



*Commonwealth of Virginia*

***VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY***

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August 3, 2023

Mr. Joel H. Peck, Clerk  
Document Control Center  
State Corporation Commission  
1300 E. Main Street, Tyler Bldg., 1<sup>st</sup> Floor  
Richmond, Virginia 23219

RE: Application of Virginia Electric and Power Company for a Certificate of Public Convenience and Necessity: 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion, Case No. PUR-2023-00088, Application No. 325 (reviewed under DEQ #23-081S).

Dear Mr. Peck:

As requested in Ms. Anna Dimitri's May 31, 2023 letter, the Department of Environmental Quality (DEQ) has coordinated the review of the above-referenced application, focusing on the DEQ supplement included with the application. The purpose of the review is to develop information for State Corporation Commission (SCC) staff about potential impacts to natural and cultural resources associated with the proposed project. Based on comments submitted by reviewers, we are providing a summary of potential impacts to these resources from construction and operation of the electric transmission lines and switching stations, as well as recommendations for minimizing those impacts and for compliance with applicable legal requirements. This report includes copies of the comments submitted by reviewers.

Thank you for the opportunity to review the application for SCC application. We trust that you will find our report helpful in your review process. If you have any questions, please feel free to call me at (804) 659-1915 or Janine Howard at (804) 659-1916.

Sincerely,

A handwritten signature in black ink that reads "Bettina Rayfield".

Bettina Rayfield, Program Manager  
Environmental Impact Review

ec: Anna Dimitri, SCC  
Valerie M. Chafee, Dominion  
David J. DePippo, Dominion  
Allison Tillett, DCR  
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Tiffany Birge, VMRC  
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Martha Little, Virginia Outdoors Foundation  
Deborah Gosney, Southside PDC  
H. Wayne Carter III, Mecklenburg County



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**COMMENTS OF THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

concerning the Application of Virginia Electric and Power Company (Dominion or Company) for a Certificate of Public Convenience and Necessity: 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion, Case No. PUR-2023-00088, Application No. 325 (reviewed under DEQ #23-081S).

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

Department of Environmental Quality (DEQ)  
Department of Conservation and Recreation (DCR)  
Department of Health (VDH)  
Department of Historic Resources (DHR)  
Department of Aviation (DOAV)  
Department of Transportation (VDOT)

The Department of Wildlife Resources, Marine Resources Commission, Virginia Outdoors Foundation, Department of Agriculture and Consumer Services, Department of Forestry, Marine Resources Commission, Southside Planning District Commission, and Mecklenburg County were also invited to comment.

The information considered in this review includes Dominion's 230 kV *Finneywood-Jeffress Lines and Jeffress Switching Station Conversion*, Application No. 325, Case No. PUR-2023-00088, focusing on the information in the DEQ Supplement.

## **PROJECT DESCRIPTION**

Dominion has submitted an application to the SCC for a Certificate of Public Convenience and Necessity to conduct the 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion project in Mecklenburg County, Virginia. The project is being proposed at the request of Old Dominion Electric Cooperative to provide service to Mecklenburg Electric Cooperative's (MEC) delivery point for MEC to provide service to one of its data center customers in Mecklenburg County. Additionally, the project is needed to comply with mandatory North American Electric Reliability Corporation Reliability Standards and to maintain reliable service to accommodate overall load growth in the area. Dominion proposes to:

1. Construct two new approximately 18.3-mile 230 kV single circuit lines on new right-of-way from the future 500-230 kV Finneywood Switching Station to the newly converted Jeffress 230 kV Switching Station, resulting in the 230 kV Finneywood-Jeffress Line #2299 and 230 kV Finneywood-Jeffress Line #2302 (the "Finneywood-Jeffress Lines"). The Finneywood-Jeffress Lines will be constructed on new permanent 120-foot-wide right-of-way (ROW) supported primarily by two side-by-side single circuit weathering steel monopoles. The Finneywood-Jeffress Lines will be constructed utilizing three-phase twin-bundled 768.2 ACSS/TW type conductor with a summer transfer capability of 1,573 MVA.
2. Convert the Company's future Jeffress 115 kV Switching Station located adjacent to Occoneechee State Park south of Highway 58 near Clarksville, Virginia in Mecklenburg County to 230 kV operation (Jeffress 230 kV Station).
3. Perform minor station-related work at the future Finneywood Station to terminate the new Finneywood-Jeffress Lines.

The three components are collectively referred to as the "Project." The Company identified an approximately 18.3-mile overhead proposed route for the Finneywood-Jeffress Lines ("Route 4" or the "Proposed Route"), as well as two overhead alternative routes ("Alternative Route 3" and "Alternative Route 5"), all of which the Company is proposing for Commission consideration and notice.

The Proposed Route (Route 4) would construct two side-by-side overhead single circuit 230 kV lines approximately 18.3 miles from the future Finneywood Station to the converted Jeffress 230 kV Station.

## **LIST OF PERMITS OR APPROVALS**

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

**1. Water Permit (see “Regulatory and Coordination Needs”, Item 1, page 24).**

Virginia Water Protection Permit (9VAC25-210 *et seq.*). Issued by the Department of Environmental Quality (DEQ) for impacts to waters and jurisdictional wetlands, including isolated wetlands.

**2. Erosion and Sediment Control and Stormwater Management Plans (see “Regulatory and Coordination Needs,” Item 2, page 24).**

- a. General erosion and sediment control specifications pursuant to Virginia Code § 62.1-44.15:55. General erosion and sediment control specifications are subject to annual approval by DEQ.
- b. Erosion and Sediment Control Plans for construction of facilities not covered under Virginia Code § 62.1-44.15:55 are subject to approval by the appropriate plan approving authority.

**3. Stormwater Management Program Permit (see “Regulatory and Coordination Needs,” Item 3, page 24).**

General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (VAR10) (9VAC25-880-70 *et seq.*) involving land disturbance of 1 acre or more. Coverage under this general permit is approved by the VSMP authority.

**4. Air Quality Permits or Approvals (see “Regulatory and Coordination Needs,” Item 4, page 25).**

- a. Open Burning Permit (9VAC5-130 *et seq.*). For open burning involving demolition debris.
- b. Fugitive dust emissions (9VAC5-50-60 *et seq.*). Governs abatement of visible emissions.

**5. Solid and Hazardous Waste Management (see “Regulatory and Coordination Needs,” Item 5, page 25).**

- a. Applicable state laws and regulations include:
  - Virginia Waste Management Act (*Code of Virginia* Section 10.1-1400 *et seq.*);
  - Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC20-60);
  - Virginia Solid Waste Management Regulations (VSWMR) (9VAC20-81); and
  - Virginia Regulations for the Transportation of Hazardous Materials (9VAC20-110).

- b. Applicable Federal laws and regulations include:
- Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and
  - U.S. Department of Transportation Rules for Transportation of Hazardous materials (49 CFR Part 107).

**6. Historic and Archaeological Resources (see “Regulatory and Coordination Needs,” Item 7, page 26).**

Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation 36 CFR 800 requires that federally licensed and permitted projects consider its effects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 applies if there is federal involvement such as the issuance of a Section 404 Clean Water Act permit, including Nationwide Permits. The applicability of Section 106 to the entire project or any portion thereof must be determined by the responsible federal agency.

**7. Virginia Department of Transportation Land Use Permit (see “Regulatory and Coordination Needs,” Item 9, page 26).**

The General Rules and Regulations of the Commonwealth Transportation Board (24VAC30-151) are adopted pursuant to the authority of § 33.1-12 of the Code of Virginia. These rules and regulations provide that no work of any nature shall be performed on any real property under the ownership, control or jurisdiction of VDOT until written permission has been obtained from VDOT.

**8. Floodplain Management (see “Regulatory and Coordination Needs,” Item 10, page 26).**

Pursuant to 44 CFR 59.2(b), local floodplain ordinances are required as part of a locality’s participation in the National Flood Insurance Program (NFIP). For localities that participate in the program, all development within a special flood hazard area must comply with the locally adopted floodplain management ordinance and be permitted by the community. The NFIP participation status and contact information for Virginia communities are available as part of the [Virginia Local Floodplain Management Directory](#).

**9. Aviation (see “Regulatory and Coordination Needs,” Item 11, page 26).**

Form 7460-1 should be submitted to the Federal Aviation Administration if a proposed development is 200 feet above ground level or within 20,000 linear feet of a public use airport pursuant to Title 14 CFR Part 77 or if the development

involves any construction or alteration at any height greater than the imaginary surfaces identified in the Federal Air Regulations Part 77.

**10. Protected Species Legislation (see “Regulatory and Coordination Needs,” Item 12, page 27).**

The Federal Endangered Species Act and Virginia protected species legislation may apply if there is any taking of protected species. The applicant must comply with the Federal Endangered Species Act (16 U.S.C. sections 1531 *et seq.*), Virginia protected species legislation (Virginia Code §29.1-563 *et seq.*), and the Virginia Endangered Plant and Insect Species Act of 1979 as amended (Chapter 39 of Virginia Code Section 3.1-1020 through 1030).

## **SUMMARY OF FINDINGS AND RECOMMENDATIONS**

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

A summary of recommendations follows:

- Follow DEQ’s recommendations for construction activities to avoid and minimize impacts to wetlands to the maximum extent possible (Environmental Impacts and Mitigation, Item 1(c), page 8).
- Follow DEQ’s recommendations regarding air quality protection, as applicable (Environmental Impacts and Mitigation, Item 4(d), page 14).
- Reduce solid waste at the source, reuse it and recycle it to the maximum extent practicable, as applicable (Environmental Impacts and Mitigation, Item 5(c), page 15).
- Coordinate with the Department of Conservation and Recreation’s (DCR) Division of Natural Heritage to obtain an update on natural heritage information as needed and with questions related to its recommendations for the protection of the Eastern big-eared bat, the Whitemouth Shiner, ecological cores, and for invasive species management (Environmental Impacts and Mitigation, Item 6(e), page 18).
- Coordinate with DHR regarding the recommended to complete and submit comprehensive cultural resources surveys, along with the recommendation to

evaluate identified resources, assess of potential direct/indirect impacts to eligible and listed resources and avoid/minimize/mitigate moderate to severe impacts (Environmental Impacts and Mitigation, Item 7(c), page 20).

- Coordinate with the Virginia Department of Health (VDH) regarding its recommendations for the projection of surface waters (Environmental Impacts and Mitigation, Item 8(c), page 21)
- Follow the principles and practices of pollution prevention to the maximum extent practicable (Environmental Impacts and Mitigation, Item 10, page 22).
- Limit the use of pesticides and herbicides to the extent practicable (Environmental Impacts and Mitigation, Item 11, page 23).

## ENVIRONMENTAL IMPACTS AND MITIGATION

**1. Water Quality and Wetlands.** The DEQ Supplement (page 8) indicates that an offsite desktop wetland delineation was previously completed by ERM using remote sensing data sources. An infield wetland delineation will be completed for the approved route alignment selected by the SCC upon the Company receiving the final order.

It was determined that the Proposed Route would cross 34.3 acres of wetlands, including:

- 29.5 acres of palustrine forested wetlands
- 1.4 acres of palustrine scrub-shrub wetlands
- 0.9 acre of palustrine emergent wetlands
- 1.4 acres of riverine wetlands
- 1.2 acres of freshwater ponds

Prior to construction the Company will delineate wetlands and other waters of the U.S. 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)*.

**1(a) Agency Jurisdiction.** The State Water Control Board promulgates Virginia's water regulations covering a variety of permits to include the [Virginia Pollutant Discharge Elimination System Permit \(VPDES\)](#) regulating point source discharges to surface waters, Virginia Pollution Abatement Permit regulating sewage sludge, storage and land application of biosolids, industrial wastes (sludge and wastewater), municipal wastewater, and animal wastes, the [Surface and Groundwater Withdrawal Permit](#), and the [Virginia Water Protection \(VWP\) Permit](#) regulating impacts to streams, wetlands, and other surface waters. The VWP permit is a state permit which governs wetlands, surface water, and surface water withdrawals and impoundments. It also serves as



§401 certification of the federal Clean Water Act §404 permits for dredge and fill activities in waters of the U.S. The VWP Permit Program is under the Office of Wetlands and Stream Protection (OWSP), within the DEQ Division of Water Permitting. In addition to central office staff that review and issue VWP permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities:

- Clean Water Act, §401;
- Section 404(b)(i) Guidelines Mitigation Memorandum of Agreement (2/90);
- State Water Control Law, Virginia Code section 62.1-44.15:20 *et seq.*; and
- State Water Control *Regulations*, 9 VAC 25-210-10.

**1(b) Agency Findings.** The DEQ OWSP completed a wetland impact consultation for the proposed project on May 8, 2023. A wetland delineation has not been conducted at this time. However, Environmental Resources Management (ERM) conducted a wetland desktop study to identify probable wetlands based on a review of multiple data sources. The table below provides a summary of the medium to high probability wetlands expected to be present within the proposed Project right-of-way.

**Table 1: Summary of the Probabilities of Wetland and Waterbody Occurrence along Project Route Alternatives <sup>a, b</sup>**

Probability	Total right-of-way Acres <sup>c</sup>	Wetland and Waterbody type (acres)				
		PEM Emergent	PFO Forested	PSS Scrub-shrub	PUB Freshwater pond	Riverine Stream
Alternative Route 3						
High	0.8	NA	0.7	NA	NA	0.1
Medium/High	10.1	0.3	8.0	0.0	1.1	0.8
Medium	24.9	1.2	22.9	NA	0.3	0.5
Alternative Route 4						
High	0.8	NA	0.7	NA	NA	0.1
Medium/High	9.0	0.3	7.1	0.0	1.1	0.6
Medium	23.3	0.6	21.7	1.4	0.2	0.6
Alternative Route 5						
High	1.7	NA	1.4	NA	NA	0.2
Medium/High	9.6	0.3	8.1	0.0	0.3	0.8
Medium	38.5	2.5	34.6	0.3	0.6	0.6

NA Not applicable due to absence of wetland or waterbody type within the alternative route  
 a The numbers in this table have been rounded for presentation purposes; as a result, the totals may not reflect the sum of the addends.  
 b Jeffress Station wetlands and waterbodies are included within each route rather than individually.  
 c Total acres may not total the sum of wetland and waterbody types. This is due to some of the lower probability rankings not overlapping with NWI or interpreted wetlands, and therefore not having a wetland/waterbody type associated with them.

Measures such as but not limited to Best Management Practices (BMPs) must be taken to avoid and minimize impacts to surface waters during construction activities, including potential water quality impacts resulting from construction site runoff. The disturbance of land and surface waters, which include wetlands, open water, and streams, may require prior approval by DEQ, the U.S. Army Corps of Engineers, the Virginia Marine Resources Commission, and/or local government wetlands boards (generally in the northern and piedmont regions of Virginia). The Army Corps of Engineers and DEQ work in conjunction to provide official confirmation of whether there are federal and/or state jurisdictional surface waters that may be impacted by the proposed project. VMRC provides its own review to determine its agency jurisdiction. Review of National Wetland Inventory maps or topographic maps for locating wetlands, open waters, or streams may not be sufficient; there may need to be a site-specific review by a qualified professional.

If construction activities will occur in or along any streams (perennial, intermittent, or ephemeral), open water or wetlands, the applicant should contact the DEQ VWP manager at the Piedmont Regional Office (PRO) to determine the need for any permits prior to commencing work that could impact surface waters. DEQ's permit need decisions neither replace nor supersede requirements set forth by other local, state, federal, and Tribal laws, nor eliminate the need to obtain additional permits, approvals, consultations, or authorizations as required by law before proposed activities may commence.

**1(c) Recommendations.** DEQ OWSP recommends:

1. Prior to commencing project work, all surface waters on the project site should be delineated by a qualified professional and verified by the U.S. Army Corps of Engineers (the Corps) for federal jurisdictional waters and by DEQ for state jurisdictional waters.
2. Wetland and stream impacts should be avoided and minimized to the maximum extent practicable.
3. If the scope of the project changes, additional review will be necessary by one or more offices in the Commonwealth's Secretariat of Natural and Historic Resources and/or the Corps.
4. At a minimum, any required compensation for impacts to State Waters, including the compensation for permanent conversion of forested wetlands to emergent wetlands, should be in accordance with all applicable state regulations and laws. Consider mitigating impacts to forested or converted wetlands by establishing new forested wetlands within the impacted watershed.
5. Any temporary impacts to surface waters associated with this project should be restored to pre-existing conditions.

6. No activity may substantially disrupt the movement of aquatic life indigenous to the water body, including those species, which normally migrate through the area, unless the primary purpose of the activity is to impound water. Culverts placed in streams must be installed to maintain low flow conditions. No activity may cause more than minimal adverse effect on navigation. Furthermore the activity must not impede the passage of normal or expected high flows and the structure or discharge must withstand expected high flows.

7. Erosion and sedimentation controls should be designed in accordance with the Virginia Erosion and Sediment Control Handbook, Third Edition, 1992. These controls should be placed prior to clearing and grading and maintained in good working order to minimize impacts to state waters. These controls should remain in place until the area is stabilized and should then be removed. Any exposed slopes and streambanks should be stabilized immediately upon completion of work in each permitted area. All denuded areas should be properly stabilized in accordance with the Virginia Erosion and Sediment Control Handbook, Third Edition, 1992.

8. No machinery may enter surface waters, unless authorized by a Virginia Water Protection (VWP) individual permit, general permit, or general permit coverage.

9. Heavy equipment in temporarily impacted surface waters should be placed on mats, geotextile fabric, or other suitable material, to minimize soil disturbance to the maximum extent practicable. Equipment and materials should be removed immediately upon completion of work.

10. Activities should be conducted in accordance with any Time-of-Year restriction(s) as recommended by the Department of Wildlife Resources (DWR), the Department of Conservation and Recreation, or the Virginia Marine Resources Commission. The permittee should retain a copy of the agency correspondence concerning the Time-of-Year restriction(s), or the lack thereof, for the duration of the construction phase of the project.

11. All construction, construction access, and demolition activities associated with this project should be accomplished in a manner that minimizes construction materials or waste materials from entering surface waters, unless authorized by a VWP individual permit, general permit, or general permit coverage. Wet, excess, or waste concrete should be prohibited from entering surface waters.

12. Herbicides used in or around any surface water should be approved for aquatic use by the United States Environmental Protection Agency (EPA) or the U.S. Fish & Wildlife Service. These herbicides should be applied according to label directions by a licensed herbicide applicator. A non-petroleum based surfactant should be used in or around any surface waters.

**1(d) Requirements.** The proposed project may require a Virginia Water Protection individual permit or general permit coverage.

The applicant may submit a Joint Permit Application (JPA) in accordance with form instructions for further evaluation and final permit need determination by DEQ (see Item 2 in the Environmental Impacts and Mitigation section below for information on submitting a JPA).

**2. Subaqueous Lands and Tidal Wetlands.** According to the DEQ Supplement (page 5), all route options utilize an overhead configuration that would span waterbodies; no transmission structures are planned to be installed within waterbodies. All Proposed and Alternative Routes for the Project cross perennial and intermittent waterbodies (rivers, streams, tributaries, and open water features).

No tidal wetlands are found within the project area (page 8).

The Company requested comments from VRMC on April 20, 2023.

**2(a) Agency Jurisdiction.** The Virginia Marine Resources Commission regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to Virginia Code § 28.2-1200 through 1400. For nontidal waterways, VMRC states that it has been the policy of the Habitat Management Division to exert jurisdiction only over the beds of perennial streams where the upstream drainage area is 5 square miles or greater. The beds of such waterways are considered public below the ordinary high water line.

The VMRC serves as the clearinghouse for the JPA used by the:

- Corps for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act;
- DEQ for issuance of a VWP permit;
- VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands; and
- local wetlands board for impacts to wetlands.

The VMRC will distribute the completed JPA to the appropriate agencies. Each agency will conduct its review and respond.

**2(b) Agency Finding.** VMRC did not comment on the proposal.

**3. Erosion and Sediment Control and Stormwater Management.** The DEQ Supplement (page 17) states that Dominion has DEQ-approved *Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management for Construction of Linear Electric Transmission Facilities (TE VEP 8000)*. The specifications are given to the contractors, and erosion and sediment control measures

are required to be in place prior to construction commencing. These specifications outline the requirements for the rehabilitation of the ROW.

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

- Virginia Erosion and Sediment Control (ECS) Law (§ 62.1-44.15:51 *et seq.*) and Regulations (9VAC25-840);
- Virginia Stormwater Management Act (§ 62.1-44.15:24 *et seq.*);
- Virginia Stormwater Management Program (VSMP) regulation (9VAC25-870); and
- 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (9VAC25-880).

In addition, DEQ is responsible for the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities related to Municipal Separate Storm Sewer Systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program (9VAC25-890-40).

### **3(b) Requirements.**

**3(b)(i) Erosion and Sediment Control and Stormwater Management Annual Specifications.** In accordance with §62.1-44.15 *et seq.*, electric, natural gas and telephone utility companies, interstate and intrastate natural gas pipeline companies, and railroad companies shall, and authorities created pursuant to § 5.2-5102 may, file general erosion and sediment control standards and specifications annually with DEQ for review and approval. Such standards and specifications shall be consistent with the requirements of this article and associated regulations and the Erosion and Sediment Control Law and Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) and associated regulations where applicable. The specifications shall apply to:

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

Dominion must have a certified Responsible Land Disturber in charge of and responsible for carrying out the project-specific erosion and sediment control plan and the land-disturbing activity. As an annual standards and specifications for erosion and sediment control holder, Dominion must have a certified erosion and sediment control inspector that must provide for an inspection during or immediately following initial installation of erosion and sediment controls, at least once in every two-week period, within 48 hours following any runoff producing storm event, and at the completion of the

project. Dominion must contact [standardsandspecs@deg.virginia.gov](mailto:standardsandspecs@deg.virginia.gov) two weeks prior to land disturbance.

**3(b)(ii) General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (VAR10).** The operator or owner of a construction activity involving land disturbance of equal to or greater than 1 acre is required to register for coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also include the land disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit, and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Plan (VSMP) Permit Regulations. Additional information is available at [Stormwater | Virginia DEQ](#).

The Virginia Stormwater Management Permit (VSMP) Authority is DEQ.

**4. Air Quality.** The DEQ Supplement (page 5) states that fugitive dust will be controlled and vehicle speed will be kept to a minimum. There will be minimal earth disturbance associated with the project.

Tree clearing would be required for a significant portion of the routes and portions of the 120-foot-wide ROW for the Proposed and Alternative Routes. 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.

**4(a) Agency Jurisdiction.** The [DEQ Air Division](#), on behalf of the State Air Pollution Control Board, is responsible for developing regulations that implement Virginia's Air Pollution Control Law ([Virginia Code §10.1-1300 et seq.](#)). DEQ is charged with carrying out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate DEQ regional office is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance. As a part of this mandate, environmental impact reviews (EIRs) of projects to be undertaken in the state are also reviewed. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

The Air Division regulates emissions of air pollutants from industries and facilities and implements programs designed to ensure that Virginia meets national air quality standards. The most common regulations associated with projects are:

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

**4(b) Ozone Attainment Status.** According to the DEQ Air Division, Mecklenburg County is located in an ozone attainment area.

**4(c) Requirements.**

**4(c)(i) Fugitive Dust.** During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9VAC5-50-60 *et seq.* of the Regulations for the Control and Abatement of Air Pollution. These precautions include, but are not limited to, the following:

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

**4(c)(ii) Open Burning.** If project activities change to include open burning or the use of special incineration devices are employed in the disposal of land-clearing debris during demolition and construction, these activities must meet the requirements under 9VAC5-130 *et seq.* for open burning. Whereas, the regulation provides for, but does not require, the local adoption of a model ordinance concerning open burning, Dominion should contact the locality to determine what local requirements, if any, exist. Some applicable provisions of the regulation include, but are not limited to:

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;
- The material to be burned shall consist of clean burning demolition material;
- The burning shall be at least 500 feet from any occupied building unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;
- The burning shall be conducted at the greatest distance practicable from highways and air fields;
- The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
- The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and

- The burning shall be conducted only when the prevailing winds are away from any city, town or built-up area.

**4(d) Agency Recommendation.** Precautions should be taken to minimize emissions, particularly during periods of high ozone.

**5. Solid and Hazardous Waste Management.** The DEQ Supplement (page 11) states that a database search for solid and hazardous wastes and petroleum release sites identified environmentally regulated sites within the study area including a hazardous waste facility (handles or generates hazardous waste), a solid waste facility (landfill), one petroleum release site, and five registered petroleum storage facilities within 1-mile of the proposed route.

The Company has a procedure in place to handle petroleum contaminated soil, if encountered.

**5(a) Agency Jurisdiction.** On behalf of the Virginia Waste Management Board, the [DEQ Division of Land Protection and Revitalization](#) is responsible for carrying out the mandates of the Virginia Waste Management Act (Virginia Code §10.1-1400 *et seq.*), as well as meeting Virginia's federal obligations under the Resource Conservation and Recovery Act and the Comprehensive Environmental Response Compensation Liability Act (CERCLA), commonly known as Superfund. The DEQ Division of Land Protection and Revitalization also administers those laws and regulations on behalf of the State Water Control Board governing Petroleum Storage Tanks (Virginia Code §62.1-44.34:8 *et seq.*), including Aboveground Storage Tanks (9VAC25-91 *et seq.*) and Underground Storage Tanks (9VAC25-580 *et seq.* and 9VAC25-580-370 *et seq.*), also known as 'Virginia Tank Regulations', and § 62.1-44.34:14 *et. seq.* which covers oil spills.

*Virginia:*

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

*Federal:*

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



**5(b) Agency Findings and Database Search.** The DEQ Division of Land Protection and Revitalization (DLPR) staff conducted a 200-foot radius search of solid and hazardous waste databases (including petroleum releases) to identify sites in close proximity to the project corridor. DLPR identified one petroleum release site within the project area which might impact the project.

Petroleum release in close proximity to the project corridor:

*Pollution Complaint (PC) Number 20027055, Bynum R A Residence, 12310 Highway 92 West, Chase City, Virginia, Release Date: 06/24/2002, Status: Closed.*

The DEQ PC case identified should be further evaluated by the project engineer or manager to establish the exact location, nature and extent of the petroleum release and the potential to impact the proposed project. In addition, the project engineer or manager should contact the DEQ's Piedmont Regional Office at (804) 527-5020 (Tanks Program) for further information about the PC case.

**5(c) Pollution Prevention Recommendations.** DEQ encourages all projects and facilities to implement pollution prevention principles, including:

- the reduction, reuse and recycling of all solid wastes generated; and
- the minimization and proper handling of generated hazardous wastes.

**5(d) Requirements.**

- Any soil that is suspected of contamination or solid or hazardous wastes, including construction and demolition wastes and universal wastes, that are generated during construction must be tested and disposed of in accordance with applicable federal, state and local laws and regulations. It is the generator's responsibility to determine if a solid waste meets the criteria of a hazardous waste and as a result be managed as such.
- Contact DEQ if improperly disposed solid or hazardous wastes, or petroleum contaminated soils, are encountered during construction and follow applicable federal, state and local regulations for disposal.
- All structures being demolished should be checked as appropriate for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, state regulations 9VAC20-81-620 for ACM and 9VAC20-60-261 for LBP must be followed.
- The removal, relocation or closure or installation/operation of any regulated petroleum storage tanks, aboveground storage tank (AST) or underground storage tank (UST), must be conducted in accordance with the requirements of the Virginia Tank Regulations 9 VAC 25-91-10 *et seq.* (AST) and / or 9 VAC 25-580-10 *et seq.* (UST).

**6. Natural Heritage Resources.** According to the DEQ Supplement (page 13), Dominion queried the DWR, DCR, and the U.S. Fish and Wildlife Service (USFWS)

databases to identify significant habitat that may be impacted by the project. A number of federal- and state-listed threatened and endangered species (Northern long-eared bat, Tri-Colored bat, Atlantic pigtoe, Eastern big-eared bat, Little brown bat, Loggerhead shrike, Whitemouth shiner) were identified as possibly occurring within the project vicinity.

There are two Stream Conservation Units (SCU) located within the study area: the Allen Creek-Rt 600 SCU and the Bluestone Creek-Devils Creek SCU.

Construction and maintenance of the new transmission line facilities could have some minor impacts on wildlife; however, the impacts will be short term and limited to the period of construction. The Company will work with the appropriate jurisdictional agencies to minimize any impacts on SCUs, ecological cores, and protected species during implementation of the Project.

#### **6(a) Agency Jurisdiction.**

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

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

**6(b) Agency Findings.** The DCR DNH searched its Biotics Data System (Biotics) for occurrences of natural heritage resources from the area outlined on the submitted map.

#### **Alternative Routes 3, 4 & 5**

Eastern Big-Eared Bat: According to predicted suitable habitat modeling, there is potential for Eastern big-eared bat (*Corynorhinus rafinesquii macrotis*, G3G4T3/S2/NL/LE) to occur in the northern section of **all three alternative routes (3,4, &5)** near the Finneywood Station, if suitable habitat exists on site. The Eastern big-eared bat is named for its enormous ears twice the length of its head, is extremely rare in Virginia and is currently known only from the southeastern portion of the state.

Although widespread throughout the southeast, they are never found in large numbers. These bats roost singly or in small groups in hollow trees or abandoned buildings. Refer to the attached DCR memorandum dated July 12, 2023 for more information about this species.

Threats to this species include forest destruction, particularly hollow tree removal, decreasing availability of abandoned buildings, and possibly, insecticides. Please note that this species is currently classified as endangered by DWR.

Whitemouth Shiner: According to DCR's predicted suitable habitat modeling, there is a potential for the Whitemouth Shiner (*Notropis alborus*, G4/S1/NL/LT) to occur in Allen Creek and Butcher Creek if suitable habitat exists on site. Allen Creek is crossed by all three routes and Butcher Creek is crossed by **routes 5 and 3** with **route 4** directly adjacent to Butcher Creek.

The Whitemouth Shiner is known from the Roanoke River drainage in Virginia and from other Atlantic Slope drainages in North Carolina and South Carolina. It inhabits warm, clear, or somewhat turbid, small to medium sized creeks in the middle and lower Piedmont. This species may be found in shallow, small pools and in deep and shallow portions of long pools, in places having a silt, sand, and bedrock substrate. Please note that this species is currently classified as threatened by the Virginia Department of Wildlife (DWR).

In addition, both Allen and Butcher Creek have been designated by the DWR as a "Threatened and Endangered Species Water" for the Whitemouth Shiner.

Ecological Cores: Furthermore, the proposed project will impact Ecological Cores (**C2, C3, C4, and C5**) as identified in the Virginia Natural Landscape Assessment (<https://www.dcr.virginia.gov/natural-heritage/vaconvisvnl>). Mapped cores in the project area can be viewed via the Virginia Natural Heritage Data Explorer, available here: <http://vanhde.org/content/map>. While the SCC application document (Volume III) identifies ecological cores within each proposed alternative route where timber harvest has occurred, these forests still provide ecosystem services including erosion control, hydrological regulation, and wildlife habitat. Management practices that allow for regrowth of these forests post-harvest ensure that these ecosystem services remain intact, and others are restored.

Ecological Cores are areas of at least 100 acres of continuous interior, natural cover that provide habitat for a wide range of species, from interior-dependent forest species to habitat generalists, as well as species that utilize marsh, dune, and beach habitats. Interior core areas begin 100 meters inside core edges and continue to the deepest parts of cores. Cores also provide the natural, economic, and quality of life benefits of open space, recreation, thermal moderation, water quality (including drinking water recharge and protection, and erosion prevention), and air quality (including sequestration of carbon, absorption of gaseous pollutants, and production of oxygen).

Cores are ranked from C1 to C5 (C5 being the least significant) using nine prioritization criteria, including the habitats of natural heritage resources they contain.

Impacts to cores occur when their natural cover is partially or completely converted permanently to developed land uses. Habitat conversion to development causes reductions in ecosystem processes, native biodiversity, and habitat quality due to habitat loss; less viable plant and animal populations; increased predation; and increased introduction and establishment of invasive species.

**6(c) Threatened and Endangered Plant and Insect Species.** According to DCR DNH, the current activity will not affect any documented state-listed plants or insects.

**6(d) State Natural Area Preserves.** There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

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

**6(e)(i) Eastern Big-Eared Bat.** DCR recommends avoiding tree removal in bottomland habitats along Horsepan Creek, Finneywood Creek and their tributaries, and assessing any large potential roost trees, including suitable trees in the ROW and potential danger trees slated for removal, and/or abandoned structures on the property for bat presence/absence. DCR also recommends coordination with DWR if removal of potential roost habitat for the Eastern big-eared bat becomes necessary to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

**6(e)(ii) Whitemouth Shiner.** To minimize adverse impacts to the aquatic ecosystem due to the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations. Due to the legal status of the Whitemouth shiner, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the DWR, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

**6(e)(iii) Ecological Cores.** Alternative **Routes 3 and 4** will impact a core with very high ecological integrity. Further investigation of these impacts is recommended and DCR-DNH can conduct a formal impact analysis upon request. This analysis would estimate direct impacts to cores and habitat fragments and indirect impacts to cores. The final products of this analysis would include an estimate of the total impact of the project in terms of acres. For more information about the analysis and service charges, please contact Joe Weber, DCR Chief of **Biodiversity Information and Conservation Tools** at [Joseph.Weber@dcr.virginia.gov](mailto:Joseph.Weber@dcr.virginia.gov).

DCR recommends avoidance of impacts to cores. When avoidance cannot be achieved, DCR recommends minimizing the area of impacts overall and concentrating the impacted area at the edges of cores, so that the most interior remains intact.

**6(e)(iv) Invasive Species Management.** DCR recommends the development and implementation of an invasive species plan to be included as part of the maintenance practices for all ROW. The invasive species plan should include an invasive species inventory for the project area based on the current DCR Invasive Species List (<http://www.dcr.virginia.gov/natural-heritage/document/nh-invasive-plant-list-2014.pdf>) and methods for treating the invasives. DCR also recommends the ROW restoration and maintenance practices planned include appropriate revegetation using native species in a mix of grasses and forbs, robust monitoring, and an adaptive management plan to provide guidance if initial revegetation efforts are unsuccessful or if invasive species outbreaks occur.

**7. Historic and Archaeological Resources.** The DEQ Supplement (pages 17-23) indicates a Stage 1 Pre-Application Analysis was completed for the proposed project in accordance with DHR guidelines. Both archaeological sites and historic properties were identified in the vicinity of the project corridor of the Proposed Route. Coordination with DHR is ongoing.

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

**7(b) Agency Comments.** DHR has been in direct consultation with the applicant's consultants regarding the 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion Project. In correspondence dated June 15, 2023, DHR reviewed and provided comments on the pre-application report, *Finneywood to Jeffress 230 kV Transmission Line Project Pre-Application Analysis* prepared by ERM, in accordance with Section I of DHR's *Guidelines for Assessing Impacts of Proposed Electric*

*Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia (2008).*

To summarize, within the tiered study area, there are five previously identified architectural resources. These numbers include no National Historic Landmark; one resource listed in the Virginia Landmarks Register (VLR) and the National Register of Historic Places (NRHP) and three eligible and locally significant resources. The report states that all five previously recorded historic architectural resources are located in the same DHR study tiers for Route Alternatives 3 and 4. The findings are the same for each route alternative, Route Alternative 4 is the farthest away from most resources, and thus would have a lesser impact. DHR concurred that the project alternatives will cause moderate adverse impacts to VLR/NRHP-eligible Mistletoe/Mistletoe Castle (DHR ID #058-0038) and that mitigation is warranted. DHR will need additional information on impacts to VLR/NRHP-eligible Wilkinson Place/Grovesend (DHR ID #058-0281).

One recorded archaeological site (44MC0986) is located within or adjacent to the right-of-way for each of the three route alternatives. The site is considered not eligible for listing on the National Register of Historic Places and is unlikely to warrant further consideration in the context of the Project. DHR recommended that the portions of the proposed right-of-way that have not been subject survey should be surveyed at a phase I level. DHR also agreed that previously identified sites should be re-identified. Sites that have not been evaluated should be evaluated for potential eligibility for listing in the National Register of Historic Places. After the sites have been re-identified and the boundaries have been sufficiently delineated, sites that have been recommended eligible or potentially eligible for listing in the NRHP should be avoided. If the sites cannot be avoided, additional testing and treatment may be needed.

**7(c) Recommendation.** DHR recommends:

1. Comprehensive cultural resources surveys, in accordance with DHR guidelines, by qualified professional prior to construction of any SCC-approved alternative.
2. Evaluation of all identified resources for listing in the VLR/NRHP.
3. Assessment of potential direct and indirect impacts to all VLR/NRHP-eligible/ listed resources, including previously inaccessible properties.
4. Avoidance, minimization, and/or mitigation of moderate to severe impacts to VLR/NRHP- eligible/listed resources by Dominion in consultation with DHR and other stakeholders.

Upon receipt of the requested material, DHR can provide additional comments regarding impacts to historic resources.

**7(d) Requirement.** If there is any federal involvement, Dominion should coordinate the project or any portion thereof with the responsible federal agency and DHR to ensure compliance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations at 36 CFR 800.

**8. Public Water Supply.** The DEQ Supplement (page 32) indicates that Dominion has coordinated with VDH regarding public water supply impacts.

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

**8(b) Agency Findings.** VDH-ODW determined that the Town of Clarksville Kerr Reservoir surface water intake (PWS ID 5117310) is located within a 5-mile radius of the project site.

The project is within the watershed of the following public surface water sources:

PWS ID Number	System Name	Facility Name
<b>5117310*</b>	<b>CLARKSVILLE, TOWN OF</b>	<b>KERR RESERVOIR INTAKE</b>
5025450	LAWRENCEVILLE, TOWN OF	MEHERRIN RIVER
3595250	EMPORIA, CITY OF	MEHERRIN RIVER
5117707	ROANOKE RIVER SERVICE AUTHORITY	LAKE GASTON INTAKE

\*the project falls within 5 miles of the intake and is within the intake's watershed

**8(c) Recommendation.** Utilize best management practices, including erosion and sedimentation controls and spill prevention controls and countermeasures on the project site. Carefully manage materials while on site and during transport to prevent impacts to nearby surface water.

**8(d) Requirement.** Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

**9. Transportation.** According to the DEQ Supplement (page 30) major roadways as well as secondary and tertiary roadways are crossed by the Proposed Route. Temporary closures of roads and or traffic lanes would be required during construction of the Project. No long-term impacts on roads are anticipated. The Company will comply with the VDOT requirements for access to the rights-of-way from public roads. The Company will obtain the necessary VDOT permits as required and comply with permit conditions. The Company will prepare traffic control plans for the counties' review and approval for all work that may result in temporary road closures.

**9(a) Agency Jurisdiction.** The [Virginia Department of Transportation](#) provides comments pertaining to potential impacts to existing and future transportation systems.

**9(b) Agency Requirement.** Any portion of the proposed projects that will occur within VDOT right-of-way (ROW) will require a Land Use Permit (LUP). A Land Use Permit will be required for installation of the overhead transmission lines across VDOT roads/ROW. The permit may be obtained from the appropriate VDOT Residency office.

A Land Use Permit is required for any temporary construction entrances and any entrances to be installed for permanent access to the transmission line.

All work within the ROW must comply with all current VDOT standards, specifications, Work Area Protection Manual, and Land Use Permit requirements.

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

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed project is committed to minimizing its environmental impacts, setting environmental goals and achieving improvements in its environmental performance. DEQ offers EMS development assistance and it recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program (VEEP). VEEP provides recognition, annual permit fee discounts, and the possibility for alternative compliance methods.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Integrate pollution prevention techniques into the facility maintenance and operation, to include inventory control for centralized storage of hazardous materials. Maintenance facilities should have sufficient and suitable space to allow for effective inventory control and preventive maintenance.

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

**11. Pesticides and Herbicides.** In general, when pesticides or herbicides must be used, their use should be strictly in accordance with manufacturers' recommendations.



In addition, we recommend that Dominion use the least toxic pesticides or herbicides effective in controlling the target species to the extent feasible. For more information on pesticide or herbicide use, contact VDACS at 804-371-6560.

**12. Floodplain Management.** The DEQ Supplement (page 10) states based on the online Flood Insurance Rate Maps, the project study area lies within Zone X (areas of minimal flood hazard, Zone AE (base flood elevation and 100-year floodplain), and Zone A (areas with a 1% annual chance of flooding). Temporary grading and timber mats may be used within the 100-year floodplain. The Company will coordinate with the local floodplain coordinators as required.

**12(a) Agency Jurisdiction.** DCR is the lead coordinating agency for the Commonwealth's floodplain management program and the National Flood Insurance Program (Executive Memorandum 2-97).

**12(b) Requirement.** Dominion must contact the local floodplain administrator for an official floodplain determination and comply with the community's local floodplain ordinance, including receiving a local permit, as necessary. Failure to comply with the local floodplain ordinance could result in enforcement action from the locality.

**13. Aviation Impacts.** The DEQ Supplement (page 31) indicates that the Company has coordinated with the Department of Aviation and confirmed that the Project is located within 20,000 linear feet of the Chase City Airport. As such the Company is required to submit a completed 7460 form to the Federal Aviation Administration (FAA).

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

**13(b) Agency Finding.** DOAV found that the proposed project is located roughly 3.1 miles to the northeast of the Lake Country Airport and 2.1 miles to the southeast of the Chase City Airport. This project lies within 20,000 feet of both airports which requires additional attention to the flying public.

**13(c) Requirements.** Submit a Form 7460-1 to the Federal Aviation Administration (FAA) for any portion of this project that reaches a height above ground level of 200' or more, to ensure that the construction would not constitute a hazard to air navigation. The Form 7460-1 should be completed and submitted to the FAA at least 45 days before the start of the proposed construction.

## REGULATORY AND COORDINATION NEEDS

**1. Water Quality and Wetlands.** A VWP individual or general permit (9VAC25-210 *et seq.*) may be required. If applicable, permitting action commences with the receipt of a complete JPA. Questions on the applicability and fulfillment of VWP permit requirements may be addressed to DEQ PRO (Bryan Jones, 804-712-4001).

To obtain a JPA form, contact VMRC (Tiffany Birge at (757) 247-2254 or [Tiffany.Birge@mrc.virginia.gov](mailto:Tiffany.Birge@mrc.virginia.gov)).

**2. Erosion and Sediment Control and Stormwater Management.** Transmission line construction must comply with Dominion's DEQ-approved annual specifications. Dominion must contact [standardsandspecs@deq.virginia.gov](mailto:standardsandspecs@deq.virginia.gov) two weeks prior to land disturbance. Dominion must have a certified Responsible Land Disturber in charge of and responsible for carrying out the project-specific erosion and sediment control plan and the land-disturbing activity. Questions regarding annual erosion and sediment control specifications should be directed to DEQ ([standardsandspecs@deq.virginia.gov](mailto:standardsandspecs@deq.virginia.gov)).

Buildings, facilities and other structures not covered under § 62.1-44.15:55 must comply with the requirements of the appropriate local erosion and sediment control and stormwater program. Dominion must contact officials with the appropriate locality to determine local requirements.

**3. General Virginia Pollutant Discharge Elimination System Permit for Discharges of Stormwater from Construction Activities (VAR10).** For projects involving land-disturbing activities equal to or greater than 1 acre, Dominion is required to apply to DEQ under the Virginia Stormwater Management Program (VSMP) General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also includes the land disturbance of less than 1 acre of total land area that is part of a larger common plan of development or sale, if the larger common plan of development will ultimately disturb equal to or greater than 1 acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit, and the SWPPP must address water quality and quantity in accordance VSMP Permit Regulations (VSWML §62.1-44.15:24 *et seq.*; VSMP Permit Regulations 9VAC25-870 *et seq.*). Specific questions regarding the VSMP General Permit for Construction Activities requirements should be directed to DEQ, the VSMP authority for the project.

Contact DEQ's Piedmont Regional Office with questions (Elizabeth Southers, 804-754-5172).

**4. Air Quality Regulations.** Construction and operation of the transmission lines are subject to air pollution control regulations administered by DEQ. The following sections of Virginia Administrative Code may be applicable:

- 9VAC5-50-60 *et seq.* governing fugitive dust emissions; and
- 9VAC5-130 *et seq.*, for open burning.
- 

Contact DEQ PRO (James Kyle, 804-489-6241) for additional information about air pollution control requirements.

**5. Solid and Hazardous Waste Management.** Contact PRO, Shawn Weimer (804-659-2704), for information on suitable waste disposal sites in the project area or if contaminated soils are encountered.

**5(a) Solid and Hazardous Waste.** Contaminated soil, all solid waste, hazardous waste, and hazardous materials must be managed in accordance with all applicable federal, state and local environmental regulations.

**5(b) Asbestos-Containing Material.** If applicable, it is the responsibility of the owner or operator of a demolition activity, prior to the commencement of the demolition, to thoroughly inspect the affected part of the facility where the operation will occur for the presence of asbestos, including Category I and Category II non-friable asbestos-containing material. Upon classification as friable or non-friable, all asbestos-containing material shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9VAC 20-81-620) and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9VAC20-110-10 *et seq.*). Contact the Department of Labor and Industry (804-371-2327) for additional information.

**5(c) Lead-Based Paint.** If applicable, this project must comply with the U.S. Department of Labor Occupational Safety and Health Administration (OSHA) regulations and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements, contact the Department of Professional and Occupational Regulation (804-367-8500).

**5(d) Storage Tanks.** Report the installation, relocation or removal of any above or below ground petroleum storage tank to DEQ Piedmont Regional Office (804-527-5020). The removal, relocation or closure or installation/operation of any regulated petroleum storage tanks, aboveground storage tank (AST) or underground storage tank (UST), must be conducted in accordance with the requirements of the Virginia Tank Regulations 9 VAC 25-91-10 *et seq.* (AST) and / or 9 VAC 25-580-10 *et seq.* (UST).

**6. Natural Heritage Resources.** Contact DCR DNH (Rene' Hypes at 804-371-2708 or [Rene.Hypes@dcr.virginia.gov](mailto:Rene.Hypes@dcr.virginia.gov)) to obtain an update on natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

Coordinate with DCR (Allison Tillett, 804-238-8620) regarding its recommendations for the protection of the Eastern big-eared bat, the Whitemouth Shiner, ecological cores, and for invasive species management.

Coordinate with DWR (Amy Martin, 804-367-2211) regarding the Whitemouth Shiner to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

**7. Historic and Archaeological Resources.** Coordinate with DHR (Jennifer Bellville-Marrion, [Jennifer.Bellville-Marrion@dhr.virginia.gov](mailto:Jennifer.Bellville-Marrion@dhr.virginia.gov)) regarding the recommendation to complete and submit comprehensive cultural resources surveys, along with the recommendation to evaluate identified resources, assess of potential direct/indirect impacts to eligible and listed resources and avoid/minimize/mitigate moderate to severe impacts.

If applicable, Dominion should coordinate the project with the responsible federal agency and DHR to ensure compliance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations at 36 CFR 800. Contact DHR (Roger Kirchen at 804-482-6091 or [Roger.Kirchen@dhr.virginia.gov](mailto:Roger.Kirchen@dhr.virginia.gov)) for Section 106 coordination as necessary.

**8. Public Water Supply and Waterworks.** Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility. Contact VDH, Arlene Fields Warren, with questions (804-864-7492).

**9. VDOT Land Use Permit.** Contact the VDOT Residency Office ([https://www.virginiadot.org/about\\_vdot/residencies.asp](https://www.virginiadot.org/about_vdot/residencies.asp)) for questions on applicable land-use and ROW permitting requirements for the projects and to obtain the appropriate authorizations. Questions may also be directed to Todd Scheid (804-914-3446).

**10. Floodplain Management.** Dominion must reach out to the local floodplain administrator to ensure compliance with the local floodplain management 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)

**11. Aviation Impacts.** Contact the FAA Washington Airports District Office (703-661-1354) to submit Form 7460-1 for compliance with federal aviation requirements for any structure, permanent or temporary, that reaches 200-feet above ground level. This form must be submitted at least 45 days before the start of the proposed construction.

Joel H. Peck  
DEQ #23-081S  
PUR-2023-00088

Contact DOAV (Scott Denny, [Scott.Denny@doav.virginia.gov](mailto:Scott.Denny@doav.virginia.gov)) with questions if necessary.

**12. Wildlife and Fisheries Resources.** Coordinate with DWR (Amy Martin, 804-367-2211) regarding the Whitemouth Shiner to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

**Re: Sufficiency Review: 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion, Case No. PUR-2023-00088, Application No. 325**

Ballou, Thomas (DEQ) <Thomas.Ballou@deq.virginia.gov>

Fri 6/2/2023 7:44 AM

To:Howard, Janine (DEQ) <Janine.Howard@deq.virginia.gov>

Good morning Janine - Mecklenburg County is an attainment air for the NAAQS, including ozone.

---

**From:** Howard, Janine (DEQ) <Janine.Howard@deq.virginia.gov>

**Sent:** Thursday, June 1, 2023 4:12 PM

**To:** Ballou, Thomas (DEQ) <Thomas.Ballou@deq.virginia.gov>

**Cc:** Howard, Janine (DEQ) <Janine.Howard@deq.virginia.gov>

**Subject:** Sufficiency Review: 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion, Case No. PUR-2023-00088, Application No. 325

Hello Tom,

We have received a request from the SCC to review Dominion's application for the 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion Project, Case No. PUR-2023-00088.

As part of the sufficiency review process, would you please provide the ozone attainment status of Mecklenburg County?

The SCC application documents are available via Dominion's website: [Legal | Dominion Energy](#)

Thank you,

Janine

*Janine Howard*

Environmental Impact Review Coordinator  
Virginia Department of Environmental Quality  
1111 East Main Street, Suite 1400  
Richmond, VA 23219  
804-659-1916

For program updates and public notices please subscribe to [Constant Contact](#).



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

**MEMORANDUM**

DATE: July 12, 2023  
TO: Janine Howard  
FROM: Allison Tillett, Environmental Impact Review Coordinator  
SUBJECT: DEQ 23-081S, 230 KV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion

**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. PRR also administers the Land & Water Conservation Fund (LWCF) program in Virginia.

**Division of Natural Heritage**

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

**Alternative Routes 3, 4 & 5**

According to predicted suitable habitat modeling, there is potential for Eastern big-eared bat (*Corynorhinus rafinesquii macrotis*, G3G4T3/S2/NL/LE) to occur in the northern section of **all three alternative routes (3,4, &5)** near the Finneywood Station, if suitable habitat exists on site. The Eastern big-eared bat is named for its enormous ears twice the length of its head, is extremely rare in Virginia and is currently known only from the southeastern portion of the state. Although widespread throughout the southeast, they are never found in large numbers. These bats roost singly or in small groups in hollow trees or abandoned buildings. They forage only after dark primarily in mature forests of both upland and lowland areas along permanent bodies of water (NatureServe, 2009). The details of this bat's feeding behavior and much of its natural history remain a mystery. Lack of information regarding the ecology of the Eastern big-eared bat, and their sensitivity to disturbance, make

them particularly vulnerable to destruction of roost sites and feeding areas where their presence goes undetected (Handley and Schwab 1991, Harvey 1992).

Threats to this species include forest destruction, particularly hollow tree removal, decreasing availability of abandoned buildings, and possibly, insecticides. Please note that this species is currently classified as endangered by the Virginia Department of Wildlife Resources (VDWR).

DCR recommends avoiding tree removal in bottomland habitats along Horsepan Creek, Finneywood Creek and their tributaries, and assessing any large potential roost trees, including suitable trees in the right-of-way (ROW) and potential danger trees slated for removal, and/or abandoned structures on the property for bat presence/absence. DCR also recommends coordination with DWR if removal of potential roost habitat for the Eastern big-eared bat becomes necessary to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

Additionally, according to DCR's predicted suitable habitat modeling, there is a potential for the Whitemouth Shiner (*Notropis alborus*, G4/S1/NL/LT) to occur in Allen Creek and Butcher Creek if suitable habitat exists on site. Allen Creek is crossed by all three routes and Butcher Creek is crossed by **routes 5 and 3** with **route 4** directly adjacent to Butcher Creek.

The Whitemouth Shiner is known from the Roanoke River drainage in Virginia and from other Atlantic Slope drainages in North Carolina and South Carolina (NatureServe, 2009). It inhabits warm, clear, or somewhat turbid, small to medium sized creeks in the middle and lower Piedmont. This species may be found in shallow, small pools and in deep and shallow portions of long pools, in places having a silt, sand, and bedrock substrate. Please note that this species is currently classified as threatened by the Virginia Department of Wildlife (VDWR).

Impoundment, channelization, siltation, and agricultural runoff are threats to the habitat of the Whitemouth shiner (Burkhead and Jenkins, 1991).

In addition, both Allen and Butcher Creek have been designated by the VDWR as a "Threatened and Endangered Species Water" for the Whitemouth Shiner.

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations. Due to the legal status of the Whitemouth shiner, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDWR, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

Furthermore, the proposed project will impact Ecological Cores (**C2, C3, C4, and C5**) as identified in the Virginia Natural Landscape Assessment (<https://www.dcr.virginia.gov/natural-heritage/vaconvisvnl>). Mapped cores in the project area can be viewed via the Virginia Natural Heritage Data Explorer, available here: <http://vanhde.org/content/map>. While the SCC application document (Volume III) identifies ecological cores within each proposed alternative route where timber harvest has occurred, these forests still provide ecosystem services including erosion control, hydrological regulation, and wildlife habitat. Management practices that allow for regrowth of these forests post-harvest ensure that these ecosystem services remain intact, and others are restored.

Ecological Cores are areas of at least 100 acres of continuous interior, natural cover that provide habitat for a wide range of species, from interior-dependent forest species to habitat generalists, as well as species that utilize marsh,



dune, and beach habitats. Interior core areas begin 100 meters inside core edges and continue to the deepest parts of cores. Cores also provide the natural, economic, and quality of life benefits of open space, recreation, thermal moderation, water quality (including drinking water recharge and protection, and erosion prevention), and air quality (including sequestration of carbon, absorption of gaseous pollutants, and production of oxygen). Cores are ranked from C1 to C5 (C5 being the least significant) using nine prioritization criteria, including the habitats of natural heritage resources they contain.

Impacts to cores occur when their natural cover is partially or completely converted permanently to developed land uses. Habitat conversion to development causes reductions in ecosystem processes, native biodiversity, and habitat quality due to habitat loss; less viable plant and animal populations; increased predation; and increased introduction and establishment of invasive species.

DCR recommends avoidance of impacts to cores. When avoidance cannot be achieved, DCR recommends minimizing the area of impacts overall and concentrating the impacted area at the edges of cores, so that the most interior remains intact.

Alternative **Routes 3 and 4** will impact a core with very high ecological integrity. Further investigation of these impacts is recommended and DCR-DNH can conduct a formal impact analysis upon request. This analysis would estimate direct impacts to cores and habitat fragments and indirect impacts to cores. The final products of this analysis would include an estimate of the total impact of the project in terms of acres. For more information about the analysis and service charges, please contact Joe Weber, DCR Chief of **Biodiversity Information and Conservation Tools** at [Joseph.Weber@dcr.virginia.gov](mailto:Joseph.Weber@dcr.virginia.gov).

DCR recommends the development and implementation of an invasive species plan to be included as part of the maintenance practices for all right-of-way (ROW). The invasive species plan should include an invasive species inventory for the project area based on the current DCR Invasive Species List (<http://www.dcr.virginia.gov/natural-heritage/document/nh-invasive-plant-list-2014.pdf>) and methods for treating the invasives. DCR also recommends the ROW restoration and maintenance practices planned include appropriate revegetation using native species in a mix of grasses and forbs, robust monitoring, and an adaptive management plan to provide guidance if initial revegetation efforts are unsuccessful or if invasive species outbreaks occur.

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

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

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

The VDWR maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Amy Martin at 804-367-2211 or [amy.martin@dwr.virginia.gov](mailto:amy.martin@dwr.virginia.gov).

Division of State Parks

DCR's Division of State Parks is responsible for acquiring and managing, state parks. Park development and master planning are managed by the Division of Planning and Recreation Resources. Master plans are required prior to a parks opening and are updated every ten years (Virginia Code § 10.1-200 *et seq.*).

### Division of Dam Safety and Floodplain Management

#### Dam Safety Program:

The Dam Safety program was established to provide proper and safe design, construction, operation and maintenance of dams to protect public safety. Authority is bestowed upon the program according to *The Virginia Dam Safety Act*, Article 2, Chapter 6, Title 10.1 (10.1-604 *et seq.*) of the Code of Virginia and Dam Safety Impounding Structure Regulations (Dam Safety Regulations), established and published by the Virginia Soil and Water Conservation Board (VSWCB).

#### 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)

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

Cc: Amy Martin, VDWR

#### Literature Cited

Burkhead, N.M. and R.E. Jenkins. 1991. Whitemouth shiner. In *Virginia's Endangered Species: Proceedings of a Symposium*. K. Terwilliger ed. The McDonald and Woodward Publishing Company, Blacksburg, VA.

Handley, C.O., and D. Schwab. 1991. Eastern big-eared bat. In *Virginia's Endangered Species: Proceedings of a Symposium*. K. Terwilliger ed. The McDonald and Woodward Publishing Company, Blacksburg, Virginia. p. 571-573.

Harvey, M.J. 1992. Bats of the Eastern United States. Arkansas Game and Fish Commission, Little Rock, Arkansas. pp.46

NatureServe. 2009. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.1. NatureServe, Arlington, Virginia. Available <http://www.natureserve.org/explorer>. (Accessed: March 31, 2010).



# COMMONWEALTH of VIRGINIA

Travis A. Voyles  
Secretary of Natural and  
Historic Resources

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

Julie V. Langan  
Director  
Tel: (804) 367-2323  
Fax: (804) 367-2391  
[www.dhr.virginia.gov](http://www.dhr.virginia.gov)

July 14, 2023

Janine Howard  
Dept. of Environmental Quality  
Office of Environmental Impact Review  
P.O. Box 1105  
Richmond, VA 23218

Re: 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion  
Case No. PUR-2023-00088  
Mecklenburg County, VA  
DHR File No. 2023-3309  
DEQ #23-081S

Dear Ms. Howard:

We have received your request for comments on the project referenced above. Our comments are provided as assistance to the Virginia Department of Environmental Quality (DEQ) and the State Corporation Commission (SCC).

DHR has been in direct consultation with the applicant's consultants regarding the 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion Rebuild Project. In correspondence dated June 15, 2023, DHR reviewed and provided comments on the pre-application report, *Finneywood to Jeffress 230 kV Transmission Line Project Pre-Application Analysis* prepared by ERM, in accordance with Section I of DHR's *Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia* (2008).

To summarize, within the tiered study area, there are five (5) previously identified architectural resources. These numbers include no (0) National Historic Landmark; one (1) resource listed in the Virginia Landmarks Register (VLR) and the National Register of Historic Places (NRHP) and three (3) eligible and locally significant resources. The report states that all five previously recorded historic architectural resources are located in the same DHR study tiers for Route Alternatives 3 and 4. The findings are the same for each route alternative, Route Alternative 4 is the farthest away from most resources, and thus would have a lesser impact. We concurred that the project alternatives will cause moderate adverse impacts to VLR/NRHP-eligible Mistletoe/Mistletoe Castle (DHR ID #058-0038) and that mitigation is warranted. We will need additional information on impacts to VLR/NRHP-eligible Wilkinson Place/Grovesend (DHR ID #058-0281).

One recorded archaeological site (44MC0986) is located within or adjacent to the right-of-way for each of the three route alternatives. The site is considered not eligible for listing on the National Register of Historic Places

Western Region Office  
962 Kime Lane  
Salem, VA 24153  
Tel: (540) 387-5443  
Fax: (540) 387-5446

Northern Region Office  
5357 Main Street  
PO Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7029  
Fax: (540) 868-7033

Eastern Region Office  
2801 Kensington Avenue  
Richmond, VA 23221  
Tel: (804) 367-2323  
Fax: (804) 367-2391

and is unlikely to warrant further consideration in the context of the Project. DHR recommended that the portions of the proposed right-of-way that have not been subject survey should be surveyed at a phase I level. DHR also agreed that previously identified sites should be re-identified. Sites that have not been evaluated should be evaluated for potential eligibility for listing in the National Register of Historic Places. After the sites have been re-identified and the boundaries have been sufficiently delineated, sites that have been recommended eligible or potentially eligible for listing in the NRHP should be avoided. If the sites cannot be avoided, additional testing and treatment may be needed.

Our general recommendations included the following:

1. Comprehensive cultural resources surveys, in accordance with the DHR guidelines, by qualified professionals prior to construction of any SCC-approved alternative.
2. Evaluation of all identified resources for listing in the VLR/NRHP.
3. Assessment of potential direct and indirect impacts to all VLR/NRHP-eligible/listed resources, including previously inaccessible properties.
4. Avoidance, minimization, and/or mitigation of moderate to severe impacts to VLR/NRHP-eligible/listed resources by Dominion in consultation with DHR and other stakeholders.

Upon receipt of the requested materials, DHR can provide additional comments regarding impacts to historic resources. If you have any questions at this time, please contact me at [jennifer.bellville-marrion@dhr.virginia.gov](mailto:jennifer.bellville-marrion@dhr.virginia.gov).

Sincerely,



Jenny Bellville-Marrion, Project Review Archaeologist  
Review and Compliance Division

## DEQ Project # 23-081S, Finneywood-Jeffress Switching Station Conversion

Denny, S. Scott (DOAV) <Scott.Denny@doav.virginia.gov>

Tue 6/13/2023 10:00 AM

To:Howard, Janine (DEQ) <Janine.Howard@deq.virginia.gov>

Dear Ms. Howard:

The Virginia Department of Aviation has reviewed the information on the above referenced project. Based on the proposed location it appears as though portions the line will be within 20,000 linear feet of both the Chase City Airport and the Lake Country Airport. Therefore a 7460 form must be submitted to the Federal Aviation Administration (FAA) for evaluation on potential impacts to air navigation. Provided the FAA issues a "Determination of No Hazard", the Department has no objection to the project as it has been presented.

Please feel free to contact me at (804) 236-3638 if you have any questions.

Sincerely,

S. Scott Denny  
Senior Aviation Planner  
Virginia Department of Aviation



# COMMONWEALTH OF VIRGINIA

Greg Campbell  
Director

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

V/TDD – (804) 236-3624  
FAX – (804) 236-3635

July 17, 2023

Mr. Janine Howard  
Department of Environmental Quality  
Office of Environmental Impact Review  
PO Box 1105  
Richmond, VA 23218

**RE: 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion, Case No PUR-2023-00088, Application No. 325**

Dear Ms. Howard,

The Virginia Department of Aviation has received and reviewed the supporting documents pertaining to the 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion.

The proposed project is located roughly 3.1 miles to the Northeast of the Lake Country airport and 2.1 miles to the Southeast of the Chase City airport. This project lies within 20,000 feet of both airports which requires additional attention to the flying public. Should the proposed project at any point exceed an height above the ground of 200 feet, the Department requests that the project proponent notify the Federal Aviation Administration by submitting a completed 7460-1 at least 45 days before the start of the proposed construction.

Sincerely,

*Stephen Smiley*

Stephen Smiley  
Senior Aviation Planner  
Airport Services Division





Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Travis A. Voyles
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4020

May 8, 2023

James P. Young
Environmental Specialist III
Dominion Energy Environmental Services
120 Tredegar Street
Richmond, VA 23219

RE: Dominion Energy Virginia's Proposed 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion Project - Mecklenburg County, VA

Dear Mr. Young:

In accordance with the Department of Environmental Quality-State Corporation Commission Memorandum of Agreement Regarding Wetland Impact Consultation (July 2003), we have reviewed the information submitted by Dominion Energy Virginia (Dominion). Dominion proposes to construct two new 230 kV single circuit lines on new right-of-way from the future 500-230 kV Finneywood Switching Station to the Company's future Jeffress 115 kV Switching Station (the 230 kV Finneywood-Jeffress Lines), and then to convert the future Jeffress 115 kV Switching Station located adjacent to Occoneechee State Park south of Highway 58 near Clarksville, Virginia, in Mecklenburg County, to 230 kV operation (Jeffress 230 kV Station) (collectively, the Project).

Summary of Findings

A wetland delineation has not been conducted at this time. However, Environmental Resources Management conducted a wetland desktop study to identify probable wetlands based on a review of multiple data sources. The tables below provide a summary of the medium to high probability wetlands expected to be present within the proposed Project right-of-way.

Table 1: Summary of the Probabilities of Wetland and Waterbody Occurrence along Project Route Alternatives a, b

Table with 7 columns: Probability, Total right-of-way Acres, and Wetland and Waterbody type (acres) including PEM Emergent, PFO Forested, PSS Scrub-shrub, PUB Freshwater pond, and Riverine Stream. Row 1: Alternative Route 3, High, 0.8, NA, 0.7, NA, NA, 0.1.

Probability	Total right-of-way Acres c	Wetland and Waterbody type (acres)				
		PEM Emergent	PFO Forested	PSS Scrub-shrub	PUB Freshwater pond	Riverine Stream
Medium/High	10.1	0.3	8.0	0.0	1.1	0.8
Medium	24.9	1.2	22.9	NA	0.3	0.5
Alternative Route 4						
High	0.8	NA	0.7	NA	NA	0.1
Medium/High	9.0	0.3	7.1	0.0	1.1	0.6
Medium	23.3	0.6	21.7	1.4	0.2	0.6
Alternative Route 5						
High	1.7	NA	1.4	NA	NA	0.2
Medium/High	9.6	0.3	8.1	0.0	0.3	0.8
Medium	38.5	2.5	34.6	0.3	0.6	0.6

NA Not applicable due to absence of wetland or waterbody type within the alternative route

a The numbers in this table have been rounded for presentation purposes; as a result, the totals may not reflect the sum of the addends.

b Jeffress Station wetlands and waterbodies are included within each route rather than individually.

c Total acres may not total the sum of wetland and waterbody types. This is due to some of the lower probability rankings not overlapping with NWI or interpreted wetlands, and therefore not having a wetland/waterbody type associated with them.

**Water Quality and Wetlands.** Measures such as but not limited to Best Management Practices (BMPs) must be taken to avoid and minimize impacts to surface waters during construction activities, including potential water quality impacts resulting from construction site runoff. The disturbance of land and surface waters, which include wetlands, open water, and streams, may require prior approval by DEQ; the U.S. Army Corps of Engineers; the Virginia Marine Resources Commission (VMRC); and/or local government wetlands boards (generally in the northern and piedmont regions of Virginia). The Army Corps of Engineers and DEQ work in conjunction to provide official confirmation of whether there are federal and/or state jurisdictional surface waters that may be impacted by the proposed project. VMRC provides its own review to determine its agency jurisdiction. Review of National Wetland Inventory maps or topographic maps for locating wetlands, open waters, or streams may not be sufficient; there may need to be a site-specific review by a qualified professional. If construction activities will occur in or along any streams (perennial, intermittent, or ephemeral), open water or wetlands, the applicant should contact the DEQ-VWP manager at our Piedmont Regional Office to determine the need for any permits prior to commencing work that could impact surface waters. DEQ's permit need decisions neither replace nor supersede requirements set forth by other local, state, federal, and Tribal laws, nor eliminate the need to obtain additional permits, approvals, consultations, or authorizations as required by law before proposed activities may commence.

### **Recommendations and Potential Permits**

DEQ offers the following recommendations:

1. Prior to commencing project work, all surface waters on the project site should be delineated by a qualified professional and verified by the U.S. Army Corps of Engineers (the Corps) for federal jurisdictional waters and by DEQ for state jurisdictional waters.
2. Wetland and stream impacts should be avoided and minimized to the maximum extent practicable.
3. If the scope of the project changes, additional review will be necessary by one or more offices in the Commonwealth's Secretariat of Natural Resources and/or the Corps.
4. At a minimum, any required compensation for impacts to State Waters, including the compensation for permanent conversion of forested wetlands to emergent wetlands, should be in accordance with all

applicable state regulations and laws. Consider mitigating impacts to forested or converted wetlands by establishing new forested wetlands within the impacted watershed.

5. Any temporary impacts to surface waters associated with this project should be restored to pre-existing conditions.
6. No activity may substantially disrupt the movement of aquatic life indigenous to the water body, including those species, which normally migrate through the area, unless the primary purpose of the activity is to impound water. Culverts placed in streams must be installed to maintain low flow conditions. No activity may cause more than minimal adverse effect on navigation. Furthermore the activity must not impede the passage of normal or expected high flows and the structure or discharge must withstand expected high flows.
7. Erosion and sedimentation controls should be designed in accordance with the Virginia Erosion and Sediment Control Handbook, Third Edition, 1992. These controls should be placed prior to clearing and grading and maintained in good working order to minimize impacts to state waters. These controls should remain in place until the area is stabilized and should then be removed. Any exposed slopes and streambanks should be stabilized immediately upon completion of work in each permitted area. All denuded areas should be properly stabilized in accordance with the Virginia Erosion and Sediment Control Handbook, Third Edition, 1992.
8. No machinery may enter surface waters, unless authorized by a Virginia Water Protection (VWP) individual permit, general permit, or general permit coverage.
9. Heavy equipment in temporarily impacted surface waters should be placed on mats, geotextile fabric, or other suitable material, to minimize soil disturbance to the maximum extent practicable. Equipment and materials should be removed immediately upon completion of work.
10. Activities should be conducted in accordance with any Time-of-Year restriction(s) as recommended by the Department of Game and Inland Fisheries, the Department of Conservation and Recreation, or the Virginia Marine Resources Commission. The permittee should retain a copy of the agency correspondence concerning the Time-of-Year restriction(s), or the lack thereof, for the duration of the construction phase of the project.
11. All construction, construction access, and demolition activities associated with this project should be accomplished in a manner that minimizes construction materials or waste materials from entering surface waters, unless authorized by a Virginia Water Protection (VWP) individual permit, general permit, or general permit coverage. Wet, excess, or waste concrete should be prohibited from entering surface waters.
12. Herbicides used in or around any surface water should be approved for aquatic use by the United States Environmental Protection Agency (EPA) or the U.S. Fish & Wildlife Service. These herbicides should be applied according to label directions by a licensed herbicide applicator. A non-petroleum based surfactant should be used in or around any surface waters.

Permits:

Based on DEQ's review of the information provided by Dominion dated April 18, 2023, the proposed project may require a Virginia Water Protection (VWP) individual permit or general permit coverage. The applicant may submit a Joint Permit Application (JPA) in accordance with form instructions for further evaluation and final permit need determination by DEQ.

Should you have any questions, please don't hesitate to contact me at 804-965-4329 or at [michelle.henichack@deq.virginia.gov](mailto:michelle.henichack@deq.virginia.gov).

Sincerely,

*Michelle Henichack*

Michelle Henichack, PWS

Senior Wetland Ecologist  
Office of Wetlands & Stream Protection

Cc: Bryan Jones, DEQ- PRO  
Bettina Rayfield, DEQ - Office of Environmental Review



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MEMORANDUM

TO: Janine Howard, DEQ/EIR Environmental Program Planner

FROM: Nikolas I. Churchill, Division of Land Protection & Revitalization Review Coordinator

DATE: June 30, 2023

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

SUBJECT: Environmental Impact Review: 23-081S 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion, Case No. PUR-2023-00088, Application No. 325 in Mecklenburg County, Virginia.

The Division of Land Protection & Revitalization (DLPR) has completed its review of the State Corporation Commission's June 12, 2023 EIR for 23-081S 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion, Case No. PUR-2023-00088, Application No. 325 in Mecklenburg County, Virginia.

DLPR staff conducted a search (200 ft. radius) of the project area of solid and hazardous waste databases (including petroleum releases) to identify waste sites in close proximity to the project area. DLPR identified one (1) petroleum release site within the project area which might impact the project.

DLPR staff has reviewed the submittal and offers the following comments:

**Hazardous Waste/RCRA Facilities – none in close proximity to the project area**

**CERCLA Sites – none in close proximity to the project area**

**Formerly Used Defense Sites (FUDS) – none in close proximity to the project area.**

**Solid Waste – none in close proximity to the project area.**

**Virginia Remediation Program (VRP) – none in close proximity to the project area**

**Petroleum Releases – One (1) found in close proximity to the project area.**

- 1. PC Number 20027055, Bynum R A Residence, 12310 Highway 92 West, Chase City, Virginia, Release Date: 06/24/2002, Status: Closed.**

*Please note that the DEQ's Pollution Complaint (PC) cases identified should be further evaluated by the project engineer or manager to establish the exact location, nature and extent of the petroleum release and the potential to impact the proposed project. In addition, the project engineer or manager should contact the DEQ's Southwest Regional Office at (276) 676-4800 (Tanks Program) for further information about the PC cases.*

**PROJECT SPECIFIC COMMENTS**

None

**GENERAL COMMENTS**

**Soil, Sediment, Groundwater, and Waste Management**

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

**Asbestos and/or Lead-based Paint**

All structures being demolished/renovated/removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-81-620 for ACM and 9VAC 20-60-261 for LBP must be followed. Questions may be directed to the DEQ's Southwest Regional Office at (276) 676-4800.

**Pollution Prevention – Reuse - Recycling**

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

If you have any questions or need further information, please contact Nikolas Churchill by phone at (804) 659-2663 or email [nikolas.churchill@deq.virginia.gov](mailto:nikolas.churchill@deq.virginia.gov).

Re: NEW PROJECT SCC 230 kV Finneywood-Jeffress Lines, PUR-2023-00088, DEQ 23-081S

Gavan, Larry (DEQ) <Larry.Gavan@deq.virginia.gov>

Tue 6/13/2023 9:16 AM

To:Howard, Janine (DEQ) <Janine.Howard@deq.virginia.gov>

**Erosion and Sediment Control/ Stormwater Management Annual**

**Specifications.** In accordance with §62.1-44.15 *et seq.*, electric, natural gas and telephone utility companies, interstate and intrastate natural gas pipeline companies, and railroad companies shall, and federal entities and authorities created pursuant to § 5.2-5102 may, file general erosion and sediment control standards and specifications annually with DEQ for review and approval. Such standards and specifications shall be consistent with the requirements of this article and associated regulations and the Erosion and Sediment Control Law and Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) and associated regulations where applicable. The specifications shall apply to:

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

The applicant must have a certified Responsible Land Disturber in charge of and responsible for carrying out the project-specific erosion and sediment control plan and the land-disturbing activity. As an annual standards and specifications for erosion and sediment control holder, The applicant must have a certified erosion and sediment control inspector that must provide for an inspection during or immediately following initial installation of erosion and sediment controls, at least once in every two-week period, within 48 hours following any runoff producing storm event, and at the completion of the project. The applicant must contact: standardsandspecs@deq.virginia.gov two weeks prior to land disturbance.

**Virginia Stormwater Management Plan General Permit for Construction Activities**

**(VAR10).** The operator or owner of construction activities involving land disturbance equal to or greater than one acre must register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also include the land disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit, and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Plan (VSMP) Permit Regulations.

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**From:** Fulcher, Valerie (DEQ) <Valerie.Fulcher@deq.virginia.gov>

**Sent:** Monday, June 12, 2023 9:42 AM

**To:** dgif-ESS Projects (DWR) <ESSProjects@dwr.virginia.gov>; Tignor, Keith (VDACS)

<Keith.Tignor@vdacs.virginia.gov>; DCR-PRR Environmental Review (DCR) <envreview@dcr.virginia.gov>;

odwreview (VDH) <odwreview@vdh.virginia.gov>; Kirchen, Roger (DHR) <Roger.Kirchen@dhr.virginia.gov>; Lasher,

Terrance J. (DOF) <Terry.Lasher@dof.virginia.gov>; Didier, Karl (Virginia) <Karl.Didier@dof.virginia.gov>; Folks, Clint

(DOF) <Clint.Folks@dof.virginia.gov>; MRC - Scoping (MRC) <Scoping@mrc.virginia.gov>; EIR Coordination (VDOT)

<EIR.Coordination@vdot.virginia.gov>; Harrington, Rusty N. (DOAV) <Rusty.Harrington@doav.virginia.gov>;



**MEMORANDUM  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
Piedmont Regional Office**

**4949-A Cox Road**

**Glen Allen, VA 23060**

**804/527-5020**

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TO: Janine Howard  
Environmental Program Planner

FROM: Kelley West  
Environmental Planner

DATE: July 14, 2023

SUBJECT: 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion,  
Case No. PUR-2023-00088, Application No. 325 (23-081S)

I have reviewed the SCC Application for the above referenced project by which Dominion Energy Virginia proposes to construct two new 18.3-mile 230 kV single circuit transmission line on new right of way from future 500-230kV Finneywood Switching Station to the newly converted Jeffress Line #2299 and 230kV Finneywood-Jeffress Line #2302. The Finneywood-Jeffress Lines will be constructed on new permanent 120ft-wide-right-of-way supported primarily by two side-by-side single circuit weathering steel monopoles. The project also includes converting the company's future Jeffress 115kV switching station located adjacent to Occoneechee State Park to 230kV operation and perform minor work at the future Finneywood Station. These improvements will take place to provide service requested by the customer in Mecklenburg County and to maintain reliable service in Mecklenburg County, Virginia. My comments are as follows:

Storm Water: DEQ has regulatory authority for the Virginia Pollutant Discharge Elimination System (VPDES) programs related to municipal separate storm sewer systems (MS4s) and construction activities. Erosion and sediment control measures are addressed in local ordinances and State regulations. Additional information is available at <http://www.deq.virginia.gov/Programs/Water/StormwaterManagement.aspx>. Non-point source pollution resulting from this project should be minimized by using effective erosion and sediment control practices and structures. If the total land disturbance exceeds 10,000 square feet, an erosion and sediment control plan will be required. Some localities also require an E&S plan for disturbances less than 10,000 square feet. A Stormwater Management Plan may also be required. For any land disturbing activities equal to one acre or more, you are required to apply for coverage under the VPDES General Permit for Discharges of Storm Water from Construction Activities. The Virginia Stormwater Management Permit (VSMP) Authority may be DEQ or the locality. Specific questions regarding the Stormwater Management Program requirements should be directed to the county first then Elizabeth Southers (804) 754-5172, [Elizabeth.Southers@deq.virginia.gov](mailto:Elizabeth.Southers@deq.virginia.gov).

Wetlands: DEQ-PRO requires that all construction activities avoid and minimize impacts to surface waters including wetlands to the maximum extent possible. Permanent and temporary impacts, including conversion of wetlands from one Cowardin class to another, to surface waters

or wetlands may require prior approval by DEQ's Virginia Water Protection Program (VWPP) and/or the U.S. Army Corps of Engineers. Additionally, the Army Corps of Engineers is the final authority for an official confirmation of federal jurisdictional wetlands or other surface waters that may be impacted by the proposed project. DEQ may confirm additional waters as jurisdictional beyond those under federal authority. For any questions or additional information concerning VWP Permit requirements, please contact Bryan Jones (804) 712-4001, [Bryan.Jones@deq.virginia.gov](mailto:Bryan.Jones@deq.virginia.gov).

Air: DEQ-PRO recommends the proposed actions shall operate in a manner consistent with air pollution control practices for minimizing emissions, especially during periods of high ozone. Fugitive dust should be kept to a minimum, (9 VAC5-50-60). For further questions concerning air quality issues, please contact James Kyle at (804) 489-6241, [james.kyle@deq.virginia.gov](mailto:james.kyle@deq.virginia.gov).

Waste: The generation or recovery of any hazardous waste materials should be tested and removed in accordance with the Virginia Hazardous Waste Management Regulations (9 VAC 20-60) and/or the Virginia Solid Waste Management Regulations (9 VAC 20-81). Please understand that it is the generator's responsibility to determine if a solid waste meets the criteria of a hazardous waste and as a result be managed as such. In addition, asbestos waste, lead waste, or contaminated residues generated must be handled and disposed of in accordance with the VSWMR or VHWMR as applicable. DEQ recommends that pollution prevention principles be implemented to reduce the amount of wastes at the source, such as the re-use and recycling of construction waste materials. If you have any questions concerning hazardous/solid waste management, please contact Shawn Weimer at (804) 659-2704, [Shawn.Weimer@deq.virginia.gov](mailto:Shawn.Weimer@deq.virginia.gov).

Above/Underground Storage Tanks (AST/UST): All necessary precautions should be taken to avoid or minimize potential environmental/health risks. Please report the installation, relocation or removal of any above or below ground petroleum storage tank to DEQ Piedmont Regional Office. For any petroleum contaminated soil/groundwater that are encountered during the sub-surface phases of this project, please contact your Local Fire Marshall with any personal safety concerns and report any such contamination to DEQ-PRO. The disposal of contaminated soils and groundwater should be done in accordance with DEQ regulatory guidelines. If you have any further questions or concerns or need to report the installation, relocation or removal of a tank please contact the DEQ-PRO at (804) 527-5020.

**RE: NEW PROJECT SCC 230 kV Finneywood-Jeffress Lines, PUR-2023-00088, DEQ 23-081S**

Warren, Arlene (VDH) <Arlene.Warren@vdh.virginia.gov>

Tue 6/13/2023 10:39 AM

To:Howard, Janine (DEQ) <Janine.Howard@deq.virginia.gov>

Cc:Environmental Impact Review (DEQ) <eir@deq.virginia.gov>

**Project #: 23-081S**

**Project Name: 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion, Case No. PUR-2023-00088, Application No. 325**

UPC #: N/A

**Location: Mecklenburg County**

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

There are no public groundwater wells within a 1-mile radius of the project site.

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

PWS ID Number	System Name	Facility Name
5117310	CLARKSVILLE, TOWN OF	KERR RESERVOIR INTAKE

The project is within the watershed of the following public surface water sources (facilities where the project falls within 5 miles of the intake **and** is within the intake’s watershed are formatted in **bold**):

PWS ID Number	System Name	Facility Name
<b>5117310</b>	<b>CLARKSVILLE, TOWN OF</b>	<b>KERR RESERVOIR INTAKE</b>
5025450	LAWRENCEVILLE, TOWN OF	MEHERRIN RIVER
3595250	EMPORIA, CITY OF	MEHERRIN RIVER
5117707	ROANOKE RIVER SERVICE AUTHORITY	LAKE GASTON INTAKE

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

Materials should be managed while on site and during transport to prevent impacts to nearby surface water.

***The Virginia Department of Health – Office of Drinking Water appreciates the opportunity to provide comments. If you have any questions, please let me know.***

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**From:** Fulcher, Valerie (DEQ) <Valerie.Fulcher@deq.virginia.gov>

**Sent:** Monday, June 12, 2023 9:43 AM

**To:** dgif-ESS Projects (DWR) <ESSProjects@dwr.virginia.gov>; Tignor, Keith (VDACS) <Keith.Tignor@vdacs.virginia.gov>; DCR-PRR Environmental Review (DCR) <envreview@dcr.virginia.gov>; odwreview (VDH) <odwreview@vdh.virginia.gov>; Kirchen, Roger (DHR) <Roger.Kirchen@dhr.virginia.gov>; Lasher,

## Environmental Impact Review Comments - 230 kV Finneywood-Jeffress Lines and Jeffress Switching Station Conversion

Scheid, Todd (VDOT) <Todd.Scheid@vdot.virginia.gov>

Mon 7/10/2023 9:59 AM

To:Howard, Janine (DEQ) <Janine.Howard@deq.virginia.gov>;EIR Coordination (VDOT) <EIR.Coordination@vdot.virginia.gov>;Environmental Impact Review (DEQ) <eir@deq.virginia.gov>;Fulcher, Valerie (DEQ) <Valerie.Fulcher@deq.virginia.gov>

Cc:McAdory, Liz (VDOT) <Liz.McAdory@vdot.virginia.gov>

Janine,

I have no comments or concerns in relation to this project. However, below are the comments made by Todd Cage with the VDOT South Hill Residency in relation to this project:

- A Land Use Permit will be required for installation of the overhead transmission lines across VDOT roads/ROW.
- A Land Use Permit is required for any temporary construction entrances and any entrances to be installed for permanent access to the transmission line.
- All current VDOT standards, specifications, WAP, etc. will need to be followed when in VDOT ROW.

If you have any questions or concerns, please do not hesitate to contact me.

Respectfully,  
Todd Scheid



**Todd W. Scheid**

*Planning Specialist / Richmond District Planning Department*

Virginia Department of Transportation

Office Phone: 804-524-6000

Work Cell Phone: 804-914-3446

[Todd.Scheid@VDOT.Virginia.gov](mailto:Todd.Scheid@VDOT.Virginia.gov)