

**DOMINION VIRGINIA POWER
 RESPONSE TO COMMENTS SUBMITTED BY INTERESTED PARTIES
 IN RESPONSE TO THE PUBLIC NOTICE DATED OCTOBER 1, 2015
 CONCERNING THE SURRY-SKIFFES CREEK-WHEALTON PROJECT**

**US Army Corps of
 Engineers
 Norfolk District
 Regulatory Office
 Received by: RLS
 Date: Jan 29, 2016**

Comments in Support of Surry-Skiffes Creek Project				
General Response:				
These comments support the Surry-Skiffes Creek project and/or oppose the Chickahominy route. Detailed responses to these comments are not required and a “comment acknowledged” response is sufficient.				
1	Arthur Knowles (EOC USN)	Support	1. Believes project is quick, reasonable, and economical way to avoid unreliable electrical service and rolling blackouts.	Comment acknowledged.
2	Christopher Rouzie (Senior VP of Thalhimer)	Support	1. Supports project to maintain compliance with the North American Electric Reliability Corporation standards to ensure the reliability and integrity of the region’s electric grid.	Comment acknowledged.
3	Daniel Anzur (resident of Chesapeake, VA)	Support	1. General support because the project is the most reliable and cost effective option.	Comment acknowledged.
4	Darlene Dozier (resident of Toano, VA)	Support	1. General support because the project is the “only feasible solution” to impending power reliability issues.	Comment acknowledged.
5	David Ledbetter (resident of Charles City, VA)	Support	1. General support for the project as it is the only feasible and reasonable alternative to	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			satisfy FERC requirements. 2. Opposed to the Chickahominy route, criticizing the Corps White Paper analysis of the Chickahominy route.	
6	David and Maria Clark (residents of Williamsburg, VA)	Support	1. General support for the project and reliable electricity. 2. Counters claims of negative visual impacts by describing the visibility of the proposed towers from various vantage points.	Comment acknowledged.
7	David Mogo	Support	1. General support for the project and does not think trenching under the James to run the lines underwater is viable. 2. Notes other manmade structures visible from Jamestown Island.	Comment acknowledged.
8	David Peters	Support	1. General support for the project for power reliability.	Comment acknowledged.
9	David Richards	Support	1. General support for the project for power reliability.	Comment acknowledged.
10	Dorothy Roemer (resident of Williamsburg, VA)	Support	1. General support for the project for power reliability.	Comment acknowledged.
11	Dale Russell	Support	1. General support for the project for power reliability.	Comment acknowledged.
12	David Westfall	Support	1. General support for the project for power reliability.	Comment acknowledged.
13	Edward Burton	Support	1. General support of project for power reliability.	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			2. Notes that underwater lines could cause greater environmental disruption.	
14	Elizabeth Middleton (resident of Williamsburg, VA)	Support	1. General support of project for power reliability. 2. Also notes the need for solar panels on individual residences and businesses.	Comment acknowledged.
15	Elizabeth Weisman (speaking for the residents of Colonial Heritage, located in the Western section of James City County)	Support	1. Opposes the Chickahominy route because of the 'higher cost' and greater scenic impact; lists other negative impacts of the Chickahominy alternative. 2. General support for the project for power reliability reasons.	Comment acknowledged.
16	Elmer Wooldridge	Support	1. General support for the project for power reliability.	Comment acknowledged.
17	Grover Campbell	Support	1. General support of project for power reliability.	Comment acknowledged.
18	Georgia Carter	Support	1. General support of project for power reliability.	Comment acknowledged.
19	Gary and Lina Davis (residents of Williamsburg, VA)	Tentative Support	1. General support of project if it is "truly the only way" for power reliability in the area, otherwise in favor of an option that does not use power lines over a river.	Comment acknowledged.
20	Gary Murphy	Support	1. General support of project for power reliability.	Comment acknowledged.
21	Harry Keys (resident of	Support	1. General support for the project for energy reliability.	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
	Williamsburg, VA)			
22	Jerald Abraham	Support	1. General support for the project for power reliability.	Comment acknowledged.
23	Jack Ezzel, Jr. (CEO Zel Tech)	Support	1. General support of project for power reliability.	Comment acknowledged.
24	John Grant	Support	1. General support of project for power reliability. 2. Opines that project “strikes the perfect balance.”	Comment acknowledged.
25	Janet Hawk	Support	1. General support of project for power reliability. 2. Opposes the Chickahominy route.	Comment acknowledged.
26	John Howard, Jr.	Support	1. General support of project for power reliability. 2. Points out the various other industrial sites from historical vantage points.	Comment acknowledged.
27	Janet Johnson	Support	1. General support for project for power reliability.	Comment acknowledged.
28	James Kunkle	Support	1. General support because of power reliability.	Comment acknowledged.
29	Judith Ledbetter (Director, Charles City County Center for Local History)	Support	1. Oppose the Chickahominy alternate route. 2. Corps is bound by the final decision of the SCC, as affirmed by the Virginia SC, holding that the Chickahominy route would have a greater overall impact, especially to the Captain John Smith Chesapeake National Historic Trail.	1. Comment acknowledged. 2. Corps has independently evaluated routes and concluded Chickahominy would have greater impacts to aquatic resources.

Comments in Support of Surry-Skiffes Creek Project				
30	James Miniclier, Jr. (resident of Charles City, VA)	Support	1. Oppose the Chickahominy route. 2. General support for project for power reliability.	Comment acknowledged.
31	Darlene Stephenson (CEO, Bon Secours Mary Immaculate Hospital)	Support	1. General support because of power reliability that will ensure the hospital will best be able to serve the community.	Comment acknowledged.
32	Conway Sheild, III (partner at a Newport News law firm and resident of James City, VA)	Support	1. General support because of power reliability. 2. Consistent reliable power needed for the firm to provide excellent service to its clients. 3. Cites need to comply with the North American Electric Reliability Corporation standards.	Comment acknowledged.
33	Chris and Dean Canavos (Co-Presidents of Canavos Properties)	Support	1. General support because of power reliability. 2. Over \$20 million in capital invested on the Peninsula and reliable electricity is a pre-condition to doing business.	Comment acknowledged.
34	Col. Caroline Miller (USAF Commander at Joint Base Langley-Eustis)	Support	1. General support because of power reliability. 2. Reliable power is needed for the 633d Air Base Wing.	Comment acknowledged.
35	Anna Van Buren (President and CEO, Faneuil)	Support	1. General support because of power reliability. 2. Capital investment of \$6.44	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			million on the Peninsula and need power reliability to stay in business.	
36	Mayor George Wallace (City of Hampton, on behalf of the City Council of the City of Hampton, VA)	Support	<ol style="list-style-type: none"> 1. General support because of power reliability. 2. Cites hospitals, air force base, universities, business, schools, and other city components that require electricity. 	Comment acknowledged.
37	John Reinhart (CEO of Virginia Port Authority)	Support	<ol style="list-style-type: none"> 1. General support because of power reliability. 2. Port of Virginia is responsible for over 340,000 jobs (directly or indirectly) and it needs a reliable supply of electricity to sustain growth. 	Comment acknowledged.
38	Kevin Sweeney (President and CEO, Rear Admiral, USN; writing on behalf of the Hampton Roads Economic Development Alliance)	Support	<ol style="list-style-type: none"> 1. General support for the project because of power reliability. 2. Cites goal to market Hampton Roads to private investors and businesses and unable to do that without steady power supply. 	Comment acknowledged.
39	Mary Blunt (Corporate Vice President, Sentara Healthcare Peninsula Operations)	Support	<ol style="list-style-type: none"> 1. General support for the project because of power reliability. 2. Cites operation of hospitals and rehab facilities that require constant access to electricity. 	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
40	McKinley Price (Mayor, Newport News)	Support	<ol style="list-style-type: none"> 1. General support of the project for power reliability. 2. Notes that community is 190,000 people, the businesses in the area (Shipbuilding, CSX railway, Huntington-Ingalls, CNU, etc.). 	Comment acknowledged.
41	Ross Mugler (Commissioner of the Revenue, Hampton, VA)	Support	<ol style="list-style-type: none"> 1. General support for the project because of power reliability. 2. Cites responsibility to respond to needs of the citizens of Hampton and this project is something that his constituents need to assure continuation of a reliable electric supply. 	Comment acknowledged.
42	Rick Williamson (Rear Admiral, U.S. Navy Commander, Navy Region Mid-Atlantic)	Support	<ol style="list-style-type: none"> 1. General support for the project because of power reliability. 2. Cites need for stable and reliable electric power at installations such as Naval Weapons Station Yorktown. 	Comment acknowledged.
43	Rick Cole (President, Dominion Terminal Associates)	Support	<ol style="list-style-type: none"> 1. General support of the project for power reliability 2. Part of its operations are at the end of the high voltage line and is therefore vulnerable to problems with the electrical grid. 3. Also notes the health and safety concerns associated with 	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			blackouts.	
44	Toru Nishizawa (President and CEO, Cannon Virginia, Inc.)	Support	1. General support for project because of power reliability. 2. Notes that Canon Virginia has 2,000 employees and \$800 million in capital investment in the region and need reliable power to do business.	Comment acknowledged.
45	Thomas Thompson (Chairman, Harrison & Lear, Inc., Realtors)	Support	1. General support for project because of power reliability. 2. Company manages apartment units, shopping centers, and office complexes, and all need reliable electricity to operate.	Comment acknowledged.
46	William Downey (President and CEO of Riverside Health System)	Support	1. General support for project because of power reliability. 2. Notes that Riverside operates a medical center, community hospitals, and other similar facilities employing over 9,000 people and they need reliable power.	Comment acknowledged.
47	Wendy Drucker (Managing Directors, Drucker & Falk, LLC)	Support	1. General support for project because of power reliability. 2. Company manages over 30,000 apartments and 3.5 million square feet of commercial space and they need reliable electricity to operate properly.	Comment acknowledged.
48	William Harvey (President,	Support	1. General support for project because of power reliability.	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
	Hampton University)		2. Notes need for reliable power for the university to operate as it has and plans to continue operating.	
49	Katherine Miniclier (resident of Charles City, VA)	Support	1. General support for the project as it is the only feasible and reasonable alternative. 2. Opposes the Chickahominy route.	Comment acknowledged.
50	Marie L. DeGrace (resident of Williamsburg, VA)	Support	1. General support for the project as it is the only feasible and reasonable alternative. 2. Opposes the Chickahominy route.	Comment acknowledged.
51	Jerald J. Stewart (resident of Williamsburg, VA)	Support	1. General support for the project as it is the only feasible and reasonable alternative. 2. Opposes the Chickahominy route.	Comment acknowledged.
52	David Ledbetter (resident of Charles City County, VA)	Support	1. General support for the project as it is the only feasible and reasonable alternative. 2. Opposed to the Chickahominy route.	Comment acknowledged.
53	Matt Gray (resident of Williamsburg, VA)	Support	1. General support of project for power reliability.	Comment acknowledged.
54	Bryce Hollingsworth (resident of Williamsburg, VA)	Support	1. General support of project for power reliability.	Comment acknowledged.
55	Deidre and David	Support	1. Opposes the Chickahominy	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
	Lenderking (residents of Williamsburg, VA)		route because of the ‘higher cost’ and greater environmental impacts.	
56	Natalie Joski (resident of Williamsburg, VA)	Support	1. General support for project because of power reliability.	Comment acknowledged.
57	Noel West (resident of Yorktown, VA)	Support	1. General support because the project is the only feasible solution to impending power reliability issues.	Comment acknowledged.
58	Arthur P. Henderson (resident of Newport News)	Support	1. Supports project for power reliability reasons.	Comment acknowledged.
59	Bill Flewelling (resident of Williamsburg, VA)	Support	1. Opposes the Chickahominy route because of the ‘higher cost’ and greater environmental impacts. 2. General support of project for power reliability and preserving the environmental character of the County.	Comment acknowledged.
60	Anna Van Buren (representing Greater Peninsula Now)	Support	1. General support for project for power reliability.	Comment acknowledged.
61	Mark Paul (resident of Williamsburg, VA)	Support	1. General support of project for power reliability.	Comment acknowledged.
62	Ron Kirkland (Executive Director	Support	1. General support of project for power reliability.	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
	of the Williamsburg Hotel and Motel Association)			
63	Sandra Martin (resident of Williams, VA)	Support	1. Opposes the Chickahominy route because of the 'higher cost' and greater environmental impacts.	Comment acknowledged.
64	John F. Miniclier, Jr.	Support	1. Chickahominy Alternative is unfair to residents of Charles City County. 2. Firsthand experience with the hardships residents experience when there is no power. 3. Charles City County already hosts one Dominion 500 kV line that runs across the James. 4. Those who create the demand for power must bear their fair share of the burden. 5. Environmental justice issue if the more damaging Chickahominy alternative becomes the preferred route.	Comment acknowledged.
65	Joseph Pierce	Support	1. Something needs to be done to ensure that reliable electrical service will continue uninterrupted. By the Spring of 2017, Dominion will have to start shutting off the power whenever the system becomes unreliable.	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			<p>2. Hard for business to operate when there are 80 blackouts a year.</p> <p>3. Elderly citizens and persons with medical devices that operate on electricity will be affected.</p> <p>4. The proposed project is an efficient and economical way to solve the problem in a timely manner.</p> <p>5. Permit the project and allow it to move forward.</p>	
66	John Reaser	Support	<p>1. The need for the project is urgent. Aware that the Peninsula could face rotating blackouts if the line is not built.</p> <p>2. Homes and businesses rely on a steady, reliable supply of energy.</p> <p>3. Many operations and installations that are vital to the nation's defense which are located on the peninsula would be affected by rolling blackouts.</p> <p>4. Encouraged that the Corps' White Paper found that Dominion's proposed project is reasonable, cost-effective and technically feasible.</p> <p>5. Urges the Corps to permit the project and allow it to move</p>	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			forward.	
67	James White	Support	<ol style="list-style-type: none"> 1. Wants the Corps to approve the permit. 2. The River is a far cry from what Captain John Smith saw. Mentioned a number of industrialized sites along the James. 3. Dominion’s project strikes the balance of preventing further damage while accepting the fact that it is a working river. 4. The proposed line would be difficult to view from most of the historic areas. 	Comment acknowledged.
68	Joseph Williams	Support	<ol style="list-style-type: none"> 1. Wants the Corps to approve the permit as soon as possible. 2. Those against the line jeopardize reliable electric service on the Peninsula. 3. The Peninsula will lose half of its power supply. 4. The electric grid will be in severe trouble. 5. The SCC concluded that the line is the most cost-effective, feasible, and timely, and would have no significant impact on the Peninsula’s historic resources. This was upheld by the Virginia Supreme Court. 	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
69	John Yancey, President, John Yancey Companies	Support	<ol style="list-style-type: none"> 1. Understands that the units at Yorktown have to be shut down by April 2017. 2. The only plan which can be successfully implemented within the requisite timeframe and have the least impact on the environment is the line crossing the James. 3. The Chickahominy route would take longer and would have a greater impact on more than 1,500 residents and businesses and have a greater impact on wetlands. Unreliable power supply would harm existing businesses as well as the efforts to attract new businesses. 4. The economy of the Peninsula would suffer. 5. The line would be more than 3 miles away from the majority of residents in the Williamsburg area and will not be visible from all of Jamestown Island. 6. The area has heavy ferry and barge traffic and structures and lights are already visible along the shoreline. Therefore the argument that the towers will destroy the pristine scene as 	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			<p>viewed by Captain John Smith is without merit.</p> <p>7. Some of the suggestions can only be described as “magical thinking.”</p> <p>8. The SCC ruled that the project is needed and the Virginia Supreme Court concurred with the SCC.</p>	
70	Lewis Savedge	Support	<p>1. Wants the permit approved.</p> <p>2. The other alternatives are not feasible and are expensive.</p>	Comment acknowledged.
71	Linda Warren	Support	<p>1. The river is not the same waterway that Captain John Smith encountered 400 years ago. The river is a working river.</p> <p>2. The line would not be visible from most of Jamestown Island and barely visible from communities east of the historic district.</p>	Comment acknowledged.
72	Lesa Jones	Support	<p>1. Charles City Resolutions supporting the James River crossing.</p>	Comment acknowledged.
73	Local 8888, United Steelworkers of America	Support	<p>1. The SCC has approved the project and its findings upheld by the Supreme Court of Virginia.</p> <p>2. Project needed to replace the power generated at Yorktown, and prevent blackouts.</p>	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			<p>3. The project is needed and should be permitted.</p> <p>4. The loss of reliable service would be catastrophic for the Peninsula and other communities.</p>	
74	Marvin Blalock	Support	<p>1. Wants the Corps to issue the permit as the need for the project is urgent.</p> <p>2. Businesses on the Peninsula rely on reliable electricity.</p> <p>3. Confident that the line can be built in a way that protects the river and preserves the beautiful view.</p>	Comment acknowledged.
75	Marvin Burger	Support	<p>1. Wants the permit approved as soon as possible.</p> <p>2. Alternatives are not feasible and are expensive.</p>	Comment acknowledged.
76	Miranda Hall	Support	<p>1. Discouraged to know that the Chickahominy route was still an option.</p> <p>2. Wants the Corps to approve the James River crossing.</p>	Comment acknowledged.
77	Malalage Peiris	Support	<p>1. The proposed project is quick, economical and reasonable.</p> <p>2. Electricity is not a luxury but a necessity.</p> <p>3. The region needs another source of electricity to fill the gap when the Yorktown Power</p>	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			Station is forced to shut down.	
78	Matthew Rowe	Support	<ol style="list-style-type: none"> 1. Submitted his testimony that was given before the SCC. 2. Chickahominy route does not make environmental or financial sense and impacts more homes and communities than the already approved SCC Scurry-Skiffes route. 	Comment acknowledged.
79	Neil Clark	Support	<ol style="list-style-type: none"> 1. Wants the Corps to approve the proposed project as soon as possible. 2. Unless something is done, the electrical system will hurt, including rolling blackouts. 	Comment acknowledged.
80	Pat Hensley	Support	<ol style="list-style-type: none"> 1. Rolling blackouts will be an inconvenience and have an impact on the livelihoods of those who live in the region as well as the economy. 	Comment acknowledged.
81	Roger Anderson	Support	<ol style="list-style-type: none"> 1. Wants the Corps to promptly approve the permit. 2. There is a critical need for the project. 3. Williamsburg thrives on tourism and the commentator expressed his concern for the economy if the area does not have reliable electricity. 	Comment acknowledged.
82	Richard Kline	Support	<ol style="list-style-type: none"> 1. Concerned that the Chickahominy line can be damaged because of rifle fire by 	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			vandals.	
83	Robert Meyer	Support	<ol style="list-style-type: none"> 1. Needed to maintain electric reliability and national security. 2. Concerned for rolling blackouts once Yorktown is shut down. 	Comment acknowledged.
84	Raymond Willis	Support	<ol style="list-style-type: none"> 1. Wants the Corps to approve the permit as soon as possible. 2. Opposed to Dominion running Yorktown in violation of federal law. 3. None of the other alternatives make sense. 	Comment acknowledged.
85	The Residents of Colonial Heritage	Support	<ol style="list-style-type: none"> 1. Wants the Corps to consider the negative impacts that would result if the Chickahominy route is chosen rather than the James crossing, including: (1) the need for new, undeveloped existing right-of-way; (2) impacts to 28.53 miles of private lands; (3) crossing within 500 feet of homes, schools, and public parks; (4) clearing of trees and forested wetlands; and (5) passing through the heart of the Chickahominy Indian community. 2. The Chickahominy route is 30 miles longer and there are more environmental impacts. 	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
86	Ron Chappell	Support	<ol style="list-style-type: none"> 1. Does not want the Corps to undertake an EIS. 2. Wants the Corps to issue the permit as soon as possible. 3. The section of the James where the line would cross is already heavily developed. 4. The line will not be visible from Jamestown settlement. 5. Water quality impacts miniscule and acceptable. 6. The project will eliminate air emissions for two coal-fired generating units in Yorktown. 7. Delay associated with requiring an EIS would cause repeated power shortages. 	Comment acknowledged.
87	Sherrif Gabriel Morgan, Newport News	Support	<ol style="list-style-type: none"> 1. Rolling blackouts would be a problem to public safety and the military. 2. The evidence considered by the SCC led it to conclude that the project is needed. The Supreme Court of Virginia upheld the SCC determination. 	Comment acknowledged.
88	Tyndall Baucom	Support	<ol style="list-style-type: none"> 1. Wants the Corps to approve the permit. 2. The James River is not pristine. 	Comment acknowledged.
89	Thomas Fenton	Support	<ol style="list-style-type: none"> 1. Dominion does not have the right to invade his family burial 	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			ground which is located along the Chickahominy route.	
90	Thomas Herbert	Support	<ol style="list-style-type: none"> 1. Wants the Corps to issue the permit. 2. The evidence considered by the SCC led it to conclude that the project is needed. The Supreme Court of Virginia upheld the SCC determination. 3. The loss of reliable power will have an impact on the regions ability to retain existing businesses and jobs and attracting new ones. 	Comment acknowledged.
91	Brenda Pogge, House of Delegates 96 th District	Support	<ol style="list-style-type: none"> 1. The proposed line is the least expensive, shortest, and most consistent supply of sustainable power, and least damaging to the environment and recreational resources. 2. The Chickahominy route is longer with more environmental impacts and more expensive than the proposed route. 	Comment acknowledged.
92	William Beckerdite	Support	<ol style="list-style-type: none"> 1. Newport News has one of the world's largest shipyards and employs thousands of people. It also plays a critical role in the nation's defense. 2. Wants the Corps to approve the line quickly. 	Comment acknowledged.
93	William Slifer	Support	<ol style="list-style-type: none"> 1. Wants the Corps to issue the 	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			<p>permit.</p> <p>2. Newport News has one of the world's largest shipyards and employs thousands of people. It also plays a critical role in the nation's defense.</p> <p>3. The proposed line would not disrupt the view.</p> <p>4. Running the line underwater has far more environmental disruptions.</p>	
94	Wendell Wornom	Support	<p>1. Wants the Corps to approve the permit.</p> <p>2. Project needed to prevent unreliable electricity and blackouts.</p>	Comment acknowledged.
95	Wade Weisman	Support	<p>1. Corps to consider the negative impacts that would result if the Chickahominy route is chosen rather than the James crossing, including: (1) the need for new, undeveloped existing right-of-way; (2) impacts to 28.53 miles of private lands; (3) crossing within 500 feet of homes, schools, and public parks; (4) clearing of trees and forested wetlands; and (5) passing through the heart of the Chickahominy Indian community.</p>	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			2. The Chickahominy route is 30 miles longer and there are more environmental impacts.	
96	Zach Trogon	Support	1. Charles City resolution urging the Corps to approve the James River crossing.	Comment acknowledged.
97	Dominion Form Comment Letters: 713 letters, almost entirely the same. There were two versions, but no substantive differences.	Support	1. The proposed line is the best way to reliably meet energy demands. 2. Urges the Corps to support the project so that the peninsula has the electricity needed once the Yorktown units are retired.	Comment acknowledged.
98	Charles Harwood, Jr. (resident of Charles City, VA)	Tentative	1. General opposition to the Chickahominy route and wants it stricken from consideration. 2. Does not mention route for current project.	Comment acknowledged.
99	Elizabeth Weisman (speaking for the residents of Colonial Heritage, located in the Western section of James City County)	Support	1. Opposes the Chickahominy route because of the 'higher cost' and greater scenic impacts of the Chickahominy alternative. 2. General support for the project for power reliability reasons.	Comment acknowledged
100	David Ledbetter (resident of Charles City, VA)	Support	1. General support for the project as it is the only feasible and reasonable alternative to satisfy FERC requirements. 2. Opposed to the	Comment acknowledged.

Comments in Support of Surry-Skiffes Creek Project				
			Chickahominy route, criticizing the Corps White Paper analysis of the Chickahominy route.	
101	Roger Anderson	Support	1. Williamsburg thrives on tourism and the commentator expressed his concern for the economy if the area does not have reliable electricity.	Comment acknowledged.

Issue Category 1 – Need for an EIS**General Response:**

The Corps makes the determination on whether to require an Environmental Impact Study (“EIS”) based on an evaluation of all of the resources that may be impacted by the project, the significance of those impacts and whether impacts may be mitigated. Under the Corps’ regulations, most permits require an Environmental Assessment (“EA”) and not an EIS. *See* 33 CFR § 230.7(a). The Corps may decide, based on its experience with similar projects and the facts and circumstances, that proceeding first with an EA is appropriate here. *See* Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment O (July 2, 2015), explaining the EIS decision process in further detail.

Several of the comments requested the Corps undertake a full EIS, claiming an EIS is necessary to assess viable alternatives and their impacts. The Corps has evaluated each alternative to the project against the purpose and need of the Project as well as the effects the Project will have on aquatic resources, endangered species, and cultural resources. The Corps has evaluated criteria for the alternatives in light of all of the information that has been supplied to date and has issued a Preliminary Alternatives Conclusions White Paper. In considering these various alternatives the Corps’ evaluated: (1) whether the alternative would continue to provide the North Hampton Roads Load Area (“NHRLA”) with electrical service that meets current demand and reasonable projected future load growth; (2) whether the alternative is compliant with North American Electric Reliability Corporation (“NERC”) Reliability Criteria Standards; (3) whether the alternative is compliant with the Mercury and Air Toxics Standards (“MATS”); (4) the cost of the alternative; (5) existing technology/engineering required by the alternative; and (6) the alternative’s siting and land use restrictions. The Corps concluded that only two alternatives are available; the proposed Surry-Skiffes Whealton 500 kV project and the Chickahominy-Skiffes-Whealton 500 kV project. The other alternatives were determined to be not practicable due to failure to meet the project needs, cost, engineering constraints, and/or logistics that are discussed in greater detail in the general response to Issue Category 3.

An EIS is required only when a major federal action will significantly affect the quality of the human environment. Under the National Environmental Policy Act (“NEPA”), a determination of significance must be based not only on context, but also on the intensity of an impact, which, under CEQ regulations, evaluates impacts based on matters of degree. 40 C.F.R. § 1508.27(a)-(b). When evaluating impacts to historic properties under NEPA, the permitting federal agency typically classifies the quality of the impacts based on whether there is a direct or indirect physical impact to historic properties, and the extent to which the visual impacts affect the characteristics or diminish the elements of integrity that render the properties historic. This typically is done by categorizing impacts as, for example, negligible, minor, moderate, or major. These categories often are linked to or correlated with the agencies’ National Historic Preservation Act (“NHPA”) § 106 evaluation of whether there are adverse impacts under 36 C.F.R. § 800.5. That evaluation focuses on the extent to which impacts diminish the integrity of the historic property. *See* 36 C.F.R. § 800.5(a)’s 7 integrity factors of

Issue Category 1 – Need for an EIS

location, design, setting, materials, workmanship, feeling, or association. The Cultural Resources Effects Assessment's ("CREA") evaluation of impacts under 36 C.F.R. § 800.5, the facts surrounding the location of the transmission line and towers, and other record evidence, provide USACE with the information necessary to make significance conclusions regarding visual impacts under NEPA.

Under USACE's NEPA regulations (33 C.F.R. Part 325 App. B), the scope of USACE's NEPA review is limited to the areas in which it has direct jurisdiction, and those areas in which it has control and responsibility over a project. Here, the application of those regulations demonstrates the scope of USACE's NEPA review is limited to impacts related to the placement of the transmission line over the river, and do not include the remainder of the Surry-Skiffes project (the "Project").

USACE regulations direct it to proceed with an EA when issuing a permit for an activity such as the Project. 33 C.F.R. § 230.7. Relevant court opinions are consistent with USACE's approach to use an EA. In a case challenging a USACE permit for a barge marina in a rural stretch of the Mississippi River, facts similar to Dominion's Project, the court addressed whether an EA was sufficient or whether an EIS should be required based on potential visual impacts from the barge project. *River Rd. Alliance v. Army Corps of Engineers*, 784 F.2d 445, 449 (7th Cir. 1985). The court articulated the standard of review for that kind of decision: "the nature of that judgment dictates that it will only be overturned if it is an abuse of discretion." *Id.* Under that standard of review, the court then articulated the issue:

that the issue for us *is not* whether National Marine Services Barge fleeting facility [is] an unfortunate eyesore, marring one of the remaining spots of unspoiled beauty on the Mississippi River in the general vicinity of St Louis; it is that. ... [The issue] *is* whether the Corps exceeded the bounds of its decision-making authority in concluding that the fleeting facility would not have so significant an impact on the environment as to require [an EIS].

Id. at 450 (emphasis added).

The court explained how the EA process had evolved to allow sufficient consideration of all environmental consequences. Noting that earlier cases suggesting the fixing of the standard for "significant" at the lower end of a scale that runs from "not trivial to momentous" was the:

product of a time when environmental impact statements were less formidable than they have grown to be, when federal agencies were less sensitive than they mostly are today to environmental concerns, and, perhaps most important, when environmental assessments involved a less elaborate procedure for determining whether there was so significant an environmental impact as to warrant the preparation of

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an environmental impact statement. . . . [T]oday, for good or ill, environmental assessments are thorough enough to permit a higher threshold for requiring environmental impact statements.

Id. at 450-451.

The court went on to explain the role of visual impacts and public opposition in making this determination, and rejected both as the basis for mandating an EIS:

Aesthetic impacts alone will rarely compel the preparation of an environmental impact statement The necessary judgments are inherently subjective and normally can be made as reliably on the basis of an environmental assessment as on the basis of a much lengthier and costlier environmental impact statement. The fact that there was public opposition to the [barge project] cannot tip the balance. *See e.g., Town of Orangetown v Gorsuch*, 718 F.2d 28, 39 (2d Cir. 1983). That would be the environmental counterpart to the “heckler’s veto” of First Amendment law.

Id. at 451.¹

Thus, as *River Road Alliance* makes clear, the decision whether to conduct an EA or EIS remains in the sole, and sound discretion of USACE.

USACE has not completed its evaluation of potential mitigation for visual impacts. It is well established that the agency is within its prerogative to, and in fact should, evaluate potential mitigation prior to determining whether to issue a finding of no significant impact (“FONSI”) or proceed to an EIS. Indeed, USACE regularly considers the impact of mitigation as a factor on whether impacts will be significant for purposes of NEPA. That approach has long been recognized and accepted. *Ohio Valley Env'tl. Coal. v. Aracoma Coal Co.*, 556 F.3d 177, 191-92 (4th Cir. 2009) (“Even where an EA determines that a proposed action will have a significant environmental impact, an agency may avoid issuing an EIS where it finds that mitigating measures can be taken to reduce the environmental impact of the project below the level of significance.”) (citing *Roanoke River Basin Ass’n v. Hudson*, 940 F.2d 58, 62 (4th Cir.1991)). USACE currently is in the middle of the NEPA process.

USACE has been fulfilling their responsibilities under 33 C.F.R. Parts 320 through 327. This includes required coordination under the

¹ In addition, mere opposition to a project or its impacts does not create controversy for purposes of NEPA so as to suggest a significant impact. *North Carolina v. FAA*, 957 F.2d 1125, 1133-34 (4th Cir. 1992); *Clement v. LaHood*, 2010 WL 1779701, at *7-8 (E.D. Va. 2010).

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<p>Endangered Species Act (particularly involving the Project’s potential impact on the Atlantic sturgeon and Long Eared Bat), National Historic Preservation Act (analyzing the impacts on historical and cultural resources [see Final List of Historic Properties and Consolidated Effects Report]), and other applicable Federal laws. Many of the issues raised in the comments will be addressed in USACE’s decision document which will include the public interest review (33 C.F.R. 320.4(a)) and assessment under the 404(b)(1) Guidelines for the Specification of Disposal Sites for Dredged or Fill Material (40 C.F.R. Part 230).</p>				
1	Anne Davis (student at William & Mary)	Oppose	1. Opposes power lines built over a river without an environmental impact study.	See response to Issue Category 1.
2	Randy Randol III (VA Scientists and Engineers for Energy and Environment)	Oppose	1. Wants an EIS to be conducted because it is required under NEPA. 2. Claims that the USACE Alternatives White Paper is deficient because it relies on Dominion’s information.	See response to Issue Category 1. All information submitted to the Corps has been evaluated independently by the Corps, including information submitted by Dominion. The Corps is entitled to rely on information submitted by the applicant (and any other interested party), as long it independently reviews such information.
3	Adrian Whitcomb, Jr. (resident of Newport News, VA)	Oppose	1. Wants an EIS to be conducted.	See response to Issue Category 1.
4	Barry Starke (Earth Design Associates, Inc.)	Oppose	1. Wants an EIS to be conducted.	See response to Issue Category 1.
5	Robert Stieg, Jr. (resident of Millwood, VA)	Oppose	1. Wants an EIS to be conducted.	See response to Issue Category 1.
6	Calder Loth (resident of	Oppose	1. Requests a full EIS.	See response to Issue Category 1.

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	Richmond, VA)			
7	Charles Seilheimer, Jr. (document named C_Petty because of e-mail address)	Oppose	1. Requests a full EIS.	See response to Issue Category 1.
8	Curtis Stoldt and Sharon Marcial (residents of Williamsburg, VA)	Oppose	1. Requests a full EIS.	See response to Issue Category 1.
9	Deanna Beacham (resident of Mechanicville, VA and former employee of the Virginia Council on Indians)	Oppose	1. Requests a full EIS to determine the cumulative effects of the project on Virginia's economic investment in the major tourist area.	See response to Issue Category 1. Regarding the project's impact on tourism comment, <i>see</i> response to Issue Category 5.
10	Dan Holmes (Director of State Policy, Piedmont Environmental Council)	Oppose	1. Requests a full EIS.	See response to Issue Category 1.
11	J. Randall Minchew (Virginia House of Delegates – 10 th District)	Oppose	1. Requests a full EIS and critical of the SCC to minimize the power lines' alleged impacts.	See response to Issue Category 1.
12	Emmanuel Dabney	Oppose	1. Wants a full EIS to be conducted.	See response to Issue Category 1.
13	Elizabeth Outka (resident of Midlothian, VA)	Oppose	1. Wants a full EIS to be conducted.	See response to Issue Category 1.
14	Gail Anderson	Oppose	1. Requests a full EIS to be	See response to Issue Category 1.

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	(Boulder, CO)		conducted.	
15	George Little	Oppose	1. Requests a full EIS to be conducted.	See response to Issue Category 1.
16	Jeanette Cadwallender (President, Garden Club of Virginia)	Oppose	1. Requests a full EIS to be conducted.	See response to Issue Category 1.
17	Hylah Boyd (2 separate letters)	Oppose	1. Requests a full EIS.	See response to Issue Category 1.
18	Joanne Berkley (resident of Norfolk, VA)	Oppose	1. Requests a full EIS to be conducted.	See response to Issue Category 1.
19	J. Capozzelli (writing for Historic Jamestown)	Oppose	1. Requests a full EIS to be conducted, which will also allow an open discussion with those who care about Jamestowne.	See response to Issue Category 1. Regarding the open discussion, USACE has held open public comment periods and issued notices of consulting party meetings (which are open to the public) and USACE believes that an addition public hearing is not warranted.
20	Jamie May	Oppose	1. Requests a full EIS be conducted.	See response to Issue Category 1.
21	Margaret Fowler (resident of Williamsburg, VA)	Oppose	1. Requests that a full EIS is conducted.	See response to Issue Category 1.
22	Robert Lane (resident of McLean, VA and member of the Mid-Atlantic Regional Advisory Council of the	Oppose	1. Requests that a full EIS be conducted.	See response to Issue Category 1.

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	National Parks Conservation Association)			
23	Thomas Leitch (Governor, Central North Carolina Company of the Jamestowne Society)	Oppose	1. Requests that a full EIS be conducted (specifically notes natural resource impact and effect on endangered sturgeons).	See response to Issue Category 1.
24	Kevin Twine (resident of Brunswick, ME)	Oppose	1. Personalized form NPCA letter. 2. Notes that a FONSI would be “entirely inappropriate.”	See response to Issue Category 1. Regarding the comment that a FONSI would be “entirely inappropriate”, the Corps would issue a FONSI if it determines, during its environmental assessment process, that no significant environmental impacts will occur as a result of the project.
25	Mark Perreault (resident of Norfolk, VA)	Oppose	1. Requests a full EIS be conducted.	See response to Issue Category 1.
26	Pam Goddard (resident of Washington, DC, commenting on behalf of National Parks Conservation Association)	Oppose	1. Requests a full EIS be conducted.	See response to Issue Category 1.
27	Julia Moore	Oppose	1. Wants an EIS.	See response to Issue Category 1.
28	Joshua Rellick	Oppose	1. Wants an EIS to collect the data necessary to make an informed decision on the matter.	See response to Issue Category 1.

Issue Category 1 – Need for an EIS				
29	James Rich	Oppose	1. Wants an EIS because of the cultural, historical, economic and environmental significance of the area.	See response to Issue Category 1.
30	Judy Scardina	Oppose	1. Wants an EIS.	See response to Issue Category 1.
31	Jessica Seidenberg	Oppose	1. Wants an EIS.	See response to Issue Category 1.
32	Julia Steele	Oppose	1. Wants an EIS.	See response to Issue Category 1.
33	Jane Yerkes	Oppose	1. Wants an EIS.	See response to Issue Category 1.
34	Kathleen E. Haines	Oppose	1. Wants an EIS.	See response to Issue Category 1.
35	Keith Engelmeier	Oppose	1. The final Corps determination should be based on the findings of independent outside consultants.	See response to Issue Category 1. The Corps makes an independent determination whether an EIS is warranted based on its evaluation of resources that will be impacted by the project.
36	Kirby Smith	Oppose	1. Wants an EIS.	See response to Issue Category 1.
37	Lucile Miller	Oppose	1. Wants an EIS.	See response to Issue Category 1.
38	Lisa Mountcastle	Oppose	1. Wants an EIS.	See response to Issue Category 1.
39	Lily Panoussi	Oppose	1. Wants an EIS.	See response to Issue Category 1.
40	Leighton Powell, Executive Director, Scenic Virginia	Oppose	1. Wants an EIS. If the EIS reveals that the proposed transmission line is the only way to achieve reliable energy, then the Corps must have an inventory of the assets that will be impacted so that the damage can be mitigated.	See response to Issue Category 1.
41	Vaughan Boleky	Oppose	1. Wants an EIS.	See response to Issue Category 1.
42	McGuire Boyd	Oppose	1. Wants an EIS.	See response to Issue Category 1.
43	Matthew Mullett	Oppose	1. Wants environmental studies to ascertain the impact to wildlife and the surrounding	See response to Issue Category 1.

Issue Category 1 – Need for an EIS				
			area.	
44	Pam Michael	Oppose	1. Wants an EIS.	See response to Issue Category 1.
45	Peyton Wells	Oppose	1. Wants an EIS.	See response to Issue Category 1.
46	Pamela Kent Pettus	Oppose	1. Wants an EIS. 2. The powerline would destroy the character of the most important places in the world.	See response to Issue Category 1.
47	Robert Dunkerly	Oppose	1. Wants an EIS.	See response to Issue Category 1.
48	Sara Butler	Oppose	1. Wants an EIS.	See response to Issue Category 1.
49	Sally Thomas	Oppose	1. Wants an EIS.	See response to Issue Category 1.
50	Stephen Lucas	Oppose	1. Wants an EIS.	See response to Issue Category 1.
51	Scenic America	Oppose	1. Wants an EIS.	See response to Issue Category 1.
52	Thomas Corbin	Oppose	1. Wants an EIS.	See response to Issue Category 1.
53	Wendy Wheatcraft	Oppose	1. Wants an EIS.	See response to Issue Category 1.
54	Ms. Vicki	Oppose	1. Wants an EIS	See response to Issue Category 1.
55	Gayle Randol (resident of Richmond, VA and former guide at Historic Jamestowne)	Oppose	1. Wants an EIS because alternatives have been misrepresented because Jamestown Island is a priceless historical site.	See responses to Issue Categories 1-3, and 5.

Issue Category 2 – View Shed Impacts**General Response:**

The five historic properties (44JC0662, Carter’s Grove, Hog Island Wildlife Management Area, the newly defined Eligible Historic District (which includes the contributing portion of the Captain John Smith Chesapeake National Historic Trail), and Colonial National Historical Park/Colonial Parkway and the Jamestown National Historic Site/Jamestown Island) that would experience an adverse effect due to visual impacts would have an impact intensity of Moderate. For these five resources, the visibility of the transmission line would alter the integrity of setting and/or feeling in a way that would diminish the overall integrity of the resource. These resources will still retain historic importance and integrity for other characteristics. While the construction of the Project will introduce elements that are out of historic character for the properties’ setting and feeling, the structures are seen within the mid-ground to background and do not obstruct, sever, or surround historical viewsheds for Carter’s Grove, Colonial Parkway, and Jamestown. Hog Island derives its historical significance primarily under Criterion D, for its archaeological potential to yield important information in prehistory and history. The construction of structures east of Hog Island will diminish the setting and feeling of the property but not result in a loss of these characteristics as views from Hog Island to Jamestown are maintained and the setting and feeling within the boundary of the property itself remains. Similarly, the integrity of setting and feeling of the Eligible Historic District will be altered and diminished by the visibility of the transmission line structures, particularly in the immediate vicinity of the river crossing. However, setting and feeling are not lost overall for the resource as important views are maintained (e.g., Hog Island to Jamestown) and visibility of the Project is minimal throughout much of this large property due to distance and topographic and vegetative obstructions. For example, without consideration of the visibility of the structures, more than 75% of the Eligible Historic District is greater than 3.5 miles from the transmission structures, making the structures to appear in the background, if they are even visible at all. There would be No Adverse Effect for the remaining resources.

See also Letter from S. Miller, Dominion, to L. Rhodes, USACE , Attachment 1, Response to Comments F, G (July 2, 2015) and Stantec’s Cultural Resources Effects Assessment, Surry-Skiffes Creek-Whealton Transmission Line Project, Surry, James City, and York Counties, Cities of Newport News and Hampton, Virginia (Sept. 15, 2015), also known as the Consolidated Effects Report (“CREA”) for further discussion on the impacts of the proposed transmission line on the viewshed of historic properties. Comments regarding the “pristine” view represent the commenters’ opinion regarding one or more views from some vantage point within the Area of Potential Effect (“APE”). The visual impacts to resources have been considered in Stantec’s Visual Effects Assessment, which considered the impacts to these resources. *See* CREA; Letter from S. Miller, Dominion, to L. Rhodes, USACE, at 5-6 (July 2, 2015).

Regarding the comments on photo simulations of the APE, photo simulations were prepared for key resources by Truescapes as part

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of work associated with this project. Reference points were noted in the photographs to indicate the general location of the line and as noted to provide geographic reference. Line of sight analysis was utilized in concert with these photographs to identify the visibility and assess the potential effects of the project from each of the resources.

The Advisory Council on Historic Preservation (“ACHP”) noted that the consulting parties were not satisfied with the computer-generated view shed representations provided by DVP. They described the comments from these parties, which appear to request the creation of a "virtual reality," where one could see a simulation of the proposed Project from any vantage point. While commenters might desire such a visual representation, it is not required or suggested by the Virginia Department of Historic Resource's (2008) Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia. We believe the submitted computer-generated view shed representations from vantages points of concern, including Carter's Grove Plantation and Jamestown Island, reasonably satisfy the applicable requirements and are consistent with past practices for assessing indirect effects on known properties. DVP prepared the CREA in response to the Department of Historic Resources' June 19, 2015 letter and will present a consolidated report detailing all survey work performed, resources identified, eligibility determinations and effects to these resources. *See* CREA; Letter from S. Miller, Dominion, to L. Rhodes, USACE, at 5-6.

The NHPA Section 106 regulations do not expressly require the identification of the severity of impacts, but instead require (and focus on) the identification of adverse effects. Nevertheless, the NHPA Section 106 regulations do require the consideration of mitigating any adverse effects on historic properties that cannot be avoided or minimized. Therefore, depending on the circumstances, the need for determining the severity and/or nature of adverse effects may exist. In those circumstances, agencies often look to their NEPA evaluations for assistance, and link the two similar analyses. This is because identification of the severity of impacts is more suitably addressed under the NEPA review process. In that evaluation, USACE evaluates the intensity and context of potential impacts to historic properties to determine whether significant impact to the human environment will occur as a result of the Project. NEPA evaluations typically classify the intensity of potential impacts by categorizing the intensity of impacts as negligible, minor, moderate, or major. The National Park Service (“NPS”) recently completed an Environmental Assessment for shoreline stabilization along the Colonial Parkway. Within that document, intensity of impact to cultural resources was defined and compared to Section 106 effects as follows:

- *Negligible*: the impact is at the lowest level with no identifiable positive or negative impact. This category of impact would correlate to an NHPA evaluation of no effect or no adverse effect.
- *Minor*: the impact would alter a defining characteristic of a resource, but would not diminish the integrity of the resource. This category would correlate to an NHPA evaluation of no adverse effect.
- *Moderate*: the impact would alter a defining characteristic of the resource and would diminish the overall integrity of the resource.

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This category would correlate to an NHPA evaluation of adverse effect.

- *Major*: the impact would result in the actual loss of a character-defining feature and would diminish the overall integrity of the resource. This category of intensity would correlate to an NHPA evaluation of adverse effect.

Using these definitions of intensities, one can develop intensities of impact for each historic property within the APE of the Project using the assessment of effects described in the CREA. Visual effects are the primary indirect effects relate to the Project. Historic properties from which there would be no visibility of the proposed Project, and would therefore have no alteration of any defining characteristic of the resource, would have an impact intensity of Negligible (e.g. Bourne-Turner House). Historic properties from which the Project would be visible, but that visibility would not diminish the integrity of the characteristics contributing to the NRHP eligibility of the resource, would have an impact intensity of Minor. Examples are Fort Boykin, which has visibility of the transmission line only at the James River shoreline at a distance of nearly nine miles, and the Ghost Fleet, for which the characteristic of setting and feeling does not contribute to the resource’s NRHP eligibility.

Regarding comments that the project would “industrialize” the river, as recognized by the Keeper of the National Register (“Keeper”) and the consulting parties, the entire river crossing project APE, direct and indirect, is located within a historic district, which is cultural landscape of national historic significance. As a cultural landscape, this area illustrates the specific local response of American Indian, European, and African cultures, land use, and activities to the inherent qualities of the underlying environment. The landscape reflects these aspects of our country’s origins and development through its relatively unaltered form and features evoking the ways it was used by the early inhabitants and continuing to reveal much about our current evolving relationship with the natural world. While many of the individual historic properties located within this cultural landscape historic district are distinct and significant enough to be either listed or considered eligible for inclusion in the NRHP by themselves it is their thematic connections that make them significant contributing elements to the broader cultural landscape eligible for designation as a historic district, which documents from both a cultural and natural perspective a continuum of American history up through today.

As acknowledged by one of the consulting parties, the area of the river that will be crossed is not “pristine.” NPS letter at 3. Another acknowledged the area of most significant impact is to the south of the Project on the river because the views to the north of the Project are cut off by curvature of the river’s path. Yet, if one were traveling on the water from the south that visitor’s field of vision would first see the James River Bridge, Newport News Shipbuilding and the highly developed shoreline of Newport News. Further up river, Busch Gardens is visible as is the Ghost Fleet located in the water and Surry Nuclear Power Station to the west. Such a view at the point the towers would come into view is not pristine, and the impacts of the visible towers must be evaluated in light of the surroundings and shoreline and river use. The river first became a working river with the establishment of Jamestown and has continued as such to this day. Views of the river are dynamic and have changed over time due to river traffic, including the ferry

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operations and other modern river traffic.				
<p>To the extent the comments suggest that building the transmission line crossing will promote other industrial facilities to locate there, there is no evidence in the record to suggest such an outcome. Therefore, such comments are speculation. This is particularly true given the current ownership of the properties in the area, which consists of public or preservation-based ownership in the Jamestown area. See also the requirements under the Chesapeake Bay Preservation Act regarding Resource Protection Areas, and buffers areas and additional development mitigation requirements. Moreover, the transmission line crossing is not like a highway interchange; it does not foster access to an area for purposes of development. Instead, it provides regional power supplies and disperses development. Case law makes clear that an agency does not establish precedent for future actions, or set development in motion that cannot be reversed when it authorizes a unique, independent project, such as the Project. <i>See Presidio Golf Club v. Nat’l Park Serv.</i>, 155 F.3d 1153, 1162-63 (9th Cir. 1998).</p>				
1	Ann Layman	Oppose	1. General opposition to any structures that will impact view from Carters Grove and Jamestown Island.	See response to Issue Category 2.
2	Allison Spears	Oppose	1. General opposition to installing power lines across the upper James.	See response to Issue Category 2.
3	Anne Wright (resident of Covington, VA)	Oppose	1. General opposition to transmission lines around and through Carter’s Grove.	See response to Issue Category 2.
4	Charles Birr (resident of Williamsburg, VA)	Oppose	1. General opposition to towers for visual reasons.	See response to Issue Category 2.
5	Cheri Eimer	Oppose	1. General opposition to the project and request that permit be denied.	See response to Issue Category 2.
6	Carole Geiger (resident of Fincastle, VA)	Oppose	1. General opposition to the project for visual reasons (Carter’s Grove, Jamestowne Island, and Capt. John Smith Trail, specifically) and	See response to Issue Category 2.

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			allegedly negative impact on tourism.	
7	Carmen Lancellotti	Oppose	1. General opposition for visual reasons and requests a “less visually invasive” project.	See response to Issue Category 2.
8	Charlie Schmidt	Oppose	1. General opposition to the project for visual reasons and alleged oyster habitat impacts.	See response to Issue Category 2.
9	Christine Watson	Oppose	1. General opposition for visual reasons.	See response to Issue Category 2.
10	Vicki Campbell (resident of Petersburg, VA)	Oppose	1. General opposition for visual reasons.	See response to Issue Category 2.
11	Richard Gresham (Vice President, E.T. Gresham Company)	Oppose	1. General opposition for visual reasons.	See response to Issue Category 2.
12	Diane Martin (resident of Topping, VA)	Oppose	1. General opposition because of visual impacts.	See response to Issue Category 2.
13	Dale Wheary	Oppose	1. General opposition because of visual impacts.	See response to Issue Category 2.
14	J. Randall Minchew (Virginia House of Delegates – 10 th District)	Oppose	1. General opposition because of visual impacts (specifically mentions Historic Jamestowne, Colonial Parkway, and Carter’s Grove Plantation). 2. Segment of river is eligible for protection under Virginia Scenic Rivers Act.	See response to Issue Category 2. The Corps is aware that Virginia has designated this area of the James review under Virginia Scenic Rivers Act, as well as separately acknowledged it has a historic river under VA Code 10.1-419. The Corps is taking these designations into consideration as it makes its decisions. The Corps notes that

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				nothing in the VSRA or VA Code 10.1-419 prevents or regulates any of the activities proposed by Dominion.
15	Elizabeth Outka (resident of Midlothian, VA)	Oppose	1. General opposition because of visual impacts (specifically mentions Jamestown Island, Carter’s Grove, and the Capt. John Smith Trail).	See response to Issue Category 2.
16	Eric and Rebecca Schulkowski (residents of Williamsburg, VA)	Oppose	1. General opposition because of visual impacts.	See response to Issue Category 2.
17	Fred Weiler (resident of Standardsville, VA)	Oppose	1. General opposition because of visual impacts.	See response to Issue Category 2.
18	Gail Anderson (Boulder, CO)	Oppose	1. Takes issue with Dominion’s simulated pictures to demonstrate what the towers would look like.	See response to Issue Category 2.
19	George Pinckney (resident of Richmond, VA)	Oppose	1. General opposition of project because of visual impacts.	See response to Issue Category 2.
20	Gayle Randol (resident of Richmond, VA and former guide at Historic Jamestowne)	Oppose	1. General opposition of project because of visual impacts.	See response to Issue Category 2.
21	Jeanette	Oppose	1. General opposition because	See response to Issue Category 2.

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	Cadwallendaer (President, Garden Club of Virginia)		of visual impacts (specifically notes Jamestown Island, Carter’s Grove, and Capt. John Smith Trail).	
22	Hylah Boyd (2 separate letters)	Oppose	1. General opposition because of visual impacts.	See response to Issue Category 2.
23	Jeanne Ancarrow	Oppose	1. General opposition because of visual impacts.	See response to Issue Category 2.
24	J. Capozzelli (writing for Historic Jamestown)	Oppose	1. Generally opposition because of visual impacts (specifically mentions historic Jamestown, Colonial National Historical Park, and the Capt. John Smith Trail).	See response to Issue Category 2.
25	James and Judith Adams	Oppose	1. General opposition because of visual impacts.	See response to Issue Category 2.
26	Jamie May	Oppose	1. General opposition because of visual impacts.	See response to Issue Category 2.
27	Ann Hohenberger (member of the Garden Club of Virginia)	Oppose	1. General opposition because of visual impacts.	See response to Issue Category 2.
28	John Shelton (Secretary of State, Jamestowne Society)	Oppose	1. General opposition to the current project as proposed because of visual impacts.	See response to Issue Category 2.
29	Thomas Leitch (Governor, Central North Carolina Company of the Jamestowne	Oppose	1. General opposition of project because of visual impacts (specifically mentions Historic Jamestowne, Colonial Parkway, Carter’s Grove and Capt. John	See response to Issue Category 2.

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	Society)		Smith Trail).	
30	Walter Zadan (resident of Williamsburg, VA)	Oppose	1. General opposition because of visual impacts.	See response to Issue Category 2.
31	Calvin White (resident of Vancouver, WA)	Oppose	1. Form NPCA letter. 2. General opposition because of visual impacts (specifically mentions historic Jamestown, Colonial National Historical Park, and Capt. John Smith Trail) . 3. Opines that a “huge screen with a mural of western US” should be used to help camouflage the towers.	See response to Issue Category 2. Regarding the screen comment, virtual images of the project have been generated and techniques to camouflage the towers are being assessed.
32	Anthony J. Taylor (resident of Williamsburg, VA)	Oppose	1. General opposition to the project because of visual impacts.	See response to Issue Category 2.
33	Merry A. Outlaw (resident of Williamsburg, VA)	Oppose	1. General opposition to the project because of visual impacts (specifically mentions the Colonial Parkway).	See response to Issue Category 2.
34	Doug Hansen (resident of Williamsburg, VA)	Oppose	1. General opposition for because of visual impacts.	See response to Issue Category 2.
35	Dale Hoak (resident of Williamsburg, VA)	Oppose	1. General opposition for visual reasons.	See response to Issue Category 2.
36	Roy Nugent (resident of Williamsburg, VA)	Oppose	1. General opposition to towers for visual reasons.	See response to Issue Category 2.

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37	Berry Hoak (resident of Williamsburg, VA)	Oppose	1. General opposition for visual reasons.	See response to Issue Category 2.
38	Anonymous	Oppose	1. General opposition for visual reasons.	See response to Issue Category 2.
39	Margaret Gunn (resident of Williamsburg, VA)	Oppose	1. General opposition for visual reasons.	See response to Issue Category 2.
40	Garbriel Morey (resident of Williamsburg, VA)	Oppose	1. General opposition to the project for visual reasons and allegedly negative impact on tourism.	See response to Issue Category 2.
41	Kenneth Levine (resident of Williamsburg, VA)	Oppose	1. General opposition to power lines and towers.	See response to Issue Category 2.
42	Judy Scardina	Oppose	1. The proposed line would be an eyesore and a scar to the region's integrity, heritage, and beauty. 2. The landscape should remain pristine.	See response to Issue Category 2.
43	Judith Thomas	Oppose	1. USACE has to protect obstruction of the surface water especially one with scenic and cultural history and impaired status as the James.	See response to Issue Category 2.
44	Gail Anderson (Boulder, CO)	Oppose	1. Takes issue with Dominion's simulated pictures to demonstrate what the towers would look like.	Photo simulations were prepared for key resources by Truescapes as part of work associated with this project. Reference points were noted in the photographs to indicate the general location of the line and as noted to provide geographic reference. Line of sight

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				analysis was utilized in concert with these photographs to identify the visibility and assess the potential effects of the project from each of the resources.
45	Jane Yerkes	Oppose	1. Oppose constructing the line across the James because it will destroy the historical and sensitive attributes of the waterway.	See response to Issue Category 2.
46	Jeffrey King	Oppose	1. The line would ruin the vistas.	See response to Issue Category 2.
47	Kathy and Howard Richardson	Oppose	1. Dominion’s proposed plan is outrageous and would defile the beauty of the historic resource.	See response to Issue Category 2.
48	Keith Engelmeier	Oppose	1. Dominion’s actions represent corporate irresponsibility and are an indication of their lack of interest in maintaining the visual aesthetics of the James River and Virginia’s Historic Triangle. 2. The 17 towers will have a negative impact on the aesthetics and Historic Triangle.	See response to Issue Category 2.
49	Leroy Nopper	Oppose	1. Convenience and money are the reasons for marring the beautiful scenic river. Wants to preserve the natural beauty.	See response to Issue Category 2.
50	Vaughan Boleky	Oppose	1. The river landscape that is largely unchanged from its appearance in the 17th century would not be the same for	See response to Issue Category 2.

Issue Category 2 – View Shed Impacts				
			visitors. 2. The proposed line would alter the landscape, disrupt wildlife, and jeopardize recreational uses.	
51	Melodye Brown	Oppose	1. Pristine landscape unaltered from the early settlement in 1607.	See response to Issue Category 2.
52	Maria Butler	Oppose	1. Do not construct the towers near Jamestown.	See response to Issue Category 2.
53	Margie Lucas	Oppose	1. The line would be a visual pollution. Wants the historic image of the colonists preserved.	See response to Issue Category 2.
54	Matthew Mullett	Oppose	1. The lines would be an eyesore.	See response to Issue Category 2.
55	Mary Catherine Plaster	Oppose	1. The line would destroy views and natural resources surrounding Jamestown Island, Carter’s Grove. 2. Considering erecting the transmission towers is outrageous.	See response to Issue Category 2.
56	Nancy Philpott	Oppose	1. There must be a solution that would not endanger the historic and scenic heritage including burying the lines, using an existing river crossing, or exploring alternative energy.	See response to Issue Category 2.
57	Pamela Kent Pettus	Oppose	1. The powerline would destroy the character of the most important places in the world.	See response to Issue Category 2.

Issue Category 2 – View Shed Impacts				
58	Robert Ramsey	Oppose	1. Thinks that the damage done to the ecology of the James and preservation of the historic view shed outweighs the threatened rolling loss of power.	See response to Issue Category 2.
59	Sara Butler	Oppose	1. The line would be in view of Jamestown Island, Carter’s Grove, and other historic sites.	See response to Issue Category 2.
60	Walter Cooper	Oppose	1. Visual and environmental effects of the proposed line will be greater than Dominion has acknowledged.	See response to Issue Category 2.
61	William Fox	Oppose	1. If the project is allowed, it will permanently and irreparably deface the river’s historic view scape. 2. Some options are not economically feasible but can’t see how a price can be put on the beauty of the James.	See response to Issue Category 2.
62	Wendy Wheatcraft	Oppose	1. Visitors would no longer experience a river landscape that is largely unchanged from the way it appeared in the 17 th century.	See response to Issue Category 2.
63	Ms. Vicki	Oppose	1. General opposition for visual impacts (specifically mentions Colonial National Park, Capt. John Smith Trail, and historic Jamestowne).	See response to Issue Category 2.
64	Dorothy Canter Consulting	Oppose	1. General opposition for visual impacts (specifically mentions	See response to Issue Category 2.

Issue Category 2 – View Shed Impacts				
			Colonial National Historical Park).	
65	Ron Figg	Oppose	1. General opposition for visual impacts.	See response to Issue Category 2.

Issue Category 3 – Alternatives Other than the Proposed Project				
General Response:				
<p>Numerous alternatives to the Project were offered and extensively evaluated as part of the submitted Joint Permit Application (submitted August 2013), the Alternatives Analysis (received by the Corps November 7, 2014), the revised Alternatives Analysis (received by the Corps January 8, 2015), revised Table 3.1 (received by the Corps January 15, 2015), Stantec’s Alternatives Analysis (received by the Corps Nov. 7, 2014 and additional materials provided Dec. 19, 2014 and Jan. 8, 2015), and USACE Preliminary Alternatives Conclusions White Paper (October 1, 2015). Those alternatives did not meet the Project’s need or purpose. The analysis also found that the environmental impacts associated with the Chickahominy route are significantly greater than those for the proposed Surry – Skiffes Creek route. <i>See</i> Alternatives Analysis (November 6, 2015), Revised Alternatives Analysis (January 1, 2015), including revised Table 3.1, and USACE Preliminary Alternatives Conclusions White Paper (October 1, 2015), which provide an in depth examination of the alternatives analysis.</p> <p>Regarding comments suggesting the Yorktown Units generate energy using natural gas, the Corps White Paper (Oct. 1, 2015), Stantec’s Alternative Analysis (received by the Corps Nov. 7, 2014 and additional materials provided Dec. 19, 2014 and Jan. 8, 2015) Revised Table 3.1 (received by the Corps Jan. 15, 2015), and Letter from S. Miller, Dominion, to L. Rhodes, USACE , Attachment 1, Response to Comment E (July 2, 2015), explained that there is currently not a sufficient gas supply to support year-round operation of gas-fired generation at Yorktown and significant expansion of the regional gas supply would be required. Currently, the region does not have adequate infrastructure to support this expansion and there is no certainty when this infrastructure may be in place. Also, retrofitting the Yorktown units would only temporarily delay the need for transmission upgrades within the region to 2019 but at a cost of over \$1 billion to the Virginia customer. Furthermore, the retrofitted facilities would still be less efficient than newer generation facilities and burn more fuel to achieve the required capacities.</p> <p>With regards to burying the transmission lines under the river, as discussed in the alternatives analyses noted above, that alternative presents reliability and operational concerns. For example, locating and repairing damaged underground lines is significantly more</p>				

Issue Category 3 – Alternatives Other than the Proposed Project

difficult, timing consuming, expensive, and environmentally damaging than locating and repairing overhead lines. In order to replace a cable in a pipe type cable system any cable splices in the circuit will need to be removed first in order to remove the old cable. Splices are larger in diameter than the pipe and prevent pulling the cable through the pipe. A splice in the riverbed will need to be retrieved by multiple cranes on barges to bring the pipe type cable to a splicing platform. The splicing platform is constructed in the river first before the pipe is retrieved. The pipe is secured to other piles driven in the river and on the platform. A controlled environment room is built on the platform surrounding splice to prevent contaminants and moisture from entering the pipe after it is opened. This room is critical to splicing a cable. Once the new splice is completed, the pipe is welded around the splice and lowered back into the riverbed. The riverbed is prepared by dredging or water jetting the river bottom in order to install the pipe to its proper depth. This process does not take into account the time and effort to remove and install new cables (which would need to be manufactured, causing further delay) in the pipe all of which requires specialized work crews and equipment. This process is extraordinarily expensive and time consuming. In addition, the necessary permits needed to perform dredging work in the river would need to be obtained, which would further increase expenses and delay. In short, this process is neither reasonable nor practicable and does not meet the project's purpose and need. Other issues concerning this alternative include routing and siting constraints, land acquisition requirements, costs, increased environmental and cultural impacts, and time constraints. While some commenters have provided examples of transmission lines that have been buried underwater under different factual circumstances for different projects, as the discussion above suggests, those facts are not analogous here. This option was analyzed fully in the Corps White Paper as an alternative, and ultimately did not meet the projects need and purpose.

Regarding alternative energy solutions as an alternative, the materials found that standalone generation solutions to be \$633 million to satisfy 2016 North American Electric Reliability Corporation (“NERC”) reliability criteria. An additional \$722 million would be required to provide sufficient generation by 2021, bringing the total cost of a standalone generation solution to an estimated \$1.3 billion. Stand-alone generation would also face siting, permitting, and construction timeline constraints.

Regarding running the line under the James River Bridge, the Corps White Paper, Revised Alternatives Analysis and the revised Table 3.1 evaluated this alternative and concluded that this alternative does not meet the Project's purpose or need due to the significant cost, electrical violations likely to occur and inability to construct the transmission plus generation alternative within the required timeframe. *See* Letter from S. Miller, Dominion, to L. Rhodes, USACE , Attachment 1, Response to Comment C (July 2, 2015).

The Corps White Paper also addressed reconfiguring the existing network with High Tension Low Sag (“HTLS”) conductors and found that the use of HTLS conductors would require the majority of 230kV-115kV systems in the NHRLA to be upgraded. Use of HTLS conductors on the Surry-Skiffes Creek-Wheaton 500 kV Overhead (Dominion's Preferred Alternative) pose no reduction in the number of towers needed to cross the James River.

Issue Category 3 – Alternatives Other than the Proposed Project

Regarding the cost of another alternative, Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment D, specifically states “[c]ontrary to the comments, as the Revised Alternatives Analysis and the revised Table 3.1 demonstrate, the costs associated with the evaluated alternatives are, with one exception, between three and eight times the cost of the proposed project, and that the alternatives have additional environmental, cultural, archeological, logistical, and temporal impacts and/or issues that render them unable to meet the project’s purpose and need and/or not practicable. In any event, even assuming the facts were as the comment suggests, high cost alternatives do not meet the project’s purpose and need of providing “cost-effective” bulk electric services. As a regulated entity, Dominion is required to provide cost-effective services to its customers, because, among other things, the costs of service are passed on to its customers through electricity rates and fees. Dominion’s ability to recover the costs of the project is limited by the fact that the rates it can charge are set by the Federal Energy Regulatory Commission and Virginia State Corporation Commission. Therefore, contrary to the comment, Dominion cannot simply spread out the costs related to a project.”

The Corps White Paper (Oct. 1, 2015), Stantec’s Alternative Analysis (received by the Corps Nov. 7, 2014 and additional materials provided Dec. 19, 2014 and Jan. 8, 2015) and Revised Table 3.1 (received by the Corps Jan. 15, 2015) examined rerouting the line along existing utility right-of-ways. Those alternatives did not meet the Project’s purpose or need. The Chickahominy route met the Project’s purpose and need but there are significantly greater environmental impacts than those for the proposed Surry – Skiffes Creek route. The Chickahominy route utilizes an existing ROW owned by Dominion that extends approximately 37.9 miles from the Chickahominy Substation in Charles City County to the proposed Skiffes Creek Switching Station in James City County. 24.9 miles is unimproved ROW that would require clearing for construction of the proposed line. The Chickahominy route crosses 93.32 acres of non-tidal wetlands, 8.64 acres of tidal wetlands and requires the clearing and permanent conversion of 62 acres of palustrine forested wetlands.

1	Society of Architectural Historians	Oppose	1. Requests Corps to recommend alternative routes, burying transmission lines, adapting Yorktown station to a new fuel source, encouraging alternative energy options.	See response to Issue Category 3.
2	Andrew Edward (resident of Williamsburg)	Oppose	1. Wants an alternative project instead of the proposed project and listed putting the switching station on Hog Island and	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
			running lines under the river as an option.	
3	Aurelia Lewis (resident of Richmond, VA)	Oppose	1. Requests an alternative, less “invasive” route for the project.	See response to Issue Category 3.
4	Allison Spears	Oppose	1. General opposition to installing power lines across the upper James.	See response to Issue Category 3.
5	Andrea Steegmayer	Oppose	1. General opposition to power lines, wants solar power development instead.	See response to Issue Category 3.
6	Adrian Whitcomb, Jr. (resident of Newport News, VA)	Oppose	1. Supports underwater cables instead of towers. 2. Supports switching the Yorktown facility to natural gas.	See response to Issue Category 3.
7	Anne Wright (resident of Covington, VA)	Oppose	1. General opposition to transmission lines around and through Carter’s Grove.	See response to Issue Category 3.
8	Cheri Eimer	Oppose	1. General opposition to the project and request that permit be denied.	Comment acknowledged.
9	Charles Harwood, Jr. (resident of Charles City, VA)	Tentative	1. General opposition to the Chickahominy route and wants it stricken from consideration. 2. Does not mention route for current project.	See response to Issue Category 3.
10	Carolyn Holmes (resident of Williamsburg, VA)	Oppose	1. Wants alternative routes and transmissions options to be explored further.	See response to Issue Category 3.
11	Claudia Kessel (resident of	Oppose	1. Wants alternative routes to be explored further.	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
	Williamsburg, VA)			
12	Christine Llewellyn (resident of Williamsburg, VA)	Oppose	1. Wants reconsideration of underwater power lines by independent analysts.	See response to Issue Category 3.
13	Calder Loth (resident of Richmond, VA)	Oppose	1. Wants reconsideration of underwater power lines.	See response to Issue Category 3.
14	James McCracken (resident of Richmond, VA)	Oppose	1. Wants further consideration of alternative options.	See response to Issue Category 3.
15	Charles Seilheimer, Jr. (document named C_Petty because of e-mail address)	Oppose	1. Wants further consideration of underwater power lines or running the lines under the lower James River bridge.	See response to Issue Category 3.
16	Curtis Stoldt and Sharon Marcial (residents of Williamsburg, VA)	Oppose	1. Wants reconsideration of underwater lines or other alternatives.	See response to Issue Category 3.
17	Christine Watson	Oppose	1. Wants further consideration of alternative energy options.	See response to Issue Category 3.
18	Deanna Beacham (resident of Mechanicville, VA and former employee of the Virginia Council on Indians)	Oppose	1. Wants further consideration of alternative routes or burying the lines.	See response to Issue Category 3.
19	Dorothy Canter Consulting	Oppose	1. Wants further consideration of alternative routes.	See response to Issue Category 3.
20	Drew Gruber (resident of	Oppose	1. Wants further consideration of underwater lines.	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
	Williamsburg, VA)			
21	Dan Millison (2 letters included, one personal with a personal Williamsburg, VA address listed and a second on Transenergy, LLC letterhead)	Oppose	<ol style="list-style-type: none"> 1. Claims analysis of alternatives report by Dominion and Stantec Consulting is deficient along with the Corps' White Paper. 2. Wants rebuild of existing 230 kV lines next to James River bridge considered and use of HTLS conductors considered. 	<p>See response to Issue Category 3.</p> <p>See response to Dan Millison's comments in Issue Category 9.</p> <p>See USACE Preliminary Alternatives Conclusions White Paper, at 4-5 (October 1, 2015).</p>
22	Ellen LeCompte (resident of Richmond, VA)	Oppose	<ol style="list-style-type: none"> 1. Wants further consideration of alternatives to the project. 	See response to Issue Category 3.
23	Elizabeth Outka (resident of Midlothian, VA)	Oppose	<ol style="list-style-type: none"> 1. Requests further consideration of burying the power lines, relocating the project, and pursuing alternative energy options. 	See response to Issue Category 3.
24	Gail Anderson (Boulder, CO)	Oppose	<ol style="list-style-type: none"> 1. Wants further consideration of laying the power lines under the James. 	See response to Issue Category 3.
25	Gary and Lina Davis (residents of Williamsburg, VA)	Tentative Support	<ol style="list-style-type: none"> 1. General support of project if it is "truly the only way" for power reliability in the area, otherwise in favor of an option that does not use power lines over a river. 	<p>Comment acknowledged.</p> <p>See response to Issue Category 3.</p>
26	George Pinckney (resident of Richmond, VA)	Oppose	<ol style="list-style-type: none"> 1. Wants further consideration of underwater lines, James River Bridge, and new upstream crossing possibilities). 	See response to Issue Category 3.
27	Gayle Randol	Oppose	<ol style="list-style-type: none"> 1. Thinks Dominion should 	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
	(resident of Richmond, VA and former guide at Historic Jamestowne)		<p>only be able to use existing crossing routes across the James.</p> <p>2. Argues that the Chickahominy route is best because it utilizes existing right-of-ways and takes 3 months less to construct.</p> <p>3. Also argues for the James River Bridge Crossing route.</p> <p>4. Argues that Yorktown can be powered with natural gas from Cove Point terminal or otherwise.</p> <p>5. Argues line could be buried under the river, which also enhanced grid security.</p>	
28	Hylah Boyd (2 separate letters)	Oppose	1. Wants further consideration of underwater power lines.	See response to Issue Category 3.
29	H. Scott Butler (resident of Blacksburg, VA)	Oppose	1. Wants further consideration of underwater power lines and untrustworthy of opinion that the underwater route will not work for this project.	See response to Issue Category 3.
30	Hans Schwartz	Oppose	1. Wants further consideration of underwater power lines.	See response to Issue Category 3.
31	Jeanne Ancarrow	Oppose	1. Wants further consideration of underwater power lines (same letter forwarded by Hylah Boyd).	See response to Issue Category 3.
32	James and Judith Adams	Oppose	1. Wants further consideration of underwater power lines.	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
			2. Wants further consideration of making Yorktown a natural gas facility.	
33	John Shelton (Secretary of State, Jamestowne Society)	Oppose	1. Asked two questions: could the power lines be buried under the riverbed and could the lines be run under the James River Bridge (further downstream).	See response to Issue Category 3.
34	Lynn Crump (resident of Chester, VA)	Oppose	1. Wants consideration of putting the power lines under the river.	See response to Issue Category 3.
35	Margaret Fowler (resident of Williamsburg, VA)	Oppose	1. Does not think the current project is the only cost effective, time sensitive option.	See response to Issue Category 3.
36	Thomas Leitch (Governor, Central North Carolina Company of the Jamestowne Society)	Oppose	1. Argues that there has been no “meaningful examination” of alternatives.	See response to Issue Category 3.
37	Ruth Hosek (resident of Chicago, IL)	Oppose	1. Form NPCA letter. 2. Wants further investigation into renewable energy sources instead of the power lines.	See response to Issue Category 3.
38	Amy Harlib (resident of New York, NY)	Oppose	1. Form NPCA letter. 2. Wants solar and wind options to be further considered.	See response to Issue Category 3.
39	Anthony J. Taylor (resident of Williamsburg, VA)	Oppose	1. Supports underwater cables instead of towers.	See response to Issue Category 3.
40	Doug Hansen (resident of	Oppose	1. Wants further consideration of alternative options.	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
	Williamsburg, VA)			
41	Helen Hansen (resident of Williamsburg, VA)	Oppose	1. Wants further consideration of alternative options – alternative energy sources. 2. Supports underground cable.	See response to Issue Category 3.
42	Dale Hoak (resident of Williamsburg, VA)	Oppose	1. Supports underwater cables instead of towers.	See response to Issue Category 3.
43	Berry Hoak (resident of Williamsburg, VA)	Oppose	1. Wants further consideration of alternative options.	See response to Issue Category 3.
44	Margaret Gunn (resident of Williamsburg, VA)	Oppose	1. Wants further consideration of alternative options.	See response to Issue Category 3.
45	Rachel Trichler (resident of Williamsburg, VA)	Oppose	1. Wants further consideration of alternative options.	See response to Issue Category 3.
46	Pam Goddard (resident of Washington, DC/commenting on behalf of National Parks Conservation Association)	Oppose	1. Wants further consideration of alternative options.	See response to Issue Category 3.
47	Garbriel Morey (resident of Williamsburg, VA)	Oppose	1. Wants further consideration of alternative options.	See response to Issue Category 3.
48	Kenneth Levine (resident of Williamsburg, VA)	Oppose	1. Supports underwater cables instead of towers. 2. Wants further consideration of alternative options.	See response to Issue Category 3.
49	Bill Whittaker	Oppose	1. Supports underwater cables	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
	(resident of Williamsburg, VA)		instead of towers.	
50	Dan Millison (Manager of Transcendery, L.L.C., Williamsburg, VA)	Oppose	1. Requests that Dominion consider reconfiguring the existing network with HTLS conductors.	See response to Issue Category 3.
51	Jessica Seidenberg	Oppose	1. Proposes to build the line under the James River or along an already existing route.	See response to Issue Category 3.
52	Julia Steele	Oppose	1. Can't believe there is not another alternative to the construction of the towers across the James River.	See response to Issue Category 3.
53	Joseph Wayland	Oppose	1. Wants another alternative constructed such as constructing the transmission line under the river. Stated that this is being considered by the New England Clean Power Link to construct a line beneath Lake Champlain from Canada to New England.	See response to Issue Category 3.
54	Jane Yerkes	Oppose	1. Wants Dominion to construct the underwater line. Dominion has the technology and financial means to make the crossing non-intrusive to its customers.	See response to Issue Category 3.
55	Jeffrey King	Oppose	1. Wants the line to be built underwater or across a bridge. Recognizes that the cost would be greater, but can be borne	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
			over significant time by the power users.	
56	Keith Engelmeier	Oppose	<ol style="list-style-type: none"> 1. Technically viable alternative exist. Urge Corps to fully explore all technical alternatives. 2. Not in the public interest to accept Dominion’s determination that there are no acceptable alternatives. 	See response to Issue Category 3.
57	Kenneth Levine	Oppose	<ol style="list-style-type: none"> 1. Plan to build a new gas line to Tidewater; use this for the Yorktown power plant. 2. Run the line under the James. 3. Build solar panels on the roof of the mall. 4. A speaker at the hearing stated that new technology in power lines could easily double the capacity of the current power lines at a quicker replacement cost. 	See response to Issue Category 3.
58	Kevin Rasmussen	Oppose	<ol style="list-style-type: none"> 1. Wants a submerged transmission line. Also examine converting Yorktown to natural gas. 	See response to Issue Category 3.
59	Kirby Smith	Oppose	<ol style="list-style-type: none"> 1. Wants an underwater line or if the option is there to build no line at all, then it should be considered. 	See response to Issue Category 3.
60	Lucile Miller	Oppose	<ol style="list-style-type: none"> 1. Dominion can bury the line or carry them in a conduit 	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
			through the river.	
61	Lily Panoussi	Oppose	1. Dominion should not construct the cheapest alternative and find a less obtrusive route.	See response to Issue Category 3.
62	Melodye Brown	Oppose	1. Negligent of the Corps not to fully evaluate the impacts and the alternatives.	See response to Issue Category 3.
63	Mary Carbonneau	Oppose	1. Evaluate all possible alternatives. There are other ways.	See response to Issue Category 3.
64	Mary Hart Darden	Oppose	1. Logical determination can give the James a by-pass for the next generation.	See response to Issue Category 3.
65	Mary Horton	Oppose	1. Wants the underwater alternative.	See response to Issue Category 3.
66	Margie Lucas	Oppose	1. Questions whether an underground alternative to viable.	See response to Issue Category 3.
67	Matthew Mullett	Oppose	1. Wants an alternative which would not impact the waterway.	See response to Issue Category 3.
68	Maria Paluzsay	Oppose	1. Underwater alternative would be better off investigating an alternative energy source.	See response to Issue Category 3.
69	Mark Paul	Oppose	1. Underwater 500 kV would be a better alternative. 2. Dominion could construct a 500 kV line from the west or north across existing right of ways. 3. The cost of another	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
			alternative, even though more expensive than the proposed project, can be distributed among customers.	
70	Mary W.	Oppose	1. Find another way.	See response to Issue Category 3.
71	Nancy Philpott	Oppose	1. There must be a solution that would not endanger the historic and scenic heritage including burying the lines, using an existing river crossing, or exploring alternative energy options.	See response to Issue Category 3.
72	Patrick Calvert	Oppose	1. The line can be buried or re-routed along existing utility right-of-ways.	See response to Issue Category 3.
73	Shannon Logue	Oppose	1. Wants the Corps to consider the underwater alternative.	See response to Issue Category 3.
74	Totally Opposed	Opposed	1. The proposed route is not the best way to reliably meet the energy demands.	See response to Issue Category 3.
75	William Fox	Oppose	1. Some options are not economically feasible but can't see how a price can be put on the beauty of the James. 2. Older plants are being converted to LNG.	See response to Issue Category 3.
76	Win Harrington	Oppose	1. Put the power line underground.	See response to Issue Category 3.
77	William Kelso	Oppose	1. Put the power line underwater.	See response to Issue Category 3.
78	Wendy Wheatcraft	Oppose	1. Wants the line constructed underwater or across an existing	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
			river crossing.	
79	William Wilhelm	Oppose	1. Dominion has not exhausted all alternatives. Many examples of lines constructed in river and ocean beds.	See response to Issue Category 3.
80	YOUPEOPLE AREDUMB	Oppose	1. Not the best route to meet reliable energy demands.	See response to Issue Category 3.
81	Randy Randol III (VA Scientists and Engineers for Energy and Environment)	Oppose	1. Wants Yorktown 1 & 2 to stay on-line and use Yorktown 3, fueled with natural gas (claims Dominion has access to plenty of natural gas to do this). 2. Wants Dominion to use existing crossing routes across the James (9 total crossings, details two of them). Option 1 – Upstream using the Chickahominy route and existing right of ways Dominion owns (also resolves NERC reliability violations because of less construction time). Option 2 – 17 miles downstream from Surry Dominion have double circuit 230 kV lines could be used (James River Bridge crossing) 3. Wants underground wires (notes the Save the James Allian Alt Solution – hybrid).	See response to Issue Category 3.
82	Diane Martin	Oppose	1. Wants further consideration of alternative solutions to the	See response to Issue Category 3.

Issue Category 3 – Alternatives Other than the Proposed Project				
			power issue.	
83	Dale Wheary	Oppose	1. Wants further consideration of alternatives.	See response to Issue Category 3.
84	J. Capozzelli (writing for Historic Jamestown)	Oppose	1. Wants further consideration of alternative routes (underground or pre-existing crossing specifically mentioned).	See response to Issue Category 3.
85	Martin Poole (CTO/Scientist at Wireless Power Technologies)	Oppose	1. Essentially offering a “solution” to have the power lines run under the river using a “patent that is a hundred years old.” 2. Noted that he forwarded the idea to Austin Bogues of the Virginia Gazette.	See response to Issue Category 3. Comment acknowledged.
86	Ron Figg	Oppose	1. Yorktown should be upgraded, instead of building the 500 kV lines, and should be run off natural gas coming from “an existing pipelines right of way and underground crossing.” 2. Dominion already has plenty of existing oil storage and a pipeline right of way at Yorktown that should be run with natural gas and oil as a back-up. 3. There is enough natural gas in the area to provide Yorktown with a consistent supply	For comments 1, 4, and 5, see Response to Issue Category 3. In addition, the proposed Project route was approved by the SCC, a decision affirmed by the Virginia Supreme Court. Among other things, the SCC considered that Dominion coordinated its line route selection with the Department of Defense and other government agencies, and found many potential routes were “unworkable.” SCC Order at 55 (Nov. 26, 2013); <i>see</i> SCC, Hearing Officer’s Report at 23, 25-27, 35-36 (Aug. 2, 2013) (stating that routing on Fort Eustis was rejected to protect landing approaches to Felker Airfield). In response to comment 2, the MATS rule

Issue Category 3 – Alternatives Other than the Proposed Project				
			<p>(Atlantic Coast Pipeline, Mountain Valley Pipeline, and Western Marcellus Pipeline all specifically mentioned as connecting to Virginia Transco pipeline corridor).</p> <p>4. Dominion can build an underground route as evidenced by their success in northern VA using XLPE underground cables.</p> <p>5. Claims a two-mile route using anchor stations at Fort Eustis and Dominion controlled property is cheaper and more secure than the four-mile Surry-Skiffes Creek route.</p>	would require pollution control equipment for oil firing. This option was rejected.
87	Ron Figg	Oppose	<p>1. Multiple sources of local generation is better than dependence on one large powerline due to recovery reasons.</p> <p>2. Much more difficult to replace/fix river crossings as opposed to transmission structures on the Peninsula or an underground route (mentioned ease of replacing piping for XLPE underground cables).</p>	See response to Issue Category 3.

Issue Category 4 – Impacts to Species/Consultation**General Response:**

USACE notes that it addresses, and will address, issues related to impacts to the river and water quality primarily under its Clean Water Act and Rivers and Harbor Act reviews prior to issuing a permit. These reviews also include a public interest review regarding whether USACE ought to issue a permit.

Regarding protected species in the river, formal consultation under the Endangered Species Act is not required if the National Marine Fisheries Service (“NMFS”) concurs with a finding of “Not Likely to Adversely Affect.” USACE coordination with NMFS has been ongoing concerning effects to the Atlantic sturgeon. On April 16, 2014, NMFS completed its informal consultation with the USACE regarding the proposed Project, concurring with USACE that the Project and USACE’s issuance of the permit was “not likely to adversely affect” species listed under the Endangered Species Act. In July 2014, NMFS re-affirmed that conclusion and found that re-initiation of informal consultation was not necessary related to potential project phasing. On June 10, 2015, USACE re-initiated consultation with NMFS. In an email to USACE dated June 23, 2015, NMFS provided several best management practices (“BMPs”) that if implemented, could allow for NMFS to concur that effects to the sturgeon would be insignificant or discountable. These BMPs included time of year restrictions and use of bubble curtains during pile driving activities to attenuate noise. Dominion has agreed to implement these measures and communicated this to USACE. USACE submitted a follow-up letter to NMFS on November 25, 2015 and also submitted additional information on December 17 and 29, 2015 in order to consider changes to the Project and provide new information about listed species in the action area. After re-consideration, in a lengthy, thorough analysis set forth in a January 28, 2016 letter, NMFS agreed with the USACE that re-initiation of informal consultation was appropriate, and concluded that the changes to the Project and other new information did not change its conclusion that it concurs with USACE that the Project and USACE’s issuance of the permit for it is “not likely to adversely affect” the Atlantic sturgeon. NMFS also concurred with USACE that the Project and USACE’s issuance of the permit would have no effect on sea turtles because they are not expected to be present in the vicinity of the Project as the turtles *may* move into the lower James near the confluence with the Chesapeake Bay, but that area is 30 miles downstream from the Project.

Regarding impacts to the natural habitat and potential impacts to protected species on land, USACE is in informal consultation with USFWS and is also coordinating with the NPS. *See* Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment Q (July 2, 2015) (explaining that “coordination efforts remain ongoing updated information will be provided when available”). USACE will incorporate the results of this consultation and coordination into its review of the permits. Further, USACE anticipates that wetlands mitigation related to impacts to wetlands along the river’s shoreline will help to protect the water quality and wildlife in the area.

Issue Category 4 – Impacts to Species/Consultation				
<p>Regarding concern for the oyster habitat on the bottom on the James, because the footprint of the aerial line towers is insignificant in light of the size of the river (<i>see, e.g.</i>, Letter from K. Damon-Randall, NMFS, to R. Steffey, 16 (Jan. 28, 2016)), the aerial lines will have minimal, if any, impact on these habitats. Other alternatives that were analyzed, such as the underground wires would have had a much greater impact on these habitats. <i>See</i> CREA 3.22-3.33.</p>				
<p>Impacts to aquatic resources from other potential alternatives was greater.</p>				
1	Department of Conservation and Recreation	Provides compliance recommendations going forward.	<ol style="list-style-type: none"> 1. Searched its Biotics Data System for presence of natural heritage resources in project area; found natural heritage resources in the project area, but due to scope of activity and distance to resources, no anticipation of adverse impacts on these resources. 2. Recommends coordination with the Virginia Department of Game and Inland Fisheries (VDGIF) to ensure compliance with Virginia Endangered Species Act; recommends inventories for rare plants in the area and certain animal species. 3. Requests project information and updated map to be re-submitted if project scope changes or 6 months passes before plan is executed. 	<p>See response to Issue Category 4.</p> <p>Comment acknowledged.</p>
2	Charlie Schmidt	Oppose	<ol style="list-style-type: none"> 1. General opposition to the project for visual reasons and alleged oyster habitat impacts. 	<p>See response to Issue Category 4.</p>

Issue Category 4 – Impacts to Species/Consultation				
3	Jennifer Catriana (resident of Baldwin, NY)	Oppose	1. Thinks there are wild plants and creatures in the area that need to be preserved and protected.	See response to Issue Category 4.
4	Kathleen E. Haines	Oppose	1. The proposed project would adversely affect wildlife and natural features.	See response to Issue Category 4.
5	Vaughan Boleky	Oppose	1. The proposed line would alter the landscape, disrupt wildlife, and jeopardize recreational uses.	See response to Issue Category 4.
6	Melodye Brown	Oppose	1. The towers would negatively impact the natural habitat and Virginia's tourism industry.	See response to Issue Category 4.
7	Matthew Mullett	Oppose	1. Wants environmental studies to ascertain the impact to wildlife and the surrounding area.	See response to Issue Category 4.
8	Patrick Calvert	Oppose	1. The Atlantic sturgeon will be adversely affected by damaging river bottom construction.	See response to Issue Category 4.
9	Peyton Wells	Oppose	1. Tourism would be at risk, wildlife would be disrupted, and the landscape would be altered.	See response to Issue Category 4.
10	Robert Ramsey	Oppose	1. Thinks that the damage done to the ecology of the James and preservation of the historic view shed outweighs the threatened rolling loss of power.	See response to Issue Category 4.

Issue Category 4 – Impacts to Species/Consultation				
11	Stephen Lucas	Oppose	1. The number of historic, cultural, and natural / environmental resources that will be impacted by the proposed line are overwhelming.	See response to Issue Category 4. See response to Issue Category 2.
12	Walter Cooper	Oppose	1. Visual and environmental effects of the proposed line will be greater than Dominion has acknowledged.	See response to Issue Category 4.
13	Wendy Wheatcraft	Oppose	1. The proposed project will impact 212 square feet of subaqueous river bottom and 281 square feet of non-tidal wetlands, and convert ½ acre of palustrine forested wetlands and disrupt wildlife and the river recreational uses.	See response to Issue Category 4.
14	Christine Watson	Oppose	1. Thinks the project would be devastating to wildlife.	See response to Issue Category 4.
15	J. Capozzelli (writing for Historic Jamestown)	Oppose	1. Thinks the project impairs the critical habitat for endangered Atlantic sturgeon and harms birds.	See response to Issue Category 4.

Issue Category 5 – Tourism/Economic Impacts

General Response:

Regarding the comment that the Project would have a negative impact on tourism, the purpose of the towers is to provide electricity to the NHRLA including Williamsburg, the historic triangle, and surrounding area for, among other things, the businesses that rely on and facilitate historic tourism. As stated at the public hearing by Mr. Robert Coleman, Vice Mayor of Newport News City Council (Public Hearing Tr. Pg. 56), and Mr. Ross A Mugler, Commissioner of Revenue for the City of Hampton (see Public Hearing Tr. Pg. 88), the project is needed to attract and retain businesses in the Peninsula. Not having reliable electricity would damage the economy of the area as a business destination. Businesses that would be affected include military, Federal, civilian, and national security installations. The same logic applies to hotels and restaurants. Without them, there would be no tourism. Thus, contrary to the comments, the Project is necessary to maintain tourism.

While commenters suggest that the placement of the transmission line near certain historic properties would negatively impact tourism, they provide nothing but speculation on this point. Common experience regarding the tourists’ experience at the historic properties in question, for example Jamestown and Carter’s Grove, informs us that there would be little to no impact on tourism. This is because these properties and attractions focus the tourists’ interests landward toward the physical manifestations, or replications and explanations thereof, of the historic activities that occurred there, and not the river views that historic inhabitants may have had. *See also* Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment H (July 2, 2015), explaining that the Virginia State Corporation Commission (“SCC”) was required, by statute, to consider the economic impacts of the project. In its Approval Order, SCC found the Project would support economic development because it is crucial to ensuring reliable electric service. “Given these benefits and the modern development along the route, the SCC could not conclude that tourism in the Historic Triangle or economic development in the Commonwealth would be negatively impacted by the proposed project.” Stantec, Summary of Corps Public Notice Comments and Responses, at 4 (May 12, 2014).

1	Robert Stieg, Jr. (resident of Millwood, VA)	Oppose	1. Thinks the project puts at risk public and private investments in preservation of the site.	See response to Issue Category 5.
2	Carole Geiger (resident of Fincastle, VA)	Oppose	1. General opposition to the project for visual reasons and allegedly negative impact on tourism (“education and economic damage”).	See response to Issue Category 5.
3	Robert Lane	Oppose	1. Argues that Dominion and	See response to Issue Category 5.

Issue Category 5 – Tourism/Economic Impacts				
	(resident of McLean, VA and member of the Mid-Atlantic Regional Advisory Council of the National Parks Conservation Association)		Stantec understated the historical significance of the Artillery Site at Trebell's Landing and Hog Island (referring to NRHP criteria), while also too narrowly drawing the impact of the transmission line on remaining Civil War sites of the Peninsular Campaign.	The historical value of the area has been evaluated in the Cultural Resources Effects Assessment. Also, see response to Issue Category 2.
4	Garbriel Morey (resident of Williamsburg, VA)	Oppose	1. General opposition to the project for visual reasons and negative impact on tourism.	See response to Issue Category 5.
5	James Rich	Oppose	1. Wants an EIS because of the cultural, historical, economic and environmental significance of the area.	See response to Issue Category 5.
6	Judy Scardina	Oppose	1. The proposed line would be an eyesore and a scar to the region's integrity, heritage, and beauty (forwarded a Preservation Virginia e-mail).	See response to Issue Category 5.
7	Jessica Seidenberg (resident of Williamsburg, VA)	Oppose	1. Tourism in Historic Jamestown would be jeopardized.	See response to Issue Category 5.
8	Vaughan Boleky	Oppose	1. The river landscape that is largely unchanged from its appearance in the 17th century would not be the same for visitors. 2. The proposed line would alter the landscape, disrupt	See response to Issue Category 5.

Issue Category 5 – Tourism/Economic Impacts				
			wildlife, and jeopardize recreational uses.	
9	Melodye Brown	Oppose	1. The towers would negatively impact the natural habitat and Virginia’s tourism industry.	See response to Issue Category 5.
10	Peyton Wells	Oppose	1. Tourism would be at risk, wildlife would be disrupted, and the landscape would be altered.	See response to Issue Category 5.
11	Sally Thomas	Oppose	1. If the argument comes down to money, consider the sums of money spent to bring Williamsburg and Jamestown to life.	See response to Issue Category 5.
12	Stephen Lucas	Oppose	1. The number of historic, cultural, and natural resources that will be impacted by the proposed line are overwhelming.	See response to Issue Category 5.
13	Wendy Wheatcraft	Oppose	1. Visitors would no longer experience a river landscape that is largely unchanged from the way it appeared in the 17th century.	See response to Issue Category 5.
14	Christine Watson	Oppose	1. Thinks the project will be devastating to economically and recreationally.	See response to Issue Category 5.
15	J. Randall Minchew (Virginia House of Delegates)	Oppose	1. Wants an EIS to consider impact on regional tourism economics.	See response to Issue Category 5.

Issue Category 6 – Extreme Weather / Security Issues				
General Response:				
<p>Regarding hurricane and storm damage see Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment L (July 2, 2015), explaining that the facilities are designed for 100 MPH wind with the worst case exposure over the water. The National Electric Safety Code (“NESC”) defines the criteria required for the extreme wind load that apply to transmission facilities. The NESC uses wind speed maps and calculations in the American Society of Civil Engineers (ASCE) standard “Minimum Design Loads for Buildings and Other Structures”. The proposed projects design accounts for wind speeds and ice loads higher than the normal for the area. Further, control devices will be installed around the structures to prevent collisions from water vessels harming the integrity of the foundation.</p>				
1	Curtis Stoldt and Sharon Marcial (residents of Williamsburg, VA)	Oppose	1. Alleges that above ground lines pose a greater security threat than underwater lines.	See response to Issue Category 6.
2	Gayle Randol (resident of Richmond, VA and former guide at Historic Jamestowne)	Oppose	1. Thinks that the project is vulnerable to terrorist groups such as ISIS.	All infrastructure has these risks of potential cyber or physical attacks. The proposed project meets the NERC Cyber Infrastructure Protection 14 security standard. <i>See</i> North American Electric Reliability Corporation CIP-014-2, “Physical Security” (2015).
3	James and Judith Adams	Oppose	1. Vulnerability to shipping and extreme weather events.	See response to Issue Category 6.
4	Kenneth Levine	Oppose	1. The proposed power lines would be susceptible to damage from hurricanes or tornadoes.	See response to Issue Category 6.

Issue Category 6 – Extreme Weather / Security Issues				
5	Randy Randol III (VA Scientists and Engineers for Energy and Environment)	Oppose	1. Thinks the proposed project is vulnerable to grid security (physical or cyber-attacks, specifically notes ISIS).	All infrastructure has these risks of potential cyber or physical attacks. The proposed project meets the NERC Cyber Infrastructure Protection 14 security standard. <i>See</i> North American Electric Reliability Corporation CIP-014-2, “Physical Security” (2015).
6	Ron Figg	Oppose	<p>1. The proposed project presents security issues based on NERC and FERC standards (attached NERC’s petition outlining increased recommendations for electric utility security).</p> <p>2. A straight line is less risky, from a security standpoint, than a route across the river with angle structures.</p> <p>3. The SCC is not interested in the security of the project (citing a weblink).</p>	<p>1. The project meets the applicable Cyber Infrastructure Protection 14 security standard. <i>See</i> North American Electric Reliability Corporation CIP-014-2, “Physical Security” (2015). The Corps notes that FERC does not have applicable security standards; FERC delegated those issues to NERC.</p> <p>2. All infrastructure has risks of potential attacks, and as noted, the project as routed meets NERC’s security standards. In addition, the proposed Project route was approved by the SCC, and that decision was affirmed by the Virginia Supreme Court. <i>See</i> also response to comment 7 below.</p> <p>3. Comment acknowledged (the referenced link was broken).</p>
7	Ron Figg	Oppose	1. Claims that the proposed project is a “risky design” because the crossing design has a large number of structures in the water that are easily accessible and the design has “angle structures” that, if	Comments 1 and 2. The angled route provides additional security to the lines. The angles are substantially reinforced and are designed and constructed to provide additional support for the

Issue Category 6 – Extreme Weather / Security Issues				
			<p>destroyed, leads to the entire structure “going down”.</p> <p>2. He worked for a company in the 1960s surveying transmission lines out of Surry and determined that a design using one “anchor structure” on Dominion controlled property and crossing 2 miles of river to another anchor structure on Fort Eustis provided for the greatest security (versus the 4-mile Surry-Skiffes Creek “line dog leg crossing”) – anchor structure designs reduce cable sag and structures in the water.</p> <p>3. Having a connecting substation next to I-64 is risky and not secure – “anyone can drive by and shoot transformer bushing or fire a mortar over the fence.”</p> <p>4. Dominion will not be able to quickly recover if the power lines go down in an emergency event (as opposed to the existing transmission network).</p>	<p>powerlines. The angle towers have “dead”-end conductors meaning that the conductors’ end and are attached to the tower and a new conductor begins on that tower. In an inline tower the conductors continue without being dead ended. This configuration prevents excess sag in the lines and the angles also help prevent a “cascade” of the towers in the event that a tower goes down. Regarding placing structures on Fort Eustis, see response to Comment 86 in Issue Category 3.</p> <p>Comment 3. Every major energy facility is vulnerable to some degree from potential threats. Beginning in 2013, after a domestic terror event in California, design standards have been developed and adapted to reduce physical and cyber threats as well as decrease recovery time. Dominion’s regular coordination with local, state, and federal officials also helps minimize and security threats.</p> <p>Comment 4. Adding structures and conductors in existing rights of way does not provide true redundancy, in terms of risk assessment and management. Moreover adding such structures in existing corridors increases the risk of coincident failures.</p>

Issue Category 7 – Impacts to Boating/Air Traffic

General Response:

Regarding impacts to air traffic, see Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment M, which explained that lighting will be added to the towers per Federal Aviation Administration (FAA) regulations. As reflected in the Supplemental Testimony of Elizabeth P. Harper filed in the SCC case on September 19, 2012, and its attachments, Dominion had significant discussions and correspondence with the military (Langley Air Force Base and Fort Eustis) to arrive at the proposed route. *See also* Stantec, Summary of Corps Public Notice Comments and Responses, at 2 (May 12, 2014).

Regarding the comments claiming the Project will cause issues with boating traffic, *see* letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment N, notes that the Corps has considered the impacts of the project on navigation, as documented in Stantec’s Summary of Corps Public Notice Comments and Responses, at 1-2, 13 (May 12, 2014). Dominion has worked with the Corps on potential navigation issues, has designed its transmission line structures to provide the necessary clearances to the navigation channels in the James River, and has agreed to coordinate with the Corps and the Virginia Pilots Association on a natural channel realignment drift issue in the Tribell Shoal Channel.

1	Lynn Crump (resident of Chester, VA)	Oppose	1. Poses the issue of ships getting around the power lines.	See response to Issue Category 7.
2	Joseph Wayland	Oppose	1. Reasons why the proposed line is unacceptable include the historical importance of the James, and low flying military and commercial river traffic.	See response to Issue Category 7.
3	Walter Cooper	Oppose	1. The proposed line will have significant impact on air traffic.	See response to Issue Category 7.

Issue Category 8 – Project Not Needed (i.e., scare tactics by Dominion, no rolling blackouts, MATS rule remanded)

General Response:

The proposed Project is necessary in order to provide sufficient electric generation to meet the service area's need. As explained in Stantec's Alternatives Analysis Report and Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment I, "according to PJM Regional Transmission Operator, Dominion's load is the third largest in the PJM territory serving approximately 2.4 million customers. PJM performed sensitivity analyses to evaluate the performance of transmission projects without the retired units and concluded there is limited availability to offset the loss of generation and an overall lack of new generation development in the area. Various alternatives evaluated show an inability to provide sufficient electric generation to meet service area needs. Dozens of engineering studies validated Dominion studies, concluding, in all cases, several cascading outage scenarios affecting areas from the NHRLA into northern Virginia, City of Richmond and North Carolina were identified."

The need for the proposed Project is also highlighted in the July 2, 2015 Letter from S. Miller to L. Rhodes, which states: "In order to perform its legal duty to furnish adequate and reliable electric service, DVP must, when necessary, construct new transmission facilities in its system. The electric facilities proposed as part of the Project are necessary so that DVP can continue to provide reliable electric service to its customers in the North Hampton Roads Load Area ("NHRLA"), consistent with mandatory North American Electric Reliability Corporation ("NERC") Reliability Standards for transmission facilities and the Company's planning criteria. The purpose and need for the proposed transmission facilities is to provide reliable, cost-effective bulk electric power delivery to the NHRLA to maintain compliance with NERC standards. The Project is the minimum necessary to address the immediate reliability issues directly resulting from continued load growth in the NHRLA and the loss of generation upon retirement of Yorktown Units 1 and 2 in response to the mandatory regulations issued by the US Environmental Protection Agency ("EPA") for the control of emissions from listed air pollutants."

Regarding whether this much power is necessary, the need for the proposed Project was determined using the specific methodologies and computer modeling algorithms required by NERC Reliability Standards, and the power flow studies used to make that determination were verified by the SCC's independent expert consultant. That determination is also verified by the current operating circumstances in effect in the NHRLA, where existing system load in the NHRLA already exceeds the capability of the transmission system without Yorktown Units 1 and 2. See Stantec Alternatives Analysis (filed January 8, 2015), Section 3.1.3.

A decrease in total annual energy usage in the NHRLA does not affect the need for the proposed project. While the results of demand-side management resources are already accounted for in the transmission planning process that produced the proposed Project, the transmission system must be planned to address peak loading rather than annual energy usage. After the retirement of Yorktown

Issue Category 8 – Project Not Needed (i.e., scare tactics by Dominion, no rolling blackouts, MATS rule remanded)

Units 1 and 2, 98% of the NHRLA requirements must come from distant generators in order to provide reliable electricity under peak conditions at various locations. *See* Letter from K. Curtis, Dominion, to P. Goddard, NPCA, 2 (Dec. 15, 2015). The proposed Project’s 500 kV line is required to provide the necessary strength and capacity to gain access to this remote generation.

Regarding the timeframe for the project, the Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment J states: “timing of the project is being driven by mandatory and inflexible regulatory requirements issued by the US Environmental Protection Agency for the control of emissions from listed air pollutants and the electricity load demands in the North Hampton Roads area. The electric facilities proposed as part of the Project are necessary so that DVP can continue to provide reliable electric service to its customers, consistent with mandatory North American Electric Reliability Corporation (“NERC”) Reliability Standards for transmission facilities and the Company’s planning criteria. These EPA regulations include the Mercury and Air Toxics Standards (“MATS”) rule. On June 29, 2015, the United States Supreme Court remanded the MATS rule back to the US Court of Appeals for the D.C. Circuit for further proceedings consistent with the Supreme Court opinion. The Supreme Court held that EPA must consider cost, including the cost of compliance, before deciding whether regulation is “appropriate” and “necessary.” The Supreme Court did not vacate nor stay the effective date of the MATS rule. Thus, the deadlines imposed in the rule are unchanged by the Supreme Court decision. On December 15, 2015, the DC Circuit Court of appeals left the MATS rule in effect until EPA completes its analysis. As a result, it is necessary for DVP to proceed with the Project, as well as the retirement of units 1 and 2 at Yorktown Power Station, as scheduled.”

The Virginia Supreme Court affirmed the SCC’s determination of need for new transmission facilities based on violations of NERC Reliability Standards. On April 16, 2015, that Court unanimously affirmed the SCC’s determinations that only the proposed Project would meet the identified electrical need and that the 500 kV overhead crossing of the James River approved by the SCC will reasonably minimize adverse impacts on the scenic assets, historic districts, and environment of the area affected. *BASF Corp. v. State Corp. Comm’n*, ___ Va. ___, 770 S.E.2d 458 (2015).

Regarding comments that the prospect of brownouts are being used as a threat and are not realistic or likely, the Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment I (July 2, 2015) states: “The proposed project is needed to meet growing electric demands within the North Hampton Roads Load Area (NHRLA). New regulations aimed at reducing air emissions have imposed mandatory and inflexible deadlines on existing electric generating units and require Dominion to retire two coal plants that serve the region. As a result of the retirement decisions and deadlines required to comply with reliability standards, the proposed project is necessary to replace lost generation by 2017. The Company notes that the inability to begin construction for the past three years since the Application was filed with the Commission has made it impossible for the proposed facilities to be

Issue Category 8 – Project Not Needed (i.e., scare tactics by Dominion, no rolling blackouts, MATS rule remanded)

completed and in service by December 31, 2015, as provided in the Commission's February 28, 2014 Order Amending Certificates. As permitted by federal environmental regulations, the Company has obtained from the Virginia Department of Environmental Quality a one-year extension of the April 16, 2015 deadline for Yorktown Units 1 and 2 to comply with the U.S. Environmental Protection Agency's ("EPA") MATS regulation that will be achieved by retiring the units, which drove the original June 1, 2015 need date for the new transmission facilities. The Company also will seek from the EPA an administrative order under EPA's Administrative Order Policy for the MATS Rule 2 which, if granted, would provide an additional one-year waiver of non-compliance with the regulations that drive those retirements and further extend the deadline for Project completion to June 1, 2017. . . . PJM performed sensitivity analyses to evaluate the performance of transmission projects without the retired units and concluded there is limited availability to offset the loss of generation and an overall lack of new generation development in the area. Id. at 2.4. Various alternatives evaluated show an inability to provide sufficient electric generation to meet service area needs. Dozens of engineering studies validated Dominion studies, concluding, "in all cases, several cascading outage scenarios affecting areas from the NHRLA into northern Virginia, City of Richmond and North Carolina were identified." (Stantec, 2015 at 3.1).

Regarding comments that there is no particular rush, and timing is being used as a smokescreen, the timing of the project is being driven by mandatory and inflexible regulatory requirements issued by the US EPA for the control of emissions from listed air pollutants and the electricity load demands in the North Hampton Roads area. *See* Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment J (July 2, 2015).

Regarding the available alternatives to comply with the Project goals, numerous alternatives to the Project were offered and evaluated for the Corps's consideration as part of the submitted Joint Permit Application (submitted August 2013), the Alternatives Analysis (received by the Corps November 7, 2014 and additional materials provided December 19, 2014 and January 8, 2015) and materials referenced therein. The alternatives included in these documents included the No Action alternative, offsite alternatives and onsite alternatives. Additional details regarding each of these alternatives are included in the SCC Hearing documents, which were incorporated into the permit application by reference. *See also* Response to Issue Category 3.

The comment that Dominion and the SCC governs when and whether rolling blackouts might occur is incorrect. Whether rolling blackouts occur is a function of, among other things, NERC reliability standards for transmission facilities with which Dominion must comply.

1	Gayle Randol (resident of Richmond, VA	Oppose	1. Thinks that SCOTUS's decision on the MATS rule means the shutdown of some facilities, thereby necessitating this	See response to Issue Category 8.
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Issue Category 8 – Project Not Needed (i.e., scare tactics by Dominion, no rolling blackouts, MATS rule remanded)				
	and former guide at Historic Jamestowne)		project, is not actually necessary. 2. Argues that Yorktown can be powered with natural gas.	
2	Walter Zadan (resident of Williamsburg, VA)	Oppose	1. States that the “rolling blackouts” language are scare tactics/blackmail.	See response to Issue Category 8.
3	Julia Moore	Oppose	1. Questions whether this much power is necessary. Provide incentives for the public to use less energy.	See response to Issue Category 8.
4	Jeffrey King	Oppose	1. Dismisses Dominion’s claims of rolling blackouts.	See response to Issue Category 8.
5	Kevin Rasmussen	Oppose	1. EPA is not required by EPA’s mercury emission regulation to close Yorktown. Dominion’s claim if a final one-year extension into 2017 does not have to be the final extension and an excuse for Dominion to use the Surry Nuclear Plant. 2. Also examine converting Yorktown to natural gas.	See response to Issue Category 8.
6	Randy Randol III (VA Scientists and Engineers for Energy and Environment)	Oppose	1. Thinks there is no imminent threat of “rolling blackouts” and Supreme Court invalidated the MATS rule.	See response to Issue Category 8.

Issue Category 9 – Miscellaneous				
General Response:				
The comments in this Issue Category did not fit well into any of Issue Categories 1-8 and are instead addressed individually, below.				
1	Society of Architectural Historians	Oppose	1. Joins in opposition with Jamestown Rediscovery, Preservation Virginia, and the National Trust for Historic Preservation.	Comment acknowledged.
2	Dan Millison (2 letters included, one personal with a personal Williamsburg, VA address listed and a second on Transendergy, LLC letterhead)	Oppose	1. Claims analysis of alternatives report by Dominion and Stantec Consulting is deficient along with the Corps' white paper. 2. Claims regulatory capture involved.	See the response to the commenter's comments in Response to Comments at the October 30, 2015 Hearing, which Dominion previously provided to the Corps. Regarding the claims of regulatory capture, USACE is not aware of any evidence of regulatory capture, and the commenter has provided none.
3	Daniel Shaye (resident of James City County, VA)	Oppose	1. Wants further consideration of the "numbers and science" behind the project and its alternatives.	See Alternatives Analysis (November 6, 2015), Revised Alternatives Analysis (January 1, 2015), including revised Table 3.1, and USACE Preliminary Alternatives Conclusions White Paper (October 1, 2015), which provide an in depth examination of the alternatives analysis. Specifically, Table 3.1 provides the cost and impact estimations for many of the proposed alternatives.
4	Julia King (resident of St. Mary's City, MD)	Oppose	1. General opposition for stewardship reasons and opposition to "cheap" electricity.	Comment acknowledged.
5	Margaret Fowler	Oppose	1. Suggests that Stantec's	Comment 1. Regarding the comment that

Issue Category 9 – Miscellaneous				
	(resident of Williamsburg, VA)		<p>assessment cannot be trusted because they were paid by Dominion, asserting that they are just “document dumping”.</p> <p>2. Argues that the SCC’s review was not “thorough and robust” as Dominion claims.</p> <p>3. Dominion bought and paid for the answer they got at the SCC hearing.</p>	<p>Stantec’s review cannot be trusted, USACE has and will continue to fulfill its duty to independently review all information submitted regarding the project before relying on it.</p> <p>Comments 2 and 3. The Virginia Supreme Court has affirmed the SCC’s determination of need for new transmission facilities based on violations of NERC Reliability Standards. On April 16, 2015, that Court unanimously affirmed the SCC’s determinations that only the Proposed Project would meet the identified electrical need and that the 500 kV overhead crossing of the James River approved by the SCC will reasonably minimize adverse impacts on the scenic assets, historic districts and environment of the area affected. <i>BASF Corp. v. State Corp. Comm’n</i>, ___ Va. ___, 770 S.E.2d 458 (2015). The SCC’s decision was the subject of judicial review and upheld. The commenter provides no evidence to justify the allegations in comment 3.</p>
6	Robert Lane (resident of McLean, VA and member of the Mid-Atlantic Regional Advisory	Oppose	1. Seems most concerned about building over areas that have not been sufficiently studied for historical purposes.	See Response to Comments Submitted by Consulting Parties, Issue Category 6 – Adequacy of Cumulative Effects Analysis, pages 2-3, 32); Cultural Resources Effects Assessment, Surry-Skiffes Creek-Wheaton Transmission Line Project, Surry, James City,

Issue Category 9 – Miscellaneous				
	Council of the National Parks Conservation Association)			and York Counties, Cites of Newport News and Hampton, Virginia, pages 3.86-3.90, 3.118-3.124 (Sept. 15, 2015).
7	Tony Marra	Oppose	1. No substantiation, just “I say NO !! to the St James River Towers. This must not be allowed.”	Comment acknowledged.
8	Kevin Twine (resident of Brunswick, ME)	Oppose	1. Notes that a FONSI would be “entirely inappropriate”.	Regarding the comment that a FONSI would be “entirely inappropriate”, <i>see</i> Letter from S. Miller, Dominion, to L. Rhodes, USACE , Attachment 1, Response to Comment O (July 2, 2015). The Corps’ NEPA regulations expressly provide that section 404 permits “normally require only an EA” rather than a full EIS (33 C.F.R. § 230.7(a)). The Corps would issue a FONSI if it determines during its environmental assessment process that no significant environmental impacts will occur as a result of the project. See also response to Issue Category 1.
9	Jim Steitz (resident of Gatlinburg, TN)	Oppose	1. Argues that Historic Park designation precludes the project.	Commenter is incorrect that Colonial National Historic Park’s designation as a Historic Park precludes the project. This information is, however, relevant for purposes of the Corps’s compliance with the National Historic Preservation Act.
10	Deborah Garrison (resident of	Oppose	1. Likens the project to coal fired power plant in Kentucky	Comment acknowledged.

Issue Category 9 – Miscellaneous				
	Winchester, KY)		that caused harm, including health issues, in a nearby city.	
11	Gerald Rust (resident of Troy, IN)	Oppose	1. Notes that the towers are “very dangerous” to the health of anyone in the proximity of them.	Regarding health concerns, see Direct Testimony of James Cox on Behalf of Virginia Electric and Power Company before the SCC, Case No. PUE-2012-0029 at pp. 13-14; <i>see also</i> Application, Appendix, DEQ Supplement, Direct Testimony and Exhibits of Virginia Electric and Power Company, Case No. PUE-2012-00029, at App’x Sections IV.A-C, pp. 334-44 (filed June 11, 2012).
12	Anonymous	Oppose	1. Supports Chickahominy route, with some redesign/mitigation to avoid archaeological sites/wetlands.	The Chickahominy route utilizes an existing right of way owned by Dominion that extends approximately 37.9 miles from the Chickahominy Substation in Charles City County to the proposed Skiffes Creek Switching Station in James City County. 24.9 miles is unimproved ROW that would require clearing for construction of the proposed line. The Chickahominy route crosses 93.32 acres of non-tidal wetlands, 8.64 acres of tidal wetlands and requires the clearing and permanent conversion of 62 acres of palustrine forested wetlands. These environmental impacts are significantly greater than those for the Surry-Skiffes Creek route.
13	Jan Sokolowsky (resident of Williamsburg, VA) (holds a PhD in	Oppose	1. Believes a study should be conducted to place a monetary value on intangible assets using methodology in academic	Comment 1. Comment acknowledged. Currently, expert agencies are evaluating what mitigation may be appropriate for adverse impacts to historic properties that cannot be

Issue Category 9 – Miscellaneous				
	economics and is an expert on cost/benefit analyses)		<p>article “Using Happiness Surveys to Value Intangibles: The Case of Airport Noise,” by Bernard van Praag & Barbara Baarsma.</p> <p>2. Commenter is happy to “contribute to finding the best way forward.”</p>	<p>avoided or minimized further.</p> <p>Comment 2. Comment acknowledged.</p>
14	John Oloughlin	Oppose	<p>1. Opposes the project for the reasons cited by the preservation folks.</p>	<p>Comment acknowledged.</p>
15	Keith Engelmeier	Oppose	<p>1. The final Corps determination should be based on the findings of independent outside consultants.</p> <p>2. Not in the public interest to accept Dominion’s determination that there are no acceptable alternatives.</p> <p>3. The NPS has designated this section of the James as one of the most significant historic, relatively undeveloped rivers. This fact should be reason for the Corps to deny the permit.</p>	<p>Comment 1. The Corps makes an independent determination based on its evaluation of resources which will be impacts by the project. This independent determination is based on all of the information provided to the Corps. The Corps may, but is not required to, utilize outside consultants to assist it.</p> <p>Comments 2 and 3. Consideration of the public interest is part of the Corps’s permit issuing process, and it will do so here. Regarding alternatives, see response to Issue Category 3. Regarding NPS’s “designation” of this section of the James, see response to Issue Categories 2 and 5.</p>
16	Maria Butler	Oppose	<p>1. Do not construct the towers near Jamestown.</p> <p>2. Virginia is educationally significant to Virginia and the</p>	<p>Comment acknowledged.</p>

Issue Category 9 – Miscellaneous				
			U.S.	
17	Marcia Connor	Oppose (e-mail titled “Please deny Dom’s request”)	1. Please!!! Thank-you!!!	Comment acknowledged.
18	Thomas Leitch (Governor, Central North Carolina Company of the Jamestowne Society)	Oppose	1. Requests that there be a public hearing so the full impact of Dominion’s project can be explored and well as viable alternatives.	Regarding an additional public hearing, based on the comments received following the numerous public notices, and numerous consulting party meetings (which also are open to the public), and those received at the public meeting on October 30, 2015, USACE believes that an addition public hearing is not warranted.
19	Randy Randol III (VA Scientists and Engineers for Energy and Environment)	Oppose	1. Does not think the Corps gave enough value to the preservation of Jamestown Island and thinks that the cost difference between the Skiffes Creek route and other alternatives is illusory because of the inevitable litigation costs of choosing the Skiffes Creek route. 2. Claims Dominion may have hid information of two wind turbines it is building, and running a power line under water to connect them to the grid, from the USACE and SCC to avoid undermining Dominion’s proposal.	1. Regarding the Corps’s evaluation of the impacts from the Projects, see responses to Issue Categories 2 and 5. The Corps’s evaluation of alternatives, including costs, is not based on the unknowable, potential costs of possible future litigation. Further, the Corps believes that the comment’s assumption that no litigation would follow if route other than the proposed Project route was chosen to be unreasonable. 2. The commenter has provided no basis for the claim that Dominion is hiding information about wind turbine construction, and the claim is in fact false. See response to Issue Category 3 regarding burying the power line.
20	Gayle Randol	Oppose	1. Thinks that the cost	See response to comment 19 above.

Issue Category 9 – Miscellaneous				
	(resident of Richmond, VA and former guide at Historic Jamestowne)		difference between the Skiffes Creek route and other alternatives is illusory because of the inevitable litigation costs of choosing the Skiffes Creek route and thinks the cost estimates are suspect because there are no ranges.	
21	Ron Figg	Oppose	<p>1. The proposed project is not consistent with past decisions made by Dominion in upgrading coal units to natural gas.</p> <p>2. Dominion did not properly follow a required Integrated Resource Plan for “long range integrated planning” and therefore Corps shouldn’t be “backed into a corner” to approve the project</p> <p>3. Claims Dominion caused this problem when they changed the power flow by closing generation locations at load center and then got in trouble with NERC and FERC standards trying to connect to remote replacement generation.</p> <p>4. NERC Reliability Standards require adequacy and security analysis and the SCC testimony</p>	<p>Comment 1. The proposed project and its alternatives were analyzed for each’s ability to meet the project’s need and purpose. The proposed project was one of only two viable options. For further discussion on why retrofitting facilities was not a viable option, see response to Issue Category 3.</p> <p>Comment 2. See response to Issue Category 8.</p> <p>Regarding comment 3, the retirement of the York Town Units 1 and 2 are required by EPA regulations. The power flow models are required for proper planning to meet NERC reliability standards.</p> <p>Comment 4. The project meets the applicable Cyber Infrastructure Protection 14 security standard. <i>See</i> North American Electric Reliability Corporation CIP-014-2, “Physical Security” (2015).</p>

Issue Category 9 – Miscellaneous				
			focuses only on adequacy.	

Issue Category 10 - NPCA Form Comments #1 (10,174)

General Response:

The following general response addresses comments in these letters that have not been detailed in other Issue Categories.

Regarding industrialization of the river, if one were traveling on the water from the south that visitor’s field of vision would first see the James River Bridge, Newport News Shipbuilding and the highly developed shoreline of Newport News. Further up river, Busch Gardens is highly visible as is the Ghost Fleet located in the water and Surry Nuclear Power Station to the west. Such a view at the point the towers would come into view could hardly be seen as pristine, and the impacts of the visible towers would not be significant in light of the surroundings and shoreline and river use. The river first became a working river with the establishment of Jamestown and has continued as such to this day. To the extent the comments suggest that building the transmission line crossing will promote other industrial facilities to locate there, there is no evidence in the record to suggest such an outcome. Therefore, such comments are speculation. This is particularly true given the current ownership of the properties in the area, which consist of public or preservation-based ownership in the Jamestown area. See also the requirements under the Chesapeake Bay Preservation Act regarding Resource Protection Areas, and buffers areas and additional development mitigation requirements. Moreover, the Transmission Line crossing is not like a highway interchange; it does not foster access to an area for purposes of development. Instead, it provides regional power supplies and disperses development.

Regarding an additional public hearing, based on the comments received following the numerous public notices, and numerous consulting party meetings (which also are open to the public), and those received at the public meeting on October 30, 2015, an additional public hearing is not warranted.

1.	NPCA Form Comment Letters: 10,174 letters. It appears that these letters were originally sent to the Corps in June, but the Corps	10,174 Opposition Letters	<ol style="list-style-type: none"> 1. Full EIS to be completed. 2. Value of protecting Jamestown historic character outweighs the benefit of any energy company. 3. The project will damage the historic Jamestown, Colonial National Historical Park, and the Captain John Smith Chesapeake National Historic Trail by turning this historic setting into an industrialized area. 	<p>In addition to the General Response to Issue Category 10, which addresses responses not already addressed in other Issue Categories, commenters should also refer to:</p> <p>Regarding the EIS comment, see response to Issue Category 1.</p> <p>Regarding the protection of Jamestown</p>
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Issue Category 10 - NPCA Form Comments #1 (10,174)				
	<p>never received the letters. Therefore, the letters were resubmitted via email by Pamela Goddard on August 19, 2015.</p>		<p>4. Alternatives exist that would meet the energy needs without harming historic or natural resources. 5. Request a public meeting.</p>	<p>historic character outweighing the benefits to any energy company comment, <i>see</i> response to Issue Category 5 and 8, which explains why the project is needed.</p> <p>Regarding the alternatives exist comment, <i>see</i> response to Issue Category 3, which explains why the Surry-Skiffes Creek was the alternative chosen to meet the needs and purpose of the project.</p>

Issue Category 11 - NPCA Form #2 (11,671)				
General Response:				
The following general response addresses comments in these letters that have not been detailed in other Issue Categories.				
Regarding the harm to the historic and scenic landscapes of Jamestown, Colonial National Historical Park, Captain John Smith Trail, and other historic sites, Stantec recommended that archaeological site 44JC0662, Carter’s Grove, Hog Island Wildlife Management Area, and the newly defined Eligible Historic District (which includes the contributing portion of the Captain John Smith Chesapeake National Historic Trail) would be adversely affected by the project. Stantec also concurred with the Corps’ determinations of adverse effect to the Colonial National Historical Park/Colonial Parkway and the Jamestown National Historic Site/Jamestown Island. <i>See</i> Response to Comments Submitted by Consulting Parties Concerning the Surry-Skiffes Creek-Wheaton Project, Issue Category 1 – Which Historic Properties Were Adversely Affected? Pages 1-16, detailing the effects on various historic properties and addressing stakeholders’ concerns.				
1.	NPCA Form Comment Letters: 11,671 Letters	11,671 Opposition Letters	1. Wants an EIS to investigate the alternatives and the effects of the proposal. 2. Dominion’s proposal would harm the historic and scenic landscape of Jamestown, Colonial National Historical Park, Captain John Smith Trail and other historic sites.	In addition to the General Response to Issue Category 11, which addresses responses not already addressed in other Issue Categories, commenters should also refer to: Regarding the EIS comment, see response to Issue Category 1. Regarding the damage to the historic and scenic landscape comment, see response to Issue Category 2 regarding view shed impacts.

Issue Category 12 - NPCA Personalized Comments #1 (1,037 Letters)

General Response:

Many of the comments in these personalized form comments have been addressed in previous Issue Category responses. The relevant Issue Category responses to reference have been noted for each comment and, in the event a comment has not been previously addressed, responses to novel comments are located next to each comment. The form portion of these comments is addressed in the response to Issue Category 10.

<p>1.</p>	<p>NPCA individualized Form Comment Letters: 1,030 letters almost the same as the NPCA Form comments but containing additional sentences that express value preferences or a personal connection to the area. It appears that these letters were originally sent to the Corps in June, but the Corps never received</p>	<p>1,030 individualized Form Comments</p>	<p>There were multiple references to the following specific comments which were in addition to the comments in the NPCA form comment letter:</p> <ol style="list-style-type: none"> 1. The view shed will be marred/destroyed. 2. Protect, preserve and don't destroy National Parks and Historic Places. 3. Consider alternative that would protect the public interest. 4. Run the line underwater. 5. Consider economic and environmental impacts. 6. Effects on tourism. 7. Powerline would not benefit the community. 8. Species in and around the James River would be affected including the sturgeon. 9. Invest in wind, solar, or wave energy. 10. Use another crossing where infrastructure is already in place. 11. Lines would drive down property values. 	<p>1, 2, 15, 16. Regarding the view shed will be marred/destroyed, pristine view, and impact to the feel of the area comments, see response to Issue Category 2. Specifically, regarding the comments stating that the area is pristine, <i>see</i> Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment F (July 2, 2015) stating that "this comment represents the commenter's opinion regarding, what appears to be, one or more views from some vantage point within the Area of Potential Effect ("APE"). No response is necessary regarding the commenters opinion. In any event, to the extent the commenter means to equate pristine with a lack of development, as reflected in the Visual Effects Assessment and its addendum, there is industrial, commercial, and residential development in this area visible within the APE, and has been for many years."</p>
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Issue Category 12 - NPCA Personalized Comments #1 (1,037 Letters)				
	<p>the letters. Therefore, the letters were resubmitted via email by Pamela Goddard on August 19, 2015.</p>		<p>12. Lines would degrade local's and visitor's experience. 13. Families would not relocate to the area. 14. Storms and hurricanes would affect the lines. 15. Lines would destroy the feeling of the Jamestown area. 16. The area is pristine. 17. The lines would generate harmful electrical frequencies which cause cancer. 18. Include cultural and sociological studies. 19. Planning Department Commissions should determine whether a Special Use Application is needed. 20. Convert AC to DC for the underwater crossing then convert back to AC. 21. Consider educating the public on ways to use less energy.</p>	<p>2. Regarding the protect and preserve comment, impacts of the project are being evaluated under the Corps Section 106 process.</p> <p>4, 9, 10, 20. Regarding the alternative routes (i.e. underwater routing) or energy sources (i.e. investing in wind, solar, or wave energy) comments, see response to Issue Category 3. Specifically, regarding the use of another crossing, the Corps White Paper and the Alternative Analysis found that these alternatives did not meet the projects need or purpose. Also, regarding new generation, the Corps White Paper and the Alternative Analysis found that stand-alone generation would face siting, permitting and construction timeline constraints.</p> <p>5, 6, 18. Regarding the environmental impacts and economic impacts comments, see responses to Issue Category 1 and 5.</p> <p>6, 12, 15. Regarding the effect on tourism and locals/visitors experience comments, see response to Issue Category 5.</p> <p>8. Regarding impacts to species in the area, specifically the sturgeon, see response to Issue Category 4.</p>

Issue Category 12 - NPCA Personalized Comments #1 (1,037 Letters)				
				<p>7. Regarding the no benefit to the community comment, as outlined in the Corps White Paper and Stantec’s Alternative Analysis, a loss or delay of reliable electricity to, or rolling blackouts in, the NHRLA is not beneficial to the community.</p> <p>11, 13. Regarding the comments stating that the line would harm the economy by driving down property values and turning off families from relocating to the area, see Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment H (July 2, 2015) stating that “As reflected in the Summary of Corps Public Notice Comments and Responses prepared by Stantec on May 12, 2014, the Virginia State Corporation Commission (“SCC”) was required, by statute, to consider the economic impacts of the project. In its Approval Order, SCC found the project would support economic development because it is crucial to ensuring reliable electric service. “Given these benefits and the modern development along the route, the SCC could not conclude that tourism in the Historic Triangle or economic development in the Commonwealth would be negatively</p>

Issue Category 12 - NPCA Personalized Comments #1 (1,037 Letters)				
				<p>impacted by the proposed project.” <i>Quoting</i> Stantec, Summary of Corps Public Notice Comments and Responses, at 4 (May 12, 2014).</p> <p>14. Regarding the severe weather impacts comment, see response to Issue Category 6.</p> <p>17. Regarding the harmful electrical frequencies comment, see Direct Testimony of James Cox on Behalf of Virginia Electric and Power Company before the SCC, Case No. PUE-2012-0029 at pp. 13-14; see also Application, Appendix, DEQ Supplement, Direct Testimony and Exhibits of Virginia Electric and Power Company, Case No. PUE-2012-00029, at App’x Sections IV.A-C, pp. 334-44 (filed June 11, 2012).</p> <p>18. Regarding the assessment of cultural effects comment, see Stantec’s Cultural Resources Effects Assessment, Surry-Skiffes Creek-Wheaton Transmission Line Project, Surry, James City, and York Counties, Cities of Newport News and Hampton, Virginia (September 15, 2015), also known as the Consolidated Effects Report (“CREA”).</p> <p>19. Regarding the special use application</p>

Issue Category 12 - NPCA Personalized Comments #1 (1,037 Letters)				
				<p>comment, this process has already been initiated with James City County for the switching station.</p> <p>20. Regarding the converting the power from AC to DC and running the line under the river comment, <i>see</i> Corps White Paper and Stantec’s Alternative analysis finding that this alternative is presented with routing and siting constraints, land acquisition requirements, reliability concerns, cost, increased environmental and cultural impacts and time constraints.</p> <p>21. Demand side management and conservation is not sufficient to meet the Project’s purpose and need. See the Corps White Paper (Oct. 1, 2015), which analyzed numerous alternatives to the Project.</p>

Issue Category 13 - NPCA Personalized Comments #2 (2,148)

General Response:

Many of the comments in these personalized form comments have been addressed in previous Issue Category responses. The relevant Issue Category responses to reference have been noted for each comment and, in the event a comment has not been previously addressed, responses to novel comments are located next to each comment. The form portion of these comments is addressed in the response to Issue Category 11.

<p>1.</p>	<p>NPCA individualized Form Comment Letters: 2,148 letters almost the same as the NPCA Form comments but containing additional sentences that express value preferences or a personal connection to the area.</p>	<p>2,148 Individualized Form Comments</p>	<p>There were multiple references to the following specific comments which were in addition to the comments in the NPCA form comment letter:</p> <ol style="list-style-type: none"> 1. Consider another alternative/place towers elsewhere. 2. Property value in the area will decrease. 3. Place the towers underground. 4. The view should be kept pristine and not marred by the towers. 5. Environmental and Societal impacts must be studied. 6. The lines would be subjected to weather and other threats. 7. Renewable options like wind, solar, wave should be considered. 8. Wildlife would be affected, such as the sturgeon and birds. 9. Tourism, education and the economy of the region would be harmed. 10. Consider the impacts to the local community. 11. Visitor experience would be ruined. 12. At minimum, an EA is required. 	<p>1, 3, 7, 13, 14, 19. Regarding alternative routes (i.e. running the lines underground) or energy sources (i.e. wind and solar), see response to Issue Category 3. Specifically, regarding new generation, the Corps White Paper and the Alternative Analysis found that stand-alone generation would face siting, permitting and construction timeline constraints. Specifically, regarding the use of another crossing, the Corps White Paper and the Alternative Analysis found that these alternatives did not meet the projects need or purpose.</p> <p>2. Regarding the comments stating that the line would harm the economy by driving down property values, <i>see</i> Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment H (July 2, 2015) stating that “As reflected in the Summary of Corps Public Notice Comments and Responses prepared by Stantec on May 12, 2014, the</p>
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Issue Category 13 - NPCA Personalized Comments #2 (2,148)				
			<p>13. Alternatives were not given adequate consideration.</p> <p>14. Employ another alternative no matter the cost.</p> <p>15. The lines would industrialize the landscape.</p> <p>16. Review historical, economic and cultural impacts of the proposed line.</p> <p>17. Dominion is interested in profit.</p> <p>18. Consider a way to blend the transmission lines in with the landscape.</p> <p>19. Use an existing bridge in the area to construct the proposed line.</p> <p>20. Dominion is using threats of rolling brownouts if the lines are not built.</p> <p>21. The lines would take away from the historic feel.</p>	<p>Virginia State Corporation Commission (“SCC”) was required, by statute, to consider the economic impacts of the project. In its Approval Order, SCC found the project would support economic development because it is crucial to ensuring reliable electric service. “Given these benefits and the modern development along the route, the SCC could not conclude that tourism in the Historic Triangle or economic development in the Commonwealth would be negatively impacted by the proposed project.” <i>Quoting</i> Stantec, Summary of Corps Public Notice Comments and Responses, at 4 (May 12, 2014).</p> <p>4, 15. Regarding the comments stating that the area is pristine, <i>see</i> Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment F (July 2, 2015) stating that “this comment represents the commenter’s opinion regarding, what appears to be, one or more views from some vantage point within the APE. No response is necessary regarding the commenters opinion. In any event, to the extent the commenter means to equate pristine with a lack of development, as reflected in the Visual Effects Assessment and its addendum,</p>

Issue Category 13 - NPCA Personalized Comments #2 (2,148)				
				<p>there is industrial, commercial, and residential development in this area visible within the APE, and has been for many years.” Further, regarding the industrialization of the landscape comment, see response to Issue Category 2.</p> <p>5, 16, 21. Regarding the environmental and cultural impacts assessment should be completed comment, impacts of the project are being evaluated under the Corps Section 106 process. Further, regarding cultural effects, see Stantec’s Cultural Resources Effects Assessment, Surry-Skiffes Creek-Whealton Transmission Line Project, Surry, James City, and York Counties, Cities of Newport News and Hampton, Virginia (September 15, 2015), also known as the Consolidated Effects Report (“CREA”).</p> <p>6. Regarding the exposure to severe weather comment, see response to Issue Category 6.</p> <p>8. Regarding the effect on wildlife comment, see response to Issue Category 4.</p> <p>9, 11. Regarding the tourism and economy of the region would be harmed</p>

Issue Category 13 - NPCA Personalized Comments #2 (2,148)				
				<p>and visitor experience would be harmed comments, see response to Issue Category 5.</p> <p>10. Regarding the consideration of impacts to the local community comment, as outlined in the Corps White Paper and Stantec’s Alternative Analysis, a loss or delay of reliable electricity to, or rolling blackouts in, the NHRLA would be a negative impact to the local community.</p> <p>12. Regarding the environmental assessment (“EA”) is needed comment, see response to Issue Category 1.</p> <p>20. Regarding the threats of brownouts comment, <i>see</i> Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment L (July 2, 2015).</p> <p>18. Regarding the blending the transmission lines comment, different camouflaging alternatives are being considered.</p>

Issue Category 14 - NTHP Form Letters (1,465)

General Response:

The following general response addresses comments in these letters that have not been detailed in other Issue Categories.

Regarding the water preservation comment, impacts to water quality are expected to be temporary and minor, resulting from the installation of piles in the river crossing and construction of structure foundations within the land portions of the project. Impact installation of piles within the substrate in the James River would not be expected to contribute to more than negligible turbidity. Construction work on the land portion of the project will be performed using Best Management Practices to minimize erosion and sedimentation under Dominion’s General Erosion and Sedimentation Control Specifications for the Construction and Maintenance of Electric Transmission Lines. The Corps will fully consider the effect to water quality during the Public Interest Review.

1.	NTHP Form Comment Letters: 1,465 letters	1,465 Opposition Letters	<ol style="list-style-type: none"> 1. The James River connects sites like the Jamestown Island, Colonial Parkway and Carter’s Grove. 2. Wants an EIS. 3. Alternatives should be explores such as burying the power lines below ground or locating the lines in a less historically significant location. 4. Come up with innovative solution that would preserve the water and landscape. 5. Visitors experience a landscape that is unchanged from the way it appeared in the 17th century. 	<p>In addition to the General Response to Issue Category 14, which addresses responses not already addressed in other Issue Categories, commenters should also refer to:</p> <ol style="list-style-type: none"> 2. Regarding the EIS comment, see response to Issue Category 1. 3, 4. Regarding the explore alternatives such as burying the power lines or locating them in a less historically significant location and the need for innovative solution comments, see response to Issue Category 3. Specifically, regarding burying the power line under the river, the Alternatives Analysis and Revised Alternatives analysis, included in Table 3.1, demonstrated that burying a transmission
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Issue Category 14 - NTHP Form Letters (1,465)				
				<p>line would result in adverse environmental and archeological impacts greater than the proposed project, cost many times the amount of the proposed project, and have reliability and visual impact issue.</p> <p>5. Regarding view shed impacts, see response to Issue Category 2.</p>

Issue Category 15 - NTHP Personalized Letters (165)

General Response:

Many of the comments in these personalized form comments have been addressed in previous Issue Category responses. The relevant Issue Category responses to reference have been noted for each comment and, in the event a comment has not been previously addressed, responses to novel comments are located next to each comment. The form portion of these comments is addressed in the response to Issue Category 14.

<p>1.</p>	<p>NTHP Individualized Form Comment Letters: 165 letters almost the same as the NTHP form comments but containing additional sentences that express value preferences or a personal connection to the area.</p>	<p>165 Individualized Form Comments</p>	<p>There were multiple references to the following specific comments which were in addition to the comments in the NTHP form comment letter:</p> <ol style="list-style-type: none"> 1. View shed will be marred/ destroyed. 2. Lines would produce EMF polluting carcinogens. 3. The landscape is pristine. 4. Other landmarks which lie within the view shed include Berkley Plantation, Shirley Plantation and Westover. 5. The lines would affect tourism. 6. Convert Yorktown to natural gas. 7. Corps should consult with the NRC regarding evaluation of cultural resources. 8. Added cost of an alternative is worth preserving the historic site. 9. Added cost on an alternative to consumers can be spread over many decades. 10. Species would be affected by the proposed line. 11. Burying the lines would offer 	<p>1, 3. Regarding the view shed will be marred/destroyed and pristine view comments, see response to Issue Category 2. Specifically, regarding the comments stating that the area is pristine, <i>see</i> Letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment F (July 2, 2015) stating that “this comment represents the commenter’s opinion regarding, what appears to be, one or more views from some vantage point within the APE. No response is necessary regarding the commenters opinion. In any event, to the extent the commenter means to equate pristine with a lack of development, as reflected in the Visual Effects Assessment and its addendum, there is industrial, commercial, and residential development in this area visible within the APE, and has been for many years.”</p> <p>2. Regarding the lines producing EMF polluting carcinogens concern, <i>see</i> Direct</p>
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Issue Category 15 - NTHP Personalized Letters (165)				
			<p>protection from hurricanes, etc.</p>	<p>Testimony of James Cox on Behalf of Virginia Electric and Power Company before the SCC, Case No. PUE-2012-0029 at pp. 13-14; <i>see also</i> Application, Appendix, DEQ Supplement, Direct Testimony and Exhibits of Virginia Electric and Power Company, Case No. PUE-2012-00029, at App'x Sections IV.A-C, pp. 334-44 (filed June 11, 2012).</p> <p>4. The referenced landmarks are not within the view shed.</p> <p>5. Regarding the effect on tourism comment, see response to Issue Category 5.</p> <p>6, 8, 11. Regarding the convert Yorktown to natural gas and alternative routing (such as burying the lines) comments, see response to Issue Category 3.</p> <p>9. Regarding the comment that the additional cost of an alternative can be spread over time to Dominion's customers comment, as a regulated entity, Dominion is required to provide cost-effective services to its customers, because, among other things, the costs of service are passed on to its customers through electricity rates and fees. Dominion's ability to recover the costs of</p>

Issue Category 15 - NTHP Personalized Letters (165)				
				<p>the project is limited by the fact that the rates it can charge are set by the Federal Energy Regulatory Commission and Virginia State Corporation Commission. Therefore, contrary to the comment, Dominion cannot simply spread out the costs related to a project. <i>See</i> letter from S. Miller, Dominion, to L. Rhodes, USACE, Attachment 1, Response to Comment D.</p> <p>7. Regarding the need to evaluate cultural impacts from the project comment, <i>see</i> Stantec’s Cultural Resources Effects Assessment, Surry-Skiffes Creek-Whealton Transmission Line Project, Surry, James City, and York Counties, Cities of Newport News and Hampton, Virginia (September 15, 2015), also known as the Consolidated Effects Report (“CREA”).</p> <p>10. Regarding the impact on species in the area comment, see response to Issue Category 4.</p>