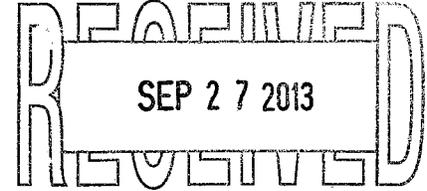


Steffey, Randy L NAO

From: Petrow, Carol [petrow.carol@epa.gov]
Sent: Friday, September 27, 2013 7:09 AM
To: Steffey, Randy L NAO
Subject: [EXTERNAL] NAO-2012-00080 (Virginia Dominion Power Transmission Power Line)

Randy

U.S. ARMY CORPS OF ENGINEERS



Dominion Virginia Power proposes to construct a new electrical transmission powerline and associated infrastructure, known as Surry - Skiffes Creek - Whealton project, consistent with the North American Electric Reliability Corporation (NERC) standards. The proposed project involves construction of a new 7.76-mile 500kV overhead transmission powerline from Surry nuclear power plant to the proposed Skiffes Creek 500kV-230kV-115kV switching station, on 51 acres of private and commercial property in James City County, followed by the construction of 20.2 miles of new 230kV overhead transmission powerline from the switching station to Whealton substation in Hampton.

As proposed, the jurisdictional impacts associated with the overall project will result in the loss of 220 square feet of non-tidal wetlands and 1142 square feet of subaqueous river bottom. An additional 0.71 acres of palustrine forested wetlands will be converted to scrub-shrub wetlands. Impacts associated with selective hand clearing are not regulated. The applicant has not proposed mitigation.

The public notice identifies measures designed to avoid and minimize direct impacts to aquatic resources to the maximum extent practicable. These include:

- Minimizing clearing and disturbance to forested areas, including wetlands by co-locating the proposed line within an existing cleared ROW currently occupied by transmission facilities. Utilizing the existing ROW avoids the need to clear additional forested areas and minimizes the potential for additional environmental impacts;
- Locating support structures outside of wetlands to the maximum extent practicable and spanning all tidal crossings outside of the James River;
- Clearing of wetlands, as well as areas within 100 feet of stream channels by hand rather than with mechanized heavy equipment;
- Designing tower placement in the James River to provide maximum span lengths, thereby minimizing the number of towers within the river; and
- Locating the proposed switching station entirely in uplands to avoid all impacts to waters of the US, including wetlands.

We recognize the steps being taken to avoid and minimize impacts to jurisdictional aquatic resources. Based on the information available, the applicant has considered alternatives

which meet the stated purpose and need. If impacts to aquatic resources are reduced to the maximum extent practicable and the project as proposed is determined to be the least environmentally damaging practicable, then EPA has no objections at this time.

However, we are requesting the Corps consider requiring mitigation for the proposed conversion and temporary impacts to forested wetlands to compensate for loss of ecological services specific to forested wetland systems. EPA would like to reserve the right to comment if additional environmental concerns are identified by another agency or the applicant or if substantive changes are made to the proposal.

We are supportive of measures recommended by resource agencies to reduce impacts to listed species and their habitat, EFH and other natural resources.

Thank you for considering our comments.

Carol Petrow

U.S. Environmental Protection Agency

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