



Stantec Consulting Services Inc.
5209 Center Street
Williamsburg VA 23188
Tel: (757) 220-6869
Fax: (757) 229-4507

September 8, 2014

Mr. Randy Steffey
U.S. Army Corps of Engineers
Norfolk District Office
803 Front Street
Norfolk, VA 23501

**Re: Section 106 Coordination Consulting Party Comment Response
Surry – Skiffes Creek – Whealton 500kV/230kV Line
Surry, James City and York Counties, and the Cities of Newport News and Hampton,
Virginia
Applicant: Virginia Electric and Power Company (Dominion Virginia Power)
Stantec Project #203446520**

Dear Mr. Steffey:

In response to your letter dated May 8 2014, the consulting parties to the ongoing Section 106 process have provided comments regarding the Surry – Skiffes Creek – Whealton 500kV/230kV project. Stantec Consulting Services, Inc. is pleased to submit this summary of the comments received as well as a response to these comments on behalf of the applicant, Dominion Virginia Power. For ease of reference, the comments regarding the Section 106 process as well as the major resources (e.g., Carter’s Grove, Colonial Parkway, Jamestown Island and the Captain John Smith Trail) have been combined by resource and addressed below. Additional specific comments from the consulting parties are sorted by commenting party and addressed in the attached tables.

Stantec and Dominion have also continued to coordinate with the Corps and DHR regarding the limits of the Area of Potential Effect for the project. Based on direction from the Corps and DHR, the APE has been divided into a Direct APE for archaeological resources and an Indirect APE for architectural resources. Revised mapping depicting the Direct and Indirect APE are being provided under separate cover (September 8, 2014). Revised resource tables were also provided with this submittal.

General Comments:

- 1. Several parties expressed concerns about the Corps fulfillment of Section 106 responsibilities. Specifically ACHP raised concerns about the compression of steps of Section 106. DHR shared these concerns and supported the recommendation for consulting parties to meet and discuss how the Corps will proceed through the Section 106 process. Some commented that findings were issued prematurely, and several commenters requested an in-person meeting for all parties involved.*



Reference: Section 106 Consulting Party Comment Response

While the Corps has made initial recommendations on resources based on the studies provided by Dominion, no official determinations have been made. As such, Section 106 is ongoing and Dominion is agreeable to a meeting with consulting parties to discuss the progress to date and next steps under Section 106. In their letter, VDHR indicated that they would not offer final determinations until the appropriate time, but have offered technical comments on various resources presented in the reports submitted to the Corps and VDHR by Dominion and Stantec. Dominion and Stantec continue to coordinate with VDHR and the Corps to provide clarification where needed and look forward to fully participating with the consulting parties in these matters.

2. *Consulting parties expressed concerns over applicants request to initiate data recovery at site 44JC066 prior to conclusion of Section 106 review.*

Site 44JC066 was identified during a Phase 1 archaeological study conducted in accordance with the requirements of the State Corporation Commission (SCC) filing for the project. The site was identified and recommended as eligible by Stantec. DHR concurred with these findings, and in accordance with DHR's Guidelines for SCC transmission lines, a Phase 2 investigation was conducted. DHR concurred with Stantec's Phase 2 findings as part of the SCC review, and indicated that further action at the site (Phase 3 Data Recovery) should be delayed until such time that the project could be reviewed under Section 106. The Corps indicated to Dominion that no work at this site will be authorized until Section 106 is complete. As such, no additional work has been initiated at this location.

3. *Comments were received regarding the adequacy of the studies conducted within the area of potential effect for the project. The assertion was made that the Corps relied solely on Stantec's identification of historic properties, and that Stantec relied on lists from VDHR, minimal literature review, and data that was years old in most cases.*

Stantec and Dominion followed the guidelines and process promulgated by DHR for the determination of potential effects to cultural and historic resources for transmission line projects. The studies provided were determined by VDHR and the Corps to meet the requirements of Section 106. The studies conducted to date will be discussed further at the consulting parties meeting later this month.

4. *Many comments were received regarding the overall irreparable harm and adverse economic impact the proposed line would have on the historic community within the project area.*

Dominion Virginia Power filed for approval of the Transmission Project from the Virginia State Corporation Commission ("SCC") on June 11, 2012 to address current and future transmission reliability standards. Following extensive public hearings, participation by numerous parties including BASF, and collaboratively working with agencies and other stakeholders to minimize impacts, the SCC approved the Transmission Project in its Orders in Case No. PUE-2012-00029, dated November 26, 2013 ("Order") and February 28, 2014 ("Order Amending Certificates").



Reference: Section 106 Consulting Party Comment Response

The project addresses North American Electric Reliability Corporation (“NERC”) violations related to the retirements of the Yorktown Power Station that are driven by mandatory U. S. Environmental Protection Agency (“EPA”) regulations that will take effect in April 2015. The project is necessary to maintain a reliable and operational transmission grid in this region of the state. Alternative routes, both overhead and underground, have been thoroughly explored and are outlined within the Joint Permit Application as well as within the State Corporation Commission documents. The delivery of reliable power to the region is of significant importance to the regional economy given the extent of military and defense end users within the region. Tourism destinations such as Busch Gardens, Water Country USA, Colonial Williamsburg, Kingsmill Resort and local hotels and retail shops are also highly dependent on reliable power to operate and provide guest amenities for visitors. While the economic impact of this project is not under the Section 106 purview, the purpose and need for the project will be further detailed at the upcoming consulting parties meeting.

5. *Comments regarding potential effects due to construction access.*

All construction access routes have been identified and submitted to the Corps for confirmation. The routes utilize existing roads and paths where feasible. Where access is required and existing paths are not present (typically within the right-of-way itself), timber mats will be used or upland areas will be top dressed with stone. As a Phase 1 of the entire right-of-way was conducted in accordance with DHR Guidelines, archaeological resources within the right-of-way access areas have been identified. No ground disturbance is required for access. Furthermore, the routes and any required erosion and sediment control measures have been adjusted to avoid identified resources within the right-of-way. As such, no disturbance to these areas will occur. Stantec and Dominion will provide further information on access routes and construction practices at the upcoming consulting parties meeting.

6. *Comments regarding extent of lighting required for towers.*

Several parties raised questions and concerns over the extent of lighting required for the towers within the river. Towers will be subject to lighting requirements under the Federal Aviation Administration (FAA) as well as for navigational purposes in accordance with U.S. Coast Guard (USCG) guidelines. The FAA requires towers and obstructions to be lit in accordance with advisory circular AC70/7460-1K. Specifically, towers exceeding 200 feet in overall height above ground level are normally required to be marked and/or lighted. The four (4) towers adjacent to the channels will require lighting under these guidelines.

Recommended lighting options are as follows:

- Lighting standard L-864 - A flashing red obstruction light (20-40 flashes per minute (FPM)), or
- Lighting standard L-865 - A medium intensity flashing white obstruction light (40 FPM), or
- A combination of L-864 and L-865



September 8, 2014
Mr. Randy Steffey
Page 4 of 5

Reference: Section 106 Consulting Party Comment Response

Lights will be placed at the top of the towers and will be visible from all directions. The FAA will recommend the minimum standard necessary taking into account safety, economy and related concerns.

Lights are also expected to be required under USCG guidelines to aid in navigation. Typical lighting may include fixed amber lights affixed to the fender system adjacent to the navigational channels as is the case at the James River Bridge. Individual towers are not expected to require lighting, although the final requirements will be coordinated with the USCG. The portion of the James River in the vicinity of the proposed crossing currently consists of numerous lights that are operational from twilight to dawn. These include flashing red and green channel markers for both the federal channel and the tug and barge channel, as well as visible lights from water and cellular phone towers in the surrounding area.

Carter's Grove Plantation

Several comments were raised regarding the Corps' and Stantec's treatment of Carter's Grove. Both the Corps and VDHR have agreed with Stantec's determination that the project will adversely affect this resource. As Carter's Grove is a listed NRHP, NHL and VLR resource, the project will be reviewed under Section 110(f) as well as Section 106 of the NHPA.

As part of the studies conducted by Dominion and Stantec, photographs were taken from numerous locations on the property to identify the significant viewsheds warranting further evaluation. These viewsheds lead to the determination by Stantec that the project would result in an adverse effect to Carter's Grove. Since no consulting parties appear to disagree with this determination, Dominion submits it is appropriate to move to identify mitigation to compensate for this effect.

Colonial Parkway

Comments provided suggested that the entire Colonial National Historic Park (NHP) be evaluated as a whole. The studies conducted by Stantec on behalf of Dominion evaluated the two portions of the Park that are within the project APE, the Colonial Parkway and Jamestown. As these areas are in the closest proximity to the project, they would experience the most significant effect. While some comments requested that additional overlooks be evaluated, the viewpoint selected for evaluation of potential effects to the Colonial Parkway was chosen as it represented the most direct line of sight and view to the project. We do not feel that inclusion of the entire Park is required or would add any additional value to the studies provided as the significant features of the NHP within the APE have already been addressed.

Jamestown

Comments provided requested that additional viewshed analyses be provided from Jamestown Island. The publicly accessible areas of Jamestown Island were investigated first-hand by Stantec as well as through visual simulations provided by Truescape. Areas of Jamestown Island not accessible to the public were not included in the viewshed analysis. The simulation provided in the materials submitted to the Corps was taken from Black Point. Based on this viewpoint, Stantec recommended no adverse effect due to the general lack of visibility of the line.



September 8, 2014
Mr. Randy Steffey
Page 5 of 5

Reference: Section 106 Consulting Party Comment Response

Captain John Smith Trail

Multiple consulting parties recommended that the Captain John Smith Trail be further addressed and that the Trail be treated as an eligible resource. The Trail itself was created through a legislative act in recognition of the 400th anniversary of the Jamestown Settlement in 2007. The Trail spans approximately 3,000 miles from the James River and follows the coastline of the Chesapeake Bay extending into northern Virginia and parts of Maryland. Treatment of the trail as an eligible resource without further evaluation and definition from the agencies appears to be unwarranted at this time. At current, there is no framework in which the resource can be adequately evaluated and potential impacts identified and addressed. Specifically, we request that the Corps and DHR provide further guidance as to the boundaries of the resource itself as well as the characteristics that add to its eligibility status. Dominion requests that additional information be provided by the agencies prior to the consulting parties meeting so that the trail and potential effects to the trail can be evaluated and discussed in a meaningful manner.

Thank you for your prompt review of this material. Please feel free to contact me at 757-220-6869 or Christine.conrad@stantec.com if I can provide any further information.

Sincerely,

Christine F. Conrad

Christine F. Conrad, Ph.D.
Senior Associate, Environmental Sciences

Enclosures

cc: Mr. Roger Kirchen, Virginia Department of Historic Resources
Ms. Audrey Cotnoir, US Army Corps of Engineers
Ms. Andrea Kampinen, Virginia Department of Historic Resources
Ms. Courtney Fisher, Dominion Virginia Power

Reference: Section 106 Consulting Party Comment Response

Advisory Council on Historic Preservation Letter Dated June 3, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
ACHP	Schedule and Public Involvement	ACHP concerned about the compression of the first three steps of the Section 106 review, and resulting limitations on the ability of consulting parties to provide the Corps with informed comments. ACHP fully intends to enter the 106 consultation for this undertaking.	Comments are addressed in the cover letter provided.
ACHP	Site 44JC0662 Data Recovery	Letter for National Trust cites a request from a consultant for the project proponent for permission to carry out data recovery on site 44JC0662 prior to completion of 106 review. If data recovery allowed to proceed prior to completion of 106, such action would curtail the consideration of alternatives.	Comments are addressed in the cover letter provided. No further action at this site has been authorized.
ACHP	SCC Review	Aware of state-level review as part of SCC process SHPO participated in that process as appropriate to state law. However, the Corps and Consulting Parties in the Section 106 review were not part of that review process. Section 106 has its own requirements as set forth in Section 800.3 through 800.6 of 36 CFR Part 800.	Comments are addressed in the cover letter provided.

Reference: Section 106 Consulting Party Comment Response

Virginia Department of Historic Resources (VDHR) Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
VDHR	Process and Consulting Party Involvement	DHR shares concerns and supports the recommendation for Consulting Parties meeting to discuss how the Corps will proceed through Section 106 process. Accordingly, DHR is unable to comment of the effects of this project on historic properties at this time. Offer following technical comments on the identification of historic properties, presented by project segment.	Comments are addressed in the cover letter provided.
VDHR	Skiffes Creek Switching Station	DHR previously commented on Phase I and Phase II report. Recommend site 44JC06602 as eligible for listing. Previous recommendations remain valid.	Stantec has prepared a draft MOA/MOU and is awaiting final outcome of Section 106 to proceed
VDHR	230kV Segment – Previous Determination (SCC)	Many of the archaeological resources identified by Corps in this segment of the project were not specifically addressed in the Sept 4, 2012 VDHR letter.	New archaeological resources were required to be included within the expanded 0.5 mile APE. As such, these were not addressed in the studies provided under the SCC process.
VDHR	230kV Segment – Archaeological Resources	DHR concurs with Corps NRHP eligibility recommendations for 18 archaeological sites with exception of sites 44YO0183 and 44YO1131. Recommend these site be managed as unevaluated, but warrant no further work within APE;	Concur with determinations.

Reference: Section 106 Consulting Party Comment Response

Virginia Department of Historic Resources (VDHR) Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
VDHR	230kV Segment – Architectural Resources	<p>Sept 4, 2012 comments addressed NRHP eligibility of seven previously surveyed properties and 88 newly identified properties. The Corps' consultation letter to DHR identifies 132 historic architectural resources within APE for this segment, 32 of which are listed in resource table as not surveyed. Discrepancies in count of resources and the scope of the Corps' architectural identification efforts for this segment should be discussed.</p>	<p>Please see attached tables. Discrepancies in the architectural resource survey and counts for inventoried properties are the result of the the implementation of a 0.5-mile APE during the Corps' Section 106 review. The survey for this section was completed with reference to the SCC guidance and included a combination of adjacent parcels (large portions of the 230 kV section will be restrung with no new tower construction) and full survey within the 0.5-mile APE for sections where new tower construction will take place.</p>
VDHR	500kV Segment – Archaeological Resources	<p>Number of resources in report does not match Corps letter. Sites 44JC0649 and 44JC0650 are mapped within or directly adjacent to the study area but based on archaeological testing, are not present within the ROW. Recommend sites should be managed as unevaluated, but no further work within APE; DHR concurs that 23 underwater buffers represent potentially NRHP eligible resources and should be avoided or subject to additional evaluation; effects to underwater buffers must consider all primary and secondary effects from staging, construction, and post-construction changes in river current.</p>	<p>See above comment for resource number discrepancies. Underwater anomalies were identified and buffer areas placed around them as shown on the APE mapping. Dominion is avoiding all buffer areas. The construction methods and secondary impacts to underwater anomalies will be discussed further at the consulting parties meeting.</p>

Reference: Section 106 Consulting Party Comment Response

Virginia Department of Historic Resources (VDHR) Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
VDHR	500kV – Architectural Resources	<p>Number of resources in report does not match Corps letter. DHR provided tables regarding their eligibility recommendations for 132 architectural resources within the APE. Contrary to Stantec recommendations, Bourne-Turner House, Bay Cliff Manor, Barlow-Nelson House, Bay View School, FFA/FHA Camp Association Site and 4H Camp are potentially eligible. Artillery Site at Trebell's Landing, Hog Island WMA, The Rocks, 7426 Boydkin Lane, Farmhouse, 7328 Clifton Lane, and Scotland Heights Historic District have outdated evaluations or are unevaluated and should be treated either as NRHP eligible for purpose of review or evaluated.</p>	<p>Stantec has coordinated with VDHR and the Corps to identify additional surveys necessary. These studies are in progress. Additional survey work will be discussed at the consulting parties meeting.</p>

Reference: Section 106 Consulting Party Comment Response

National Park Service (NPS) Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
NPS	Process	Compression of first three steps of Section 106 review. Additionally many materials presented in current 106 review package were completed without NPS input for the already completed SCC review process. NPS would like to be provided with a schedule for the 106 review and consultation process.	Comments are addressed in the cover letter provided.
NPS	Cumulative Impacts	Analyze cumulative effects of modern development and potential effects of additional development in the future should project move forward in accordance with 36 CFR 800.5(a)(1);	The project is required to meet federal regulations and transmission reliability requirements. Requirements pertain to current and projected load growth. The purpose and need of the project will be further discussed at the consulting parties meeting.
NPS	Carter's Grove	Would like to note the applicability of Section 110(f) of the NHPA to this review process, since NHL is affected by the proposed project	Comments are addressed in the cover letter provided.
NPS	Visual Simulations	Need further visual simulations to determine extent of visual effect; clarify type of lighting required for proposed infrastructure; provide nighttime simulation	Affected historic properties are not open to the public at night. Therefore, night-time simulations were not provided. Towers exceeding 200 feet in height must be lit in accordance with FAA and USCG requirements. Please see cover letter for more details.

Reference: Section 106 Consulting Party Comment Response

National Park Service (NPS) Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
NPS	Captain John Smith Trail	Should be treated as eligible though not formally listed. NPS Comprehensive Management Plan (CMP) identifies tidal portions of the James River as a High Potential Route Segment. Crossing constitutes adverse effect to Captain John Smith Trail.	Comments are addressed in the cover letter provided.
NPS	Hog Island/ Chippokes State Park	Proposed route would cut directly through Chippokes SP and Hog Island WMA focus area; request additional visual simulations; including simulation and description if traveling on water;	The proposed route does not cross Chippokes SP. Stantec is conducting additional studies at Hog Island at the direction of VDHR.
NPS	Carter's Grove	Carter's Grove designated as a National Historic Landmark. Concur with determination of adverse effect to Carter's Grove.	Comments are addressed in the cover letter provided. Section 110(f) will apply.
NPS	Colonial National Historical Park	Colonial NHP cannot concur with effect determination; APE map shows Park as being unevaluated, but the entire park is listed on NRHP. Section 106 review material does not include an assessment of effects on the Park as a whole, only Jamestown Historic District (#047-0009) and Colonial Parkway (#047-0002). The Park in its entirety is listed on the NRHP. As such, the adverse effect to it must be assessed.	A large portion of Colonial National Park is not within view or within the APE of the proposed undertaking. The two components that are within the APE include Jamestown and the Colonial Parkway. See cover letter for further details.

Reference: Section 106 Consulting Party Comment Response

National Park Service (NPS) Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
NPS	Jamestown	APE Map indicates transmission line will be visible from several points along the road; however, visual effects were not assessed from portions of Black Point as well as Jamestown Loop Road. Complete visual simulations including Black Point and Jamestown Loop.	The visual assessment was conducted from Black Point and included the simulation prepared at this location by Truescape. See cover letter for further details.
NPS	Colonial Parkway	Structures will be visible from several parking areas/overlooks along Parkway, including College Creek Overlook, College Creek Parking Area, James River Overlook, and Archers Hope Overlook. All overlooks and associated viewsheds are contributing elements of the NRHP listing and historic significance of the Parkway and should be evaluated; Modern improvements and infrastructure existed when these resources were evaluated for significance and listing on the NRHP. Line poses an intrusion on the historic landscape and associated viewsheds and constitutes an adverse effect.	The view point utilized for the assessment of the Colonial Parkway was chosen because it presented the most direct view and line of sight. The simulation prepared by Truescape was presented as representation for the view from the most prominent point. See cover letter for additional details.

Reference: Section 106 Consulting Party Comment Response

National Park Service (NPS) Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
NPS	Washington-Rochambeau Rev Route National Trail	<p>The Washington-Rochambeau Revolutionary Route was designated a National Historic Trail (WR NHT) by Congress in March 2009. Line will be visible from the water route of the WR NHT and from several parking areas/overlooks along Colonial Parkway. Visual simulations should be taken from College Creek Overlook, College Creek Parking Area, James River Overlook, and Archers Hope Overlook, including perspective of a traveler on the water route. Proposed project will constitute an adverse effect to trail.</p>	<p>A review of available information on the Washington Rochambeau Trail website did not show the trail in the vicinity of the current project. Please provide additional information as the boundaries are unclear and level of evaluation required needs to be defined as with the Captain John Smith Trail. See above regarding Colonial Parkway viewsheds.</p>
NPS	Conclusion	<p>Other than Carter's Grove, NPS cannot concur with Corps effect determinations to NPS resources. Alternative that avoid a new crossing and use either underground, existing crossing or other means would be preferred by NPS.</p>	<p>Dominion conducted a thorough alternatives analysis as detailed in the SCC application and Joint Permit Application. The proposed route is the least environmentally damaging practicable alternative.</p>

Reference: Section 106 Consulting Party Comment Response

National Park Service American Battlefield Protection Program (ABPP) Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Park Service - American Battlefield Protection Program	Battlefield boundary mapping	Battlefield boundaries shown on APE Map do not necessarily reflect full research needed for a formal National Register nomination as ABPP boundaries are based on above ground historic features associated with cultural and natural landscape and did not include professional viewshed analysis or archaeological inventory or assessment of subsurface features or indications. Visual and archaeological integrity of many battlefields was unknown at time the maps/GIS data prepared. Only a good starting point, but assessments already outdated.	Studies were conducted based on available mapping at the time of the surveys. The surveys are less than five years old and are still valid. The Corps/VDHR indicated that the work done is in accordance with the standards required for Section 106.
National Park Service - American Battlefield Protection Program	Green Springs (Rev War)	Not included in visual effects; request that battlefield be fully consider as resource within APE. The ABPP awarded a Battlefield Planning Grant to James City County for mapping and archaeological investigation at Green Springs in 2009.	This site was not addressed in the original viewshed analysis. Given the distance to the resource (located next to Governor's Land >7 miles away) and lack of visibility, no adverse effects are expected.
National Park Service - American Battlefield Protection Program	Yorktown (Rev War)	ABPP's Study Area boundary does overlap the project' area's ROW and APE near proposed Skiffes Creek Switching Station; Rev War and Civil War considered separate; discussion of potential archaeological resources associated with this battle in APE and ROW should occur.	Surveyed entire ROW in accordance with standards to identify any potential resources. No disturbance outside of ROW for access so there will be no adverse effect to any potential resources outside of ROW. Any identified resources within the ROW are being avoided. No additional work required.

Reference: Section 106 Consulting Party Comment Response

National Park Service American Battlefield Protection Program (ABPP) Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Park Service - American Battlefield Protection Program	Big Bethel (Civil)	Concur with No Adverse Effect determination.	No further work required.
National Park Service - American Battlefield Protection Program	Williamsburg (Civil)	Battlefield located within ROW and APE for Skiffes - Whealton. Some increased tower heights; should consider viewshed. The Study Area for Williamsburg overlaps Kingsmill Plantation too and viewsheds not just from that historic/interpreted plantation house should be considered. What about viewshed within battlefield from the bank of the James River?	Portion of this battlefield within APE is located largely within the Kingsmill golf course and has been developed. Additionally, the battlefield is already surrounded by a marina and the Kingsmill neighborhood. Given the developed nature of the site, no adverse effects are expected. No ground disturbance will occur within the boundaries of this site.
National Park Service - American Battlefield Protection Program	Yorktown (Civil)	Part of battle listed on NRHP: Dam No. One Battlefield, listed 1995; has this site been considered separate; some overlap with APE on Sheet 6&7.	This resource was not included in the original APE and was therefore not considered separately. The resource is identified in the VDHR VCRIS system as VDHR # 121-0060. According to the boundaries available for this resource in the VCRIS system, it does not overlap with the project APE. The larger Yorktown Battlefield certainly intersects and was addressed in the Phase I survey. In addition, work within this portion of the project consists only of reconductoring and does not include tower construction. Therefore, no additional survey is required and no effects are expected.

Reference: Section 106 Consulting Party Comment Response

National Park Service American Battlefield Protection Program (ABPP) Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Park Service - American Battlefield Protection Program	Fort Boykin	Visual impacts minimal; to fully understand should consider effects on fields of observation and fire at time of Fort's use.	Agree to minimal visual impacts from elements that make the resource eligible. Distance to project is 8 miles. No further work is necessary as current work is sufficient.
National Park Service - American Battlefield Protection Program	Fort Huger	Visual impacts minimal; should consider effects on fields of observation and fire at time of Fort's use.	Agree to minimal visual impacts from elements that make the resource eligible. Distance to project is 3.2 miles. No further work is necessary as current work is sufficient.
National Park Service - American Battlefield Protection Program	James River	Consideration for river lacking; main resource for Cap John Smith Trail; Associated Property of the Rev War; War of 1812; river itself is a battlefield; consider damage to underwater resources-wish to discuss further.	Potential effects to the CJS Trail are discussed in the cover letter. Underwater resources were identified and are being avoided. Buffers have been created around identified anomalies to ensure no disturbance during construction. No further work is required for underwater resources.

Reference: Section 106 Consulting Party Comment Response

National Park Service American Battlefield Protection Program (ABPP) Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Park Service - American Battlefield Protection Program	Mulberry Point Battery/Fort Crafford	Should gain access to Mulberry Island to assess potential visual effects on Mulberry Point Battery and Fort Crafford; determination on Fort Crafford based solely on aerial photography.	Ungranted access to Ft Eustis is infeasible. The work provided is based on best available data and methods utilizing aerials and GIS models. Viewshed and line of sight modeling is completed utilizing ArcGIS and takes into account topography, canopy, and other factors when developing the model. Typically the model is based on a six foot tall person and what that person could potentially see in the line of sight or a 45 degree angle to either side. No further work is required.
National Park Service - American Battlefield Protection Program	Overland Construction Access	Will there be matting, gravel, grading, frequency of use; recommend archaeological monitoring, at the minimum, when accessing and conducting work to replace conductors or heighten the lines and any earthworks associated with the Confederate Army's Warwick Line and Yorktown, be identified and avoided before and during project.	Earthworks and archaeological resources within the ROW have been identified through Phase 1 surveys and will be largely avoided. See page 36 of the Permit Support Document. Monitoring does not appear to be consistent with the lack of impact to archaeological resources. Identified resources will be noted on all E&S plans, and safety fence will be used to ensure no disturbance where these resources are within the ROW.

Reference: Section 106 Consulting Party Comment Response

National Park Service American Battlefield Protection Program (ABPP) Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Park Service - American Battlefield Protection Program	Lee's Mill/Wynne's Mill	Recommend further research and cultural resource survey be conducted in area of ROW (285/448-285/449).	Portion of architectural resource is within the ROW and would have been included in Phase 1 archaeological survey. No ground disturbance in this area as access will be on mats and work to be done in this portion of the project consists only of restringing line. No adverse effect and no further work required.

Reference: Section 106 Consulting Party Comment Response

Colonial Williamsburg Foundation Letters Dated June 12, 2014 and July 7, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
Colonial Williamsburg Foundation	Schedule and Process	Object to each and every determination of "No Adverse Effect". Convene meeting with consulting parties. Corps has compressed 106.	Comments are addressed in the cover letter provided.
Colonial Williamsburg Foundation	Impacts to Tourism	Concerns over cumulative impacts and unspoiled visual character; tourism- over \$1 billion in visitor spending annually and \$80 million in state and local tax	The economic impact of the project is not relevant to Section 106. These types of issues will be evaluated as part of the overall permit process.
Colonial Williamsburg Foundation	Captain John Smith Trail/James River	John Smith Trail encompassing James River from below Carter's Grove to above Jamestown is eligible for inclusion on NR Material presented to date has not recognized extent and unity of historic sites that would be negatively affected, or acknowledged the unspoiled character of the James River as viewed from Carter's Grove, the Colonial Parkway and Jamestown. Stating that this section of James already industrialized is not correct. With exception of a portion of the Surry plant domes, virtually no industrial development visible form Carter's Grove, the Parkway and Jamestown.	Comments are addressed in the cover letter provided.
Colonial Williamsburg Foundation	Colonial Parkway	Viewshed impacts to Colonial Parkway which is listed on NRHP and clearly eligible to be a National Historic Landmark.	Comments are addressed in the cover letter provided.

Reference: Section 106 Consulting Party Comment Response

Colonial Williamsburg Foundation Letters Dated June 12, 2014 and July 7, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
Colonial Williamsburg Foundation	Carter's Grove	Corps' dismissal of the project's impact on Carter's Grove is inappropriate for a NHL. APE should include all of Carter's Grove. Objects to characterization of views depending heavily on presence of existing trees. Notes trees can be removed or lost (i.e. Isabel). Wants views of the towers in the absence of all trees at Carter's Grove. Specifically for Viewpoints 15 & 16.	Comments are addressed in the cover letter provided. Visual effects evaluations do take into consideration seasonal variations, but it is not likely that all trees would be removed from shoreline of Carter's Grove. Preservation of the shoreline would be part of the preservation of the resource and its setting. Distance does make a difference however in view. It is not minimizing the effect – the Corps has recommended Adverse Effect
Colonial Williamsburg Foundation	Wolstenholme Town	Wolstenholme Town is best known "Particular Plantation" in Chesapeake region. Project's direct and indirect impacts on a Woodland-era Native American ossuary and the 18th century Burwell cemetery at Carter's Grove should be investigated and evaluated.	Wolstenholme Town is an archaeological site and typically archaeological sites are not considered for visual impacts. Some comments here refer to archaeological resources and the potential for archaeological resources.
Colonial Williamsburg Foundation	Jamestown Island	Wants Importance of Visual Impact Considered and included in determining Visual Effects- Specifically discuss Jamestown Island. Objects to No Adverse Effect to Jamestown Island Historic District. States 10 tower will be visible and there is no justification for the No Adverse Effect determination.	Comments are addressed in the cover letter provided.

Reference: Section 106 Consulting Party Comment Response

Colonial Williamsburg Foundation Letters Dated June 12, 2014 and July 7, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
Colonial Williamsburg Foundation	Hog Island	Historic site on Hog Island not mentioned on Corps' documents. Cultural resources on Hog Island should be identified, understood, and evaluated in connection with project. Their proximity to lines and towers could result in significant indirect negative effects such as diminished opportunity for future interpretation to the public.	VDHR has indicated desire for additional studies at Hog Island. These resources will be analyzed as appropriate under acceptable professional protocols and guidelines.
Colonial Williamsburg Foundation	Kingsmill Plantation	Photos from Kingsmill- both interpreted portion and shoreline should be provided.	The line of sight studies suggest that the line is not visible from the interpreted site. Current photos will be taken from these areas for Corps/VDHR review.
Colonial Williamsburg Foundation	Additional Resources	Need visual assessment of potential impacts on Swann's Point, Pleasant Point, sites around Cobham Bay and Burwell Bay, Chippokes Plantation, the Matthew Jones House on Mulberry Island, Fort Boykin, Bennett's Welcome, archaeological sites on the east end of Jamestown Island, the Lawnes Point site, and other historic sites potentially in viewshed. Archaeological sites intimately associated with African and African-American people, such as the slave quarters and burials at Neck O'Land, Utopia, and Archer's Hope could be affected by project.	All known archaeological sites within the Direct APE have been surveyed. Additional architectural resources requiring survey have been identified by the Corps/VDHR. Aside from those resources, no additional surveys of architectural resources appear to be required.

Reference: Section 106 Consulting Party Comment Response

Colonial Williamsburg Foundation Letters Dated June 12, 2014 and July 7, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
Colonial Williamsburg Foundation	Additional Resources	Want all Not Evaluated Resources – Evaluated and photographs provided including those mentioned as outside of the ROW and not accessible.	This level of effort is not standard for this type of project. The studies provided are in accordance with professional standards and specifications. Resources not evaluated, except those as noted elsewhere, do not require further work.
Colonial Williamsburg Foundation	Potential Archaeological Settings	Archaeological excavations at Carter's Grove and Kingsmill have shown that riverside properties in immediate area of Jamestown are predictably rich in historic, archaeological sites. Destroying setting of such sites limits their historical development potential and their value to future generations. Disagree with assertion that only archaeological sites would be directly affected by land disturbance should be considered as being affected by project.	Archaeological sites, unless they retain above ground elements, are not typically addressed in visual effects evaluations. We understand their importance in interpreting history and the historic nature of the area, but including them in an effects evaluation when they are not directly impacted by construction is atypical.
Colonial Williamsburg Foundation	Impacts due to Access	Concerns about ground disturbing activities associated with construction (i.e. access roads, staging etc.) Statement that there will be no ground disturbance associated with these when no documentation is present is no sufficient. Wants Phase I of all construction areas.	Archaeological resources within the ROW have been identified through Phase 1 surveys and will be avoided. Monitoring does not appear to be consistent with the lack of impact to archaeological resources.

Reference: Section 106 Consulting Party Comment Response

Colonial Williamsburg Foundation Letters Dated June 12, 2014 and July 7, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
Colonial Williamsburg Foundation	Underwater Resources	Questions the feasibility of avoiding the underwater archaeological anomalies and thinks avoidance has prematurely been suggested and that DVP will not be able to avoid these resources.	23 anomalies that contain signatures consistent with submerged cultural resources were identified. The recommendations were to avoid these anomalies as well as a buffer around the anomalies to prevent any potential disturbance. The buffers will be fully avoided and construction will not affect these resources.

Reference: Section 106 Consulting Party Comment Response

James City County Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
James City County	Process and Schedule	County objects to expeditious handling of this matter by Corps. Documents submitted by Dominion essentially compress 3 steps into 1 allowing for no recourse or further investigation. Dominion's consultants merely reviewed public record and made sweeping generalizations about potential impacts, and suggested little or no mitigation. County objects to process. The minimal efforts to identify resources resulted in skewed findings of levels of impacts to which the County objects in full.	Comments are addressed in the cover letter provided.
James City County	Adequacy of Studies	In Surry-Wheaton Archaeological Resource Inventory, of 591 sites identified, 480 were not evaluated and 568 were not surveyed. Similarly, in the Surry-Wheaton Architectural Resource Inventory, of the 100 resources identified, 151 were not evaluated and 37 were not surveyed. Stantec relied on lists from DHR and minimal literature review, and relied on information and data that was years old in most cases. Stantec did not do full evaluation of all sites.	See attached tables for explanation of surveyed/unsurveyed resources. Standard process for corridor and transmission line studies is to address the direct effects to historic resources within the footprint of the proposed construction which would include both archaeological and architectural resources. Indirect effects are generally assessed for those properties determined to be historic as defined by Section 106 of the NHPA - which includes those that are determined eligible for or are listed on the NRHP.
James City County	Cumulative Impacts	Failure to consider cumulative impact, such as lost tourism revenue; half-hearted attempt to evaluate direct and indirect impacts.	The economic impact of the project is not relevant to Section 106. These types of issues will be evaluated as part of the overall permit process.

Reference: Section 106 Consulting Party Comment Response

James City County Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
James City County	Objections to Findings of Effect	Stantec prematurely issued findings.	Recommendations based on study results were provided. The Corps is responsible for final determinations which have not yet been issued.
James City County	Carter's Grove	Finding of adverse effect for Carter's Grove is accurate. Visual simulations inaccurate and produced skewed, fisheye views. Done in summer when full tree cover present. Failed to gain appropriate access to investigate. Failed to provide LOS from viewpoints 16 and 17 which were some of the most impacted views.	The Corps has initially indicated an Adverse Effect to this resource. At this time, no additional work appears necessary as an Adverse Effect has been determined.
James City County	Colonial Parkway	Found no adverse effect despite acknowledging the project will have a visual impact on a site that was established as a scenic roadway. Project will have impact on Parkway; Dominion diminishes the impacts of the project/LOS from viewpoint 9 shows impact.	Comments are addressed in the cover letter provided.
James City County	Historic Jamestowne	Stantec issued determination of no adverse effect though they did not conduct thorough firsthand analysis; did not gain appropriate access to survey site and relied on Truescape's simulations and aerial photography.	Surveys conducted are in accordance with regulatory guidelines and professional standards. Please see the cover letter for further discussion of Jamestowne.
James City County	Kingsmill Plantation	Stantec issued finding of no adverse effect without fully investigating site; used aerial photography and did not gain appropriate access.	The line of sight studies suggest that the line is not visible from the interpreted site. Current photos will be taken from these areas for Corps/VDHR review.

Reference: Section 106 Consulting Party Comment Response

James City County Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
James City County	Yorktown Battlefield	Stantec did not thoroughly analyze site by failing to gain appropriate access to portion of site within APE.	The portion of the battlefield in James City County and adjacent to the river is located largely within undeveloped wetlands and on private property. Appropriate level of effort was met.
James City County	The Ghost Fleet	Stantec dismissed Ghost Fleet due to nature of the resource. Maritime nature of the resource is significant contrasted from the nature of the electrical components of the project. Lower James Riverkeeper of the James River Association attested to the fact that the Ghost Fleet was a valuable historic resource and an intriguing feature for eco-tourist who explore James River.	The Ghost Fleet was recommended as potentially eligible for listing on the NRHP by Stantec. The resource (and several individual resources) is eligible for listing on the NRHP for their relationship to maritime history and significant contributions to the naval industry. The setting is not considered a criteria by which these resources would be found eligible.
James City County	Captain John Smith Trail	Despite acknowledgement that the Captain John Smith Trail is an eligible historic resource. No research, assessment, or analysis was performed. Truescape clearly shows the visual impact from the shore.	Comments are addressed in the cover letter provided.
James City County	Amblers and Coke Watts House, Governor's Land Archaeological District	Stantec failed to adequately identify impacts on the Amblers and Coke Watts House and the Governor's Land Archaeological District	Amblers and Coke Watts House and Governor's Land will not have visibility of the proposed transmission line and were therefore not addressed during visual effects assessment. These resources were identified and addressed in the Phase I survey documentation.

Reference: Section 106 Consulting Party Comment Response

James City County Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
James City County	Basse's Choice/Days Point Archaeological District	Stantec failed to adequately identify impacts on the Basses Choice/Days Point Archaeological District	Basse's Choice was identified as a resource, however it is an archaeological site and is also located on private property and was not included in a visual effects assessment. The site will have no direct disturbance, and visual impacts are generally not assessed for archaeological sites.
James City County	Fort Boykin and Fort Huger	Stantec failed to adequately identify impacts on Fort Huger and Fort Boykin	Fort Boykin and Fort Huger were identified and assessed for potential viewshed. Visual impact was recommended for both resources as not adverse. ABPP concurred that visual impacts were minimal on these resources.
James City County	Crouches Creek Plantation/Pleasant Point	Stantec failed to adequately identify impacts on Crouches Creek Plantation/Pleasant Point	Crouches Creek Plantation/Pleasant Point is a historic farmstead located to the east of Chippokes and the existing Surry Nuclear Power Plant. It was determined that there would be no visibility from this resource to the proposed river crossing.
James City County	Impacts to County	County stands to suffer most greatly from cumulative impacts; impacts immediate views but ultimately the decision of tourist to visit and support local economy; economic impact far-reaching.	This issue is not relevant to Section 106. These types of issues will be evaluated as part of the overall permit process.

Reference: Section 106 Consulting Party Comment Response

Christian & Barton, LLC on behalf of BASF Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
BASF	Impacts to Remediation Site	The proposed route crosses BASF poses substantial and extremely costly environmental impacts, upsets planned redevelopment and BASF request public hearing. NEPA should be initiated. BASF prefers Variation 3 crossing. BASF urges Corps to deny any permit for project based on Variation 1.	Dominion has coordinated with BASF to revise the proposed route across their property. The revised route is reflected on the provided APE maps (submitted under separate cover). Many concerns outlined in the letter are not specifically relevant to Section 106.
BASF	Historic Resource Settings	Project will dramatically and adversely affect the scenically significant and historic waterfront of the BASF property and surrounding area. Many historic resources are visible from BASF property. This perspective had been anticipated to be widely enjoyed by the public should redevelopment plans proceed as expected. Those plans now threatened by proposed route. Section 106 should consider perspective from historic and cultural resource location, and the ability of the public to view historic and cultural resources form other vantage points.	There are no known historic resources on BASF property, nor were any resources identified as part of the surveys conducted.

Reference: Section 106 Consulting Party Comment Response

Chesapeake Land Conservancy Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
Chesapeake Conservancy	Captain John Smith Trail	Disagree that current development is impacting nature of trail; trail retains viewsheds of the 17th century; NPS Plan declares James River a historic river with noteworthy scenic and ecological qualities; thru easements, parks and preserves over 50% of the 67 miles from Burwell Bay and Jamestown Island; economy tourism;	Comments are addressed in the cover letter provided.
Chesapeake Conservancy	No Effect Determination and Process	Object to No Effect determination; request ACHP and DHR to convene meeting and allow public involvement.	Comments are addressed in the cover letter provided.

Reference: Section 106 Consulting Party Comment Response

James River Association Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
James River Association	James River	James River near project rich with historical landmarks and natural viewsapes. Ability for visitor to connect deeply with river and its historic, cultural and natural resources critical to fostering stewardship for river. Project will have direct and severe effect on viewshed and on experience of visitor. From boater or paddler perspective, impacts most severe and viewshed dominated by power lines that detract from strong character of natural and historic resources.	Comments are addressed in the cover letter provided.
James River Association	Additional Focus Areas	Concerns over impacts to Captain John Smith Trail and NPS Conservation Strategy to conserve focus area along trail to enhance visitor experience. A plan for the James River Segment identifies additional focus areas near JCC which include: Chickahominy River and River Front Park, Jamestown and Powhatan Creek, Chippokes Plantation State Park, and Hog Island Wildlife Management Area. Project would impact these conservation focus areas, and degrade experience of those utilizing the Trail.	Comments are addressed in the cover letter provided.
James River Association	Alternatives Analysis	Only other feasible alternative was Chickahominy which would have even greater impacts to the environment, and cultural and historic resources;	An extensive alternatives analysis was conducted and included in both the SCC application and the Joint Permit Application. The proposed route is the least environmentally damaging practicable alternative.

Reference: Section 106 Consulting Party Comment Response

National Parks Conservation Association Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Parks Conservation Association	Schedule and Process	Lack of meaningful consultation, predetermined no adverse effect, and compressed schedule. Predetermination of "No Adverse Effect" on many resources.	Comments are addressed in the cover letter provided.
National Parks Conservation Association	Impacts to Parks and Historic Sites	Proposal would deeply impact the national parks and historic sites along James River. Would permanently mar the view shed that has been relatively unchanged for over 400 years. Critical aspect of protecting natural and historic resources is protecting night sky. Thousands of LED lights proposed and any additional lighting outlined for navigation will render protecting our night skies moot.	Towers exceeding 200 feet in height are required to be lit in accordance with FAA requirements. Additional lighting may be required for navigational purposes. Please see cover letter for more information.
National Parks Conservation Association	Impacts to Natural Resources	Would negatively impact important natural resources. Towers will disturb river bed will disturb bottom habitat and displace organisms living there. Construction on land will fragment wildlife habitat while increasing erosion. Four oyster beds would be lost. Atlantic sturgeon and other federally protected species including bald eagle, small whorled pogonia and sensitive joint vetch would be negatively impacted.	Comments are not related to Section 106 Consultation. Environmental impacts associated with the project have been addressed in the Joint Permit Application. NOAA has issued "not likely to adversely affect" sturgeon determination. Mitigation will be provided where required and as determined by the Corps.

Reference: Section 106 Consulting Party Comment Response

National Parks Conservation Association Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Parks Conservation Association	Captain John Smith Trail	Intrusion of towers with thousands of LED lights will destroy experience. No way to screen or mitigate the impacts to Captain John Smith Trail	Comments are addressed in the cover letter provided.
National Parks Conservation Association	Alternatives Analysis	Imperative for Corps to consider all alternatives. Alternatives presented including routing to an already existing crossing or putting lines underground. All impacts and alternatives must be completely researched before permit issued and must be vetted in public hearing to allow citizens to ask questions and offer input.	An extensive alternatives analysis was conducted and included in both the SCC application and the Joint Permit Application. The project purpose and need is clearly defined, and the proposed route is the least environmentally damaging practicable alternative.
National Parks Conservation Association	Impact to Tourism	Tourism multi-billion dollar industry in Commonwealth. Integrity of visitor experience critical to tourism. In 2012, Richmond VA was named the Best River Town in America by Outside magazine b/c of James River. Disruption of this magnitude would drastically reduce both accessibility and visitor experience. Boaters will be at increased risk to injury as they attempt to navigate around construction. Proposal would have negative impacts on historic, natural and scenic resources, in addition to economic harm to VA tourism.	The economic impact of the project is not relevant to Section 106. These types of issues will be evaluated as part of the overall permit process.

Reference: Section 106 Consulting Party Comment Response

National Trust for Historic Preservation Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Trust for Historic Preservation	Schedule and Process	Sect 106 should only be at initiation stage. Corps responsibility to identify and notify Consulting Parties of basic scope of the undertaking, the intent to conduct consultation, and the intent to begin to gather and review information to determine "the scope of appropriate identification efforts." Inappropriate preliminary comment deadline; inappropriate compression of Sect 106 Consultation steps; no tribal involvement; unclear if any other cities or counties, besides JCC, have been consulted.	Comments are addressed in the cover letter provided. Tribal consultation has been initiated.
National Trust for Historic Preservation	APE Inconsistent with Sect 106 Regs	Consulting parties have not been consulted regarding the APE, and the National Trust does not concur with the APE established by the Corps. The distinction in materials made between resources in the APE and resources in the ROW is unclear and arbitrary. Welcome opportunity to discuss concerns about how APE was determined and better understand methodology used.	The APE has been refined to reflect a Direct APE for archaeological resources, and an Indirect APE for architectural resources. Please see cover letter. The APE will be further discussed at the consulting parties meeting.
National Trust for Historic Preservation	Identification of Historic Resources Incomplete	Stantec identified hundreds of historic resources that may be impacted, but only a few have been evaluated for eligibility; consulting with DHR's databases to identify sites is not sufficient on its own to satisfy identification requirements.	Comments are addressed in the cover letter and resource tables provided. The surveys conducted for the project will be discussed at the consulting parties meeting. Stantec is continuing to coordinate with the Corps and VDHR.

Reference: Section 106 Consulting Party Comment Response

National Trust for Historic Preservation Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Trust for Historic Preservation	Objects to Corps' Determination of No Adverse Effect	Strenuously objects to any and all determinations of No Adverse Effect referenced in the Corps' May 13 document; determinations premature, based on insufficient information, and the determinations have been presented in a compressed review; must consider direct, indirect, and cumulative adverse effects; based on objections to these determinations of adverse effect, the Corps is required to consult with the National Trust in an effort to reach a resolution.	Comments are addressed in the cover letter provided.
National Trust for Historic Preservation	Underwater Archaeology	Corps should require Dominion to assess the National Register eligibility of the clusters of anomalies. Evaluation based solely on remote sensing information is not possible. It will be necessary to have the 23 clusters within the project area surveyed by divers. There is also a likelihood of indirect adverse effect caused by vibrations related to construction, and further direct, indirect, and cumulative adverse effects caused by operations and maintenance activities for the towers over the years.	Recommendations provided by the underwater archaeology consultant - Tidewater Atlantic Research (TAR) - included 23 anomalies that contain signatures consistent with submerged cultural resources. The recommendations were to avoid these anomalies as well as a buffer around the anomalies to prevent any potential disturbance to potentially submerged resources. At present, DVP has planned to avoid these anomalies and associated buffers. As such, no disturbance will occur and no further work is required.

Reference: Section 106 Consulting Party Comment Response

National Trust for Historic Preservation Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Trust for Historic Preservation	Martin's Hundred Cemetery	Hundreds of archaeological objects were identified, both known and newly discovered; however, there is no information included to detail a plan to protect these resources during construction. Specific concerns regarding Martin's Hundred Cemetery. Site must be fully surveyed to identify and protect unmarked graves, and evaluated for eligibility on the National Register.	The Phase I survey conducted did not identify any additional grave indications in or near the boundary and DVP has planned to avoid the area during any new construction efforts. No towers will be located within the boundaries of the site and no access is proposed through this area. As such, no disturbance to this area will occur.
National Trust for Historic Preservation	Captain John Smith Trail	Section of James River currently retains a high degree of integrity. Visitor's experience depends on the continued presence of key resources along the trail. Visual assessment fundamentally flawed due to its failure to consider the visual impacts of the proposed project on the John Smith Trail. There is no effort to capture the visual impact of the project from the perspective of a visitor to the trail. Project as proposed will have adverse effect. The assessment of direct effects to the recreational aspects of the Trail has not yet occurred.	Comments are addressed in the cover letter provided.
National Trust for Historic Preservation	Yorktown Battlefield	Project causes significant adverse visual impacts to battlefield. A LOS analysis completed from this point indicated that there will be no visibility due to dense forest conditions and distance; however, during winter months the line will certainly be visible from the location.	The LOS analysis is based on existing conditions and GIS modeling. Regardless of leaf cover, the visibility from the viewpoint would not be unobstructed. The battlefield boundaries are extensive, and the project would not adversely affect the resource.

Reference: Section 106 Consulting Party Comment Response

National Trust for Historic Preservation Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Trust for Historic Preservation	Carter's Grove	National Trust shares the concerns regarding the visual impacts on Carter's Grove and the deficiencies in the Visual Effects Assessment. Also shares concerns about the gross inadequacy of the mitigation suggestions presented by Dominion.	Comments are addressed in the cover letter provided. Mitigation options have not yet been identified or proposed.
National Trust for Historic Preservation	Colonial Parkway	The recommended determination of no adverse effect on Colonial Parkway in the Visual Effects Assessment is particularly unfounded. Based on simulations, there would be a clear view of up to 10 towers. There is little discussion in the assessment to explain the recommendation determination of no adverse effect.	Comments are addressed in the cover letter provided.
National Trust for Historic Preservation	Jamestown Island	The Visual Effects Assessment inappropriately minimizes the fact that the entire line would be visible from the island. Also implies that, b/c the tip of Black Point is undeveloped, that somehow negates the fact that there would be a visual impact, when the opposite is clearly true. Black Point is undeveloped and thus its pristine viewshed is even more important to protect.	Comments are addressed in the cover letter provided.
National Trust for Historic Preservation	Kingsmill Plantation	Photographs from a reasonably determined vantage point are needed to adequately consider the visual impacts. LOS assessment indicates that the line would be clearly visible from the site, but report concludes that the "line will not be visible from the interpreted resource." This determination requires further explanation.	The line of sight studies suggest that the line is not visible from the interpreted site. Current photos will be taken from these areas for Corps/VDHR review.

Reference: Section 106 Consulting Party Comment Response

National Trust for Historic Preservation Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Trust for Historic Preservation	Fort Huger	It is clear from the materials presented that the towers would be clearly visible from this resource; however, the assessment declares that the line would be "not likely noticeably visible." This language is typical of conclusions drawn throughout the report where the consultants have made judgment calls on the extent of visual intrusion without benefit of any clear standards.	Ground photography taken at Fort Huger suggests that the power line will be visible but will not detract from the criteria by which the Fort was determined eligible for listing on the NRHP resulting in a recommendation of no adverse impact submitted to the Corps and VDHR.
National Trust for Historic Preservation	Other Concerns	Lack of LIDAR data from sites other than Carter's Grove should be explained and rectified for each site studied.	Lidar data was used to determine broad scale visibility through GIS modeling. These limits were then used to determine the APE. Individual sites requiring further analysis were investigated separately and in accordance with professional standards. Additional LIDAR analysis is not appropriate for every site identified.
National Trust for Historic Preservation	Inadequate Assessment of Cumulative Effects	There is a complete lack of consideration of cumulative effects that would be caused by the project in the material provided; degradation of James River impact to tourism in state and local taxes; would lead to more inappropriate development in the area; efforts of generations of Virginias to place easements on nearby properties, to permit only sensitive and appropriate development, and to carefully screen any new development.	Cumulative effect and economics of the project are not relevant to Section 106. These topics will be evaluated as part of the overall permit process.

Reference: Section 106 Consulting Party Comment Response

National Trust for Historic Preservation Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Trust for Historic Preservation	Analysis of Alternatives to Avoid or Reduce Harm	Corps must fully consider a reasonable range of alternatives that would avoid and/or reduce the identified adverse effects to historic resources; state level SCC review no substitution for Sect 106 review and consultation.	A full alternatives analysis was provided in both the SCC application and the Joint Permit Application. Further discussion will be provided at the consulting parties meeting.
National Trust for Historic Preservation	National Historic Landmarks-Sect 110(f)	Carter's Grove is a NHL and will be adversely affected by the project, and Colonial Parkway is likely eligible to be recognized as NHL and should be evaluated and nominated for consideration as a part of Section 106 process.	Comments are addressed in the cover letter provided. The Corps/VDHR will comply with Section 110(f).
National Trust for Historic Preservation	Anticipatory Demolition-Section 110(k)	Resource 44JC0662. Section 110(k) referred to as "anticipatory demolition" provision, prohibits issuance of federal permits to project proponents that preemptively destroy historic resource to avoid compliance with NHPA. Concerned about conflict between Corps' response and the material presented by Dominion, and would like a full description of all activities at site 44JC0662 and opportunity to ask questions regarding those activities directly to Dominion's consultants.	Phase I and II evaluation are necessary steps taken in order to reach a recommendation for archaeological resources for both SCC process and Section 106. No additional work has been completed at 44JC0662 since its determination as an eligible archaeological resource.

Reference: Section 106 Consulting Party Comment Response

National Trust for Historic Preservation Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
National Trust for Historic Preservation	Conclusion	Support a reboot of process and request the Corps respond to outstanding previous requests for information about Dominion's required timeframe. NT request a meeting of all parties, inform parties of plan to convene preliminary public meeting, respond in writing to concerns about anticipatory demolition and commit to proceeding deliberately step-by-step 106 process.	See cover letter.
National Trust for Historic Preservation	July 7, 2014 Letter	Appears to be no efforts to involve any tribal representatives; Primary method to identify resources was DHR database, while good starting place, not appropriate place to end search. Necessary to involve stakeholders. While identifying resources impacted by project, important to recognize some resources are likely eligible for higher degree of designation than they currently have, such as Colonial Parkway, James River below Carter's Grove to above Jamestown in Historic Triangle, James River and Captain John Smith Trail; Remain concerned about level of effort to identify underwater resources. Serious concerns about progress of 106.	The Corps has provided a public involvement plan in response to similar comments. Further discussion will be provided at the consulting parties meeting.

Reference: Section 106 Consulting Party Comment Response

Preservation Virginia Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
Preservation Virginia	Schedule	Object to compressed schedule - only gave 15 days instead of 30 days; object to all No Adverse Effect determinations - insufficient information to make decision; no meaningful consultation. Intend to participate fully as Consulting Party.	Comments are addressed in the cover letter provided.
Preservation Virginia	APE Determination	Object to characterization of the ROW and the APE. Dominion narrowly defines the ROW and does not consider actual impact of the barriers and other construction apparatus that will have damaging consequences to identified underwater anomalies and other archaeological sites. More investigation of underwater and land based resources needed	Comments are addressed in the cover letter provided.
Preservation Virginia	Carter's Grove	Report characterizes Carter's Grove as a "declining property". Colonial Williamsburg will speak to factual error described in this statement. Indicated that there has not been a thorough examination of this property and casts doubt on the thoroughness of investigation of other sites.	Comments are addressed in the cover letter provided.
Preservation Virginia	Captain John Smith Trail	Scant recognition given to fact that this section of James River is part of Captain John Smith Chesapeake National Historic Trail. Trail should be identified as eligible for listing on NRHP. John Smith 17th Century maps should be consulted. No evidence from record that this obvious step was completed.	Comments are addressed in the cover letter provided.

Reference: Section 106 Consulting Party Comment Response

Preservation Virginia Letter Dated June 12, 2014 (cont.)

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
Preservation Virginia	Colonial Parkway	If approved the transmission lines will be highly visible as lights blink on and off 24 hours a day, seven days a week from vantage point of Colonial Parkway - an "All American Road" which is the highest category of significance in the National Scenic Byway system.	Please see cover letter for additional information on this resource and required lighting. The Scenic Byway system is not pertinent to Section 106.
Preservation Virginia	Historic Triangle/Economic Impact	Colonial Williamsburg, the College of William and Mary, and Preservation Virginia working to have Historic Triangle recognized as a World Heritage Site. If line built would face even more opposition as the integrity of irreplaceable landscape would be altered. Likely consequence would be loss of needed economic growth to region.	Economic impacts are not relevant to Section 106. This issue will be considered as part of the overall permit process.
Preservation Virginia	Object to Chickahominy route	Would harm significant natural, historic, and cultural resources; explore other options. Alternatives considered should include: burial, co-locating the line at an existing crossing, exploring engineering solutions that do not require new transmission line, and exploring alternate over land routes that do not cross James River near sensitive historic sites.	The Chickahominy route was not the selected alternative as it was not determined to be the least environmentally damaging practicable alternative. A thorough alternatives analysis was provided in the submitted permit application support document.
Preservation Virginia	July 7, 2014 Letter	Three additional points: First, James River warrants evaluation as historic and cultural resource. Captain John Smith Trail first of its kind water trail within NPS. River needs to be recognized as a historic and cultural resource in its own right.	Comments are addressed in the cover letter provided.

Reference: Section 106 Consulting Party Comment Response

Save the James Alliance Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
Save the James Alliance	James River and Colonial Parkway	Today visitors to the area can view and navigate river much as it existed in 1607; the NPS's Colonial National Parkway must be thoroughly evaluated with regard to visual impacts.	Comments are addressed in the cover letter provided.
Save the James Alliance	Failure to Consider Alternatives	Dominion has ignored any plausible alternative; to date Dominion has presented only one alternative that involved a line going through over 40 miles of woods and significantly impacting the Chickahominy River. Engineered a solution with the highest voltage they could muster in a 500 kV line. Dominion knows proposed line is overkill and intends to immediately reduce this voltage to 230 kV once they reach JCC; consider underwater/underground option. Yorktown conversion to gas since ample supply of natural gas exists on the south side of the James River.	An extensive alternatives analysis was conducted and included in both the SCC application and the Joint Permit Application. The project purpose and need is clearly defined, and the proposed route is the least environmentally damaging practicable alternative.
Save the James Alliance	Process and Schedule	In person participation in Sect 106 review and consultation process, which to date has been non-existent. Want a full and fair hearing. The No Adverse Effect determination was premature and this decision results from insufficient information and/or the absence of consultation required by federal law.	Comments are addressed in the cover letter provided.

Reference: Section 106 Consulting Party Comment Response

Scenic Virginia Letter Dated June 12, 2014

Commenting Party	Topic/Issue	Consulting Party Comment	Dominion Response
Scenic Virginia	James River, Captain John Smith Trail and Colonial Parkway	Proposed line will do irreparable harm to significant historic and cultural assets; James River is America's Founding River. Captain John Smith Trail would forever change; line would have deleterious effects on Colonial Parkway's All American Road status. The Corridor Management Plan for the road is used to guide future development, including the prevention of future intrusion into the viewshed of the Byway; the importance of Virginia's tourism trade to the Commonwealth cannot be overstated.	Comments are addressed in the cover letter provided. Project purpose and need is clearly defined and documented. The selected route is the least environmentally damaging practicable alternative.
Scenic Virginia	Process and Schedule	Request in person meeting with Consulting Parties to initiate Sect 106 process and review in appropriate manner. Objects to lack of public participation to date. Need additional time beyond 30 days.	Comments are addressed in the cover letter provided.
Scenic Virginia	Objection to No Adverse Effect Determination	Objects to all No Adverse Effect determinations referred to throughout Corps' distributed documents; material appears to hurry the process; insufficient information to reach any determination; effects must be reached in consultation with Consulting Parties; no meaningful consultation has occurred.	Comments are addressed in the cover letter provided.