Eligible	0.1-miles	Minimal	Moderate
233-0008	Winterham	VLR/NRHP-Eligible	0.4-miles	None	None
44PW1498	20 th Century Domestic	Unevaluated	Within ROW	TBD	TBD
44PW1582	Possible Civil War Camp	Unevaluated	Within ROW	TBD	TBD
44PW1963	Antebellum Scatter	Unevaluated	Within ROW	TBD	TBD

150120157

ATTACHMENT 5 – Railroad Alternative
December 18, 2015
DHR File No. 2014-0713

120120157

DHR ID #	Resource Name/Address	VLR/NRHP Status	Proposed Alt. - Distance	Dutton Recommended Impacts – Oct. 2015	DHR Recommended Impacts – Nov. 2015
233-0002	St. Paul's Episcopal Church	VLR/NRHP-Listed	0.17-miles	Minimal	Minimal
233-0006	Old Town Hall and Haymarket School	VLR/NRHP-Listed	0.34-miles	Minimal	None
030-5152	Buckland Mills Battlefield	VLR/NRHP-Eligible	Within ROW (POTNR)	Minimal	Moderate
030-5610/030-1016	Thoroughfare Gap Battlefield	Unevaluated/VLR-NRHP-listed	Within ROW (POTNR)	Minimal	Minimal
076-0271	Manassas National Battlefield Park Historic District & Expansion	VLR/NRHP-Listed	0.1-miles	Minimal	Minimal
076-5036	Manassas Station Operations Battlefield (Bristoe Station)	VLR/NRHP-Eligible	Within ROW (study area)	None	Minimal
076-5190	Second Battle of Manassas	Unevaluated	Within ROW (study area and POTNR)	Moderate	Moderate
076-0122	Woodlawn	VLR/NRHP-Eligible	0.75-miles	None	None
076-0147	Monroe House	Demolished	0.1-miles	None	None
076-5381	Gainesville District School	VLR/NRHP-Eligible	0.35-miles	None	None
233-0005	Haymarket Post Office	VLR/NRHP-Eligible	0.4-miles	None	None
233-0008	Winterham	VLR/NRHP-Eligible	0.27-miles	None	None
233-5015	Masonic Temple	VLR/NRHP-Eligible	0.3-miles	None	None
44PW0893	Native American Prehistoric	Unevaluated	Within ROW	TBD	TBD
44PW1853	Historic	Unevaluated	Within ROW	TBD	TBD
44PW1854	Prehistoric/unknown	Unevaluated	Within ROW	TBD	TBD

160120157



COMMONWEALTH of VIRGINIA

Randall P. Burdette
Executive Director

Department of Aviation
5702 Gulfstream Road
Richmond, Virginia 23250-2422

January 11, 2016

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ISO 9001:2008 Certified
IS-BAO Registered

Mr. John Fisher
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, 6th Floor
Richmond, Virginia 23219

RE: Haymarket 230 kV Double Circuit Transmission Line, DEQ Project # 15-1855

Dear Mr. Fisher:

The Virginia Department of Aviation has reviewed the information link you provided for the above referenced project. Following our review, it does not appear as though any portion of the proposed project is within 20,000 linear feet of a public-use airport nor does it appear as though any of the proposed structures will exceed 200' above ground level. Therefore, the project does not require submission of a 7460 to the FAA for review. The Department of Aviation has no objection to the project as proposed.

If you have any questions regarding this matter, please contact me at (804) 236-3638.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Scott Denny".

S. Scott Denny
Senior Aviation Planner
Virginia Department of Aviation





Christopher M. Price, AICP
Director of Planning

COUNTY OF PRINCE WILLIAM

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PLANNING
OFFICE

150120157

December 17, 2015

Mr. John E. Fisher
Department of Environmental Quality
Office of Environmental Impact Review
629 E. Main St., Sixth Floor
Richmond, VA 23219

Re: Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket
Substation, PUE 2015-00107
DEQ Project Number 15-1885S

Dear Mr. Fisher:

Dominion Virginia Power submitted an application to the State Corporation Commission to build a double circuit 230kV transmission line, from Gainesville to Haymarket in Prince William County, Virginia. Through resolution 15-508 dated August 4, 2015 (see Attached), the Prince William Board of County Supervisors has declared that any proposal to install new, or to re-fit, high-voltage transmission lines for Dominion's Haymarket 230kV Line and Substation Project shall be supported only if the lines are buried in the right-of-way of Interstate 66 as they pass from its intersection with US Route 29 through Haymarket and beyond. In addition, the Board of County Supervisors has reaffirmed and renewed its commitment to the Comprehensive Plan Long Range Land Use strategy LU3.14 which designates the corridors that all future electric utility lines of 150 kilovolts or more should follow, and to contain high-voltage transmission lines to designated corridors in order to protect private property and preserve the County's distinctive cultural and historic inheritance, including, but not limited to, the 52 county-registered historic sites; Historic and Prehistoric High-Sensitivity Areas identified in the Comprehensive Plan including those in residential areas; high quality open space, such as existing and planned off-road trails, open space easements, conservation easements, public school open space, and resource protection areas; and both the County's designated Rural Crescent urban growth boundary and unique Historic Overlay District. The proposed transmission line is not within one of these corridors.

Within the proposed project area, three battlefields are directly and indirectly affected including the Buckland Mills Battlefield (030-5152), the Thoroughfare Gap Battlefield (030-5610) Study, Core, and Potential National Register, and the study area for the Manassas Station Operations Battlefield (076-5036). While the direct effects of tower construction can be mitigated through archaeology Phase I, II, and III/Data Recovery and subsequent landscape restoration, the adverse effect to each Battlefield's viewshed, and all indirect adverse effects, are best mitigated by installing the transmission lines underground to the greatest extent possible. The Interstate 66 Hybrid alternative is the only alternative that adequately minimizes negative impacts to the County's cultural resources and to existing and planned residential communities

Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket
Substation, PUE 2015-00107; DEQ Project Number 15-1885S
December 17, 2015
Page 2 of 2

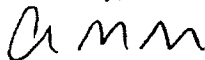
and businesses. The negative impacts to cultural resources and to existing and planned communities and businesses associated with each of the other alternatives, including Dominion's Proposed Route (I-66 Overhead), are unacceptable.

It should be noted that Prince William County would like to proactively work with Dominion Virginia Power to achieve an acceptable alternative. As such, the Prince William Board of County Supervisors has directed County staff to evaluate the Interstate 66 Hybrid alternative, and to coordinate with the Virginia Department of Transportation, in furtherance of the County's express goal of supporting the installation of buried transmission lines. The underground alternative provides a unique opportunity to collocate a major public utility project with the widening of Interstate 66, a major transportation project, with minimum disturbance both to our residents and businesses and to our cultural and environmental resources. This opportunity would allow for the project to take advantage of efficiencies and economies of scale and would significantly reduce negative impacts to the community while allowing the project to proceed in a timely manner. We look forward to working with all parties to achieve this unique and mutually beneficial solution.

In addition to the proposed transmission line project, please be advised that any proposal by Dominion Virginia Power to construct a new electric substation shall first be submitted to the Prince William County Planning Commission for consideration and public hearings, as required by Section 15.2-2232 of the Code of Virginia.

Prince William County will continue to review and comment on this application as it proceeds through the public hearing process. Please contact Justin Patton, County Archaeologist, at 703-792-5729 or jspatton@pwcgov.org if you have any questions or if you would like any additional information.

Sincerely,



Chris Price, AICP

Attachment

PRML2016-00604

cc: Prince William Board of County Supervisors
Melissa Peacor, county Executive
Susan Roltsch, Deputy County Executive
Tom Blaser, Director of Transportation
David McGettigan, Long Range Planning Manager
Justin Patton, County Archaeologist

160120157

MOTION: LAWSON

August 4, 2015
Regular Meeting
Res. No. 15-508

SECOND: CANDLAND

RE: SUPPORT PROTECTION OF PRIVATE PROPERTY, HISTORICAL
RESOURCES AND COMMERCIAL INTERESTS FROM POTENTIAL
NEGATIVE IMPACTS OF NEW HIGH VOLTAGE OVERHEAD
TRANSMISSION LINES

ACTION: APPROVED

WHEREAS, Dominion Virginia Power (Dominion) has proposed placing additional high-voltage overhead and/or buried transmission lines through portions of Western Prince William County; and

WHEREAS, Section 56-46.1 of the Code of Virginia requires the State Corporation Commission (SCC) to consider, prior to approving any overhead transmission line, whether the line is consistent with the locality's comprehensive plan; and

WHEREAS, the Prince William Board of County Supervisors has directed the County Transportation Department to work with Virginia Department of Transportation (VDOT) to more efficiently utilize infrastructure in the public right-of-way, specifically Interstate 66 right-of-way, consistent with the Community Design Chapter of the Prince William County Comprehensive Plan calling for the "location of utility easements within public rights-of-way, and the collocation of utilities within easements, through County coordination with VDOT and local utility companies";

NOW, THEREFORE, BE IT RESOLVED that the Prince William Board of County Supervisors does hereby:

1. Declare that Dominion and its regulator -- the State Corporation Commission -- in proposing and reviewing the application for the installation of high-voltage transmission lines in Prince William County, shall give full consideration and respect to the County's Comprehensive Plan and Zoning Ordinances in order to minimize the impact on its residents, businesses, environment, and historical importance;
2. Declare its intent that any proposal to install new, or to re-fit, high-voltage transmission lines for Dominion's Haymarket 230kV Line and Substation Project shall be supported only if the lines are buried in the right-of-way of Interstate 66 as they pass from its intersection with US-29 through Haymarket and beyond;

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3. Direct County staff to evaluate the Interstate 66 buried alternative, and to coordinate with VDOT, in furtherance of the County's express goal of supporting the installation of buried transmission lines. As required by Section 56-46.1B of the Code of Virginia, the State Corporation Commission must "consider (a) the costs and economic benefits likely to result from requiring the underground placement of the Line and (b) any potential impediments to timely construction of the Line," at the request of the local government, Prince William County;

4. Recommend that all costs, both direct and incidental, of burying the line be borne by Dominion and not by private property owners who through no fault or choice of their own reside or do business within close proximity to the buried line;

5. Give notice that it will not enter into agreement with Dominion to assess the costs of line burial under the provisions of Section 15.2-2404F of the Code of Virginia;

6. Require that any proposal by Dominion to construct a new electric substation shall first be submitted to the Prince William County Planning Commission for consideration and public hearings, as required by Section 15.2-2232 of the Code of Virginia;

7. Reaffirm and renew its commitment to LU3.14 of the Long-Range Land Use Plan, which designates the corridors that all future electric utility lines of 150 kilovolts or more should follow, and to contain high-voltage transmission lines to designated corridors as detailed in LU3.14 of the Long-Range Land Use Plan, in order to protect private property and preserve the County's distinctive cultural and historic inheritance, including, but not limited to, the 52 county-registered historic sites; Historic and Prehistoric High-Sensitivity Areas identified in the 2008 Comprehensive Plan and updated subsequently, including those in residential areas; high quality open space, such as existing and planned off-road trails, open space easements, conservation easements, public school open space, and resource protection areas; and both the county's designated Rural Crescent urban growth boundary and unique Historic Overlay District;

8. Declare its intent to immediately initiate a zoning text amendment to incorporate appropriate zoning requirements for data centers which would address the infrastructure necessary to support such uses and the potential impacts to other properties. This amendment will continue the County's efforts to advance commercial and industrial development;

20150804

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9. Direct that this Resolution be forwarded to Dominion Virginia Power, the Virginia State Corporation Commission, State Delegate Robert "Bob" G. Marshall, State Delegate Timothy D. Hugo, State Delegate David I. Ramadan, State Senator Richard H. Black, State Senator Richard H. Stuart, Virginia State Attorney General Mark Herring, Virginia State Governor Terry McAuliffe, US Senator Timothy M. Kaine, US Congresswoman Barbara Comstock, US Senator Mark Warner, US Congressman Rob Wittman, and Haymarket town council representatives: Mayor David Leake, Vice-Mayor Steve Aitken, Matt Caudle, Chris Morris, Joe Pasanello, Pam Swinford and Kurtis Woods.

DISCLOSURE PRIOR TO VOTE: John D. Jenkins

Votes:

Ayes: Caddigan, Candland, Jenkins, Lawson, May, Nohe, Principi, Stewart

Nays: None

Absent from Vote: None

Absent from Meeting: None

ATTEST:


Clerk to the Board

160120157

Fisher, John (DEQ)

From: Warren, Arlene (VDH)
Sent: Thursday, December 10, 2015 3:15 PM
To: Fisher, John (DEQ)
Cc: Soto, Roy (VDH)
Subject: 15-185S PROJECT SCC: Haymarket 230 kV Double Circuit Transmission Line & 230-34.5 kV Haymarket Substation PUE 2015-00107

Project Name: SCC: Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket Substation PUE 2015-00107
Project #: 15-185S
UPC #: N/A
Location: Prince William County

VDH – Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to **public drinking water sources** (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems **must be verified by the local utility.**

The following public groundwater wells appear to be located within a 1 mile radius of the project site (wells within a 1,000 ft. radius are formatted in **bold**):

PWSID	District	CNYCTY	SYSNAME	FACNAME
6153062	DISTRICT 16	PRINCE WILLIAM	CAMP SNYDER	WELL
6153037	DISTRICT 16	PRINCE WILLIAM	BRAWNER FARM	WELL #1

The following surface water intakes are located within a 5 mile radius of the project site:

PWSID	SYSNAME	FACNAME
6685100	MANASSAS, CITY OF	LAKE MANASSAS DAM

The project is within the watershed of the following public surface water sources (intakes where the project falls within 5 miles into their watershed are formatted in **bold**):

PWSID	SYSNAME	FACNAME
6685100	MANASSA, CITY OF	LAKE MANASSAS DAM
6059501	FAIRFAX COUNTY WATER AUTHORITY	OCCOQUAN RESERVIOR INTAKE

Best Management Practices should be employed on the project site including Erosion & Sedimentation Controls as well as Spill Prevention Controls & Countermeasures.

Care should be taken while transporting materials in and out of the project site, as to prevent impacts to surface water intakes within 5 miles.

There may be impacts to public drinking water sources due to this project if the mitigation efforts outlined above are not implemented.

Best Regards,

Arlene Fields Warren
 Office of Drinking Water
 804-864-7781