

BEFORE THE  
STATE CORPORATION COMMISSION  
OF VIRGINIA

APPLICATION OF  
VIRGINIA ELECTRIC AND POWER COMPANY  
FOR APPROVAL OF ELECTRIC FACILITIES

Elmont-Ladysmith 500 kV Transmission Line #574 Rebuild and Related  
Projects

Application No. 304

DEQ Supplement

Case No. PUR-2021-00082

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Based upon consultations with the Virginia Department of Environmental Quality (“DEQ”), Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”) has developed this DEQ Supplement to facilitate review and analysis of the proposed Virginia Rebuild Project by DEQ and other relevant agencies.

## 1. Project Description

In order to maintain the structural integrity and reliability of its transmission system in compliance with mandatory North American Reliability Corporation (“NERC”) Reliability Standards, Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”) proposes in Hanover and Caroline Counties, Virginia, the following:

- (i) Rebuild approximately 26.2 miles of 500 kV Line #574 on single circuit steel structures between Elmont Switching Station and Ladysmith Switching Station with dulled galvanized steel structures that can support a 500 kV circuit with an underbuild that permits a future 230kV circuit.<sup>1</sup>
- (ii) The removal of one single circuit 500 kV galvanized steel lattice tower supporting existing Line #568 (Ladysmith – Possum Point) at Ladysmith which will be replaced with two single circuit 500 kV dulled galvanized steel lattice towers.
- (iii) To complete work at Elmont and Ladysmith Switching Stations to support the new line rating.

(collectively, the “Rebuild Project” or “Project”).

## 2. Environmental Analysis

The Company solicited comments from all relevant state and local agencies about the proposed Rebuild Project in March 2021. Copies of these letters are included as Attachment 2. The DEQ provided a letter in response to the Company’s request for the proposed project on March 26, 2021. A copy of this letter is included as Attachment 2.A.1.

### A. Air Quality

The Company will control fugitive dust during construction in accordance with DEQ regulations. 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. Minimal earth disturbance will take place and vehicle speed, which is often a factor in airborne particulate, will be kept to a minimum. Erosion and sediment control are addressed in Section 2.G, below. Equipment and vehicles that are powered by gasoline or diesel motors will also be used during the construction of the line so there will be exhaust from those motors.

The existing transmission corridor currently is maintained for transmission facility operations, and no clearing is proposed. The Rebuild Project may require some trimming of tree limbs along the right-of-way edges to support construction activities. The Company does not expect to burn cleared material, but if necessary, the

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<sup>1</sup> The Company will seek Commission approval to build the 230kV circuit through a certificate of public convenience and necessity application when the need arises.

Company will coordinate with the responsible locality to ensure all local ordinances and DEQ requirements are met. The Company's tree clearing methods are described in Section 2.K.

**B. Water Source (No water source is required for transmission lines so this discussion will focus on potential waterbodies to be crossed by the proposed transmission line rebuild.)**

The proposed Rebuild Project is located within the Lower James watershed, Hydrologic Unit Code 02080206, the Pamunkey watershed, Hydrologic Unit Code 02080106, and the Mattaponi watershed, Hydrologic Unit Code 02080105. According to the U.S. Geological Survey ("USGS") topographic quadrangles (Yellow Tavern [1963], Glen Allen [1963], Hanover Academy [1969], Hewlett [1969], Ladysmith [1966], Virginia), the existing transmission line corridor crosses 11 named perennial streams and rivers, including: Stony Run, Stagg Creek, Dog Branch, South Anna River, Beaver Creek, Newfound River, Little River, North Anna River, Polecat Creek, Stevens Mill Run, and South River. According to the Virginia Department of Conservation and Recreation's ("DCR") National Hydrography Dataset found on the Natural Heritage Data Explorer, the transmission right-of-way also crosses many unnamed tributaries.

Any clearing required in the vicinity of streams will be performed by hand within 100 feet of both sides, and vegetation less than three inches in diameter will be left undisturbed.

The Company solicited comments from the Virginia Marine Resources Commission ("VMRC") regarding the proposed Rebuild Project in March 2021. According to a response dated 4/19/2021, the project is within the jurisdictional areas of the VMRC and a permit may be required. A copy of this letter is included as Attachment 2.B.1. A subaqueous encroachment permit is expected to be required for any stream crossings with a drainage area of five square miles or greater at the crossing location. The right-of-way crosses five VMRC jurisdictional waters with drainage areas greater than five square miles. A Joint Permit Application will be submitted for review by the VMRC, DEQ and the U.S. Army Corps of Engineers (the "Corps") to authorize jurisdictional crossings and for any impacts to jurisdictional features. See Section 2.D below.

**C. Discharge of Cooling Waters**

No discharge of cooling waters is associated with the Rebuild Project.

**D. Tidal and Non-tidal Wetlands**

No tidal wetlands were identified within the proposed Rebuild project area. Non-tidal wetlands are summarized below.

## Wetlands Impact Consultation

The Company utilized aerial imagery, U.S. Fish and Wildlife Service National Wetlands Inventory, National Resources Conservation Service Soil Surveys, Federal Emergency Management Floodplain Mapping, and existing contour data to estimate jurisdictional wetlands and waters of the United States within the proposed Rebuild right-of-way. Total jurisdictional resources within the proposed Rebuild Project right-of-way, as estimated using these desktop resources, are provided in Table 1 and detailed in Attachment 2.D.1.

**Table 1. Estimated Jurisdictional Resources within the Rebuild Project Right-of-Way**

Resource	Area/Length (±)
Palustrine Emergent/Scrub Shrub Wetland	146.9 AC
Palustrine Unconsolidated Bottom Open Water	0.4 AC
Stream Channel	2.8 AC/ 3.4 MI

Prior to construction, the Company will delineate wetlands and other waters of the United States using the *Routine Determination Method*, as outlined in the *1987 Corps of Engineers Wetland Delineation Manual* and methods described in the *2012 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region* (Version 2.0). The Company will also obtain any necessary permits to impact jurisdictional resources.

The Company solicited comments from the Virginia Department of Environmental Quality Office of Wetlands and Stream Protection in March 2021. According to response dated April 20, 2021, the proposed project may require a Virginia Water Protection (“VWP”) individual or general permit. See Attachment 2.D.2. The Company has sited structures to avoid wetlands and streams to the extent practicable. Temporary impacts will be restored to pre-existing conditions, and permanent impacts will be compensated for in accordance with all applicable state regulations and laws. The project is expected to require a VWP general permit. A Joint Permit Application (“JPA”) will be submitted for further evaluation and final permit need determination by DEQ. Ms. Julie Hamilton of the U.S. Army Corps of Engineers responded via an email dated March 22, 2021 and advised the Company to review the 2021 NWP57 as well as the 401 Water Quality Certification process. The Corps also advised that coordination with the Virginia Department of Historic Resources (“VDHR”) and the U.S. Fish and Wildlife Service (“USFWS”) may be required. See Attachment 2.D.3.

Prior to construction, the Company will obtain any necessary permits to impact jurisdictional resources.

**E. Solid and Hazardous Waste**

On behalf of the Company, C2 Environmental, Inc. (“C2”) conducted database searches for solid and hazardous wastes, and petroleum release sites within a 0.5-mile radius of the Rebuild Project. Publicly available data from the Environmental Protection Agency (“EPA”) Facility Registry System (“FRS”) were obtained and include *Comprehensive Environmental Response, Compensation and Liability Act* (“CERCLA”)/Superfund; *Resource Conservation and Recovery Act* (“RCRA”); and brownfield sites. Per this database, there are no registered RCRA sites present within a 0.5-mile radius of the project.

DEQ records also were searched for the presence of solid waste management facilities, Voluntary Remediation Program sites, and petroleum releases. No Voluntary Remediation Program sites were identified within 0.5 mile of the Rebuild Project. DEQ identified two registered tank facilities and fifteen petroleum release sites within the search radius, none of which fall within the right-of-way of the Rebuild Project. The Company has a procedure in place to handle petroleum contaminated soil, if encountered; however, as all identified tank facilities and release sites are located outside of the Rebuild Project area, no impacts to these sites are expected. Tables listing these sites are included in Attachment 2.E.1.

**F. Natural Heritage, Threatened and Endangered Species**

On behalf of the Company, C2 conducted online database searches for threatened and endangered species in the vicinity of the Rebuild Project, including the U.S. Fish and Wildlife (“USFWS”) Information, Planning, and Conservation (“IPaC”) system, the USFWS Critical Habitat for Threatened and Endangered Species Mapper, the USFWS Bald Eagle Concentration Area Map, the Virginia Department of Wildlife Resources (“DWR”) Virginia Fish and Wildlife Information Service (“VAFWIS”), the DWR Northern Long-eared Bat (“NLEB”) Winter Habitat and Roost Trees Map, the Virginia Department of Conservation and Recreation (“DCR”), the Natural Heritage Data Explorer (“NHDE”), and the Center for Conservation Biology (“CCB”) Bald Eagle Nest Locator. The results are presented in Table 2 below.

**Table 2. Threatened and endangered species within the Elmont-Ladysmith 500kV Rebuild Project vicinity**

<b>Species Name (Scientific Name)</b>	<b>Status</b>	<b>Results</b>
Indiana bat ( <i>Myotis sodalis</i> )  Database: USFWS	FE, SE	No known hibernacula are identified in the vicinity of the project. The project location is outside of critical habitat. No clearing of new right-of-way is proposed. No adverse effects expected.
Northern long-eared bat ( <i>Myotis septentrionalis</i> )  Database: USFWS	FT, ST	No known hibernacula or summer roosts are identified in the vicinity of the project. No clearing of new right-of-way is proposed. No adverse effects expected.
Dwarf wedgemussel	FE, SE	Suitable habitat may be present in streams.

<b>Species Name (Scientific Name)</b>	<b>Status</b>	<b>Results</b>
<i>(Alasmidonta heterodon)</i>  Database: USFWS, VAFWIS, DCR		No structures are located in streams or waterways, and no instream work is anticipated. No adverse effects expected.
Yellow lance <i>(Elliptio lanceolata)</i>  Database: USFWS, VAFWIS, DCR	FT, ST	Suitable habitat may be present in streams. The project is located outside of proposed critical habitat. No structures are located in streams or waterways, and no instream work is anticipated. No adverse effects expected. The project is located outside of proposed critical habitat.
Swamp-pink <i>(Helonias bullata)</i>  Database: DCR	FT, SE	No suitable habitat present. No clearing of new right-of-way is proposed. No adverse effects expected.
New Jersey rush <i>(Juncus caesariensus)</i>  Database: DCR	ST	Suitable habitat may be present.
Tiger salamander <i>(Ambystoma tigrinum)</i>  Database: DCR	SE	Suitable habitat may be present.
Green floater <i>(Lasmigona subviridis)</i>  Database: DCR	ST	Suitable habitat may be present in streams. No structures are located in streams or waterways, and no instream work is anticipated. No adverse effects expected.
Small whorled pogonia <i>(Isotria medeoloides)</i>  Database: DCR	FT, SE	No suitable habitat present. No clearing of new right-of-way is proposed. No adverse effects expected.
Bald eagle <i>(Haliaeetus leucocephalus)</i>  Database: USFWS, CCB	FP	No known bald eagle nests are located within 660 feet of the project area. No bald eagle concentration areas are present within the project vicinity. No adverse effects expected.

FT: federally threatened, FE: federally endangered, ST: state threatened, SE: state endangered, FP: federally protected, USFWS: US Fish and Wildlife Service, VAFWIS: Virginia Fish and Wildlife Information Service, DCR: Department of Conservation and Recreation, CCB: Center for Conservation Biology

A copy of the database search results can be found in [Attachment 2.F.1](#). Additionally, the Company requested comments from the USFWS, DWR and DCR regarding the proposed Rebuild Project in March 2021. Responses from DCR and DWR were received via emails dated March 22, 2021. DCR requested that the Company submit the project to the Division of Natural Heritage for review. The Company completed this request and received a project review from the Division of Natural Heritage on March 29, 2021. DCR recommended strict adherence to applicable state and local erosion and sediment control and stormwater management laws and regulations,

establishment/enhancement of natural buffers with native plant species and maintaining natural stream flows. They also recommend the development and implementation of an invasive species plan for right-of-way maintenance. An additional response from the DCR Division of Planning and Recreation Resources was received in a letter dated March 22, 2021. The DCR recommended minimizing disturbance and impacts along the North Anna River which qualifies for scenic designation. The DCR comments are included herein as Attachments 2.F.2 and 2.F.3. DWR recommended that a preliminary desktop review be completed using the Virginia Fish and Wildlife Information Service (VAFWIS) online tool. The Company completed this review on January 15, 2021. The results are included in Attachment 2.F.4. In an email dated March 23, 2021, USFWS indicated that an online review process should be completed for Section 7 review. The Company will coordinate with USFWS as directed and appropriate. The USFWS response is included as Attachment 2.F.5.

New and updated information is continually added to the DCR's Biotics database. Following the DCR-Natural Heritage Program SCC planning stage project review, the Company shall resubmit a project review request through the Natural Heritage Data Explorer service. This review shall occur during the final stage of engineering and upon any major modifications of the project during construction (e.g., deviations, permanent or temporary, from the original study area and/or the relocation of a tower(s) into sensitive areas) for an update on natural heritage information and coordination of potential project modifications to avoid and minimize impacts to natural heritage resources. The Company will also obtain all necessary permits prior to construction, including authorization from the VMRC, DEQ, and the Corps, and coordination with the DWR, DCR, and USFWS, as necessary, will take place through the respective permit processes to avoid and minimize impacts to listed species.

#### **G. Erosion and Sediment Control**

The DEQ approved the Company's *Standards & Specification for Erosion & Sediment Control and Stormwater Management for Construction of Linear Electric Transmission Facilities (TE VEP 8000)*. These specifications are given to the Company's contractors and require erosion and sediment control measures to be in place before construction of the line begins and specifies the requirements for rehabilitation of the right-of-way. A copy of the current DEQ approval letter dated August 13, 2019 is provided as Attachment 2.G.1. According to the approval letter, coverage was effective through August 12, 2020. The Company submitted the renewal application on August 3, 2020 and is awaiting approval.

#### **H. Archaeological, Historic, Scenic, Cultural or Architectural Resources**

A letter response was received from the Virginia Department of Historic Resources (DHR) on April 13, 2021 and is included as Attachment 2.H.1. The letter stated that a preliminary search of the DHR archives indicated a number of historic resources, including five properties that have been determined eligible or potentially eligible for listing in the Virginia Landmark Register (VLR) and National Register of Historic

Places (NRHP) within one-half mile of the project. DHR recommended that a pre-application analysis be prepared and submitted to DHR in accordance with Section I of the DHR’s *Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia*.

Dutton + Associates was retained by the Company to conduct the recommended Stage I Pre-Application Analysis for the proposed Rebuild Project. This analysis was completed in March 2021 and submitted to VDHR on April 22, 2021. The report is included as Attachment 2.H.2. As detailed by VDHR guidance, consideration was given to: one (1) National Historic Landmark (“NHL”) property located within a 1.5-mile radius of the project centerline; one (1) National Register of Historic Places (“NRHP”) listed properties, battlefields, and historic landscapes located within a 1.0-mile radius of the project centerline; four (4) NRHP-eligible sites located within a 0.5-mile radius of the project centerline; and zero (0) archaeological sites located within the project right-of-way.

### **Archaeological Resources**

There are no documented archaeological resources located within the project right-of-way.

### **Architectural Resources**

One NHL-listed architectural resources is located within 1.5-miles of the project centerline. No properties that are listed on the NRHP, or historic landscapes are located within 1-mile of the project centerline. One battlefield is located within 1-mile and is crossed by the project right-of-way. Four properties that have been determined eligible for listing on the NRHP are crossed by the project right-of-way. Distances of architectural resources to the centerline of the proposed Rebuild Project are provided in Table 3 below.

**Table 3. NRHP-listed, eligible, and battlefield resources within the vicinity of the Rebuild Project**

<b>Resource ID#</b>	<b>Resource Name</b>	<b>NRHP Status</b>	<b>Distance to Centerline (Miles)</b>
042-0030	Patrick Henry Home (Historic), Scotchtown (Historic/Current)	NHL Listing, NRHP Listing, VLR Listing	1.25
042-0123	Battle of North Anna River (Historic), North Anna Battlefield (Current Name), North Anna Battlefield (Historic)	Eligible	Crossed by right-of-way
042-0075	Cool Water (Historic/Current)	Eligible	Crossed by

<b>Resource ID#</b>	<b>Resource Name</b>	<b>NRHP Status</b>	<b>Distance to Centerline (Miles)</b>
			right-of-way
043-5347	Richmond-Ashland Trolley Line	Eligible	Crossed by right-of-way
088-5413	CSX Railroad Corridor, Richmond, Fredericksburg & Potomac Railroad	Eligible	Crossed by right-of-way
500-0001	Richmond, Fredericksburg and Potomac Railroad (Historic), Richmond, Fredericksburg and Potomac Railroad Historic District (Current Name)	Eligible	Crossed by right-of-way

**I. Chesapeake Bay Preservation Areas**

Construction, installation, operation, and maintenance of electric transmission lines are conditionally exempt from the Chesapeake Bay Preservation Act as stated in the exemption for public utilities, railroads, public roads, and facilities in 9 VAC 25-830-150. The proposed Rebuild Project is located within Chesapeake Bay Preservation Act jurisdictional counties and will meet these regulations as applicable.

**J. Wildlife Resources**

Agency databases were reviewed, and agency consultations were initiated with the USFWS, DWR, and DCR to determine if the proposed Rebuild Project has the potential to affect any threatened or endangered species. As discussed in Section 2.F, certain federal and state listed species were identified as confirmed and potentially occurring in the project area. The Company will coordinate with the USFWS, DWR, and DCR as appropriate to determine whether surveys are necessary and to minimize impacts on wildlife resources. The proposed project is a rebuild of a transmission line within existing right-of-way and minimal clearing needed to support construction activities. As such, no loss of wildlife habitat is anticipated.

**K. Recreation, Agricultural and Forest Resources**

The Rebuild Project is expected to have minimal incremental impacts on recreational, agricultural, and forest resources as no additional right-of-way is required. The general character of the Rebuild Project area is characterized as predominantly agricultural and forestal lands as well as woody wetlands and low-intensity developed land. The Virginia Scenic Rivers Act seeks to identify, designate, and protect rivers and streams that possess outstanding scenic, recreational, historic, and natural characteristics of statewide significance for future generations. The North Anna River and South Anna River are qualified for scenic river designation and are crossed by the Rebuild Project.

There is one national park, Richmond National Battlefield Park, crossed by the existing right-of-way. There are no state or local parks located within the existing right-of-way. Additionally, there are three local parks located within one mile of the right-of-way. In March 2021, the Company solicited DCR for comments on the proposed Rebuild Project. In a response dated March 22, 2021, DCR stated that any disturbance associated with the proposed project along the North Anna River edge be minimized to reduce impacts to its scenic nature. (Attachment 2.K.1).

Prime farmland, as defined by the U.S. Department of Agriculture, is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses. Land that does not meet the criteria for prime farmland can be considered “farmland of statewide importance.” The criteria for defining and delineating farmland of statewide importance are determined by the Virginia Department of Agriculture and Consumer Services. Generally, this land includes areas of soils that nearly meet the requirements for prime farmland and that economically produce high yields of crops when treated and managed according to acceptable farming methods. Other areas that are not identified as having national or statewide importance can be considered to be “farmland of local importance.” This farmland is identified by the appropriate local agencies. Farmland of local importance may include tracts of land that have been designated for agriculture by local ordinance. A total of 190.0 acres of prime farmland and 176.2 acres of farmland of statewide importance are located within the Rebuild Project right-of-way.

Hanover County has designated Agricultural and Forestal Districts within their jurisdictions under Va. Code § 3.2-205 B. According to the Hanover County General Land Use Plan and Major Thoroughfare Plan, the majority of the existing transmission line corridor is located with areas designated for agricultural land use. According to the Caroline County Land Use Map, a portion of the existing transmission line corridor is located within low density residential and planned development areas and a portion is located outside of designated primary growth areas.

Where agricultural uses are present, these activities have been occurring within the right-of-way while the existing transmission line has been in operation. The Rebuild Project may result in temporary impacts to farmland during construction but would otherwise not be expected to impact farmlands and would not alter the agricultural use.

Under the Virginia Open-Space Land Act, any public body can acquire title or rights to real property to provide means of preservation of open-space land. Such conservation easements must be held for no less than five years in duration and can be held in perpetuity. The Rebuild Project crosses one Virginia Outdoors Foundation (“VOF”) easement, HAN-VOF-2872. The table below lists all easements crossed by and within one mile of the centerline of the Rebuild Project.

**Table 4. Conservation easements crossed by and within 1.0-mile of the centerline of the Rebuild Project**

<b>Unit Name</b>	<b>Owner/Manager</b>
HAN-VOF-2872	Virginia Outdoors Foundation
HAN-VOF-2317	Virginia Outdoors Foundation
HAN-VOF-2346	Virginia Outdoors Foundation
HAN-VOF-2316	Virginia Outdoors Foundation
HAN-VOF-3816	Virginia Outdoors Foundation
Handley Easement	Henrico County

The width of the existing transmission line right-of-way varies from 150 feet to 235 feet. The proposed Rebuild Project is the rebuild of an existing transmission line, and no additional right-of-way is required. The Rebuild Project proposes to retain the existing right-of-way as currently utilized but may require additional trimming of tree limbs along the right-of-way edges and/or trimming for access roads along the corridor to support construction activities. Trees and brush located within 100 feet of streams will be cleared by hand in accordance with the Company approved Erosion and Sediment Control specifications.

Any tree along the right-of-way that is tall enough to endanger the conductors if it were to break at the stump or uproot and fall directly towards the conductors and exhibits signs or symptoms of disease or structural defect that make it an elevated risk for falling will be designated as a “danger tree” and may be removed. The Company’s arborist will contact the property owner if possible before any danger trees are cut, except in emergency situations. The Company’s Forestry Coordinator will field inspect the right-of-way and designate any danger trees present. Qualified contractors working in accordance with the Company’s Electric Transmission specifications will perform all danger tree cutting. The Virginia Rebuild Project is expected to have minimal, if any, impact on forest resources as the proposed Virginia Rebuild Project involves rebuilding a portion of an existing line which is already cleared and maintained for existing facility operation and no additional right-of-way is required.

In March 2021, the Company solicited DCR and VOF for comments on the proposed Rebuild Project. In a letter dated April 15, 2021, the VOF indicated that they hold five (5) open space easements located within 1.5 miles of the Rebuild Project and requested that project components be minimized in their presence on the landscape, or at the least, mimic the characteristics of the existing towers in height, size, and reflectivity to the greatest extent practicable. See [Attachment 2.K.2](#). While the proposed structures will be taller than the existing, the Company will use galvanized steel towers with a dulled finish and dulled conductor and shield wire to reduce glare.

## **L. Use of Pesticides and Herbicides**

Of the techniques available, selective foliar is the preferred method of herbicide application. The Company typically maintains transmission line right-of-way by means of selective, low volume applications of EPA approved, non-restricted use herbicides. The goal of this method is to exclude tall growing brush species from the right-of-way by establishing early successional plant communities of native grasses, forbs, and low growing woody vegetation. “Selective” application means the Company sprays only the undesirable plant species (as opposed to broadcast applications). “Low volume” application means the Company uses only the volume of herbicide necessary to remove the selected plant species. The mixture of herbicides used varies from one cycle to the next to avoid the development of resistance by the targeted plants. There are four means of dispersal available to the Company, including by-hand application, backpack, fixed nozzle-radiarc, and aerial. Very little right-of-way maintenance incorporates aerial equipment. The Company uses licensed contractors to perform this work that are either certified applicators or registered technicians in the Commonwealth of Virginia.

DEQ has previously requested that only herbicides approved for aquatic use by the EPA or the USFWS be used in or around any surface water. The Company intends to comply with this request.

## **M. Geology and Mineral Resources**

According to the Division of Geology and Mineral Resources Interactive Geologic Map, the Rebuild Project consists primarily of gneiss, sand and gravel, siltstone, sandstone, granite, and terrace. According to the USGS topographic maps and aerial imagery, there are no active mines or stone quarries within the limits of the Rebuild Project. A search of the Virginia Department of Mines, Minerals, and Energy online map confirms there are no active or abandoned mines within the right-of-way or within a 1.0-mile radius of the right-of-way. The Company does not anticipate that the rebuild of the existing transmission line will result in negative impacts on the geology or mineral resources in the proposed Rebuild Project area.

The Rebuild Project is located in the Piedmont physiographic province of Virginia, whose geology consists of a series of igneous and metamorphic rocks.

## **N. Transportation Infrastructure**

The entire width of the existing transmission line right-of-way varies between 150 to 235 feet in width and is currently maintained for operation of the existing transmission facilities. The transmission line corridor extends approximately 26.2 miles from the Company’s existing Elmont Substation in Hanover County to the Ladysmith Substation in Caroline County, Virginia, crossing 17 roads in Hanover County and 12 roads in Caroline County. Most of the roads within the Rebuild Project area consist of low traffic volume roads. In Hanover County there is a major road crossing of U.S. Route 54.

The Company will submit applications for land use permits and traffic control plans to the Virginia Department of Transportation (“VDOT”) for the aerial crossings of VDOT maintained roads and construction entrances from the VDOT right-of-way as needed. These permits will be obtained prior to construction.

In March 2021, the Company solicited comments from VDOT on the proposed Rebuild Project. In an email dated March 30, 2021, the VDOT Fredericksburg District requested a GIS file of the project area. See Attachment 2.N.1. The file was provided on March 31, 2021. The VDOT Richmond District had not responded at the time of filing this application.

The Company solicited comments from the Virginia Department of Aviation (“DOAv”) regarding the proposed Virginia Rebuild Project. The DOAv responded via email on April 2, 2021 which stated that a 7460 Airspace Study should be completed for portions of the project within 20,000 feet of the Hanover County Airport and for any structure which will be 200 feet or taller. See Attachment 2.N.2. The Company had previously submitted the necessary information on March 19, 2021 to initiate aeronautical studies.

Finally, the Company has reviewed the FAA’s website (<https://oeaaa.faa.gov/oeaaa/external/portal.jsp>) to identify airports within ten miles of the Virginia Rebuild Project. Based on this review, one FAA-restricted airport is located within ten miles of the Rebuild Project:

- Hanover County Municipal Airport 2.5 miles east of the Elmont Substation.

The Company will coordinate with VDOT, DOAv, and the FAA as necessary to obtain all appropriate approvals.

The existing right-of-way crosses an historic property (Cool Water) along Old Ridge Road. There is a private grass air strip on this property for small planes located in close proximity to the existing line. The FAA only regulates public airports, not grass airstrips. Therefore, the FAA does not take any jurisdiction over this private airstrip. The FAA data shows just one airplane is based at this airstrip. While not required to do so by any government agency, the Company plans to communicate with the landowner about the Rebuild Project.

## **Attachments**

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Ms. Bettina Rayfield, Manager  
Office of Environmental Impact Review  
Department of Environmental Quality, Central Office  
PO Box 1105  
Richmond, Virginia 23218

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Ms. Rayfield,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

The Company is preparing an application for Certificate of Public Convenience and Necessity ("CPCN") from the Virginia State Corporation Commission ("SCC"). Pursuant to Va. Code §15.2-2202, the Company is writing to notify you of the proposed Rebuild Project in advance of this SCC filing. We respectfully request that you submit any comments or additional information you feel would have bearing on the Project within 30 days of the date of this letter. Enclosed is a Project Location Map depicting the rebuild route and project location.

If you would like to receive a GIS shapefile of the rebuild route to assist in your project review or if you have any questions, please do not hesitate to contact Rachel Studebaker at (804) 217-1847 or [Rachel.M.Studebaker@dominionenergy.com](mailto:Rachel.M.Studebaker@dominionenergy.com). We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Sincerely,

**Dominion Energy Virginia**

A handwritten signature in black ink, appearing to read "J-P-E".

Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map



Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Ms. Robbie Rhur  
Planning & Recreation  
Department of Conservation and Recreation  
600 East Main Street, 24th Floor  
Richmond, Virginia 23219

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Ms. Rhur,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

The Company is preparing an application for Certificate of Public Convenience and Necessity ("CPCN") from the Virginia State Corporation Commission ("SCC"). Pursuant to Va. Code §15.2-2202, the Company is writing to notify you of the proposed Rebuild Project in advance of this SCC filing. We respectfully request that you submit any comments or additional information you feel would have bearing on the Project within 30 days of the date of this letter. Enclosed is a Project Location Map depicting the rebuild route and project location.

If you would like to receive a GIS shapefile of the rebuild route to assist in your project review or if you have any questions, please do not hesitate to contact Rachel Studebaker at (804) 217-1847 or [Rachel.M.Studebaker@dominionenergy.com](mailto:Rachel.M.Studebaker@dominionenergy.com). We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Sincerely,

**Dominion Energy Virginia**

A handwritten signature in black ink, appearing to read "J-P E".

Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Ms. Jaime Robb  
Piedmont Regional Office  
Department of Environmental Quality  
4949-A Cox Road  
Glen Allen, Virginia 23060

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild  
Hanover and Caroline Counties, Virginia**

Dear Ms. Robb,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Sincerely,

**Dominion Energy Virginia**

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Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Mr. Conrad Spencer, III  
Virginia Department of Mine, Minerals, and Energy  
1100 Bank Street  
Washington Building, 8th Floor  
Richmond, Virginia 23219

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Mr. Spencer,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Sincerely,

**Dominion Energy Virginia**

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Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Mr. Keith Tignor  
Endangered Plant and Insect Species Program  
Virginia Department of Agriculture and Consumer Affairs  
102 Governor Street  
Richmond, Virginia 23219

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Mr. Tignor,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Sincerely,

**Dominion Energy Virginia**

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Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Mr. Tony Watkinson  
Habitat Management Division  
Virginia Marine Resources Commission  
Building 96, 380 Fenwick Road  
Fort Monroe, Virginia 23651

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Mr. Watkinson,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Sincerely,

**Dominion Energy Virginia**

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Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Mr. Troy Andersen  
US Fish and Wildlife Service  
Ecological Services Virginia Field Office  
6669 Short Lane  
Gloucester, Virginia 23061

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Mr. Andersen,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Sincerely,

**Dominion Energy Virginia**

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Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Ms. Trisha Beasley  
Northern Regional Office  
Department of Environmental Quality  
13901 Crown Court  
Woodbridge, VA 22193

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Ms. Beasley,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Sincerely,

**Dominion Energy Virginia**

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Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Mr. Michael Dowd  
Department of Environmental Quality  
Air Division  
P.O. Box 1105  
Richmond, Virginia 23218

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Mr. Dowd,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Sincerely,

**Dominion Energy Virginia**

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Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Ms. Amy M. Ewing  
Virginia Department of Wildlife Resources  
P.O. Box 90778  
Henrico, Virginia 23228

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Ms. Ewing,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Sincerely,

**Dominion Energy Virginia**

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Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



March 19, 2021

**BY EMAIL**

Ms. Michelle Henicheck  
Office of Wetlands and Streams  
Department of Environmental Quality  
PO Box 1105  
Richmond, Virginia 23218

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574 Rebuild Hanover and Caroline Counties, Virginia**

Dear Ms. Henicheck,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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C2 Environmental completed a desktop wetland review using publicly available data to identify the potential limits of wetlands and other waters of the United States. It should be noted that the study did not include any on-site wetland delineation field investigations utilizing the 1987 Corps of Engineers Wetland Delineation Manual and methods described in the 2010 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region (Version 2.0). A probability of occurrence was assigned to each potential wetland based upon the presence or absence of additional supporting data layers including USDA-NRCS hydric soil data, NWI wetland mapping, and FEMA 100-year floodplain maps. It should be noted that streams and open water have not been assigned a probability of occurrence and have been identified based upon their consistent presence in multiple years of aeriels.

The Cowardin Classification of the wetlands within the project area have been combined into palustrine scrub-shrub (PSS) / palustrine emergent wetlands (PEM) and not separated. This is due to the fact that the study area is within a maintained ROW, and it's difficult to differentiate between

Elmont to Ladysmith  
03/19/2021  
Page 2 of 2

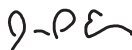
scrub-shrub and emergent wetlands even with the highest resolution aerials. Table 1 lists wetland acreages by probability as well as stream channels and open water.

Table 1. Results of Desktop Wetland Review

	<b>Low</b>	<b>Medium</b>	<b>High</b>	<b>Total</b>
PEM/PSS Wetlands	12.6 AC	36.1 AC	98.2 AC	146.9 AC
Stream Channel				2.8 AC (17,749 LF)
Open Water				0.4 AC

If you would like to receive a GIS shapefile of the rebuild route to assist in your project review or if you have any questions, please do not hesitate to contact Rachel Studebaker at (804) 217-1847 or [Rachel.M.Studebaker@dominionenergy.com](mailto:Rachel.M.Studebaker@dominionenergy.com). We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,



Jason P. Ericson  
Director, Environmental Services

Attachments:  
Project Overview Map  
Desktop Wetland Review

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Ms. S. Rene Hypes  
Virginia Department of Conservation and Recreation,  
Division of Natural Heritage  
600 East Main Street, 24th Floor  
Richmond, Virginia 23219

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Ms. S. Rene Hypes

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Sincerely,

**Dominion Energy Virginia**

A handwritten signature in black ink, appearing to read "J-P E".

Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Mr. Terry Lasher  
Forestland Conservation Division  
Virginia Department of Forestry  
900 Natural Resources Drive, Suite 800  
Charlottesville, Virginia 22903

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Mr. Lasher,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Sincerely,

**Dominion Energy Virginia**

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Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Services, Inc.  
120 Tredegar Street  
Richmond, VA 23219  
DominionEnergy.com



**March 19, 2021**

**BY EMAIL**

Mr. Todd Miller  
U.S. Army Corps of Engineers  
Norfolk District, Southern Section  
9100 Arboretum Parkway, Suite 235  
Richmond, VA 23236

**RE: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574  
Rebuild Hanover and Caroline Counties, Virginia**

Dear Mr. Miller,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Sincerely,

**Dominion Energy Virginia**

A handwritten signature in black ink, appearing to read "J-P-E".

Jason P. Ericson  
Director, Environmental Services

Attachment: Project Location Map

Dominion Energy Virginia  
10900 Nuckols Rd, 4<sup>th</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



**March 18, 2021**

**Mr. Robert Alexander  
Federal Aviation Administration, Eastern Regional Office  
159-30 Rockaway Blvd  
Jamaica, New York 11434**

**Reference: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574 Rebuild, Hanover and Caroline Counties, Virginia Notice Pursuant to Va. Code §15.2-2202 E**

Dear Mr. Alexander,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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If you would like to receive a GIS shapefile of the rebuild route to assist in your project review or if you have any questions, please do not hesitate to contact me directly at (804)201-3053 or [Greg.R.Baka@dominionenergy.com](mailto:Greg.R.Baka@dominionenergy.com). We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,

A handwritten signature in black ink that reads "Greg Baka".

Greg R. Baka  
Siting and Permitting Specialist

Attachment: Project Location Map

Dominion Energy Virginia  
10900 Nuckols Rd, 4<sup>th</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



**March 18, 2021**

**Mr. Kyle Bates, P.E.**  
**Virginia Department of Transportation, Fredericksburg District**  
**87 Deacon Road**  
**Fredericksburg, VA 22405**

**Reference: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574 Rebuild, Hanover and Caroline Counties, Virginia Notice Pursuant to Va. Code §15.2-2202 E**

Dear Mr. Bates,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

The Company is preparing an application for Certificate of Public Convenience and Necessity ("CPCN") from the Virginia State Corporation Commission ("SCC"). Pursuant to Va. Code §15.2-2202, the Company is writing to notify you of the proposed Rebuild Project in advance of this SCC filing. We respectfully request that you submit any comments or additional information you feel would have bearing on the Project within 30 days of the date of this letter. Enclosed is a Project Location Map depicting the rebuild route and project location.

If you would like to receive a GIS shapefile of the rebuild route to assist in your project review or if you have any questions, please do not hesitate to contact me directly at (804)201-3053 or [Greg.R.Baka@dominionenergy.com](mailto:Greg.R.Baka@dominionenergy.com). We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,

A handwritten signature in black ink that reads "Greg Baka".

Greg R. Baka  
Siting and Permitting Specialist

Attachment: Project Location Map

Dominion Energy Virginia  
10900 Nuckols Rd, 4<sup>th</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



**March 18, 2021**

**Mr. John A. Budesky  
Hanover County Administrator  
7516 County Complex Road  
Hanover, VA 23069**

**Reference: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574 Rebuild, Hanover and Caroline Counties, Virginia Notice Pursuant to Va. Code §15.2-2202 E**

Dear Mr. Budesky,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont – Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). Approximately 17.4 miles of the project is located directly in Hanover County. The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

The Company is preparing an application for Certificate of Public Convenience and Necessity ("CPCN") from the Virginia State Corporation Commission ("SCC"). Pursuant to Va. Code §15.2-2202, the Company is writing to notify you of the proposed Rebuild Project in advance of this SCC filing. We respectfully request that you submit any comments or additional information you feel would have bearing on the Project within 30 days of the date of this letter. Enclosed is a Project Location Map depicting the rebuild route and project location.

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Regards,

A handwritten signature in black ink that reads "Greg Baka".

Greg R. Baka  
Siting and Permitting Specialist

Attachment: Project Location Map

Dominion Energy Virginia  
10900 Nuckols Rd, 4<sup>th</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



**March 18, 2021**

**Mr. Charles M. Culley, Jr.**  
**Caroline County Administrator**  
**P.O. Box 447**  
**Bowling Green, VA ~~23009~~ 22427**

**Reference: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500kV Transmission Line Rebuild, Hanover and Caroline Counties, Virginia  
Notice Pursuant to Va. Code §15.2-2202 E**

Dear Mr. Culley,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont – Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). Approximately 8.8 miles of the project is located directly in Caroline County. The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

The Company is preparing an application for Certificate of Public Convenience and Necessity ("CPCN") from the Virginia State Corporation Commission ("SCC"). Pursuant to Va. Code §15.2-2202, the Company is writing to notify you of the proposed Rebuild Project in advance of this SCC filing. We respectfully request that you submit any comments or additional information you feel would have bearing on the Project within 30 days of the date of this letter. Enclosed is a Project Location Map depicting the rebuild route and project location.

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Regards,

A handwritten signature in black ink that reads "Greg Baka".

Greg R. Baka  
Siting and Permitting Specialist

Attachment: Project Location Map

Dominion Energy Virginia  
10900 Nuckolls Rd, 4<sup>th</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



**March 18, 2021**

**Mr. Scott Denny  
Airport Services Division  
Virginia Department of Aviation  
5702 Gulfstream Road  
Richmond, Virginia 23250**

**Reference: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574 Rebuild, Hanover and Caroline Counties, Virginia Notice Pursuant to Va. Code §15.2-2202 E**

Dear Mr. Denny,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Regards,

A handwritten signature in black ink that reads "Greg Baka".

Greg R. Baka  
Siting and Permitting Specialist

Attachment: Project Location Map

Dominion Energy Virginia  
10900 Nuckols Rd, 4<sup>th</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



**March 18, 2021**

**Mr. Roger Kirchen  
Review and Compliance Division  
Department of Historic Resources  
2801 Kensington Avenue  
Richmond, Virginia 23221**

**Reference: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574 Rebuild, Hanover and Caroline Counties, Virginia  
Notice Pursuant to Va. Code §15.2-2202 E**

Dear Mr. Kirchen,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

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Regards,

A handwritten signature in black ink that reads "Greg Baka".

Greg R. Baka  
Siting and Permitting Specialist

Attachment: Project Location Map

Dominion Energy Virginia  
10900 Nuckols Rd, 4<sup>th</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



**March 18, 2021**

**Ms. Martha Little  
Virginia Outdoors Foundation  
600 East Main Street, Suite 402  
Richmond, Virginia 23219**

**Reference: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574 Rebuild, Hanover and Caroline Counties, Virginia  
Notice Pursuant to Va. Code §15.2-2202 E**

Dear Ms. Little,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

The Company is preparing an application for Certificate of Public Convenience and Necessity ("CPCN") from the Virginia State Corporation Commission ("SCC"). Pursuant to Va. Code §15.2-2202, the Company is writing to notify you of the proposed Rebuild Project in advance of this SCC filing. We respectfully request that you submit any comments or additional information you feel would have bearing on the Project within 30 days of the date of this letter. Enclosed is a Project Location Map depicting the rebuild route and project location.

If you would like to receive a GIS shapefile of the rebuild route to assist in your project review or if you have any questions, please do not hesitate to contact me directly at (804)201-3053 or [Greg.R.Baka@dominionenergy.com](mailto:Greg.R.Baka@dominionenergy.com). We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,

A handwritten signature in black ink that reads "Greg Baka".

Greg R. Baka  
Siting and Permitting Specialist

Attachment: Project Location Map

Dominion Energy Virginia  
10900 Nuckols Rd, 4<sup>th</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



**March 18, 2021**

**Mr. Marshall Winn**  
**Virginia Department of Transportation, Richmond District**  
**2430 Pine Forest Drive**  
**Colonial Heights, VA 23834**

**Reference: Dominion Energy Virginia's Proposed Elmont - Ladysmith 500 kV Transmission Line #574 Rebuild, Hanover and Caroline Counties, Virginia Notice Pursuant to Va. Code §15.2-2202 E**

Dear Mr. Winn,

Dominion Energy Virginia (the "Company") is proposing to rebuild the existing Elmont - Ladysmith 500 kV Transmission Line #574 along a 26.2-mile corridor between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County (collectively, the "Rebuild Project"). The Rebuild Project will replace aging infrastructure that is at the end of its service life, thereby continuing to enable the Company to maintain safe and reliable electric transmission service to its customers. The Rebuild Project is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary.

The Company is preparing an application for Certificate of Public Convenience and Necessity ("CPCN") from the Virginia State Corporation Commission ("SCC"). Pursuant to Va. Code §15.2-2202, the Company is writing to notify you of the proposed Rebuild Project in advance of this SCC filing. We respectfully request that you submit any comments or additional information you feel would have bearing on the Project within 30 days of the date of this letter. Enclosed is a Project Location Map depicting the rebuild route and project location.

If you would like to receive a GIS shapefile of the rebuild route to assist in your project review or if you have any questions, please do not hesitate to contact me directly at (804)201-3053 or [Greg.R.Baka@dominionenergy.com](mailto:Greg.R.Baka@dominionenergy.com). We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,

A handwritten signature in black ink that reads "Greg Baka".

Greg R. Baka  
Siting and Permitting Specialist

Attachment: Project Location Map



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Matthew J. Strickler  
Secretary of Natural Resources

David K. Paylor  
Director

March 26, 2021

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

Rachel Studebaker  
Environmental Specialist II  
Dominion Energy Services  
120 Tredegar Street  
Richmond, VA 23219

RE: Elmont to Ladysmith 500 kV Line #574 Rebuild Project – Hanover and Caroline Counties, Virginia

Dear Ms. Studebaker:

This letter is in response to the scoping request for the above-referenced project.

As you may know, the Department of Environmental Quality, through its Office of Environmental Impact Review (DEQ-OEIR), is responsible for coordinating Virginia's review of environmental impacts for electric power generating projects and power line projects in conjunction with the licensing process of the State Corporation Commission.

### DOCUMENT SUBMISSIONS

In order to ensure an effective coordinated review of the environmental impact analysis may be sent directly to OEIR. We request that you submit one electronic to [eir@deq.virginia.gov](mailto:eir@deq.virginia.gov) (25 MB maximum) or make the documents available for download at a website, file transfer protocol (ftp) site or the VITA LFT file share system (Requires an "invitation" for access. An invitation request should be sent to [eir@deq.virginia.gov](mailto:eir@deq.virginia.gov)). The required "Wetlands Impact Consultation" can be sent directly to Michelle Henicheck at [michelle.henicheck@deq.virginia.gov](mailto:michelle.henicheck@deq.virginia.gov) or at the address above.

### ENVIRONMENTAL REVIEW UNDER VIRGINIA CODE 56-46.1

While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the environmental impact analysis document. Accordingly, Dominion should coordinate with the following state agencies and those localities and Planning District Commissions, including but not limited to:

Department of Environmental Quality:

- DEQ Regional Office
- Air Division
- Office of Wetlands and Stream Protection

- Office of Local Government Programs
  - Division of Land Protection and Revitalization
  - Office of Stormwater Management
- Department of Conservation and Recreation  
Department of Health  
Department of Agriculture and Consumer Services  
Department of Wildlife Resources  
Virginia Marine Resources Commission  
Department of Historic Resources  
Department of Mines, Minerals, and Energy  
Department of Forestry  
Department of Transportation

## DATA BASE ASSISTANCE

Below is a list of databases that may assist you in the preparation of a NEPA document:

- DEQ Online Database: Virginia Environmental Geographic Information Systems

Information on Permitted Solid Waste Management Facilities, Impaired Waters, Petroleum Releases, Registered Petroleum Facilities, Permitted Discharge (Virginia Pollution Discharge Elimination System Permits) Facilities, Resource Conservation and Recovery Act (RCRA) Sites, Water Monitoring Stations, National Wetlands Inventory:

- [www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx](http://www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx)

- DEQ Virginia Coastal Geospatial and Educational Mapping System (GEMS)

Virginia's coastal resource data and maps; coastal laws and policies; facts on coastal resource values; and direct links to collaborating agencies responsible for current data:

- <http://128.172.160.131/gems2/>

- MARCO Mid-Atlantic Ocean Data Portal

The Mid-Atlantic Ocean Data Portal is a publicly available online toolkit and resource center that consolidates available data and enables users to visualize and analyze ocean resources and human use information such as fishing grounds, recreational areas, shipping lanes, habitat areas, and energy sites, among others.

<http://portal.midatlanticocean.org/visualize/#x=-73.24&y=38.93&z=7&logo=true&controls=true&basemap=Ocean&tab=data&legends=false&layers=true>

- DHR Data Sharing System.

Survey records in the DHR inventory:

- [www.dhr.virginia.gov/archives/data\\_sharing\\_sys.htm](http://www.dhr.virginia.gov/archives/data_sharing_sys.htm)

- DCR Natural Heritage Search

Produces lists of resources that occur in specific counties, watersheds or physiographic regions:

- [www.dcr.virginia.gov/natural\\_heritage/dbsearchtool.shtml](http://www.dcr.virginia.gov/natural_heritage/dbsearchtool.shtml)

- DWR Fish and Wildlife Information Service

Information about Virginia's Wildlife resources:

- <http://vafwis.org/fwis/>

- Total Maximum Daily Loads Approved Reports

- <https://www.deq.virginia.gov/programs/water/waterqualityinformationtmdls/tmdl/tmdldevelopment/approvedtmdlreports.aspx>

- Virginia Outdoors Foundation: Identify VOF-protected land

- <http://vof.maps.arcgis.com/home/index.html>

- Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Database: Superfund Information Systems

Information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation, including sites that are on the National Priorities List (NPL) or being considered for the NPL:

- [www.epa.gov/superfund/sites/cursites/index.htm](http://www.epa.gov/superfund/sites/cursites/index.htm)

- EPA RCRAInfo Search

Information on hazardous waste facilities:

- [www.epa.gov/enviro/facts/rcrainfo/search.html](http://www.epa.gov/enviro/facts/rcrainfo/search.html)

- Total Maximum Daily Loads Approved Reports

- <https://www.deq.virginia.gov/programs/water/waterqualityinformationtmdls/tmdl/tmdldevelopment/approvedtmdlreports.aspx>

- EPA Envirofacts Database

EPA Environmental Information, including EPA-Regulated Facilities and Toxics Release Inventory Reports:

- [www.epa.gov/enviro/index.html](http://www.epa.gov/enviro/index.html)

- EPA NEPAassist Database

Facilitates the environmental review process and project planning:

- <http://nepaassisttool.epa.gov/nepaassist/entry.aspx>

If you have questions about the environmental review process, please feel free to contact me (telephone (804) 698-4204 or e-mail [bettina.rayfield@deq.virginia.gov](mailto:bettina.rayfield@deq.virginia.gov)).

I hope this information is helpful to you.

Sincerely,

A handwritten signature in black ink that reads "Bettina Rayfield". The signature is written in a cursive style with a long horizontal flourish at the end.

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



# COMMONWEALTH of VIRGINIA

*Marine Resources Commission*  
380 Fenwick Road  
Bldg 96  
Fort Monroe, VA 23651-1064

Matthew J. Strickler  
Secretary of Natural Resources

Steven G. Bowman  
Commissioner

April 19, 2021

Dominion Energy Services, Inc.  
Attn: Rachel Studebaker  
120 Tredegar Street  
Richmond, Virginia 23219

Re: Elmont to Ladysmith 500 kV Transmission Line #574  
Rebuild Project

Dear Ms. Studebaker,

This will respond to the request for comments regarding the Elmont to Ladysmith 500 kV Transmission Line #574 Rebuild project, prepared by Dominion Energy Services, Inc. Specifically, the Dominion has proposed to rebuild the existing Elmont-Ladysmith 500 kV Transmission Line #574 between the existing Elmont Substation in Hanover County and the existing Ladysmith Substation in Caroline County, Virginia.

We reviewed the project documents and found the proposed project is within the jurisdictional areas of the Virginia Marine Resources Commission (VMRC) may require a permit from this agency.

Please be advised that the VMRC pursuant to §28.2-1200 et seq of the Code of Virginia, administers permits required for submerged lands, tidal wetlands, and beaches and dunes. Any jurisdictional impacts will be reviewed by the VMRC during the Joint Permit Application process.

Please contact me at 757-902-5017 or by email at [tiffany.birge@mrc.virginia.gov](mailto:tiffany.birge@mrc.virginia.gov) if you have questions. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Tiffany L Birge".

Tiffany Birge  
Environmental Engineer

TLB  
HM



---

DESKTOP WETLAND REVIEW  
ELMONT-LADYSMITH 500 KV TRANSMISSION LINE #574  
REBUILD

Hanover and Caroline Counties, Virginia

---

Prepared For:

Dominion Energy Virginia  
c/o Rachel Studebaker  
120 Tredegar Street  
Richmond, Virginia 23219

Prepared By:

C2 Environmental, Inc.  
11846 Rock Landing Drive, Suite A  
Newport News, Virginia 23606  
Project No. 0143

March 2021

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### APPENDICES

Appendix A: Project Graphics

## 1.0 INTRODUCTION

C2 Environmental (C2 Env) has been retained by Dominion Energy Virginia (Dominion) to complete a desktop wetland review on the project known as Elmont-Ladysmith 500 kV Transmission Line #574 Rebuild. The approximate 26.2-mile, 511.7-acre project area consists of an existing transmission line right-of-way (ROW) located in Hanover and Caroline Counties, Virginia. The project area originates at the Elmont Substation in Hanover County located northeast of Greenwood Road (Route 625) and southwest of Cedar Lane (Route 623). The project area generally runs to the north terminating at the Ladysmith Substation in Caroline County located north of Route 604 (Gatewood Road), west of Jefferson Davis Highway (Route 1), and east of Countyline Church Road (Route 603).

It should be noted that this study does not include any on-site wetland delineation field investigations utilizing the *1987 Army Corps of Engineers Wetland Delineation Manual in conjunction with the 2010 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic Gulf Coastal Plain Region (version 2.0)* or the *2012 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region (Version 2.0)*. Rather, publicly available data was used to identify the potential limits of wetlands and other Waters of the U.S. (WOUS).

## 2.0 DESKTOP DATA SOURCES

Resources used to complete the desktop review include the following:

- VGIN aerial imagery dated 2017;
- VGIN infrared imagery dated 2017;
- Google Earth historic imagery ranging from 1994 to 2018;
- U.S. Geologic Survey (USGS) topographic maps;
- USGS Digital Elevation Model (DEM) 10-foot contour data;
- U.S. Department of Agriculture National Resources Conservation Service (USDA-NRCS) hydric soil survey data;
- U.S. Fish and wildlife service (USFWS) National Wetland Inventory (NWI) wetland mapping;
- Federal Emergency Management Agency (FEMA) 100-year floodplain maps.

## 3.0 METHODOLOGY AND WETLAND OCCURANCE PROBABILITY

Using the available infrared and aerial imagery along with the DEM and USGS topography, potential wetland areas were identified within the study area. The areas identified using the aerial imagery were typically darker in color, which is indicative of inundation or saturated soil conditions associated with wetlands. In many instances these dark signature areas are confined to concave landscapes as defined by the topography. However, wetland occurrence is not limited to concave landforms and can occur in flat landscapes. A probability of occurrence was assigned to each potential wetland based upon the presence or absence of additional supporting data layers including USDA-NRCS hydric soil data, NWI wetland mapping, and FEMA 100-year floodplain maps. Table 1 lists the probability criteria of wetland occurrence based upon the number of layers present in a given area. It should be

noted that streams and open water have not been assigned a probability of occurrence and have been identified based upon their consistent presence in multiple years of aerials.

**Table 1: Criteria for Probability of Wetland Occurrence**

Probability	Criteria
Low	Areas identified with only topography and aerials.
Medium	Areas identified with topography and aerials with one additional layer (NRCS hydric soil mapping, NWI wetland mapping, or FEMA 100-year floodplain maps).
High	Areas identified with topography and aerials with two or more additional layers (NRCS hydric soil mapping, NWI wetland mapping, or FEMA 100-year floodplain maps).

#### 4.0 RESULTS

The results of the desktop wetland review are provided in the Desktop Wetland Review Map (Appendix A). The Cowardin Classification of the wetlands within the project area have been combined into palustrine scrub-shrub (PSS) / palustrine emergent wetlands (PEM) and not separated. This is due to the fact that the study area is within a maintained ROW, and it's difficult to differentiate between scrub-shrub and emergent wetlands even with the highest resolution aerials. Table 2 lists wetland acreages by probability as well as stream channels and open water.

**Table 2: Results of Desktop Wetland Review**

	Low	Medium	High	Total
PEM/PSS Wetlands	12.6 AC	36.1 AC	98.2 AC	146.9 AC
Stream Channel				2.8 AC (17,749 LF)
Open Water				0.4 AC

#### 5.0 CONCLUSION

C2 Env performed a Desktop Wetland Review on the Elmont-Ladysmith 500 kV Transmission Line #574 Rebuild project to determine the potential limits of wetlands and other WOUS within the project area using publicly available off-site resources. Prior to any land disturbing activities, C2 Env recommends a detailed delineation of wetland and other WOUS followed by confirmation by U.S. Army Corps of Engineers.

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# APPENDIX A

## Project Graphics

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