#### COMMONWEALTH OF VIRGINIA

#### STATE CORPORATION COMMISSION

APPLICATION OF	)	
VIRGINIA ELECTRIC AND POWER COMPANY	)	Case No. PUR-2020-00080
For approval and certification of electric	)	
transmission facilities: Bristers-Chancellor Line #552	)	
and Chancellor-Ladysmith Line #581	)	
500 kV Transmission Line Rebuild and Related Projects	)	

#### IDENTIFICATION, SUMMARIES AND TESTIMONY OF DIRECT WITNESSES OF <u>VIRGINIA ELECTRIC AND POWER COMPANY</u>

#### **Peter Nedwick**

Witness Direct Testimony Summary

Direct Testimony

Appendix A: Background and Qualifications

#### Robert J. Shevenock II

Witness Direct Testimony Summary

**Direct Testimony** 

Appendix A: Background and Qualifications

#### Mohammad M. Othman

Witness Direct Testimony Summary

Direct Testimony

Appendix A: Background and Qualifications

#### Greg R. Baka

Witness Direct Testimony Summary

Direct Testimony

Appendix A: Background and Qualifications

#### WITNESS DIRECT TESTIMONY SUMMARY

Witness: Peter Nedwick

<u>Title</u>: Principal Engineer – Electric Transmission Planning

#### **Summary**:

Company Witness Peter Nedwick sponsors those portions of the Appendix describing the Company's transmission system and need for, and benefits of, the proposed Rebuild Project, as follows:

- Section I.B: This section details the engineering justifications for the proposed project.
- <u>Section I.C</u>: This section describes the present system and details how the proposed project will effectively satisfy present and projected future load demand requirements.
- <u>Section I.D</u>: This section describes critical contingencies and associated violations due to the inadequacy of the existing system.
- Section I.E: This section explains feasible project alternatives.
- <u>Section I.H</u>: This section provides the desired in-service date of the proposed project and the estimated construction time.
- Section I.J: This section provides information about the project if approved by the RTO.
- <u>Section I.K</u>: Although not applicable to the proposed project, this section provides outage history and maintenance history for existing transmission lines if the proposed project is a rebuild and is due in part to reliability issues.
- <u>Section I.M</u>: Although not applicable to the proposed project, this section contains information for transmission lines interconnecting a non-utility generator.
- <u>Section I.N</u>: Although not applicable to the proposed project, this section, when applicable, provides the proposed and existing generating sources, distribution circuits or load centers planned to be served by all new substations, switching stations, and other ground facilities associated with the proposed project.
- <u>Section II.A.10</u>: This section provides details of the construction plans for the proposed project, including requested and approved line outage schedules.

Additionally, Company Witness Nedwick co-sponsors the following portions of the Appendix:

- <u>Section I.A (co-sponsored with Company Witness Robert J. Shevenock II)</u>: This section details the primary justifications for the proposed project.
- <u>Section I.G (co-sponsored with Company Witness Greg R. Baka)</u>: This section provides a system map for the affected area.
- <u>Section II.A.3 (co-sponsored with Company Witness Greg R. Baka)</u>: This section provides color maps of existing or proposed rights-of-way in the vicinity of the proposed project.

A statement of Mr. Nedwick's background and qualifications is attached to his testimony as Appendix A.

## DIRECT TESTIMONY OF

#### PETER NEDWICK ON BEHALF OF

## VIRGINIA ELECTRIC AND POWER COMPANY BEFORE THE

## STATE CORPORATION COMMISSION OF VIRGINIA CASE NO. PUR-2020-00080

1	Q.	Please state your name, business address and position with Virginia Electric and
2		Power Company ("Dominion Energy Virginia" or the "Company").
3	A.	My name is Peter Nedwick, and I am a Principal Engineer in Electric Transmission
4		Planning for the Company. My business address is 10900 Nuckols Road, Glen Allen,
5		Virginia 23060. A statement of my qualifications and background is provided as
6		Appendix A.
7	Q.	Please describe your areas of responsibility with the Company.
8	A.	I am responsible for planning the Company's electric transmission system for voltages of
9		69 kilovolt ("kV") through 500 kV.
10	Q.	What is the purpose of your testimony in this proceeding?
11	A.	In order to maintain the structural integrity and reliability of its transmission system in
12		compliance with mandatory North American Electric Reliability Corporation ("NERC")
13		Reliability Standards, Virginia Electric and Power Company ("Dominion Energy
14		Virginia" or the "Company") proposes to rebuild existing 500 kV transmission Lines
15		
		#552 and #581 and perform related projects in an existing 36.7-mile transmission
16		#552 and #581 and perform related projects in an existing 36.7-mile transmission corridor between the Bristers Switching Station and Ladysmith Switching Station,

- 1 Project") since they are nearing their end of life.
- 2 The purpose of my testimony is to describe the Company's transmission system and the
- 3 need for, and benefits of, the proposed Rebuild Project. I am sponsoring Sections I.B,
- 4 I.C, I.D, I.E, I.H, I.J, I.K, I.M, I.N, and II.A.10 of the Appendix. Additionally, I co-
- 5 sponsor Section I.A with Company Witness Robert J. Shevenock II, and Sections I.G and
- 6 II.A.3 with Company Witness Greg R. Baka.
- 7 Q. Does this conclude your pre-filed direct testimony?
- 8 A. Yes, it does.

## BACKGROUND AND QUALIFICATIONS OF PETER NEDWICK

Peter Nedwick graduated from the Pennsylvania State University with a Bachelor's Degree in Electrical Engineering. He is also Registered Professional Engineer with the Commonwealth of Virginia (No. 0402 019479).

Mr. Nedwick's experience with the Company includes System Protection, Distribution Planning, and Transmission Planning. He joined the Company in 1984 as an Associate Engineer in the System Protection Group. In 1986, he joined the Company's Transmission Planning Group, where he was promoted to Engineer in 1987 and to Senior Engineer in 1991. While in the Transmission Planning Group, Mr. Nedwick was responsible for special operating studies and for planning the Company's electric transmission system for eastern Virginia and North Carolina.

In 1997, Mr. Nedwick was promoted to Staff Engineer and joined the Company's Distribution Planning Department, where he served as that department's technical expert. While in the Distribution Planning Department, Mr. Nedwick was promoted to Consulting Engineer in 2000. In 2002, Mr. Nedwick joined the Company's Electric Transmission Planning Group and was promoted to Principal Engineer in 2017.

Mr. Nedwick has previously testified before the Virginia State Corporation Commission.

#### WITNESS DIRECT TESTIMONY SUMMARY

Witness: Robert J. Shevenock II

<u>Title</u>: Principal Engineer – Electric Transmission Line Engineering

#### **Summary**:

Company Witness Robert J. Shevenock II will sponsor those portions of the Appendix providing an overview of the design characteristics of the transmission facilities for the proposed Rebuild Project, and discussing electric and magnetic field levels, as follows:

- <u>Section I.F</u>: This section describes any lines or facilities that will be removed, replaced or taken out of service upon completion of the proposed project.
- <u>Section I.L</u>: This section provides photographs illustrating the deterioration of structures and associated equipment as applicable.
- <u>Section II.A.5</u>: This section provides drawings of the right-of-way cross section showing typical transmission lines structure placements.
- <u>Section II.B.1 to II.B.4</u>: This section provides the line design and operational features of the proposed project.
- <u>Section IV</u>: This section provides analysis on the health aspects of electric and magnetic field levels.

Additionally, Company Witness Shevenock co-sponsors the following portions of the Appendix:

- <u>Section I.A (co-sponsored with Company Witness Peter Nedwick)</u>: This section details the primary justifications for the proposed project.
- <u>Section I.I (co-sponsored with Company Witness Mohammad M. Othman)</u>: This section provides the estimated total cost of the proposed project.
- <u>Section II.B.5 (co-sponsored with Company Witness Greg R. Baka)</u>: This section provides the mapping and structure heights for the existing overhead structures.

A statement of Mr. Shevenock's background and qualifications is attached to his testimony as Appendix A.

## DIRECT TESTIMONY

#### OF

#### ROBERT J. SHEVENOCK II ON BEHALF OF

## VIRGINIA ELECTRIC AND POWER COMPANY BEFORE THE

## STATE CORPORATION COMMISSION OF VIRGINIA CASE NO. PUR-2020-00080

1	Q.	Please state your name, business address and position with Virginia Electric and
2		Power Company ("Dominion Energy Virginia" or the "Company").
3	A.	My name is Robert J. Shevenock II, and I am a Principal Engineer in the Electric
4		Transmission Line Engineering Department of the Company. My business address is
5		10900 Nuckols Road, Glen Allen, Virginia 23060. A statement of my qualifications and
6		background is provided as Appendix A.
7	Q.	Please describe your areas of responsibility with the Company.
8	A.	I am responsible for the estimating and conceptual design of high voltage transmission
9		line projects from 69 kilovolt ("kV") to 500 kV.
10	Q.	What is the purpose of your testimony in this proceeding?
10 11	<b>Q.</b> A.	What is the purpose of your testimony in this proceeding?  In order to maintain the structural integrity and reliability of its transmission system in
11		In order to maintain the structural integrity and reliability of its transmission system in
11 12		In order to maintain the structural integrity and reliability of its transmission system in compliance with mandatory North American Electric Reliability Corporation ("NERC")
11 12 13		In order to maintain the structural integrity and reliability of its transmission system in compliance with mandatory North American Electric Reliability Corporation ("NERC") Reliability Standards, Virginia Electric and Power Company ("Dominion Energy
11 12 13 14		In order to maintain the structural integrity and reliability of its transmission system in compliance with mandatory North American Electric Reliability Corporation ("NERC") Reliability Standards, Virginia Electric and Power Company ("Dominion Energy Virginia" or the "Company") proposes to rebuild existing 500 kV transmission Lines

- 1 (collectively, the "Bristers-Ladysmith 500 kV Partial Rebuild Project" or "Rebuild
- 2 Project") since they are nearing their end of life.
- 3 The purpose of my testimony is to describe the design characteristics of the transmission
- 4 facilities for the proposed Rebuild Project, and also to discuss electric and magnetic field
- 5 ("EMF") levels. I sponsor Sections I.F, I.L, II.A.5, II.B.1 to II.B.4, and IV of the
- 6 Appendix. I also co-sponsor Section I.A of the Appendix with Company Witness Peter
- Nedwick; Section I.I of the Appendix with Company Witness Mohammad M. Othman;
- 8 and Section II.B.5 with Company Witness Greg R. Baka.
- 9 Q. Does this conclude your pre-filed direct testimony?
- 10 A. Yes, it does.

#### BACKGROUND AND QUALIFICATIONS OF ROBERT J. SHEVENOCK II

Robert J. Shevenock II graduated from Pennsylvania State University in 1985 with a Bachelor of Science in Electrical Engineering. He joined the Company in 1985 and has held various engineering titles within the Electric Transmission Engineering department, where he currently works as a Principal Engineer.

Mr. Shevenock has previously testified before the Virginia State Corporation Commission.

#### WITNESS DIRECT TESTIMONY SUMMARY

Witness: Mohammad M. Othman

<u>Title</u>: Engineer III – Substation Engineering

#### **Summary:**

Company Witness Mohammad M. Othman sponsors or co-sponsors the following portions of the Appendix describing the work to be performed at the existing substation for the Rebuild Project, as follows:

- <u>Section I.I (co-sponsored with Company Witness Robert J. Shevenock II)</u>: This section provides the estimated total cost of the proposed project.
- <u>Section II.C</u>: This section describes and furnishes a one-line diagram of the substation associated with the proposed project.

A statement of Mr. Othman's background and qualifications is attached to his testimony as Appendix A.

## DIRECT TESTIMONY

#### $\mathbf{OF}$

#### MOHAMMAD M. OTHMAN ON BEHALF OF

## VIRGINIA ELECTRIC AND POWER COMPANY BEFORE THE

## STATE CORPORATION COMMISSION OF VIRGINIA CASE NO. PUR-2020-00080

1	Q.	Please state your name, business address and position with Virginia Electric and
2		Power Company ("Dominion Energy Virginia" or the "Company").
3	A.	My name is Mohammad M. Othman, and I am an Engineer III in the Substation
4		Engineering section of the Electric Transmission group of the Company. My business
5		address is 2400 Grayland Avenue, Richmond, Virginia 23220. A statement of my
6		qualifications and background is provided as Appendix A.
7	Q.	What are your responsibilities as an Engineer III?
8	A.	I am responsible for evaluation of the substation project requirements, conceptual
9		physical design, scope development, preliminary engineering, and cost estimating for
10		high voltage transmission and distribution substations.
11	Q.	What is the purpose of your testimony in this proceeding?
12	A.	In order to maintain the structural integrity and reliability of its transmission system in
13		compliance with mandatory North American Electric Reliability Corporation ("NERC")
14		Reliability Standards, Virginia Electric and Power Company ("Dominion Energy
15		Virginia" or the "Company") proposes to rebuild existing 500 kV transmission Lines
16		#552 and #581 and perform related projects in an existing 36.7-mile transmission
17		corridor between the Bristers Switching Station and Ladysmith Switching Station,
18		located in the Counties of Fauquier, Stafford, Spotsylvania, and Caroline, Virginia,

- 1 (collectively, the "Bristers-Ladysmith 500 kV Partial Rebuild Project" or "Rebuild
- 2 Project") since they are nearing their end of life.
- The purpose of my testimony is to describe the work to be performed at the proposed
- 4 Rebuild Project's various substations. I sponsor Section II.C of the Appendix and co-
- 5 sponsor Section I.I of the Appendix with Company Witness Robert J. Shevenock II,
- 6 specifically, as it pertains to substation work.
- 7 Q. Does this conclude your pre-filed direct testimony?
- 8 A. Yes, it does.

# BACKGROUND AND QUALIFICATIONS OF MOHAMMAD M. OTHMAN

Mohammad M. Othman received a Bachelor of Science degree in Electrical Engineering from Virginia Commonwealth University in 2008. Mr. Othman's responsibilities included the evaluation of the substation project requirements, development of scope documents and schedules, preparation of estimates and proposals, preparation of specifications and bid documents, material procurement, design substation physical layout, develop detailed physical drawings, bill of materials, electrical schematics and wiring diagrams. Mr. Othman joined the Dominion Energy Virginia Substation Engineering department in 2010 as an Engineer II then promoted to Engineer III, the title he currently holds.

Mr. Othman has previously submitted pre-filed testimony to the Virginia State Corporation Commission.

#### WITNESS DIRECT TESTIMONY SUMMARY

Witness: Greg R. Baka

<u>Title</u>: Electric Transmission Local Permitting Consultant

#### Summary:

Company Witness Greg R. Baka will sponsor those portions of the Appendix providing an overview of the design of the route for the proposed Rebuild Project, and related permitting, as follows:

- <u>Section II.A.1</u>: This section provides the length of the proposed corridor and viable alternatives to the proposed project.
- <u>Section II.A.2</u>: This section provides a map showing the route of the proposed project in relation to notable points close to the proposed project.
- <u>Section II.A.4</u>: This section explains why the existing right-of-way is not adequate to serve the need, to the extent applicable.
- <u>Sections II.A.6 to II.A.8</u>: These sections provide detail regarding the right-of-way for the proposed project.
- <u>Section II.A.9</u>: This section describes the proposed route selection procedures and details alternative routes considered.
- <u>Section II.A.11</u>: This section details how the construction of the proposed project follows the provisions discussed in Attachment 1 of the Transmission Appendix Guidelines.
- <u>Section II.A.12</u>: This section identifies the counties and localities through which the proposed project will pass and provides General Highway Maps for these localities.
- <u>Section II.B.6</u>: This section provides photographs of existing facilities, representations of proposed facilities, and visual simulations.
- <u>Section III</u>: This section details the impact of the proposed project on scenic, environmental, and historic features.
- <u>Section V</u>: This section provides information related to public notice of the proposed project.

Additionally, Mr. Baka co-sponsors the following portion of the Appendix:

- <u>Section I.G (co-sponsored with Company Witness Peter Nedwick)</u>: This section provides a system map for the affected area.
- <u>Section II.A.3 (co-sponsored with Company Witness Peter Nedwick)</u>: This section provides color maps of existing or proposed rights-of-way in the vicinity of the proposed project.
- <u>Section II.B.5 (co-sponsored with Company Witness Robert J. Shevenock II)</u>: This section provides the mapping and structure heights for the existing overhead structures.

Finally, Mr. Baka sponsors the DEQ Supplement filed with the Application.

A statement of Mr. Baka's background and qualifications is attached to his testimony as Appendix A.

### DIRECT TESTIMONY

#### **OF**

#### GREG R. BAKA ON BEHALF OF

## VIRGINIA ELECTRIC AND POWER COMPANY BEFORE THE

## STATE CORPORATION COMMISSION OF VIRGINIA CASE NO. PUR-2020-00080

1	Q.	Please state your name, business address and position with Virginia Electric and
2		Power Company ("Dominion Energy Virginia" or the "Company").
3	A.	My name is Greg R. Baka, and I am an Electric Transmission Local Permitting
4		Consultant for Virginia Electric and Power Company ("Dominion Energy Virginia" or
5		the "Company"). My business address is 10900 Nuckols Road, Glen Allen, Virginia
6		23060. A statement of my qualifications and background is provided as Appendix A.
7	Q.	Please describe your areas of responsibility with the Company.
8	A.	I am responsible for identifying appropriate routes for transmission lines and obtaining
9		necessary federal, state, and local approvals and environmental permits for those
10		facilities. In this position, I work closely with government officials, permitting agencies
11		property owners, and other interested parties, as well as with other Company personnel,
12		to develop facilities needed by the public so as to reasonably minimize environmental
13		and other impacts on the public in a reliable, cost-effective manner.
14	Q.	What is the purpose of your testimony in this proceeding?
15	A.	In order to maintain the structural integrity and reliability of its transmission system in
16		compliance with mandatory North American Electric Reliability Corporation ("NERC")
17		Reliability Standards, Virginia Electric and Power Company ("Dominion Energy
18		Virginia" or the "Company") proposes to rebuild existing 500 kV transmission Lines

- #552 and #581 and perform related projects in an existing 36.7-mile transmission

  corridor between the Bristers Switching Station and Ladysmith Switching Station,

  located in the Counties of Fauquier, Stafford, Spotsylvania, and Caroline, Virginia,

  (collectively, the "Bristers-Ladysmith 500 kV Partial Rebuild Project" or "Rebuild
- The purpose of my testimony is to provide an overview of the route and permitting for
  the proposed Rebuild Project. As it pertains to routing and permitting, I sponsor Sections
  II.A.1, II.A.2, II.A.4, II.A.6, II.A.7, II.A.8, II.A.9, II.A.11, II.A.12, II.B.6, III, and V of
  the Appendix. I also sponsor the DEQ Supplement filed with the Application, and cosponsor Sections I.G and II.A.3 with Company Witness Peter Nedwick, and Section

II.B.5 of the Appendix with Company Witness Robert J. Shevenock II.

#### 12 Q. Has the Company complied with Va. Code § 15.2-2202 E?

Project") since they are nearing their end of life.

- 13 A. Yes. In accordance with Va. Code § 15.2-2202 E, letters dated March 19, 2020, were
  14 sent to Fauquier, Stafford, Spotsylvania, and Caroline Counties stating the Company's
  15 intent to file this Application, describing the Rebuild Project, and offering the localities
  16 an opportunity to comment. Copies of these letters are included as Appendix
  17 Attachments V.D.1-4.
- 18 Q. Does this conclude your pre-filed direct testimony?
- 19 A. Yes, it does.

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#### BACKGROUND AND QUALIFICATIONS OF GREG R. BAKA

Mr. Greg R. Baka graduated from the University of Richmond in 1989 with a Bachelor of Arts degree in Urban Studies and Political Science. From 1990 to 1992, he worked as a Zoning Analyst for the City of Gaithersburg, Maryland. From 1992 to 1995, he worked as the Zoning Administrator for King William County, Virginia. From 1995 to 1998, he served Hanover County, Virginia as a Planner and was promoted to Senior Comprehensive Planner. He returned to King William County from 1998 to 2000 and served as their Director of Planning and Community Development. He then worked at Resource International, Ltd. as a Municipal Planner between 2001 and 2003. From 2004 to 2011, Mr. Baka owned and operated Viewshed Consulting, LLC, serving clients as a Land Planning Consultant. From 2011 to 2013, he worked as the Director of Economic Development for Cumberland County, Virginia. He joined the Company's Transmission Right-of-Way group in 2013 as Senior Siting & Permitting Specialist, was promoted to Supervisor of Siting, Permitting, and Real Estate in 2015, and became a Local Permitting Consultant, his current position, in 2019. Mr. Baka has served on several land planning and development-related local boards and commissions.

Mr. Baka has previously submitted pre-filed testimony to the Virginia State Corporation Commission.

# BEFORE THE STATE CORPORATION COMMISSION OF VIRGINIA

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

Bristers-Chancellor Line #552 and Chancellor-Ladysmith Line #581 500 kV Transmission Line Rebuild and Related Projects

Application No. 298

**DEQ Supplement** 

Case No. PUR-2020-00080

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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 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 Electric Reliability Corporation ("NERC") Reliability Standards, Virginia Electric and Power Company ("Dominion Energy Virginia" or the "Company") proposes to rebuild existing 500 kV transmission Lines #552 and #581 located in the Counties of Fauquier, Stafford, Spotsylvania, and Caroline, Virginia, (collectively, the "Bristers-Ladysmith 500 kV Partial Rebuild Project" or "Rebuild Project") since they are nearing their end of life. Specifically, the Company proposes to:

- (1) Rebuild, entirely within existing right-of-way, approximately 21.5 miles of the existing 500 kV Bristers-Chancellor Line #552, which runs from the Company's existing Bristers Switching Station located in Fauquier County, Virginia, to the Company's existing Chancellor Substation located in Spotsylvania County, Virginia (the "Line #552 Segment");
- (2) Rebuild, entirely within existing right-of-way, approximately 15.2 miles of the existing 500 kV Chancellor-Ladysmith Line #581, which runs from the Company's existing Chancellor Substation located in Spotsylvania County, Virginia, to the Company's existing Ladysmith Switching Station located in Caroline County, Virginia, and which includes the rebuild of approximately 1.2 miles of 115 kV transmission Chancellor-Spotsylvania Line #198, which is co-located with Line #581 on Structures #581/2 to #581/7 (the "Line #581 Segment"); and
- (3) Perform minor substation work at the existing Bristers Switching Station, Chancellor Substation, and Ladysmith Switching Station.

As of April 2020, the Company owns approximately 6,690 miles of overhead transmission lines, approximately 2,853 miles of which were built prior to 1980. The Company has developed a proactive plan to rebuild transmission towers that are comprised of COR-TEN® weathering steel. The 500 kV system accounts for approximately 1,312 miles of the Company's total overhead transmission line system, of which 521 miles were installed prior to 1980.

The proposed Rebuild Project will replace aging infrastructure that is at the end of its service life in order to comply with the Company's mandatory transmission system planning criteria (the "Planning Criteria"), thereby enabling the Company to maintain the overall long-term reliability of its transmission system. Specifically, 500 kV Lines #552 and #581 have been identified for rebuild in the approximately 36.7-mile Bristers-Ladysmith transmission corridor. These lines were constructed in 1966 primarily on COR-TEN steel lattice towers. These COR-TEN towers have been identified for rebuild based on the Company's assessment in accordance with the Company's mandatory Planning Criteria. The Company hired a third-party company, Quanta Technology, LLC ("Quanta"), to evaluate the condition of its COR-TEN

towers. Quanta provided the 2013 Quanta Report confirming the need to rebuild certain COR-TEN towers, including those on the lines identified above.

The length of the existing right-of-way and Company-owned property to be used for the Rebuild Project is approximately 36.7 miles long. Because the existing right-of-way and Company-owned property is adequate to construct the proposed Rebuild Project, no new right-of-way is necessary. Given the availability of existing right-of-way and the statutory preference given to the use of existing rights-of-way, and because additional costs and environmental impacts would be associated with the acquisition and construction on new right-of-way, the Company did not consider any alternate routes requiring new right-of-way for the Rebuild Project.

#### 2. Environmental Analysis

The Company solicited comments from all relevant state and local agencies about the proposed Rebuild Project in March 2020. Copies of these letters are included as Attachment 2. The DEQ provided a letter in response to the Company's scoping request for the Rebuild Project on March, 23, 2020. A copy of this letter is included as Attachment 2.1.

#### 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 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 Middle Potomac-Anacostia-Occoquan watershed, Hydrologic Unit Code 02070010, the Lower Potomac watershed, Hydrologic Unit Code 02070011, the Rapidan-Upper Rappahannock watershed, Hydrologic Unit Code 02080103, the Lower Rappahannock watershed,

Hydrologic Unit Code 02080104, and the Mattaponi watershed, Hydrologic Unit Code 02080105. According to the U.S. Geological Survey ("USGS") topographic quadrangles (Somerville, Storck, Salem Church, Chancellorsville, Spotsylvania, and Ladysmith, Virginia), the existing transmission line corridor crosses 14 named perennial streams and rivers, including: Anderson Branch, Aquia Creek, Alcotti Run, Richland Run, Rappahannock River, La Roque Run, Pipe Dam Run, Ninemile Run, Lick Run, Massaponax Creek, Ni River, Po River, Matta River, and the Motto River. The Virginia Department of Conservation and Recreation's ("DCR") Natural Heritage Data Explorer provides information on streams using the National Hydrography Dataset. According to the Data Explorer mapping service, the transmission right-of-way crosses several 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 2020. Typically a subaqueous encroachment permit would be required for any stream crossings with a drainage area of five square miles or greater at the crossing location. If necessary, a Joint Permit Application ("JPA") will be submitted for review by the VMRC, DEQ, the U.S. Army Corps of Engineers (the "Corps"), and County Local Wetlands Boards to authorize jurisdictional crossings and for any impacts to jurisdictional wetlands.

The right-of-way crosses four VMRC jurisdictional waters with drainage areas greater than five square miles. A JPA will be submitted for review by the VMRC, DEQ, and 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.

#### **Wetlands Impact Consultation**

Within the Rebuild Project right-of-way, the Company delineated 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 submitted the results of this delineation to the Corps on April 15, 2020 for confirmation. See Attachment 2.D.1. Total jurisdictional resources within the

proposed Rebuild Project right-of-way are provided in Table 1 and detailed in Attachment 2.D.1.

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

Resource	Area (±)
Palustrine Forested Wetland	3.45 acres
Palustrine Emergent Wetland	74.74 acres
Palustrine Scrub Shrub	3.54 acres
Open Waters (Palustrine Unconsolidated Bottom)	1.46 acres
Perennial Stream	16,172 linear feet
Intermittent Stream	4,528 linear feet
Ephemeral Stream	357 linear feet

The Company solicited comments from the Virginia Department of Environmental Quality Office of Wetlands and Stream Protection in March 2020. The Company received a response on April 9, 2020, from the DEQ Office of Wetlands and Streams Protection, which recommended that the structures should be sited to avoid wetlands to the extent practicable and should be sited outside of stream channels. See Attachment 2.D.2.

Prior to construction, the Company will obtain any necessary permits to impact jurisdictional resources. The Company notes that recently a federal district court in Montana held that the Corp's Nationwide Permit 12, which often is relied upon by the Company to permit impacts to jurisdictional resources for electric transmission projects, was issued illegally, and thus, was vacated until the Corps completes certain consultation requirements with the appropriate species resource agencies and otherwise complies with environmental laws. While the impact of this case on the Company's ability to obtain permits for impacts to jurisdictional resources currently is unknown, it could result in delay, and potentially significant delays, in the permitting process.

#### 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 Rebuild 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. Thirteen petroleum release sites were identified within the search radius, none of which fall within the right-of-way of the Rebuild Project. These petroleum release sites may include aboveground and underground storage tank releases, as well as aboveground spills. The Company has a procedure in place to handle petroleum contaminated soil, if encountered; however, as all of the release sites are located outside of the Rebuild Project area, none of the petroleum release sites are expected to impact the Rebuild Project. A table listing these sites is included in <u>Attachment 2.E.1</u>.

#### 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 Game and Inland Fisheries ("DGIF") Virginia Fish and Wildlife Information Service ("VAFWIS"), the DGIF 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"), the Center for Conservation Biology ("CCB") Bald Eagle Nest Locator, and the National Oceanic and Atmospheric Administration ("NOAA") Section 7 Program. The results are presented in Table 2 below.

Table 2. Threatened and endangered species within the Rebuild Project vicinity

Species Name (Scientific Name)	Status	Results
Northern long-eared bat	FT, ST	No known hibernacula or summer roosts are
(Myotis septentrionalis)		identified in the vicinity of the Project.
		Follow 4(d) Rule. Not likely to adversely
Database: USFWS, DGIF		affect this species.
Indiana bat	FE	No known hibernacula are identified in the
(Myotis sodalis)		vicinity of the project. The Project location is
		outside of critical habitat. No adverse effects
Database: USFWS		expected.
Dwarf wedgemussel	FE, SE	Suitable habitat may be present in streams.
(Alasmidonta heterodon)		No structures are located in streams or
		waterways, and no instream work is
Database: VAFWIS, DCR		anticipated. Surveys may be required,
		however, should instream work be required.

Yellow lance	FT	Suitable habitat may be present in streams.
(Elliptio lanceolata)		No structures are located in streams or
		waterways, and no instream work is
Database: USFWS		anticipated. Surveys may be required,
		however, should instream work be required.
Green floater	ST	Suitable habitat may be present in streams.
(Lasmigona subviridis)		No structures are located in streams or
		waterways, and no instream work is
Database: VAFWIS		anticipated. Surveys may be required,
		however, should instream work be required.
Atlantic sturgeon	FE, SE	The Project site is not within the designated
(Acipenser oxyrinchus)		critical habitat. Not likely to adversely affect
		this species.
Database: VAFWIS		
Small whorled pogonia	FT, SE	No suitable habitat present. No clearing is
(Isotria medeoloides)		proposed.
Database: USFWS, DCR		
Harperella	FE, SE	Suitable habitat may be present. Surveys may
(Ptilimnium nodosum)		be needed.
Database: USFWS, DCR		
New Jersey rush	ST	Suitable habitat may be present. Surveys may
(Juncus caesariensus)		be needed.
Database: DCR		
Bald eagle	FP	No known bald eagle nests are located within
(Haliaeetus leucocephalus)		660 feet of the project area. No bald eagle
		concentration areas are present within the
Database: USFWS, CCB		Project vicinity.

FT: federally threatened; FE: federally endangered; ST: state threatened; SE: state endangered; USFWS: US Fish and Wildlife Service; VAFWIS: Virginia Fish and Wildlife Information Service; DCR: Department of Conservation and Recreation

A copy of the database search results can be found in <u>Attachment 2.F.1</u>. Additionally, the Company requested comments from the USFWS, DGIF, and DCR regarding the proposed Rebuild Project in March 2020. The Company received email responses from DCR requesting that the Company submit the Rebuild Project to the Division of Natural Heritage ("DNH") for review. See <u>Attachment 2.F.2</u>. The Company completed this request on March 25, 2020. A project review from the DCR's DNH was received on April 9, 2020, and is included herein as <u>Attachment 2.F.3</u>.

New and updated information is continually added to the DCR's Biotics database. Following the DCR-DNH SCC planning stage project review, the Company shall resubmit project information with completed information services order form and a map to DCR-DNH or submit the project or submit the project on-line through the Natural Heritage Data Explorer. This review shall occur during the final stage of engineering and upon any major modifications of the project during construction (i.e., 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 DGIF, DCR, USFS, 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 <a href="Attachment 2.G.1">Attachment 2.G.1</a>.

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

Dutton + Associates was retained by the Company to conduct a Stage I Pre-Application Analysis for the proposed Rebuild Project. This analysis was completed in April 2020 and submitted to VDHR on April 27, 2020. The report is included as <a href="Attachment 2.H.1">Attachment 2.H.1</a>. Preliminary background research was conducted pursuant to the *Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia* (VDHR 2008) for proposed transmission line improvements. As detailed by VDHR guidance, consideration was given to: National Historic Landmark ("NHL") properties located within a 1.5-mile radius of the Project centerline; National Register of Historic Places ("NRHP") listed properties, battlefields, and historic landscapes located within a 1.0-mile radius of the Project centerline; NRHP-eligible sites located within a 0.5-mile radius of the Project centerline; and, archaeological sites located within the Project right-of-way. Please note that the Company intends to follow up with VDHR regarding the impacts to Wigg Hall, as described in <a href="Attachment 2.H.1">Attachment 2.H.1</a>.

#### **Archaeological Resources**

A total of 18 previously recorded archaeological sites are located within or directly adjacent to the existing right-of-way. Of these, one has been determined not eligible for listing in the NRHP. The remaining resources have not been evaluated. The table below provides the archaeological resource within the Rebuild Project right-of-way.

Table 3. Archaeological resources within the Rebuild Project Right-of-Way

VDHR#	Resource Name	VDHR/NRHP Status
44FQ0108	Archaeological Site	Not Evaluated
44FQ0109	Archaeological Site	Not Evaluated
44SP0079	Archaeological Site	Not Evaluated
44SP0080	Archaeological Site	Not Evaluated
44SP0111	Archaeological Site	Not Evaluated
44SP0165	Archaeological Site	Not Evaluated
44SP0166	Archaeological Site	Not Evaluated
44SP0167	Archaeological Site	Not Evaluated
44SP0168	Archaeological Site	Not Evaluated
44SP0170	Archaeological Site	Not Evaluated
44SP0171	Archaeological Site	Not Evaluated
44SP0172	Archaeological Site	Not Evaluated
44SP0174	Archaeological Site	Not Evaluated
44SP0333	Archaeological Site	Not Evaluated
44SP0340	Archaeological Site	Not Evaluated
44SP0682	Archaeological Site	VDHR: Not Eligible
44ST0142	Archaeological Site	Not Evaluated
44ST0143	Archaeological Site	Not Evaluated

#### **Architectural Resources**

No NHL-listed architectural resources are located within the 1.5-mile buffer. Four properties that are listed on the NRHP, three battlefields, and seven historic landscapes are located within 1-mile of the Project area, and four properties that have been determined eligible for listing on the NRHP are within 0.5-miles of the Project area. Distances of architectural resources to the centerline of the proposed Rebuild Project are provided in Table 4 below. Letters were mailed to the National Park Service (the "NPS") and the Civil War Trust (the "CWT") regarding the proposed Rebuild Project and to coordinate access to these sites.

Table 4. NRHP, eligible, and battlefield resources within 1.0-mile of the centerline of the Rebuild Project

Resource ID#	Resource Name	NRHP Status	Distance to Centerline (Miles)
030-5588	Elk Run Rural Historic District (Historic), Elk Run-Germantown-Cedar Run Rural Historic District (Historic/Current)	Eligible	0.32
030-5607	Hedgeman-Rappahannock Rural Historic District (Historic)	Eligible	0.28
088-0015	Berkwood (Current), Goodloe Plantation (Historic), House, Route 605 (Function/Location), Oak Hill (Historic)	Eligible	Crossed by ROW

Resource ID#	Resource Name	NRHP Status	Distance to Centerline (Miles)
088-0059	Gayle House (Historic), Rose Mount (Historic), Rosemont (Historic)	Eligible	0.21
088-0070	Whig Hill (Historic/Current)	Eligible	0.25
088-0074	Tubal Furnace (Historic), Tubal Furnace Archaeological Site (Current)	Listed	0.31
088-0137	Rapidan Dam Canal of the Rappahannock Navigation (Current)	Listed	Crossed by ROW
088-0142	Spotsylvania Court House Historic District (NRHP Listing)	Listed	0.72
088-0220	Ashley Farm (Historic), First Day at Chancellorsville Property (Descriptive), John Mullins Farm (Current)	Preservation Easement	Crossed by ROW
088-0334	Lick Run Battlefield Historic District (Historic/Current)	Not Evaluated	Crossed by ROW
088-5129	Rowe House, 9400 Courthouse Rd (Historic/Location)	Eligible	0.31
088-5180	Chancellorsville Battlefield (Current)	Eligible	Crossed by ROW
088-5182	Spotsylvania Court House Battlefield (Current), Spotsylvania Court House Battlefield (Historic)	Eligible	Crossed by ROW
088-5188	Battle of Harris Farm Battlefield (Historic)	Not Evaluated	0.12
088-5364	Fredericksburg and Gordonsville Railroad (Historic), Fredericksburg, Orange, and Charlottesville Railroad (Historic), Potomac, Fredericksburg, and Piedmont Railroad (Historic), Unfinished Railroad (Historic), Virginia Central Railway Historic District (Historic/Current)	Eligible	Crossed by ROW
111-0134	Rappahannock Navigation System (Canal) (Historic/Current)	Eligible	Crossed by ROW
111-0147	Fredericksburg and Spotsylvania Battlefields National Military Park (Historic/Current), Fredericksburg and Spotsylvania County Battlefields Memorial National Military Park and Cemetery (NRHP Listing)	Listed	0.41
111-5001	Rappahannock River Rural Historic District	Not Eligible	Crossed by ROW

#### 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 USWFS, DGIF, 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, DGIF, and DCR as appropriate to determine whether surveys are necessary and to minimize impacts on wildlife resources. The proposed Rebuild 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. There is one designated scenic river, the Rappahannock River, within the vicinity of the Rebuild Project.

There are no state or local parks located within the existing transmission corridor right-of-way between the Bristers Switching Station and Ladysmith Switching Station. Additionally, there are no parks located within a mile of the right-of-way.

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 148.78 acres of prime farmland, 18.4 acres of prime farmland, if drained, and 337.02 acres of farmland of statewide importance are located within the Rebuild Project right-of-way. Fauquier

and Spotsylvania Counties have designated Agricultural and Forestal Districts within their jurisdictions under Va. Code § 3.2-205 B. According to the county Comprehensive Plans, the majority of the existing transmission line corridor is located with areas designated for rural and residential future land use.

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. According to the DCR's Natural Heritage Data Explorer, the Rebuild Project crosses two Virginia Outdoors Foundation ("VOF") easements (STF VOF-00430 and STF VOF-02592/DGIF – Upper Rappahannock Easement/Nature Conservancy Conservation Easement) and a Virginia Department of Historic Resources – Chancellorsville Battlefield easement. The table below lists all easements crossed by and within one mile of the centerline of the Rebuild Project.

Table 5. Conservation easements crossed by and within 1.0-mile of the Rebuild Project right-of-way

Unit Name	Owner/Manager		
Fredericksburg and Spotsylvania County			
Battlefields Memorial National Military	National Park Service		
Park			
CWT Holding	Civil War Trust		
CWT Holding	Civil War Trust		
CWT Holding	Civil War Trust		
CVBT Holding	Central Virginia Battlefields Trust		
CVBT Holding	Central Virginia Battlefields Trust		
CVBT Holding	Central Virginia Battlefields Trust		
Curtis Memorial Park	Stafford County		
Nine Mile Run	Virginia Department of Conservation and		
	Recreation		
U.S. National Park Service Easement	U.S. National Park Service		
Virginia Department of Historic Resources	Virginia Department of Historic Resources		
Easement			
Virginia Department of Historic Resources	Virginia Department of Historic Resources		
Easement			
STF-VOF-430	Virginia Outdoors Foundation		
STF-VOF-431	Virginia Outdoors Foundation		
STF-VOF-2591	Virginia Outdoors Foundation		
Central Virginia Battlefields Trust	Central Virginia Battlefields Trust		
Easement			
Fauquier County Easement	Fauquier County, VA		
Fauquier County Easement	Fauquier County, VA		

Unit Name	Owner/Manager		
Fauquier County Easement	Fauquier County, VA		
Fauquier County Easement	Fauquier County, VA		
Fauquier County Easement	Fauquier County, VA		
Fauquier County Easement	Fauquier County, VA		
Fauquier County Easement	Fauquier County, VA		
Fauquier County Easement	Fauquier County, VA		
Virginia Department of Game and Inland	Virginia Department of Game and Inland		
Fisheries Easement	Fisheries		
Spotsylvania County Easement	Spotsylvania County, VA		
Stafford Easement	Stafford County, VA		
Upper Rappahannock Easement	The Nature Conservancy		
CVBT Holding	Central Virginia Battlefields Trust		
CVBT Holding	Central Virginia Battlefields Trust		
Fauquier Open Space Easement	Fauquier County, VA		
Fauquier Open Space Easement	Fauquier County, VA		
Fauquier Open Space Easement	Fauquier County, VA		
Fauquier Open Space Easement	Fauquier County, VA		
Fauquier Open Space Easement	Fauquier County, VA		
Fauquier Open Space Easement	Fauquier County, VA		
Fauquier County	Fauquier County, VA		

The width of the existing transmission line right-of-way varies from 150 feet to 240 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 Rebuild Project is expected to have minimal, if any, impact on forest resources as the proposed 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.

The Company solicited DCR, VOF, the Piedmont Environmental Council (the "PEC"), the NPS and CWT for comments on the proposed Virginia Rebuild Project. In an email dated April 8, 2020, the DCR Environmental Impacts Review Coordinator

responded that the Rebuild Project does cross the scenically designated Rappahannock River, but that the Rebuild Project is not expected to impact the resource. See <a href="Attachment 2.K.1">Attachment 2.K.1</a>. VOF responded on April 16, 2020 indicating that the Rebuild Project crosses two easements and is within one-half mile of a third easement holding. The VOF states that the reduction in tower heights at easement VOF-02592 will improve the overall visual impact at this location but requested consideration of decreasing tower heights at other locations. The VOF also requested the use of chemically dulled galvanized steel structures and de-glared conductor at each crossing. See <a href="Attachment 2.K.2">Attachment 2.K.2</a>. PEC responded on April 16, 2020 asking the Company to consider additional treatment or measures designed to reduce the visibility of the Rebuild Project including reducing the height and using a structure finish other than galvanized steel in order to minimize the impact on historic and cultural resources in the vicinity of the Rebuild Project area. See <a href="Attachment 2.K.3">Attachment 2.K.3</a>. Consistent with these requests, 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, amphibolite, slate and metavolcanics rock. 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. There is one active mine and three abandoned mines within a 1.0-mile radius of the right-

of-way. The coordinates of these mines are provided in the table below. 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.

Table 6. Location of active and abandoned mines within a 1.0-mile radius of the

Rebuild Project

rebuild I toject			
Unit Name	Status	Latitude	Longitude
Stanley Construction Co.	Abandoned	38.122753	-77.551671
Spotsylvania Plant	Active	38.209843	-77.556733
Spotsylvania Complaint #2	Abandoned	38.339360	-77.636920
Brinton Prospect	Abandoned	38.355486	-77.633063

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 feet and 240 feet in width and is currently maintained for operation of the existing transmission facilities. The transmission line corridor extends approximately 36.7 miles from the Company's existing Bristers Switching Station in Fauquier County to the Ladysmith Switching Station in Caroline County, Virginia, crossing two roads in Fauquier County, 12 roads in Stafford County, 53 roads in Spotsylvania County, and two roads in Caroline County. Most of the roads within the Rebuild Project area consist of low traffic volume county roads. Major road crossings include U.S. Route 17 in Stafford County, and U.S. Route 3 and U.S. Route 208 in Spotsylvania County.

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 2020, the Company solicited VDOT for comments on the proposed Rebuild Project. In a letter dated March 17, 2020, the VDOT Culpeper District indicated that any work within the VDOT right-of-way would require a Land Use Permit. See <a href="https://docs.ncbi.nlm.nih.gov/Attachment-2.N.1">Attachment 2.N.1</a>. The Fredericksburg VDOT District responded via a letter dated March 31, 2020 and also noted that a Land Use Permit would be required. See Attachment 2.N.2.

The existing Rebuild Project right-of-way does not cross any railroad tracks.

The Company solicited comments from the Virginia Department of Aviation ("DOAv") regarding the proposed Virginia Rebuild Project. The DOAv responded via letter dated March 23, 2020 there are no public use airports within 20,000 linear feet of the Project and that unless support structures or temporary cranes reach a

height of 200 feet above ground level, no airspace case would be required by the Federal Aviation Administration (the "FAA"). See Attachment 2.N.3.

Finally, the Company has reviewed the FAA's website (https://oeaaa.faa.gov/oeaaa/external/portal.jsp) to identify airports within 10 miles of the Rebuild Project. Based on this review, three FAA-restricted airports are located within 10 miles of the Rebuild Project:

- Warrenton-Fauquier Airport 6.4 miles west of Bristers Switching Station;
- Shannon Airport 7.6 miles east of Chancellor Substation; and
- Stafford Regional Airport 11.9 miles northeast of Chancellor Substation.

One private airport/helipad is located within 10 miles of the proposed Rebuild Project, and the Company will work with these private entities as appropriate:

• Heth Army Helicopter Airport — 12.3 miles northeast of Ladysmith Switching Station.

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

## **Attachments**

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

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Mr. Andersen,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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)273-4086 or <a href="mailto:Rachel.M.Studebaker@dominionenergy.com">Rachel.M.Studebaker@dominionenergy.com</a>. We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,

Richard B. Gangle

Director, Environmental Services

Ms. Trisha Beasley
Department of Environmental Quality
Wetlands Protection Program
13901 Crown Court
Woodbridge, VA 22193

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Ms. Beasley,

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Regards,

Richard B. Gangle

Director, Environmental Services

Ms. Amy M. Ewing Virginia Department of Games and Inland Fisheries 7870 Villa Park, Suite 400 Henrico, Virginia 23228

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Ms. Ewing,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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)273-4086 or <a href="mailto:Rachel.M.Studebaker@dominionenergy.com">Rachel.M.Studebaker@dominionenergy.com</a>. We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,

Richard B. Gangle

Director, Environmental Services

Ms. Silvia Gazzera U.S. Army Corps of Engineers Norfolk District, Northern Division 9100 Arboretum Parkway, Suite 235 Richmond, VA 23236

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Ms. Gazzera.

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Richard B. Gangle

Director, Environmental Services

Ms. Michelle Henicheck Senior Wetland Ecologist Department of Environmental Quality P.O. Box 1105 Richmond, VA 23218

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Ms. Henicheck,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Richard B. Gangle

Director, Environmental Services

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

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Ms. Hypes,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Richard B. Gangle

Director, Environmental Services

Ms. Bettina Rayfield Department of Environmental Quality Office of Environmental Impact Review 13901 Crown Court Woodbridge, VA 22193

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Ms. Rayfield,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Richard B. Gangle

Director, Environmental Services

Ms. Robbie Rhur Department of Conservation and Recreation 600 East Main Street, 17th Floor Richmond, Virginia 23219

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Ms. Rhur,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Richard B. Gangle

Director, Environmental Services

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

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Mr. Tignor,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Richard B. Gangle

Director, Environmental Services

Mr. Tony Watkinson Habitat Management Division Virginia Marine Resources Commission 380 Fenwick Road Hampton, Virginia 23651

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Mr. Watkinson,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Richard B. Gangle

Director, Environmental Services

**VIA EMAIL** 

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

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania 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 existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Laura P. Meadows

Siting and Permitting Specialist

# **VIA EMAIL**

Mr. Greg Evans
Assistant Director for Forestland Conservation Office
Virginia Department of Forestry
900 Natural Resources Drive, Suite 800
Charlottesville, Virginia 22903

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Mr. Evans,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Laura P. Meadows

Siting and Permitting Specialist

**VIA EMAIL** 

Mr. Thomas C. Foley Stafford County Administrator 1300 Courthouse Road 3rd Floor Stafford, VA 22554

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Mr. Foley,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Laura P. Meadows

Siting and Permitting Specialist

# **VIA EMAIL**

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

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Mr. Kichen,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Laura P. Meadows

Siting and Permitting Specialist

**VIA EMAIL** 

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

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania 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 existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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,

Laura P. Meadows

Siting and Permitting Specialist

**VIA EMAIL** 

Mr. John D. Lynch, P.E. District Engineer, Culpeper District 1601 Orange Road Culpeper, VA 22701

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Mr. Lynch,

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Regards,

Laura P. Meadóws

Siting and Permitting Specialist

**VIA EMAIL** 

Mr. Paul S. McCulla Fauquier County Administrator 10 Hotel Street, Ste 204 Warrenton, VA 20186

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Mr. McCulla,

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Regards,

Laura P. Meadows

Siting and Permitting Specialist

# **VIA EMAIL**

Mr. Charles M. McCulley, Jr. Caroline County Administrator P.O. Box 447 Bowling Green, VA 22427

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Mr. McCulley,

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Regards,

Laura P. Meadows

Siting and Permitting Specialist

# **VIA EMAIL**

Ms. Marcie Parker, P.E.
District Engineer, Fredericksburg District
Virginia Department of Transportation
87 Deacon Road
Fredericksburg, VA 22405

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Ms. Parker,

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Regards,

Laura P. Meadows

Siting and Permitting Specialist

**VIA EMAIL** 

Mr. Ed Petrovitch Spotsylvania County Administrator 9104 Courthouse Road Spotsylvania, VA 22553

Reference: Dominion Energy Virginia's Proposed Bristers to Ladysmith 500kV Transmission

Line Rebuild, Fauquier, Stafford, Spotsylvania and Caroline Counties, Virginia

Notice Pursuant to Va. Code §15.2-2202 E

Dear Mr. Petrovitch,

Dominion Energy Virginia (the "Company") is proposing to rebuild existing 500kV transmission lines #552 and #581 along a 36.7-mile corridor between the existing Bristers Substation in Fauquier 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)775-5279 or <a href="mailto:Laura.P.Meadows@dominionenergy.com">Laura.P.Meadows@dominionenergy.com</a>. We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,

Laura P. Meadows

Siting and Permitting Specialist



# 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

March 23, 2020

David K. Paylor Director

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

Rachel Studebaker Environmental Specialist II Dominion Energy Services 5000 Dominion Boulevard Glen Allen, VA 23060

Matthew J. Strickler

Secretary of Natural Resources

RE: Proposed Bristers to Ladysmith 500kV Transmission Line Rebuild; Fauquier, Stafford, Spotsylvania 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 <a href="eir@deq.virginia.gov">eir@deq.virginia.gov</a> (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 <a href="eir@deq.virginia.gov">eir@deq.virginia.gov</a>.). The required "Wetlands Impact Consultation" can be sent directly to Michelle Henicheck at 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:

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

- Office of Local Government Programs
- o 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 Game and Inland Fisheries

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:

- o 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:

- o 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:

- o 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:

- o www.dcr.virginia.gov/natural heritage/dbsearchtool.shtml
- DGIF Fish and Wildlife Information Service

Information about Virginia's Wildlife resources:

- o <a href="http://vafwis.org/fwis/">http://vafwis.org/fwis/</a>
- 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
  - o 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:

- o <u>www.epa.gov/superfund/sites/cursites/index.htm</u>
- EPA RCRAInfo Search

Information on hazardous waste facilities:

- o www.epa.gov/enviro/facts/rcrainfo/search.html
- Total Maximum Daily Loads Approved Reports
  - o <a href="https://www.deq.virginia.gov/programs/water/waterqualityinformationtmdls/tmdl/tmdlde">https://www.deq.virginia.gov/programs/water/waterqualityinformationtmdls/tmdl/tmdlde</a> velopment/approvedtmdlreports.aspx
- EPA Envirofacts Database

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

- o www.epa.gov/enviro/index.html
- EPA NEPAssist Database

Facilitates the environmental review process and project planning: <a href="http://nepaassisttool.epa.gov/nepaassist/entry.aspx">http://nepaassisttool.epa.gov/nepaassist/entry.aspx</a>

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).

I hope this information is helpful to you.

Sincerely,

Bettina Rayfield, Program Manager Environmental Impact Review and

Long-Range Priorities