 <p>Photo simulations prepared by:          GTTE, LLC          email: info@gttelc.com          703 447 1350</p>	<p><b>Project:</b> Elmont-Ladysmith</p>	<p><b>Location:</b> Ashland Trolley Line 1 North</p>	<p><b>Existing View</b></p> <p>This simulation is designed for viewing on a computer monitor. To achieve the correct scale, the image should be increased or decreased in size until the scale above measures 4". When viewed with the eye at 31" from the screen the image will have the same scale as if the viewer were standing at the camera location.</p>
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Figure 5-64: Richmond-Ashland Trolley Photo Simulation 1 – Existing view from corridor split looking north. Source: GTTE, LLC




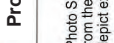
<p>Photo simulations prepared by:                  GTTE LLC                  email: info@gttelc.com                  703 447 1350</p> 	<p><b>Project: Elmont-Ladysmith</b></p> <p>Photo Simulations and diagrams represent approximate heights for electric transmission structures from the conceptual design used for the proposed project. These illustrations do not necessarily depict exact structure design or location.</p>	<p><b>Location: Ashland Trolley Line 1 North</b></p>	<p><b>Proposed View</b>                  (Location of towers not visible are overlaid with yellow tower icon)</p> <p>This simulation is designed for viewing on a computer monitor. To achieve the correct scale, the image should be increased or decreased in size until the scale above measures 4". When viewed with the eye at 31" from the screen the image will have the same scale as if the viewer were standing at the camera location.</p> 
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Figure 5-65: Richmond-Ashland Trolley Photo Simulation 1 – Proposed view from corridor split north (visible structures shown as they would appear on the landscape, structures not visible shown in yellow). Source: GTTE, LLC





<p>Photo simulations prepared by:                  GTTE, LLC                  email: info@gttelc.com                  703 447 1350</p> 	<p><b>Project: Elmont-Ladysmith</b></p> <p>Photo Simulations and diagrams represent approximate heights for electric transmission structures from the conceptual design used for the proposed project. These illustrations do not necessarily depict exact structure design or location.</p>	<p><b>Location: Ashland Trolley Line 1 South</b></p> <p>Photo Simulations and diagrams represent approximate heights for electric transmission structures from the conceptual design used for the proposed project. These illustrations do not necessarily depict exact structure design or location.</p>	<p><b>Existing View</b></p> <p>This simulation is designed for viewing on a computer monitor. To achieve the correct scale, the image should be increased or decreased in size until the scale above measures 4". When viewed with the eye at 31" from the screen the image will have the same scale as if the viewer were standing at the camera location.</p> 
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Figure 5-66: Richmond-Ashland Trolley Photo Simulation 1 – Existing view from corridor split looking south. Source: GTTE, LLC





<p>Photo simulations prepared by:                  GTTE LLC                  email: info@gttellc.com                  703 447 1350</p> 	<p><b>Project: Elmont-Ladysmith</b></p> <p>Photo Simulations and diagrams represent approximate heights for electric transmission structures from the conceptual design used for the proposed project. These illustrations do not necessarily depict exact structure design or location.</p>	<p><b>Location: Ashland Trolley Line 1 South</b></p>	<p><b>Proposed View</b>                  (Location of towers not visible are overlaid with yellow tower icon)</p> <p>This simulation is designed for viewing on a computer monitor. To achieve the correct scale, the image should be increased or decreased in size until the scale above measures 4". When viewed with the eye at 31" from the screen the image will have the same scale as if the viewer were standing at the camera location.</p> 
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Figure 5-67: Richmond-Ashland Trolley Photo Simulation 1 – Proposed view from corridor split south (visible structures shown as they would appear on the landscape, structures not visible shown in yellow). Source: GTTE, LLC

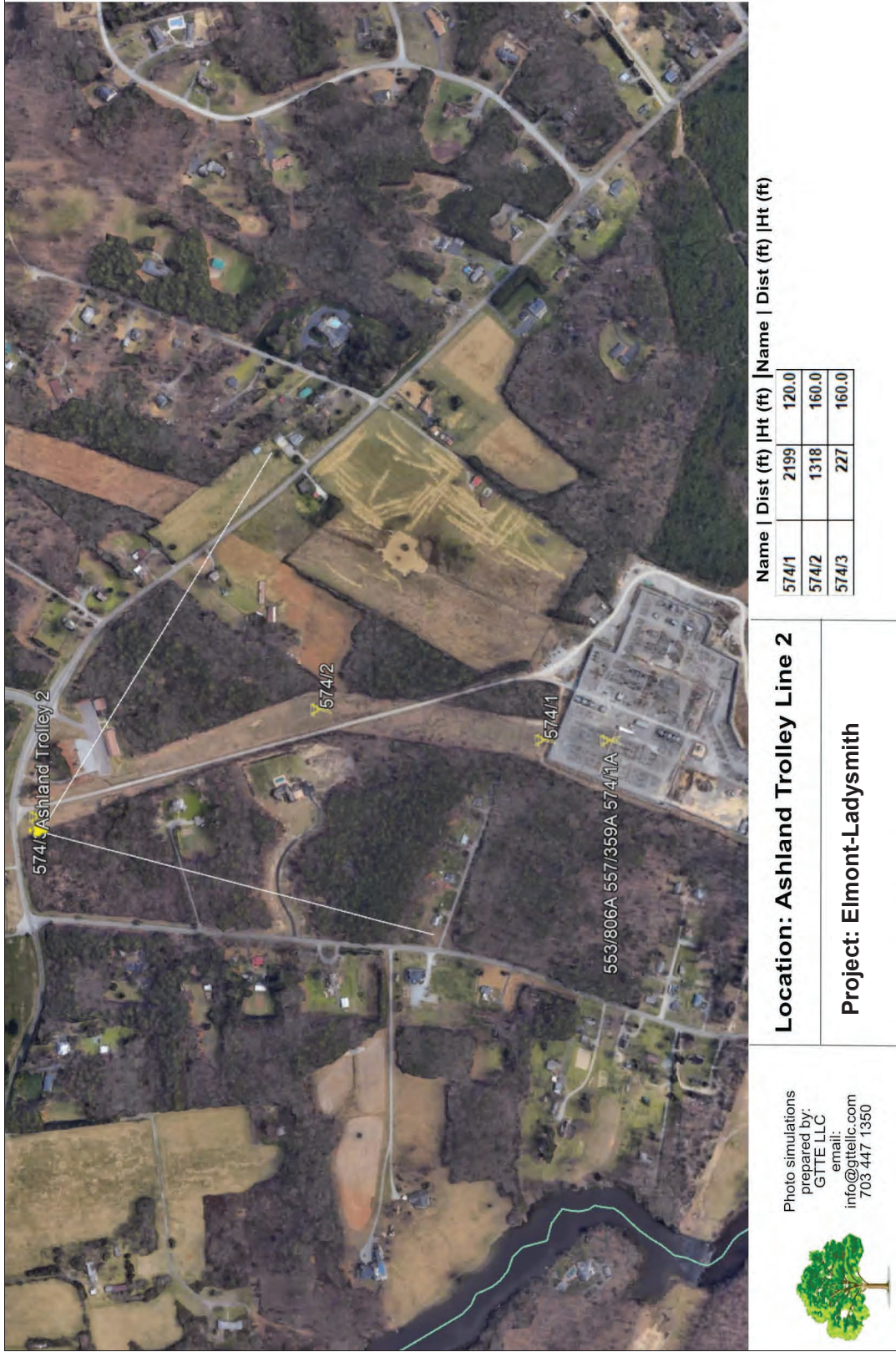


Figure 5-68: Richmond-Ashland Trolley Photo Simulation 2 – Simulation location, direction of view, and structures modeled. Source: GTTE, LLC




<p>Photo simulations prepared by:                  GTTE LLC                  email: info@gttelc.com                  703 447 1350</p> 	<p><b>Project:</b> Elmont-Ladysmith</p>	<p><b>Location:</b> Ashland Trolley Line 2</p>	<p><b>Existing View</b></p>
<p>This simulation is designed for viewing on a computer monitor. To achieve the correct scale, the image should be increased or decreased in size until the scale above measures 4". When viewed with the eye at 31" from the screen the image will have the same scale as if the viewer were standing at the camera location.</p>			

Figure 5-69: Richmond-Ashland Trolley Photo Simulation 2 – Existing view from Cedar Lane. Source: GTTE, LLC




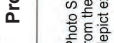
<p>Photo simulations prepared by:                  GTTE LLC                  email: info@gttellc.com                  703 447 1350</p> 	<p><b>Project: Elmont-Ladysmith</b></p> <p>Photo Simulations and diagrams represent approximate heights for electric transmission structures from the conceptual design used for the proposed project. These illustrations do not necessarily depict exact structure design or location.</p>	<p><b>Location: Ashland Trolley Line 2</b></p> <p>(Location of towers not visible are overlaid with yellow tower icon)</p>	<p><b>Proposed View</b></p> <p>This simulation is designed for viewing on a computer monitor. To achieve the correct scale, the image should be increased or decreased in size until the scale above measures 4". When viewed with the eye at 31" from the screen the image will have the same scale as if the viewer were standing at the camera location.</p> 
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Figure 5-70: Richmond-Ashland Trolley Photo Simulation 2 – Proposed view from Cedar Lane (visible structures shown as they would appear on the landscape, structures not visible shown in yellow). Source: GTTE, LLC

***Richmond, Fredericksburg & Potomac Railroad/ (VDHR ID# 088-5413)***  
***RF&P Railroad Historic District (VDHR ID# 500-0001)***

The RF&P Railroad Historic District (500-0001) is an historic rail corridor that stretches from the Potomac River to Main Street Station in the City of Richmond. From 1837 to 1943, the railroad played a critical role in the development and evolution of the region and was a prominent local railroad within the mid-Atlantic region. Previously, the RF&P Railroad was documented into two segments: a segment in Prince William and Stafford Counties (076-0301) and a segment in Spotsylvania, Caroline, Hanover, and Henrico Counties (088-5413). These were previously determined to be potentially eligible for the NRHP under Criterion A for their association with Transportation in Virginia (2016 and 2012, respectively). Since that time, the rail line from the Potomac River to Broad Street Station has been surveyed, encompassing these two segments into one rail corridor. The trains under CSXT, Amtrak, and VRE continue to run along the former RF&P rail line. Given the long and significant history of this line and the important economic role it has played in the development of cities along its path, both separate portions of the RF&P corridor, including the Hanover and Henrico County length (088-5413), and the overall RF&P Railroad Historic District, from Washington, D.C., to Richmond, Virginia (500-0001) has been determined eligible for listing in the NRHP under Criterion A for Transportation.

In order to assess the potential impact of the proposed project, visual inspection was conducted of the setting around the resource property with emphasis on views towards the project area to document existing setting, sitelines, and viewshed. This assessment found that RF&P Railroad corridor is directly crossed by the project alignment at one location, roughly 1.5 mile north of the Elmont substation. Both the railroad and the project area corridors cross through a developed suburban area in this vicinity, and are lined by residential neighborhoods with a scattering of more rural residential development spread throughout. The landscape is gently rolling with a patchwork of cleared property and undeveloped woodland. Both corridors are crossed by a number of public roads in the area, however, the project alignment crosses the railroad corridor within an otherwise undeveloped setting with no public access nearby. As such, inspection was conducted from public road crossings of the RF&P corridor, as well as select other publicly-accessible vantage points in the vicinity.

Inspection from public crossings of the RF&P Railroad corridor revealed the existing transmission line is generally screened by vegetation and development bordering the corridor. Select views towards the project area up and down the railroad corridor or down public road corridors allow limited visibility of the existing line as it is suspended overhead, however, the existing structures are screened and not visible. Other locations do not allow visibility of the project area, even as it crosses the open rail corridor, due to intervening distance.

The existing transmission line structures in the vicinity of the railroad corridor currently range from 82- to 117-feet tall and the proposed replacement structures will range from 120- to 160-feet tall respectively. As such, there will be an increase in structure height, however structures will be replaced on a one-to-one basis in generally the same location. Despite the increase in height, it is anticipated that the vegetation and development lining the narrow vistas towards the project area from the railroad corridor or down public road corridors will continue to screen all

transmission structures. The location where the project area crosses a public road and structures are visible, the railroad corridor is not visible due to vegetation and topography. As such, there are no public vantage points that allow views of both the railroad corridor and any transmission structures. The only location where such views would be expected is where the project directly crosses the railroad corridor which is not publicly accessible. This was confirmed with photo simulation that shows all structures will continue to be screened behind and beneath vegetation bordering the railroad and project area corridors from public vantage points. As such, the project is not anticipated to introduce any palpable change of viewshed from the railroad, and it is therefore D+A's opinion that the project will have no more than a *minimal impact* on the RF&P Railroad Corridor and Historic District.

Figure 5-71 depicts the location of RF&P Railroad in relation to the project alignment and viewshed buffers with the location and direction of all representative photographs and photo simulations. Figures 5-72 through 5-78 are representative photographs of the property, as well as those taken from locations within the property towards the project alignment. Figures 5-79 through 5-84 provide photo simulation, including maps with the location, direction, and structures included in each photo simulation from the property, the existing view from each simulation location, and simulated views of the proposed structures.

RESULTS OF FIELD RECONNAISSANCE

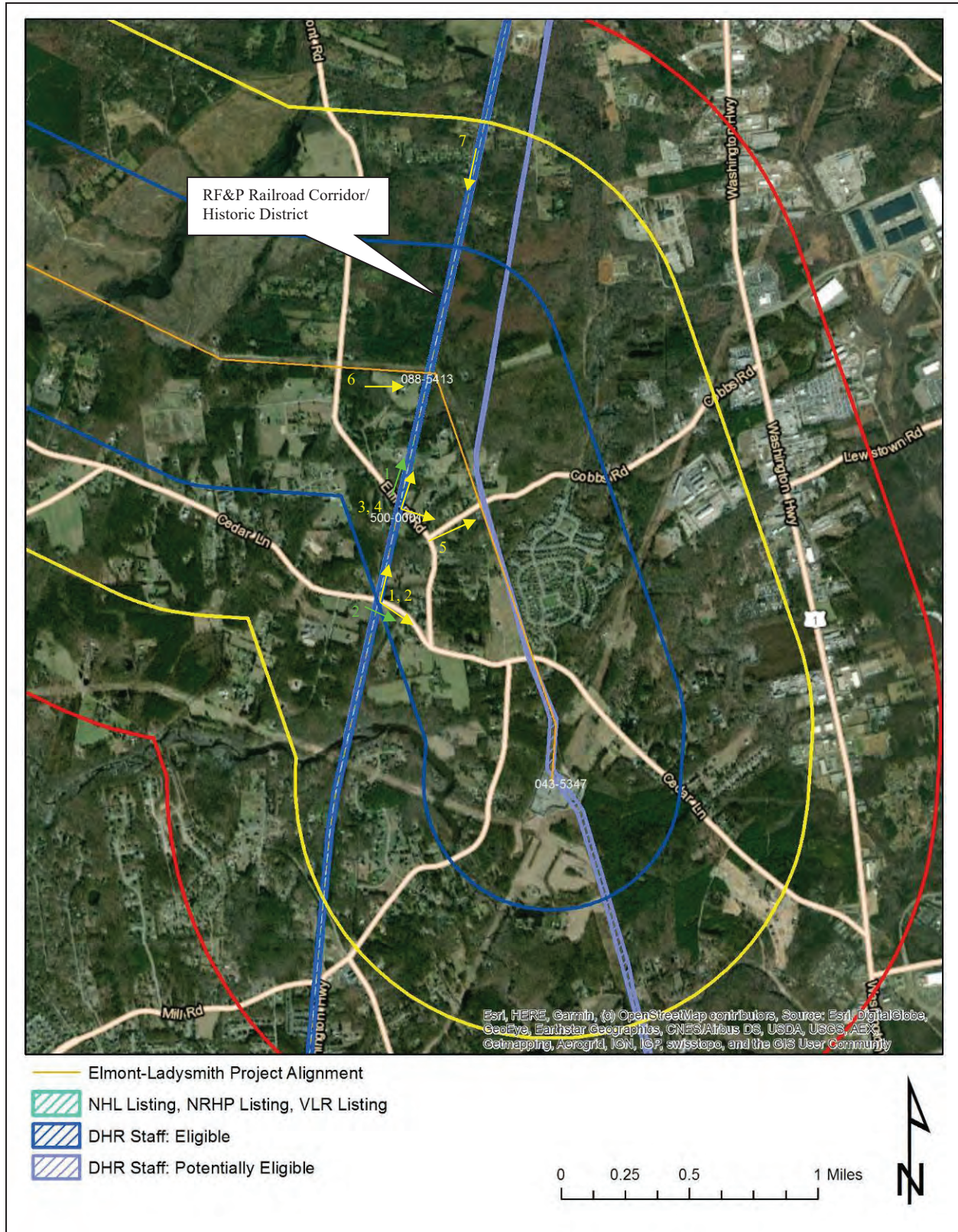


Figure 5-71: RF&P Railroad Corridor and Historic District in relation to the project area and tiered buffers with location and direction of representative photography (shown in yellow) and photo simulations (shown in green).



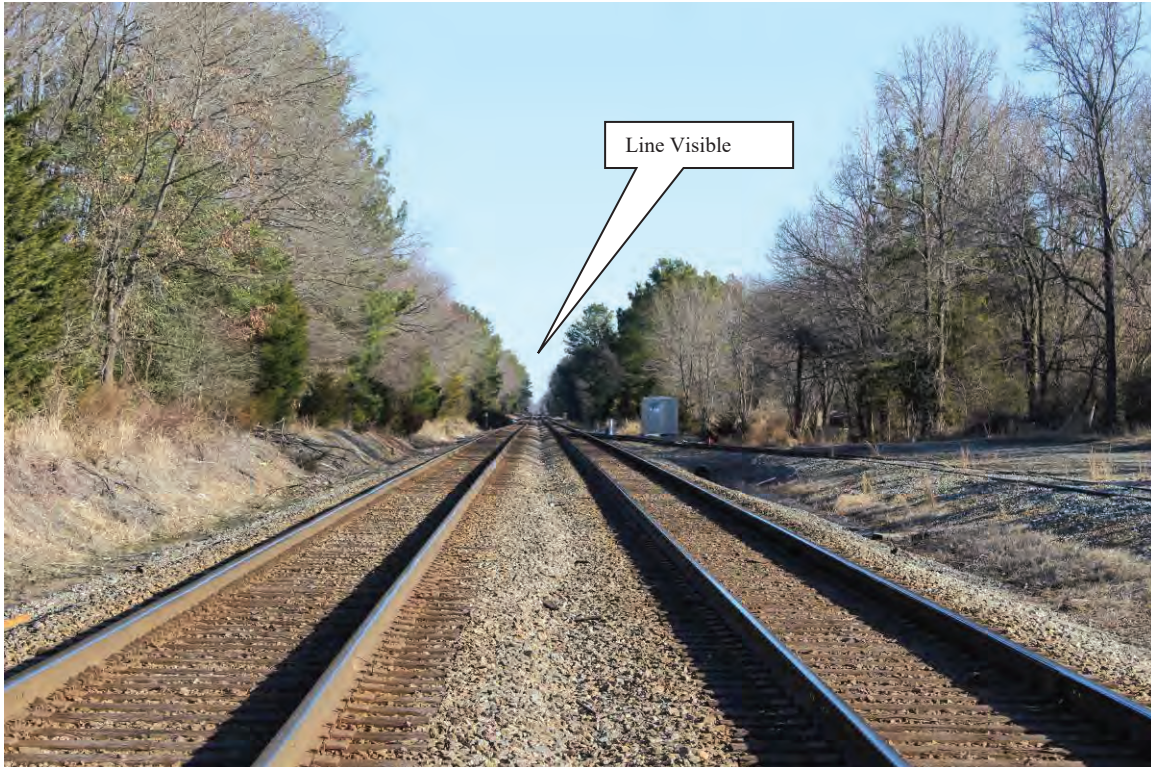
**Figure 5-72: Photo location 1- View from RF&P railroad corridor at Cedar Lane towards the project area (not visible), facing southeast.**



**Figure 5-73: Photo location 2- View up RF&P railroad corridor at Cedar Lane towards the project area (not visible), facing north.**



**Figure 5-74: Photo location 3- View from RF&P railroad corridor at Elmont Road towards the project area (not visible), facing southeast.**



**Figure 5-75: Photo location 4- View up RF&P railroad corridor at Elmont Road towards the project area (line is visible suspended over corridor, no structures visible), facing north.**



**Figure 5-76: Photo location 5- View from Elmont Road near RF&P Railroad towards the project area (line is visible as it is suspended over road, no structures visible), facing east.**



**Figure 5-77: Photo location 6- View from project area at crossing of Elmont Road towards the RF&P Railroad (not visible), facing east**



**Figure 5-78: Photo location 7- View down RF&P railroad corridor at Gwathmey Church Road towards the project area (not visible), facing south.**

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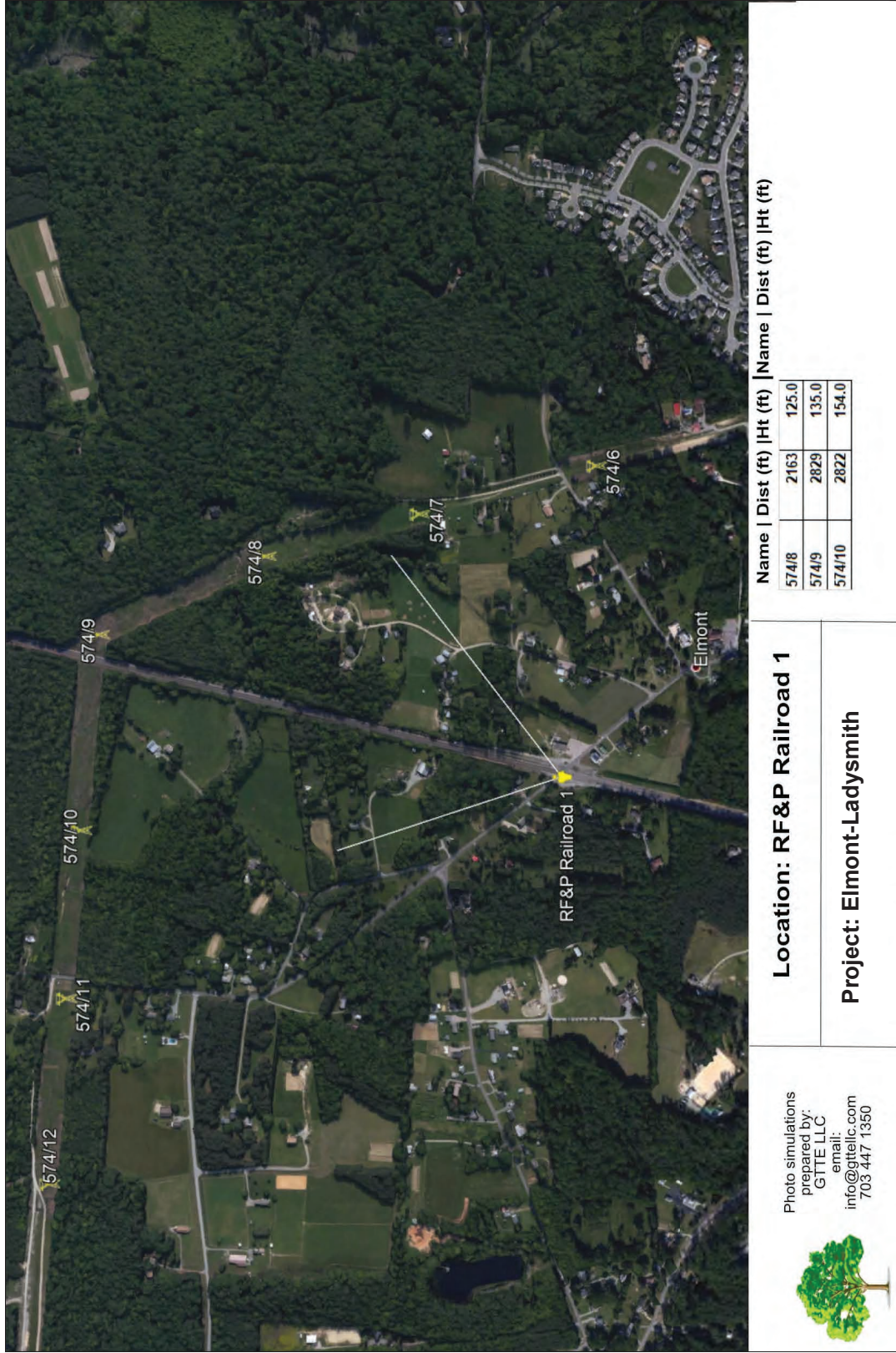


Photo simulations prepared by:  
 GTTE LLC  
 email: info@gtteilc.com  
 703.447.1350



**Location: RF&P Railroad 1**

**Project: Elmont-Ladysmith**

Figure 5-79: RF&P Railroad Photo Simulation 1 – Simulation location, direction of view, and structures modeled. Source: GTTE, LLC




<p>Photo simulations prepared by:                  GTTE, LLC                  email: info@gttelc.com                  703 447 1350</p> 	<p><b>Project:</b> Elmont-Ladysmith</p>	<p><b>Location:</b> RF &amp; P Railroad 1</p>	<p><b>Existing View</b></p> <p>This simulation is designed for viewing on a computer monitor. To achieve the correct scale, the image should be increased or decreased in size until the scale above measures 4". When viewed with the eye at 31" from the screen the image will have the same scale as if the viewer were standing at the camera location.</p>
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Figure 5-80: RF & P Railroad Photo Simulation 1 – Existing view from Elmont Road. Source: GTTE, LLC




<p>Photo simulations prepared by:                  GTTE LLC                  email: info@gttellc.com                  703 447 1350</p> 	<p><b>Project: Elmont-Ladysmith</b></p>	<p><b>Location: RF&amp;P Railroad 1</b></p>	<p><b>Proposed View</b>                  (Location of towers not visible are overlaid with yellow tower icon)</p> <p>This simulation is designed for viewing on a computer monitor. To achieve the correct scale, the image should be increased or decreased in size until the scale above measures 4". When viewed with the eye at 31" from the screen the image will have the same scale as if the viewer were standing at the camera location.</p>
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Figure 5-81: RF&P Railroad Photo Simulation 1 – Proposed view from Elmont Road (visible structures shown as they would appear on the landscape, structures not visible shown in yellow). Source: GTTE, LLC

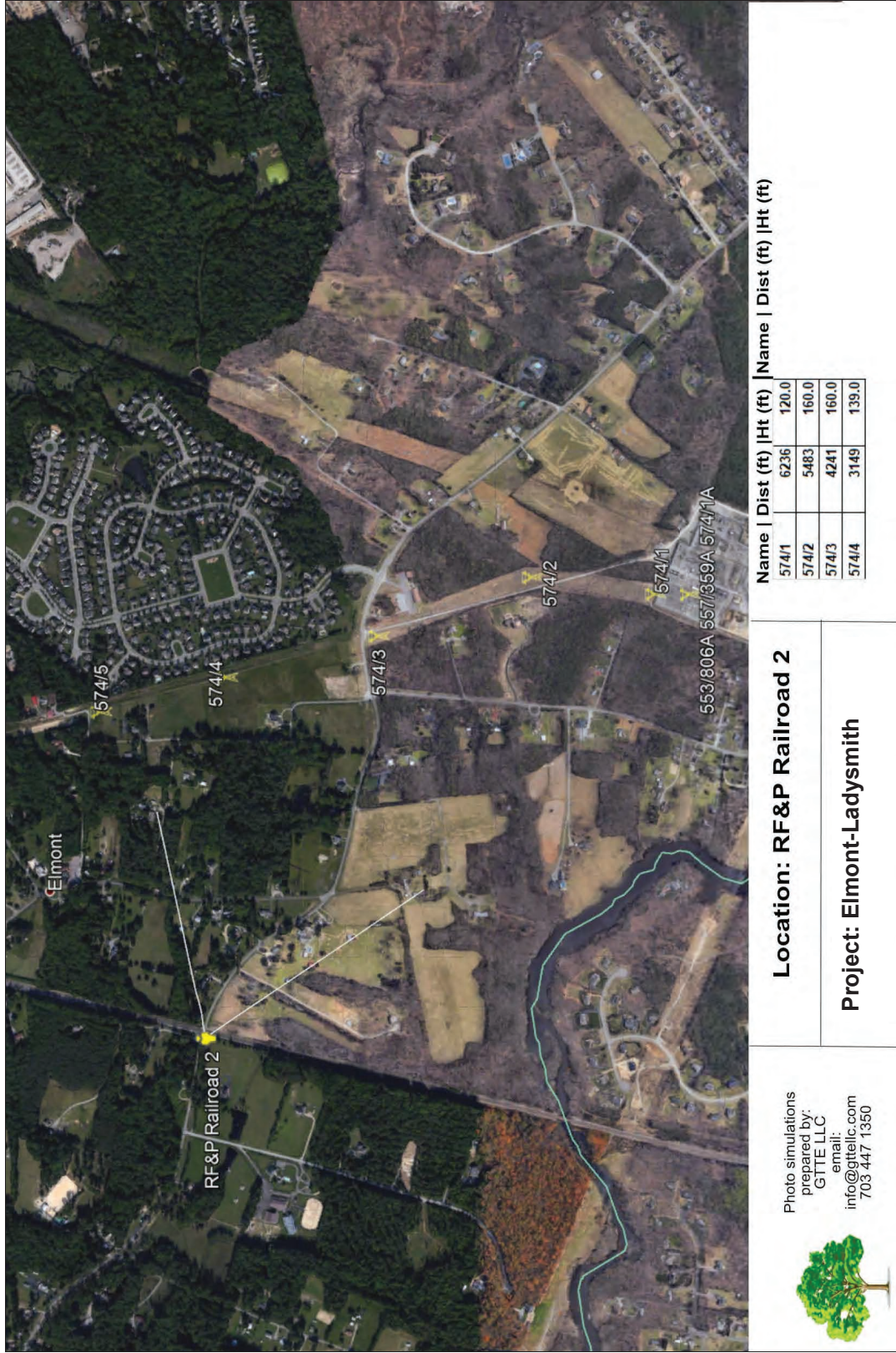


Photo simulations prepared by:  
 GTTE LLC  
 email: info@gttelc.com  
 703 447 1350



**Location: RF&P Railroad 2**

**Project: Elmont-Ladysmith**

Figure 5-82: RF&P Railroad Photo Simulation 2 – Simulation location, direction of view, and structures modeled. Source: GTTE, LLC




 <p>Photo simulations prepared by:                  GTTE LLC                  email: info@gttelc.com                  703 447 1350</p>	<p><b>Project:</b> Elmont-Ladysmith</p>	<p><b>Location:</b> RF &amp; P Railroad 2</p>	<p><b>Existing View</b></p>
<p>Photo Simulations and diagrams represent approximate heights for electric transmission structures from the conceptual design used for the proposed project. These illustrations do not necessarily depict exact structure design or location.</p>			<p>This simulation is designed for viewing on a computer monitor. To achieve the correct scale, the image should be increased or decreased in size until the scale above measures 4". When viewed with the eye at 31" from the screen the image will have the same scale as if the viewer were standing at the camera location.</p>

Figure 5-83: RF & P Railroad Photo Simulation 2 – Existing view from Cedar Lane. Source: GTTE, LLC





 <p>Photo simulations prepared by:          GTTE LLC          email: info@gttelc.com          703 447 1350</p>	<p><b>Project: Elmont-Ladysmith</b></p> <p>Photo Simulations and diagrams represent approximate heights for electric transmission structures from the conceptual design used for the proposed project. These illustrations do not necessarily depict exact structure design or location.</p>	<p><b>Location: RF &amp; P Railroad 2</b></p>	<p><b>Proposed View</b>                  (Location of towers not visible are overlaid with yellow tower icon)</p> <p>This simulation is designed for viewing on a computer monitor. To achieve the correct scale, the image should be increased or decreased in size until the scale above measures 4". When viewed with the eye at 31" from the screen the image will have the same scale as if the viewer were standing at the camera location.</p> 
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Figure 5-84: RF&P Railroad Photo Simulation 2 – Proposed view from Cedar Lane (visible structures shown as they would appear on the landscape, structures not visible shown in yellow). Source: GTTE, LLC

## 6. SUMMARY OF POTENTIAL IMPACTS

As part of this pre-application analysis of cultural resources for the proposed Elmont-Ladysmith Line #574 500kV Rebuild and Related Projects, potential impacts to previously recorded historic properties designated a NHL, NRHP-listed, or considered eligible for listing in the NRHP within the VDHR-defined buffered tiers were assessed in accordance with the VDHR guidelines. For the purposes of this analysis, an impact is one that alters, either directly or indirectly, those qualities or characteristics that qualify a particular property for listing in the NRHP and does so in a manner that diminishes the integrity of a property's materials, workmanship, design, location, setting, feeling, and/or association. With respect to transmission lines, direct impacts typically are associated with ground disturbance resulting from ROW clearing and structure construction. Indirect impacts typically are associated with the introduction of new visual elements or changes to the physical features of a property's setting or viewshed. According to VDHR guidance, project impacts are characterized as such:

- **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.
- **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.

With regards to architectural resources, six historic properties that are either designated and NHL, listed in, or determined eligible for listing in the NRHP is located within defined study tiers. This includes one (1) NHL located within 1.5 mile of the proposed project (Scotchtown/ VDHR# 042-0030), one (1) battlefield directly crossed by the project (North Anna Battlefield/ VDHR# 042-0123), and four (4) properties that have been determined eligible for listing in the NRHP that are also crossed or immediately adjacent to the project (Cool Water/ VDHR# 042-0075; Richmond-Ashland Trolley Line/ VDHR# 043-5347; CSX Railroad/Richmond-Fredericksburg-Potomac Railroad Corridor/ VDHR# 088-5143; and the RF&P Railroad Historic District VDHR# 500-0001.

Field inspection, representative photographs, and photo simulation reveal that the project extends through a mostly wooded landscape for much of its length, and therefore will be partly to completely screened from many vantage points within and near the historic properties. The exception is from Cool Water, where the existing line and structures are only visible from discrete vantage points within the property, but the project will introduce increased visibility of the structures already visible, and additional visibility of structures that are currently not visible. *It is therefore D+A's opinion that the proposed Elmont-Ladysmith Line# 574 500kV Rebuild and Related Projects may have as much as a moderate impact on*

SUMMARY OF POTENTIAL IMPACTS

**Cool Water.** Assessment shows there will be less visibility from the other historic resources, and generally limited to increased visibility of structures that are already visible with no additional visibility of more structures. Where structures can be seen, visibility will be limited to one or two structures, with no wide or uninterrupted views of multiple structures. ***It is therefore D+A's opinion that the proposed Elmont-Ladysmith Line# 574 500kV Rebuild and Related Projects will have no more than a minimal impact on Scotchtown, North Anna Battlefield, Richmond-Ashland Trolley Line, or the RF&P Railroad Corridor and Historic District.***

**Table 6-1: Potential impacts summary for architectural resources.**

VDHR #	Resource Name, Address	NRHP-Status	Distance from Project	Recommended Impact
042-0030	Patrick Henry Home (Scotchtown), 16120 Chiswell Lane	NHL	1.25 Mile	No Impact
042-0075	Cool Water, Ridge Road	NRHP-Eligible	Crossed by ROW	Moderate
042-0123	North Anna Battlefield	NRHP-Eligible	Within 1 Mile and Crossed by ROW	Minimal
043-5347	Richmond-Ashland Trolley Line	NRHP-Eligible	Crossed by ROW	Minimal
088-5413	CSX Railroad Corridor, Richmond, Fredericksburg & Potomac Railroad	NRHP-Eligible	Crossed by ROW	Minimal
500-0001	Richmond, Fredericksburg and Potomac Railroad, Richmond, Fredericksburg and Potomac Railroad Historic District	NRHP-Eligible	Crossed by ROW	Minimal

With regards to archaeology, there are no previously recorded sites within or immediately adjacent (within 100-feet of the centerline) to the project area. ***It is therefore D+A's opinion that the proposed Elmont-Ladysmith Line# 574 500kV Rebuild and Related Projects will have no impact on any previously identified archaeological sites.***

SUMMARY OF POTENTIAL IMPACTS

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## 7. REFERENCES

National Park Service

2009 “Civil War Sites Advisory Commission Report Update and Resurvey,” American Battlefield Protection Program

Virginia Department of Historic Resources

2008 *Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia*

Virginia Department of Historic Resources

2021 Virginia Cultural Resource Information System (VCRIS) database and GIS server.

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Matthew J. Strickler  
Secretary of Natural Resources

Clyde E. Cristman  
Director



**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF CONSERVATION AND RECREATION**

Rochelle Altholz  
Deputy Director of  
Administration and Finance

Russell W. Baxter  
Deputy Director of  
Dam Safety & Floodplain  
Management and Soil & Water  
Conservation

Nathan Burrell  
Deputy Director of  
Government and Community Relations

Thomas L. Smith  
Deputy Director of  
Operations

**MEMORANDUM**

DATE: March 22, 2021  
TO: Rachael Studebaker  
FROM: Roberta Rhur, Environmental Impact Review Coordinator  
SUBJECT: DCR 21-008, TRANSMISSION REBUILD Elmont to Ladysmith

Division of Planning and Recreation Resources

The Department of Conservation and Recreation (DCR), Division of Planning and Recreational Resources (PRR), develops the *Virginia Outdoors Plan* and coordinates a broad range of recreational and environmental programs throughout Virginia. These include the Virginia Scenic Rivers program; Trails, Greenways, and Blueways; Virginia State Park Master Planning and State Park Design and Construction.

This project crosses the North Anna River, this river qualifies for scenic designation. For this reason, we request that any disturbance along the river edge be minimized to reduce impacts to its scenic nature.

Floodplain Management Program:

The National Flood Insurance Program (NFIP) is administered by the Federal Emergency Management Agency (FEMA), and communities who elect to participate in this voluntary program manage and enforce the program on the local level through that community's local floodplain ordinance. Each local floodplain ordinance must comply with the minimum standards of the NFIP, outlined in 44 CFR 60.3; however, local communities may adopt more restrictive requirements in their local floodplain ordinance, such as regulating the 0.2% annual chance flood zone (Shaded X Zone).

All development within a Special Flood Hazard Area (SFHA), as shown on the locality's Flood Insurance Rate Map (FIRM), must be permitted and comply with the requirements of the local floodplain ordinance.

State Agency Projects Only

[Executive Order 45](#), signed by Governor Northam and effective on November 15, 2019, establishes mandatory standards for development of state-owned properties in Flood-Prone Areas, which include Special Flood Hazard Areas, Shaded X Zones, and the Sea Level Rise Inundation Area. These standards shall apply to all state agencies.

1. Development in Special Flood Hazard Areas and Shaded X Zones
  - A. All development, including buildings, on state-owned property shall comply with the locally-adopted floodplain management ordinance of the community in which the state-owned property is located and any flood-related standards identified in the Virginia Uniform Statewide Building Code.

- B. If any state-owned property is located in a community that does not participate in the NFIP, all development, including buildings, on such state-owned property shall comply with the NFIP requirements as defined in 44 CFR §§ 60.3, 60.4, and 60.5 and any flood-related standards identified in the Virginia Uniform Statewide Building Code.
- (1) These projects shall be submitted to the Department of General Services (DGS), for review and approval.
  - (2) DGS shall not approve any project until the State NFIP Coordinator has reviewed and approved the application for NFIP compliance.
  - (3) DGS shall provide a written determination on project requests to the applicant and the State NFIP Coordinator. The State NFIP Coordinator shall maintain all documentation associated with the project in perpetuity.
- C. No new state-owned buildings, or buildings constructed on state-owned property, shall be constructed, reconstructed, purchased, or acquired by the Commonwealth within a Special Flood Hazard Area or Shaded X Zone in any community unless a variance is granted by the Director of DGS, as outlined in this Order.

The following definitions are from Executive Order 45:

*Development for NFIP purposes is defined in 44 CFR § 59.1 as “Any man-made change to improved or unimproved real estate, including but not limited to buildings or other structures, mining, dredging, filling, grading, paving, excavation or drilling operations or storage of equipment or materials.”*

*The Special Flood Hazard Area may also be referred to as the 1% annual chance floodplain or the 100-year floodplain, as identified on the effective Flood Insurance Rate Map and Flood Insurance Study. This includes the following flood zones: A, AO, AH, AE, A99, AR, AR/AE, AR/AO, AR/AH, AR/A, VO, VE, or V.*

*The Shaded X Zone may also be referred to as the 0.2% annual chance floodplain or the 500- year floodplain, as identified on the effective Flood Insurance Rate Map and Flood Insurance Study.*

*The Sea Level Rise Inundation Area referenced in this Order shall be mapped based on the National Oceanic and Atmospheric Administration Intermediate-High scenario curve for 2100, last updated in 2017, and is intended to denote the maximum inland boundary of anticipated sea level rise.*

*“State agency” shall mean all entities in the executive branch, including agencies, offices, authorities, commissions, departments, and all institutions of higher education.*

*“Reconstructed” means a building that has been substantially damaged or substantially improved, as defined by the NFIP and the Virginia Uniform Statewide Building Code.*

#### Federal Agency Projects Only

Projects conducted by federal agencies within the SFHA must comply with federal Executive Order 11988: Floodplain Management.

DCR’s Floodplain Management Program does not have regulatory authority for projects in the SFHA. The applicant/developer must reach out to the local floodplain administrator for an official floodplain determination and comply with the community’s local floodplain ordinance, including receiving a local permit. Failure to comply with the local floodplain ordinance could result in enforcement action from the locality. For state projects, DCR recommends that compliance documentation be provided prior to the project being funded. For federal projects, the applicant/developer is encouraged reach out to the local floodplain administrator and comply with the community’s local floodplain ordinance.

To find flood zone information, use the Virginia Flood Risk Information System (VFRIS):  
[www.dcr.virginia.gov/vfris](http://www.dcr.virginia.gov/vfris)

To find community NFIP participation and local floodplain administrator contact information, use DCR's Local Floodplain Management Directory: [www.dcr.virginia.gov/dam-safety-and-floodplains/floodplain-directory](http://www.dcr.virginia.gov/dam-safety-and-floodplains/floodplain-directory)

#### Division of Soil & Water Conservation

The Department of Conservation and Recreation (DCR) Division of Soil and Water Conservation coordinates and directs programs and services to prevent degradation of the commonwealth's water quality caused by nonpoint source pollution. Statewide nonpoint source pollution control programs and services support both individual natural resource stewardship and assist local governments with resource management. These programs include nutrient management, agricultural best management practices, resource management planning, shoreline erosion advice, and assistance for Virginia's water conservation districts.

#### Office of Land Conservation

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



April 15, 2021

**VIA Email**

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

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

Dear Mr. Baka:

The Virginia Outdoors Foundation (VOF) thanks you for the advance notice of the above referenced project and the opportunity to provide direct comments regarding upgrades to this electric transmission corridor running through Hanover County and Caroline County, Virginia.

Based on the correspondence VOF received, dated March 18, 2021, Dominion is proposing to rebuild the existing 26.2-mile Elmont – Ladysmith 500 kV Transmission Line (#574), due to aging infrastructure, between the Elmont (Hanover Co.) and Ladysmith (Caroline Co.) substations. This letter further confirmed that the Dominion “Rebuild Project” is entirely within existing transmission line right-of-way or on Company-owned property and no additional right-of-way is necessary. In response to your letter of notice and request, VOF submits the following comments in response to the Rebuild Project.

VOF, 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 and holds more than 4,000 open-space easements across the Commonwealth, which protect over 860,000 acres.

An open-space 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 the conservation of natural and cultural resources.

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[virginiaoutdoorsfoundation.org](http://virginiaoutdoorsfoundation.org)

Main Street Centre, 600 E. Main St., Suite 402, Richmond, VA 23219-2416

The Rebuild Project is directly adjacent to (and crosses a small portion) of an existing open-space easement held by VOF since 2004, known as “Cool Water” (HAN-02872). This easement, located in northwestern Hanover County, is approximately 106.65 acres and lies along a portion of Cool Water Branch, a tributary to the Newfound River, ultimately draining to the Pamunkey River within the Chesapeake Bay watershed. Dominion’s transmission line currently runs along the property’s western boundary which is located along the Branch. In addition to enhancing and protecting the water quality of Cool Water Branch, the other primary conservation values of this easement property include serving as a scenic view for the traveling public along Old Ridge Road, a designated US Bicentennial Bicycle Route (and considered an important historical route in the Civil War by Hanover County); protection of important agricultural soils, wetlands, and hardwood forest; preservation of a historic dwelling known as “Cool Water” which was constructed in 1735; and preservation of the rural landscape and protection from nearby development encroachment.

In total, VOF holds open-space easements on five properties within 1.5 miles of the transmission line Rebuild Project. These easements, directly and indirectly, protect numerous conservation values for the benefit of the public and contribute to the overall high quality of life in the Commonwealth. As such, VOF is concerned about the potential characteristics of the proposed replacement structures and associated project components.

While recognizing engineering constraints, we strongly advocate for the replacement structures and the associated project components to 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 possible.

Thank you for the notice, and we look forward to working with you and Dominion Energy Virginia in the continued planning and development of this project. If you have any further questions or comments, please feel free to contact me at (804) 577-3337 or [mlittle@vofonline.org](mailto:mlittle@vofonline.org).

Sincerely,



Martha Little  
*Deputy Director*

CC: Brett Glymph, VOF Executive Director

**From:** [Greg.R.Baka@dominionenergy.com](mailto:Greg.R.Baka@dominionenergy.com)  
**To:** [Jennifer Johnson](#)  
**Cc:** [Christine Conrad](#)  
**Subject:** FW: RE: Elmont - Ladysmith 500Kv Trans. Line #574 Rebuild: Request of GIS file  
**Date:** Tuesday, March 30, 2021 12:53:12 PM  
**Attachments:** [image.png](#)

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**From:** Lupo, Shane <shane.lupo@vdot.virginia.gov>  
**Sent:** Tuesday, March 30, 2021 12:43 PM  
**To:** Greg R Baka (DEV Trans Distribution - 1) <Greg.R.Baka@dominionenergy.com>  
**Cc:** Kyle Bates <kyle.bates@vdot.virginia.gov>  
**Subject:** [EXTERNAL] RE: Elmont - Ladysmith 500Kv Trans. Line #574 Rebuild: Request of GIS file

\*\*\*This is an EXTERNAL email that was NOT sent from Dominion Energy. Are you expecting this message? Are you expecting a link or attachment? DO NOT click links or open attachments until you verify them\*\*\*

Greg,

I was forward over the letter you had sent to Kyle Bates at the Fredericksburg Residency about the Elmont - Ladysmith rebuild project. I do know we have a few bridge locations within Caroline county that the transmission line crosses and we are currently looking at replacing a bunch of bridges in Caroline Co. I am not sure if any of the bridges we have on our radar in the next few years would be along your corridor, but if you wouldn't mind sending me a GIS file for our records that would be greatly appreciated.

Thank you,



**Shane Lupo**  
*Utility Relocation Coordinator /  
Right of Way & Utility Division*  
Virginia Department of Transportation  
540-899-4613 (o) / 703-975-2403 (c)  
[shane.lupo@VDOT.Virginia.gov](mailto:shane.lupo@VDOT.Virginia.gov)

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## Rachel M Studebaker (Services - 6)

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**From:** Greg R Baka (DEV Trans Distribution - 1)  
**Sent:** Friday, April 2, 2021 4:12 PM  
**To:** Christine Conrad; Rachel M Studebaker (Services - 6)  
**Subject:** FW: [EXTERNAL] Line # 574 Rebuild Courtesy Review Comments

FYI- See Response from VDoAV below.

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**From:** Scott Denny <[scott.denny@doav.virginia.gov](mailto:scott.denny@doav.virginia.gov)>  
**Sent:** Friday, April 2, 2021 3:40 PM  
**To:** Greg R Baka (DEV Trans Distribution - 1) <[Greg.R.Baka@dominionenergy.com](mailto:Greg.R.Baka@dominionenergy.com)>  
**Subject:** [EXTERNAL] Line # 574 Rebuild Courtesy Review Comments

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Dear Mr. Baka:

The Virginia Department of Aviation has reviewed your informational letter dated March 18, 2021 requesting courtesy review of the proposed rebuild of Dominion Line # 574 between the Elmont and Ladysmith Substations.

Following our review, staff has the following comments.

1. A 7460 Airspace Study should be done for any portion of the project within 20,000 linear feet of the Hanover County Airport.
2. A 7460 Airspace Study must be done for any structure that will reach a finished grade elevation of 200' or taller. This requirement is applicable for any permanent or temporary structures.

If you have any questions regarding this matter or these comments, please feel free to contact me at (804) 236-3638.

Sincerely,

S. Scott Denny  
Senior Aviation Planner  
Virginia Department of Aviation

--

S. Scott Denny  
Senior Aviation Planner  
Virginia Department of Aviation  
804-236-3638  
[scott.denny@doav.virginia.gov](mailto:scott.denny@doav.virginia.gov)