



COMMONWEALTH of VIRGINIA

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September 10, 2014

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Environmental Assessment, Federal Energy Regulatory Commission: Transco Leidy Southeast Expansion Project, Fairfax, Prince William, Fauquier, Culpeper, Louisa, Orange, Fluvanna, Buckingham, Appomattox, Campbell and Pittsylvania Counties (DEQ 14-140F) (OEP/DG2E/Gas 1; CP13-551-000)

Dear Secretary Bose:

The Commonwealth of Virginia has completed its review of the draft Environmental Assessment (EA) for the above-referenced project. The Department of Environmental Quality (DEQ) coordinates Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act (NEPA) and responds to appropriate officials on behalf of the Commonwealth. To the extent practicable, the following agencies and localities joined in this review; however, most reviewers were unable to provide a thorough analysis given the time constraints:

- Department of Environmental Quality
- Department of Game and Inland Fisheries
- Department of Agriculture and Consumer Services
- Department of Conservation and Recreation
- Department of Health
- Department of Historic Resources
- Marine Resources Commission
- Fluvanna County
- Orange County

The Department of Forestry, Department of Transportation, Fairfax County, Prince

William County, Fauquier County, Culpeper County, Louisa County, Buckingham County, Appomattox County, Campbell County and Pittsylvania County, West Piedmont Planning District Commission (PDC), Virginia 2000, Commonwealth Regional Council, Thomas Jefferson PDC, Rappahannock-Rapidan PDC and the Northern Virginia PDC were invited to comment.

DOCUMENT REVIEW DEFICIENCIES

The Federal Energy Regulatory Commission (FERC) provided insufficient time to perform a complete coordinated review of the proposed Leidy project, given its scope affecting 11 counties in the Commonwealth. In addition, the EA does not provide sufficient evidence and impact analysis to support conclusions about proposed impacts for project locations in Virginia. The analysis primarily focuses on impacts in Pennsylvania and New Jersey without giving adequate consideration to impacts in Virginia.

PROJECT DESCRIPTION

FERC is considering a request by the Transcontinental Gas Pipe Line Company (Transco) to issue a Certificate of Public Convenience and Necessity authorizing construction and operation of natural gas pipeline facilities. Transco's purpose is to provide an additional natural gas transportation capacity to delivery points that would be accessible by customers in the mid-Atlantic and southeast. According to the EA, the project generally consists of the following:

- installing approximately 29.8 miles of new 42-inch-diameter pipeline loop in New Jersey and Pennsylvania;
- adding compression and modifying existing compressor stations in New Jersey and Pennsylvania;
- modifying existing compressor stations in North Carolina, Virginia (5 facilities), and Maryland; and
- modifying existing meter and regulating stations, mainline valves and pig launchers and receivers in states, including Virginia.

It appears that there are at least 30 existing above-ground facilities in 11 counties in Virginia that would be affected by the proposed action. The EA indicates that land disturbance would occur in 10 Virginia counties. Proposed modifications at existing aboveground facilities on Transco's Mainline system in Virginia would occur within Transco's existing facility boundaries and/or rights-of-way. There would be no impacts on wetlands as a result of aboveground facility activities in Virginia, according to the EA. Transco would install equipment needed to handle odorized gas at compressor stations in Virginia. Specifically, certain facilities within the compressor stations would be modified to remove odorant from the gas stream before normal operational releases. Odorant would not be removed from the natural gas transported in Transco's pipeline

systems. Transco also would modify valve sites and meter and regulating stations between compressor stations in Virginia to install facilities that manage odorized gas and filter odorant from the gas stream before any planned release. Transco would also add facilities that analyze odorant levels.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the Coastal Zone Management Act (CZMA) of 1972, as amended (16 USCA, CZMA § 307, § 1456(c)(3)(A)) and its implementing federal consistency regulations (15 CFR Part 930, subpart D), any applicant for a required listed federal license or permit to conduct an activity, in or outside of the coastal zone, affecting any land or water use or natural resource of the coastal zone of the Commonwealth shall provide in the application to the licensing or permitting agency a certification that the proposed activity complies with the enforceable policies of the Virginia Coastal Zone Management Program (VCP) and that such activity will be conducted in a manner consistent with the program. At the same time, the applicant shall furnish to DEQ a copy of the certification with all necessary information and data. The Commonwealth has six months after receipt of a complete Federal Consistency Certification (FCC) to concur or object to the applicant's finding of project consistency with the VCP. The VCP is comprised of a network of programs administered by several agencies. In order to be consistent with the VCP, all the applicable permits and approvals listed under the enforceable policies of the VCP must be obtained prior to commencing the project.

Insufficient Information to Commence a Federal Consistency Review

The draft EA and the information submitted on June 24, 2014, by Ecology and Environment, Inc. (from Woody Speed via email) does not contain sufficient information to perform a federal consistency review pursuant to the Coastal Zone Management Act (CZMA) of 1972, as amended (16 USCA, CZMA § 307, § 1456(c)(3)(A)) and its implementing federal consistency regulations (15 CFR Part 930, subpart D). DEQ OEIR notified Ecology and Environment, Inc. (telephone conversation and via email on June 25, 2014) that the information provided was not a FCC. The draft EA (page 120) indicates that Transco has initiated consultation with DEQ regarding federal consistency. DEQ OEIR disagrees with this assessment since sufficient information to begin a coordinated review has not been received.

ENVIRONMENTAL IMPACTS AND MITIGATION

1. Water Quality and Wetlands. The EA (page 66) states that there would be no impacts on wetlands as a result of aboveground facility activities in Virginia.

1(a) Agency Jurisdiction. The State Water Control Board promulgates Virginia's

water regulations, covering a variety of permits to include Virginia Pollutant Discharge Elimination System Permit (VPDES), Virginia Pollution Abatement Permit, Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit. The VWP Permit is a state permit which governs wetlands, surface water and surface water withdrawals and impoundments. It also serves as § 401 certification of the federal Clean Water Act § 404 permits for dredge and fill activities in waters of the United States. The VWP Permit Program is under the Office of Wetlands and Water Protection and Compliance within the DEQ Division of Water Quality Programs. In addition to central office staff who review and issue VWP Permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities.

1(b) Agency Findings. The DEQ Northern Regional Office (NRO) states that based on the information provided, it appears the project will not impact streams or wetlands. However, a VWP Permit from DEQ may be required should impacts to surface waters be necessary.

1(c) Agency Recommendations. DEQ NRO recommends the avoidance and minimization of surface water impacts to the maximum extent practicable as well as coordination with the U.S. Army Corps of Engineers.

2. Subaqueous Lands Impacts. The EA does not address subaqueous lands impacts.

2(a) Agency Jurisdiction. The Virginia Marine Resources Commission (VMRC) regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to Virginia Code § 28.2-1200 through 1400.

The VMRC serves as the clearinghouse for the Joint Permit Application (JPA) used by the:

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

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

2(b) Agency Comments. VRMC states that if any portion of the project involves any encroachments channelward of ordinary high water along natural rivers and streams above the fall line or mean low water below the fall line, a permit may be required. Any

jurisdictional impacts will be reviewed by VMRC during the JPA process.

2(c) Agency Recommendation. Coordinate with the VMRC regarding the submittal of a JPA.

3. Erosion and Sediment Control and Stormwater Management. The EA (page 42) indicates that the project would adhere to erosion and sediment controls.

3(a) Agency Jurisdiction. Effective July 1, 2013, the DEQ Water Division administers the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and the Virginia Stormwater Management Law and Regulations (VSWML&R).

3(b) Erosion and Sediment Control and Stormwater Management Project-Specific Plans. Implementation of the project must adhere to the applicable requirements of the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and the Virginia Stormwater Management Law and Regulations (VSWML&R).

3(c) General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (VAR10). DEQ is responsible for the issuance, denial, revocation, termination and enforcement of the General VPDES Permit for Discharges of Stormwater from Construction Activities (previously known as General Permit for Discharges of Stormwater from Construction Activities or Virginia Stormwater Management Program (VSMP) permit) for the control of stormwater discharges regulated under the VSWMA and the Virginia Stormwater Management Program (VSMP) Regulations.

Accordingly, the operator or owner of a construction activity involving land disturbance of equal to or greater than 1 acre is required to register for coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Regulations. General information and registration forms for the General Permit are available at www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPermits/ConstructionGeneralPermit.aspx.

4. Air Quality. According to the EA (page 141), permit modifications would not be required for work at existing compressor stations 165, 170, 175, 180, and 185 in Virginia.

4(a) Agency Jurisdiction. The DEQ Air Division, on behalf of the State Air Pollution Control Board, is responsible for developing regulations that implement Virginia's Air

Pollution Control Law. DEQ is charged with carrying out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate DEQ regional office is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance. As a part of this mandate, EIRs of projects to be undertaken in the state are also reviewed. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

4(b) Ozone Area Status. According to the DEQ Air Division, the project sites in Fairfax, Prince William and Culpeper counties are located in ozone nonattainment or ozone maintenance and emission control areas for volatile organic compounds (VOCs) and nitrogen oxides (NO_x). Fauquier, Louisa, Buckingham, Appomattox, Campbell, Fluvanna, Orange and Pittsylvania County are in ozone attainment areas.

4(c) Requirements.

4(c)(i) Emissions. All precautions are to be taken to restrict the emissions of VOCs and NO_x in Fairfax, Prince William and Culpeper counties.

4(c)(ii) Open Burning. If the implementation of the project includes the burning of vegetative debris, this activity must meet the requirements under 9VAC5-130 *et seq.* of the regulations for open burning, and it may require a permit. The regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. Contact the appropriate locality to determine what local requirements, if any, exist.

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

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

4(c)(iv) Fuel-Burning Equipment. Fuel-burning equipment (generators, compressors, etc.) or any other air-pollution-emitting equipment may be subject to registration or permitting requirements.

4(d) Agency Recommendation. Contact the appropriate DEQ regional prior to construction if fuel-burning equipment will be utilized and to determine if permit modifications are necessary for work proposed at existing facilities in Virginia.

5. Solid and Hazardous Wastes. The EA (page 121) indicates that a database search was conducted and Transco has developed an *Unanticipated Discovery of Contamination Plan*.

5(a) Agency Jurisdiction. Solid and hazardous wastes in Virginia are regulated by DEQ, the Virginia Waste Management Board and the U. S. Environmental Protection Agency. They administer programs created by the federal Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response Compensation and Liability Act (CERCLA), commonly called Superfund, and the Virginia Waste Management Act. DEQ administers regulations established by the Waste Management Board and reviews permit applications for completeness and conformance with facility standards and financial assurance requirements. All Virginia localities are required, under the Solid Waste Management Planning Regulations, to identify the strategies they will follow on the management of their solid wastes to include items such as facility siting, long-term (20-year) use and alternative programs such as materials recycling and composting.

5(b) Data Files and Databases. The DEQ Division of Land Protection and Revitalization (DLPR) (formerly the Waste Division) states that the EA addresses potential solid and hazardous waste issues. DEQ DLPR reviewed the submittal and acknowledges the search of federal and state databases by Transco.

5(c) Agency Recommendations.

- DEQ encourages all projects and facilities to implement pollution prevention principles, including:
 - the reduction, reuse and recycling of all solid wastes generated; and
 - the minimization and proper handling of generated hazardous wastes.
- Ensure that the analysis in the final EA includes an investigation on and near the proposed project locations in Virginia to identify any associated solid or hazardous waste sites or issues.

- Analyze the data in the following web-based databases to determine if the project would affect or be affected by any sites identified in the databases, which are available online at <http://www.deq.virginia.gov/Programs/LandProtection/Revitalization/ReportsPublications/OriginalReports.aspx> (details attached): Permitted Solid Waste Management Facilities, Virginia Environmental Geographic Information Systems (Solid Waste, Voluntary Remediation Program, and Petroleum Release sites), CERCLA Facilities, and Hazardous Waste Facilities databases.

6. Natural Heritage Resources. The EA (page 89) states that modification to aboveground facilities would not significantly affect wildlife habitat. However, the EA (page 89) does not provide detailed analysis to support its conclusion. There is no evidence within the EA narrative (Section 2.3) that state-listed species or significant habitat in Virginia were independently evaluated for potential impacts resulting from the proposed action. FERC recommends that the FERC Commission Order include Condition 17 (page 216) requiring that Transco file with the FERC Secretary any outstanding survey results for state-listed species and identify any additional mitigation measures developed in consultation with the applicable state agencies.

6(a) Agency Jurisdiction.

6(a)(i) Natural Heritage Resources. The mission of the Department of Conservation and Recreation is to conserve Virginia's natural and recreational resources. DCR supports a variety of environmental programs organized within seven divisions including the Division of Natural Heritage (DNH). DNH's mission is conserving Virginia's biodiversity through inventory, protection, and stewardship. The Virginia Natural Area Preserves Act, 10.1-209 through 217 of the *Code of Virginia*, was passed in 1989 and codified DCR's powers and duties related to statewide biological inventory: maintaining a statewide database for conservation planning and project review, land protection for the conservation of biodiversity, and the protection and ecological management of natural heritage resources (the habitats of rare, threatened and endangered species, significant natural communities, geologic sites, and other natural features).

6(a)(ii) Threatened and Endangered Plant and Insect Species. The Endangered Plant and Insect Species Act of 1979, Chapter 39, §3.1-102- through 1030 of the Code of Virginia, as amended, authorizes the Virginia Department of Agriculture and Consumer Services (VDACS) to conserve, protect and manage endangered species of plants and insects. VDACS Virginia Endangered Plant and Insect Species Program personnel cooperates with the U.S. Fish and Wildlife Service (FWS), DCR DNH and other agencies and organizations on the recovery, protection or conservation of listed threatened or endangered species and designated plant and insect species that are rare throughout their worldwide ranges. In those instances where recovery plans, developed by the U.S. FWS, are available, adherence to the order and tasks outlined in

the plans are followed to the extent possible. VDACS has regulatory authority to conserve rare and endangered plant and insect species through the Virginia Endangered Plant and Insect Species Act. Under a Memorandum of Agreement established between the VDACS and DCR, DCR has the authority to report for VDACS on state-listed plant and insect species.

6(b) Agency Findings. DCR DNH searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

6(b)(i) Brookneal; Virginia Fibre; MLV 180-15; MLV 165-20; Valve Site 175-10; Lousia Road; Boswells Tavern. According to the information currently in DCR DNH's files, natural heritage resources have not been documented within two miles of the project boundary. The absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks natural heritage resources.

6(b)(ii) Gordonsville; MLV 175-20; Valve Site 185-13. The Biotics Data System historically documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, DCR DNH does not anticipate that this project will adversely impact these natural heritage resources.

6(b)(iii) Alta Vista Meter Station; Bull Run; Compressor Station 185; Compressor Station 165; Compressor Station 170; Compressor Station 175; Fredericksburg; Lynchburg; MLV 180-20; MLV 185-10. The Biotics Data System documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, DCR DNH does not anticipate that this project will adversely impact these natural heritage resources.

6(b)(iv) Herndon. According to the information currently in DCR DNH's files, the Difficult Run – Stream Valley Park Stream Conservation Unit (SCU) is located downstream from the project area. SCUs identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Difficult Run – Stream Valley Park SCU has been given a biodiversity ranking of B5, which represents a site of general biodiversity. The natural heritage resource associated with this site is the Wood turtle (*Glyptemys insculpta*, G3/S2/NL/LT).

6(b)(iv)(a) Wood Turtle. The Wood turtle ranges from southeastern Canada, south to

the Great Lake states and New England. In Virginia, it is known from northern counties within the Potomac River drainage (NatureServe, 2009). The Wood turtle inhabits areas with clear streams with adjacent forested floodplains and nearby fields, wet meadows, and farmlands (Buhlmann et al., 2008; Mitchell, 1994). Since this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994). Threats to the wood turtle include habitat fragmentation, urbanization, and automobile or farm machinery mortality (Buhlmann et al., 2008). The Wood turtle is currently classified as threatened by the Department of Game and Inland Fisheries (DGIF).

6(b)(iv)(b) Difficult Run. In addition, Difficult Run has been designated by the DGIF as a Threatened and Endangered Species Water with the Wood turtle as the associated species.

6(b)(v) Scottsville. According to the information currently in DCR DNH's files, the Hardware River SCU is located downstream from the project area. The Hardware River SCU has been given a biodiversity ranking of B2, which represents a site of very high significance. The natural heritage resource associated with this site is:

- *Pleuroberma collina*, James spiny mussel, G1/S1/LE/LE

6(b)(v)(a) James Spiny mussel. The James spiny mussel is a freshwater mussel endemic to Virginia and is known from the James and Roanoke River watersheds. It occurs in a variety of substrata, ranging from sand and silt mixtures to gravel and sand mixed with rubble, and in a variety of flow regimes (Clarke & Neves, 1984; Hove & Neves, 1994). It is now restricted to small headwater streams of this watershed (Neves, 1991).

Threats to the James spiny mussel include competition with the exotic clam (*Corbicula fluminea*), erosion and sedimentation from logging, road construction, and livestock grazing, sewage effluent, and water quality degradation (Neves, 1991). Please note that this species is currently classified as endangered by the FWS and DGIF.

6(b)(v)(b) Hardware River. Hardware River has been designated by DGIF as a Threatened and Endangered Species Water for the James spiny mussel.

6(b)(v)(c) Bear Garden. According to the information currently in DCR DNH's files, the James River at Scottsville Stream Conservation Unit is downstream from the proposed project area. The James River at Scottsville SCU has been given a biodiversity ranking of B4, which represents a site of moderate significance. The natural heritage resource associated with this site is:

- *Lasmigona subviridis*, Green floater, G3/S2/NL/LT

The Green floater, a rare freshwater mussel, ranges from New York to North Carolina in the Atlantic Slope drainages, as well as the New and Kanawha River systems in Virginia and West Virginia (NatureServe, 2009). In Virginia, there are records from the New, Roanoke, Chowan, James, York, Rappahannock, and Potomac River drainages. Throughout its range, the Green floater appears to prefer the pools and eddies with gravel and sand bottoms of smaller rivers and creeks, smaller channels of large rivers (Ortman, 1919) or small to medium-sized streams (Riddick, 1973). Please note that this species has been listed as state threatened by the Virginia Department of Game and Inland Fisheries (VDGIF). Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.

6(b)(vi) Prince William. According to the information currently in DCR DNH's files, the Broad Run SCU is downstream of the project area. The Broad Run SCU has been given a biodiversity significance ranking of B3, which represents a site of high significance. The natural heritage resources of concern associated with this SCU are:

- *Alasmidonta varicose*, Brook floater, G3/S1/NL/LE
- *Elliptio lanceolata*, Yellow lance, G2G3/S2S3/SOC/NL

6(b)(vi)(a) Brook Floater. The Brook floater, a small freshwater mussel species, is known from the northeastern United States primarily in the Atlantic Slope drainages (NatureServe, 2009). In Virginia, it is recorded from the Potomac River basin with a possible record from the James River. Of 14 documented records in Virginia, only two are thought to be viable. Population declines have been documented throughout its range (NatureServe, 2009). The Brook floater typically inhabits flowing-water habitats in and near riffles and rapids of smaller creeks with rocky or gravelly substrates (Nedeau et al., 2000 per NatureServe, 2009). Many facets of its life history are unknown including its fish host. Threats for the Brook floater in particular include poor water quality as this species does not tolerate silt or nutrient pollution well (Stevenson and Bruenderman, 1995). This species is currently listed as endangered by DGIF.

6(b)(vi)(b) Yellow Lance. The Yellow lance occurs in mid-sized rivers and second and third order streams. To survive, it needs a silt-free, stable streambed and well-oxygenated water that is free of pollutants. This species has been the subject of taxonomic debate in recent years (NatureServe, 2009). Currently in Virginia, the Yellow lance is recognized from populations in the Chowan, James, York, and Rappahannock drainages. Its range also extends into Neuse-Tar river system in North Carolina. In recent years, significant population declines have been noted across its range

(NatureServe, 2009). This species is currently classified as a species of concern by the FWS; however, this designation has no official legal status.

6(b)(vi)(c) Broad Run. Broad Run has been designated by DGIF as a Threatened and Endangered Species Water for the Brook floater.

6(b)(vii) Existing Launcher Site, Campbell County.

6(b)(vii)(a) Orangefin Madtom. According to the information currently in DCR DNH's files, the Orangefin madtom (*Noturus gilberti*, G2/S2/SOC/LT) has been historically documented downstream in the Roanoke River. The Orangefin madtom is native to the Roanoke and James River systems of North Carolina and Virginia (NatureServe, 2009).

The Orangefin madtom inhabits moderate to strong riffles and runs having little or no silt in moderate-gradient, intermontane and upper Piedmont streams. This species is an intersticine dweller, found in or near cavities formed by rubble and boulders (Jenkins and Burkhead, 1993). This species is currently classified as a species of concern (not a legal designation) by FWS and as threatened by DGIF. Threats to the Orangefin madtom include channelization, siltation, various forms of chronic pollution, catastrophic chemical spills, impoundment, dewatering, and bait-seining (NatureServe, 2009). Its low reproductive rate and short life span (Simonson 1997, Simonson and Neves 1992, Simonson 1987) exacerbate these threats (Burkhead and Jenkins 1991).

6(b)(vii)(b) Roanoke River. The Roanoke River has been designated by DGIF as a Threatened and Endangered Species Water for the Orangefin madtom.

6(b)(viii) Antioch.

6(b)(viii)(a) Aquatic Natural Communities. According to the information currently in DCR DNH's files, the Middle Fork Cunningham Creek Stream Conservation Unit is located downstream of the project area. The Middle Fork Cunningham SCU has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resources of concern associated with this SCU are:

- Aquatic Natural Community, G1G2/S1S2/NL/NL
- Aquatic Natural Community, G1G2/S1S2/NL/NL

The documented Aquatic Natural Community is based on Virginia Commonwealth University's (VCU) INSTAR (*Interactive Stream Assessment Resource*) database which includes over 2,000 aquatic (stream and river) collections statewide for fish and macroinvertebrate. These data represent fish and macroinvertebrate assemblages, instream habitat, and stream health assessments. The associated Aquatic Natural Communities are significant on multiple levels. First, these streams are a grade B, as per the VCU-Center for Environmental Sciences (CES), indicating their relative regional

significance, considering the aquatic community composition and the present-day conditions of other streams in the region. These stream reaches also hold as a "Healthy" stream designation as per the INSTAR Virtual Stream Assessment (VSS) score. This score assesses the similarity of this stream to ideal stream conditions of biology and habitat for this region. Lastly, this stream contributes to high Biological Integrity at the watershed level (6th order) based on number of native/non-native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present. Threats to these significant Aquatic Natural Communities and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species.

6(b)(ix) Compressor Station 180. According to the information currently in DCR DNH's files, the Mountain Run-Mill Run SCU is located adjacent to the project area. The Mountain Run-Mill Run SCU has been given a biodiversity significance ranking of B3, which represents a site of very high significance. The natural heritage resource of concern associated with this SCU is:

- Aquatic Natural Community, G2/S2/NL/NL

The documented Aquatic Natural Community is based on VCU's INSTAR (Interactive Stream Assessment Resource) database. The associated Aquatic Natural Community is significant on multiple levels. First, this stream is a grade B, as per the VCU-Center for Environmental Sciences (CES), indicating its relative regional significance, considering its aquatic community composition and the present-day conditions of other streams in the region. This stream reach also holds as a "Healthy" stream designation as per the INSTAR Virtual Stream Assessment (VSS) score. This score assesses the similarity of this stream to ideal stream conditions of biology and habitat for this region. Lastly, this stream contributes to high Biological Integrity at the watershed level (6th order) based on number of native/non-native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present. Threats to the significant Aquatic Natural Community and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species.

6(b)(x) Marsh Run and Remington.

6(b)(x)(a) Dwarf Wedgemussel. According to the information currently in DCR DNH's files, the Dwarf wedgemussel has been historically documented in Marsh Run. The Dwarf wedgemussel grows to a length of approximately 30 mm. This species inhabits creeks of varying sizes, residing in muddy sand, sand, and gravel bottoms, in areas of slow to moderate current and little silt deposition (USFWS, 1993). Currently, this species exists in widely scattered, small populations in the Chowan, James, York, Rappahannock, and Potomac River drainages. Its native host fishes include Mottled

sculpin (*Cottus bairdi*), Johnny darters (*Etheostoma nigrum*), Tessellated darters (*Etheostoma olmstedi*) and Sculpins (*Cottus* sp.) (Michaelson and Neves, 1995). Please note that this species is currently classified as endangered by the FWS and DGIF.

6(b)(x)(b) Upland Sandpiper. Upland sandpiper (*Bartramia longicauda*, G5/S1B/NL/LT) has been historically documented in the project vicinity. Upland sandpipers breeds from Alaska, across most of Canada and south into northern and central United States (Bazuin, 1991). They nest in open farming areas with mixed habitats that include medium-height grasses and fallow or early-stage old-fields (Bazuin, 1991). Plowed fields and/or short grass, heavily grazed pastures, or sod farms, as well as airports, are also used, especially during migration (Bazuin, 1991). The nest is a cup pressed into the roots of a clump of grass or a slight hollow scooped in the ground and lined with fine grasses in dense growth. This species is currently classified as threatened by DGIF. Threats to the Upland sandpiper include loss of nesting habitat as preferred field habitats are changed to other land uses such as development (Bazuin, 1991). Also, as a ground-nesting species, this species may face increasing predation pressure as areas are more urbanized and fragmented.

6(b)(xi) Nokesville.

6(b)(xi)(a) Kettle Run SCU. According to the information currently in DCR DNH's files, the Kettle Run SCU is located adjacent to the project area. The Kettle Run SCU has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resource of concern associated with this SCU is:

- Aquatic Natural Community, G2/S2/NL/NL

6(b)(xi)(b) Aquatic Natural Community. The documented Aquatic Natural Community is based on VCU's INSTAR (*Interactive Stream Assessment Resource*) database. The associated Aquatic Natural Community is significant on multiple levels. First, this stream is a grade B, as per the VCU-Center for Environmental Sciences (CES), indicating its relative regional significance, considering its aquatic community composition and the present-day conditions of other streams in the region. This stream reach also holds as a "Healthy" stream designation as per the INSTAR Virtual Stream Assessment (VSS) score. This score assesses the similarity of this stream to ideal stream conditions of biology and habitat for this region. Lastly, this stream contributes to high Biological Integrity at the watershed level (6th order) based on number of native/non-native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present. Threats to the significant Aquatic Natural Community and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species.

6(b)(xii) Valve Site 185-05 and Valve Site Cove Point. According to the information currently in DCR DNH's files, Purple milkweed (*Asclepias purpurascens*, G5/S2/NL/NL) has been documented in the project areas (Bull Run Loop and Replacement of Transco's Mid -Atlantic Connector MP 1586.2-treeline along the western edge of the powerline right-of-way and milepost 1586.1-southern edge of the maintained right-of-way). Purple milkweed occurs in prairies, woodland openings/edges, and thickets, and in wet situations as well as on dry, rocky ridgetops, along roadsides and rights-of-way (NatureServe, 2004). The plant flowers in June and July. It occurs in eastern North America from Ontario and New Hampshire south to Georgia and west as far as South Dakota and Texas. However, distribution is spotty in parts of the range, especially along the northeastern seaboard, in the southeast (Virginia to Mississippi), and in the northern midwest. Purple milkweed is currently known from 9 locations in Virginia.

6(b)(xiii) Pleasant Valley Interconnect.

6(b)(xiii)(a) Cub Run SCU and Wood Turtle. According to the information currently in DCR DNH's files, the Cub Run SCU is located downstream of the project area. The Cub Run SCU has been given a biodiversity ranking of B5, which represents a site of general biodiversity. The natural heritage resource associated with this site is:

- *Glyptemys insculpta*, Wood turtle, G3/S2/NL/LT

Cub Run has also been designated by DGIF as a Threatened and Endangered Species Water for the Wood turtle.

6(b)(xiii)(b) Stiff Goldenrod. Stiff goldenrod (*Solidago rigida* var. *rigida*, G5T5/S2/NL/NL) has historically been documented within or immediately adjacent to the project area. Stiff goldenrod is a species of goldenrod that ranges from Rhode Island, Connecticut, western Massachusetts and New York, south to Georgia, and west to Minnesota and Missouri. Stiff goldenrod is a perennial herb that grows in the spring and summer, and blooms in the late summer. This plant is considered imperiled in Virginia (NatureServe, 2009). This occurrence of Stiff goldenrod has not been field verified since 1990.

6(b)(xiii)(c) Elklick Woodlands Natural Area Preserve. The Elklick Woodlands Natural Area Preserve has been documented within two miles of the project boundary. However, due to the scope of the activity proposed, DCR does not anticipate any negative impacts to the natural area preserve and associated natural heritage resources.

6(b)(xiv) Potomac South. According to the information in DCR DNH's files, the Potomac River- Yellow Falls Stream Conservation Unit is adjacent to the project area.

The Potomac River – Yellow Falls SCU has been given a biodiversity ranking of B3, which represents a site of high significance. The natural heritage resources associated with this site are:

- *Gomphus fraternus*, Midland clubtail, G5/S2/NL/NL
- Aquatic Natural Community, G2/S2/NL/NL
- Aquatic Natural Community, G3/S3S4/NL/NL

6(b)(xiv)(a) Adult Odonata. Adult Odonata (dragonflies and damselflies), commonly seen flitting and hovering along the shores of most freshwater habitats, are accomplished predators. Adults typically forage in clearings with scattered trees and shrubs near the parent river. They feed on mosquitoes and other smaller flying insects, and are thus considered highly beneficial. Odonates lay their eggs on emergent vegetation or debris at the water's edge. Unlike the adults, the larvae are aquatic and typically inhabit the sand and gravel substrates. Wingless and possessing gills, the larvae crawl about the submerged leaf litter and debris stalking their insect prey. The larvae seize unsuspecting prey with a long, hinged "grasper" that folds neatly under their chin. When larval development is complete, the aquatic larvae crawl from the water to the bank, climb up the stalk of the shoreline vegetation, and the winged adult emerges (Hoffman 1991; Thorpe and Covich 1991). Because of their aquatic lifestyle and limited mobility, the larvae are particularly vulnerable to shoreline disturbances that cause the loss of shoreline vegetation and siltation. They are also sensitive to alterations that result in poor water quality, aquatic substrate changes, and thermal fluctuations.

6(b)(xiv)(b) Aquatic Natural Communities. The documented Aquatic Natural Communities are based on VCU's INSTAR (Interactive Stream Assessment Resource) database. The associated Aquatic Natural Communities are significant on multiple levels. First, these streams are a grade B, per the VCU-Center for Environmental Sciences (CES), indicating its relative regional significance, considering its aquatic community composition and the present-day conditions of other streams in the region. These stream reaches also hold a "Healthy" stream designation per the INSTAR Virtual Stream Assessment (VSS) score. This score assesses the similarity of this stream to ideal stream conditions of biology and habitat for this region. Lastly, these streams contribute to high Biological Integrity at the watershed level (6th order) based on number of native/non-native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present. Threats to these significant Aquatic Natural Communities and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species.

6(b)(xiv)(c) Nichols Run and Unnamed Tributary of Potomac River 1 and 2. Nichols Run and Unnamed Tributary of Potomac River 1 and 2 are within two miles of the

project area and have been designated as Threatened and Endangered Species Waters for the Wood turtle by DGIF.

6(b)(xiv)(d) Sugarland Run. According to the information currently in DCR DNH's files, Sugarland Run designated by DGIF as a Threatened and Endangered Species Water for the Wood turtle is within two miles of the Valve Site 185-13 project area.

6(c) VDACS Response. VDACS states that it concurs with DCR's comments regarding state-listed plant and insect species.

6(d) Threatened and Endangered Plant and Insect Species. DCR finds that the current activity will not affect any documented state-listed plant and insect species.

6(e) Agency Recommendations.

- FERC should ensure that Transco adequately considers DCR DNH's recommendations listed below and reports coordination and inventory results when satisfying Condition 17 of the Commission's Order.
- Contact the DCR DNH and resubmit project information if the scope of the project changes and/or six months has passed before it is utilized.
- Implement and strictly adhere to applicable state and local erosion and sediment control and stormwater management laws and regulations, establish or enhance riparian buffers with native plant species and maintain natural stream flow to minimize adverse impacts to the aquatic ecosystem.
- Coordinate with DGIF due to the legal status of the Wood turtle, James spiny mussel, Green floater, Brook floater, Orange fin madtom, Dwarf wedgemussel and Upland sandpiper to ensure compliance with the Virginia Endangered Species Act (Code of Virginia §§ 29.1-563 – 570).
- Coordinate with the FWS regarding species under its jurisdiction (if not already completed).
- Avoid the documented occurrences of natural heritage resources and implement maintenance activities, including the use of a native seed mix free of invasive species, when re-vegetating the project area to minimize impacts at the Valve Site 185-05 and Valve Site Cove Point.
- Conduct an inventory for natural heritage resources at the Pleasant Valley Interconnect facility due for the potential for this site to support rare plants.
 - With the survey results, DCR DNH can more accurately evaluate potential

impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources. DCR DNH biologists are qualified and available to conduct inventories for rare, threatened, and endangered species.

7. Wildlife Resources. The EA (page 87) states that Transco obtained a blanket authorization from the Virginia Field Office of the FWS providing concurrence that activities associated with modifications to existing aboveground facilities would not affect listed species. There is no evidence within the EA narrative (Section 2.3) that state-listed species in Virginia were independently evaluated for potential impacts resulting from the proposed action. FERC recommends that the FERC Commission Order include Condition 17 (page 216) requiring that Transco file with the FERC Secretary any outstanding survey results for state-listed species and identify any additional mitigation measures developed in consultation with the applicable state agencies.

7(a) Agency Jurisdiction. DGIF, as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state- or federally-listed endangered or threatened species, but excluding listed insects (*Virginia Code Title 29.1*). DGIF is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 *et seq.*) and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce or compensate for those impacts. For more information, see the DGIF website at www.dgif.virginia.gov.

7(b) Agency Comments. DGIF states that without additional time and better location information (shapefiles, site maps) for the affected sites in Virginia, it cannot provide any comments regarding impacts upon listed species.

7(c) Agency Recommendations.

- FERC should ensure that Transco adequately considers DGIF's recommendations listed below and reports coordination results when satisfying Condition 17 of the Commission's Order.
- Coordinate with DGIF due to the legal status of the following species as identified by DCR DNH: the Wood turtle, James spiny mussel, Green floater, Brook floater, Orange-fin madtom, Dwarf wedgemussel and Upland sandpiper. Coordinate with DGIF about any known listed species and resources known from the project areas.
- Evaluate results from DGIF's database (<http://vafwis.org/fwis/>) of wildlife locations, including threatened and endangered species, trout streams and

anadromous fish waters, to determine potential impacts of the proposed action in Virginia on wildlife resources.

- Submit shapefiles of proposed project sites in Virginia to DGIF to assist in the agency's review.

8. Historic and Archaeological Resources. The EA (page 134) indicates that FERC is required to consider impacts to historic resources.

8(a) Agency Jurisdiction. The Department of Historic Resources (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation at 36 CFR Part 800. The preservation act requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as licenses, permits, approvals or funding. DHR also provides comments to DEQ through the state EIR review process.

8(b) Agency Comments. DHR has been in consultation with FERC and its applicant regarding this project.

8(c) Requirement. Continue to consult directly with DHR, as necessary, pursuant to Section 106 of the National Historic Preservation Act (as amended) and its implementing regulations codified at 36 CFR Part 800 which require Federal agencies to consider the effects of their undertakings on historic properties.

9. Forest Resources. The EA (page 79) indicates that modifications at the existing sites are not expected to require tree clearing.

9(a) Agency Jurisdiction. The mission of the Department of Forestry (DOF) is to protect and develop healthy, sustainable forest resources for Virginians. DOF was established in 1914 to prevent and suppress forest fires and reforest bare lands. Since the Department's inception, it has grown and evolved to encompass other protection and management duties including: protecting Virginia's forests from wildfire, protecting Virginia's waters, managing and conserving Virginia's forests, managing state-owned lands and nurseries, and managing regulated incentive programs for forest landowners.

9(b) Agency Comments. DOF did not respond to DEQ's request for comments.

9(c) Agency Recommendations. DEQ recommends that the following information be used to determine impacts to trees and forests when developing the final EA document.

Checklist for Forestland Protection

	Yes	No	Source and Date of Information
1. Have the Land Capability Classes (LCC) of the soils present in the impacted forest been identified? (The NRCS Web Soil Survey can be used to determine this information (http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm))			
2. Does the forestland possess a combination of physical characteristics important to the production of forest products with minimal inputs of fuel, fertilizers, pesticides, and labor and not be subject to intolerable erosion? (Contact the Agricultural Extension Agent for the county, city, or town)**			
3. Is the forestland valuable for the production of forest products and have a special combination of soil quality, slope, aspect, moisture supply, and species composition needed to economically produce sustained high quality or high yields of forest products when managed according to accepted silvicultural principles? (Contact the Agricultural Extension Agent for the county, city, or town)**			
4. Is the forestland of statewide or local importance in the production of forest products? (Contact the Department of Forestry Forestland Conservation Division at (434) 977-6555)			
5. Has the forestland been recognized under any state award or forestry recognition programs? (Contact VDACS (804-786-2373) about Century Farms, DCR (804-786-9333) about Clean Water Farm Award, Department of Forestry Forest Management Division for other forestry recognition programs at (434) 977-6555)			
6. Is the property part of an agricultural or forestal district or participating in use value assessment and taxation for real estate devoted to forest use? (Contact local county government)			
7. Does the forestland make a significant contribution to the local economy or the rural character of the area where the land is located? (Contact the Department of Forestry Forestland Conservation Division at (434) 977-6555)			
8. Does the preferred route or project site minimize the permanent loss of forestland?			

<p>9. Is the impacted forestland found in a watershed that is important to a municipal water supply or is adjacent to waterways with TMDL (Total Maximum Daily Load) limits? (Contact DCR at 804-786-3999 or county, city or town planners and/or review www.na.fs.fed.us/watershed/pdf/socf/Appendix%20F_Water%20Supply.pdf)</p>			
<p>10. Has the importance of the forestland in providing ecosystem services and benefits (for example, water quality, water supply, air quality, biodiversity) been evaluated? (Use the InFOREST ecosystem service calculators to assist with this (http://inforest.frec.vt.edu/))</p>			
<p>11. Is the impacted forestland covered under a conservation easement? (Use the InFOREST application mapping tool to locate conserved properties (http://inforest.frec.vt.edu/))</p>			
<p>12. Does the project impact Virginia Department of Forestry properties designated as State Forests? (Use the InFOREST application mapping tool to locate State Forests (http://inforest.frec.vt.edu/))</p>			
<p>13. Do local and state ordinances, county comprehensive plans, local watershed management plans, etc. support forestland conservation in the geographical area impacted by the major project? (Contact county, city or town planners)</p>			
<p>14. What is the Forest Conservation Value of the impacted forest? (Use the InFOREST application mapping tool to identify Forest Conservation Values (http://inforest.frec.vt.edu/))</p>			
<p>15. Does the major project impact any unique natural areas or species of interest? (Contact the Department of Forestry Forest Management Division at (434-977-6555) and Department of Conservation and Recreation Division of Natural Heritage (804-786-4554))</p>			

Characteristics to be considered when evaluating impacts on forestland

In preparing environmental impact reports, state agencies shall consider the following questions about the forestland being impacted by a major project.

1. What are the Land Capability Classes (LCC) of the soils present in the impacted forest? The capability class, which is influenced by slope, can be a major factor in evaluating forest productivity and identifying sensitive sites. For example, it is

important to retain forest cover on steep slopes which often have a LCC of V or VI.

2. Does the forestland possess a combination of physical characteristics important to the production of forest products with minimal inputs of fuel, fertilizers, pesticides, and labor and not be subject to intolerable erosion?
3. Is the forestland valuable for the production of forest products and have a special combination of soil quality, slope, aspect, moisture supply, and species composition needed to economically produce sustained high quality or high yields of forest products when managed according to accepted silvicultural principles?
4. Is the forestland of statewide or local importance in the production of forest products?
5. Has the forestland been recognized under state award or forest recognition programs? These could include Clean Water Farm Award, Century Farm Program, Soil and Water Conservation District Forestry Award, Certified Stewardship Forest, or a forest certification program such as Tree Farm, Sustainable Forestry Initiative, or Forest Stewardship Council?
6. Is the forestland part of an agricultural or forestal district or participating in use value assessment and taxation for real estate devoted to agricultural, horticultural, or forest use? The eligibility criteria for this can be found in VAC Article 4 (§ 58.1-3229 et seq.) of Chapter 32 of Title 58.1.
7. Does the forestland make a significant contribution to the local economy or the rural character of the area where the land is located?
8. Does the preferred route or project site minimize the permanent loss of forestland? Has forest fragmentation and the permanent loss of forestland been considered in the project site selection process and was a priority given to limiting forestland loss as much as possible?
9. Is the impacted forestland found in a watershed that is important to a municipal water supply or is adjacent to waterways with TMDL (Total Maximum Daily Load) limits? The focus here is on how forestland loss in a municipal water supply watershed impacts a localities water supply and water quality. Also, how does

forestland loss and associated changes to nutrient and sediment loading impact any existing TMDL?

10. What is the importance of the impacted forestland in providing forest ecosystem services and benefits such as water quality and water supply, air quality, carbon sequestration, and biodiversity?
11. Is the impacted forestland covered under a conservation easement? This information will help determine the value of the property in meeting long-term state conservation priorities.
12. Does the project impact DOF properties designated as State Forests? The focus here is how land use change in the proximity of a State Forest impacts forest management and forest recreational opportunities.
13. Do local and state ordinances, county comprehensive plans, local watershed management plans, etc. support forestland conservation in the geographical area impacted by the major project? This information again will help determine the value of the property in meeting long-term state conservation priorities.
14. What is the Forest Conservation Value (FCV) of the impacted forest? See the InFOREST User Manual for a full explanation of the importance of determining the FCV of the impacted forest.
15. Does the project impact any unique natural areas or species of interest? An example would be Longleaf pine or other forest types the Commonwealth is endeavoring to save or propagate.

9(d) Agency Recommendations.

- Coordinate the results of the checklist and characteristics questionnaire with DOF.
- Adhere to the following general recommendations to the extent feasible:
 - Protect trees not slated for removal from the effects of future construction activities. These trees should be marked and fenced at least to the drip line or the end of the root system, whichever extends farther from the stem. Marking should be done with highly visible ribbon so that equipment operators see the protected areas easily.

- Avoid parking and stacking heavy equipment and construction materials near trees because they can damage root systems by compacting the soil. Soil compaction, from weight or vibration, affects root growth, water and nutrient uptake, and gas exchange. The protection measures suggested above should be used for parking and stacking as well as for moving of equipment and materials. If parking and stacking are unavoidable, the contractors should use temporary crossing bridges or mats to minimize soil compaction and mechanical injury to plants.
- Stockpile soil should take place away from trees. Piling soil at a tree stem can kill the root system of the tree. Soil stockpiles should be covered, as well, to prevent soil erosion and fugitive dust.
- Leave trees in groupings or clusters to provide aesthetic and environmental benefits, as well as reducing costs associated with maintaining open space.

10. Public Water Supply. The EA does not specifically address water supplies in Virginia.

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

10(b) Agency Findings. The VDH ODW states that there are no apparent impacts to public drinking water sources due to this project. The following public groundwater wells are within a 1-mile radius of the project site:

- Falling River Country Club Drilled well is approximately 0.7 miles from Compressor Station 170.
- Tenaska Well 1 and Tenaska Well 2 are located approximately 0.44 miles from the project site Antioch Meter and Regulation Station.
- Battlefield Farms Well 1 is located approximately 0.3 miles from Compressor Station 180.

No public surface water intakes are located within a 5-mile radius of the project site. The project is not within Zone 1 (up to 5 miles into the watershed) of any public surface water sources.

11. Chesapeake Bay Preservation Act. The EA does not address Chesapeake Bay Preservation Areas.

11(a) Agency Jurisdiction. Effective July 1, 2013, the DEQ Water Division

administers the Chesapeake Bay Preservation Act (Virginia Code §62.1-44.15:67 – 62.1-44.15:78) and Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations).

11(b) Chesapeake Bay Preservation Areas. In Fairfax and Prince William counties, the areas protected by the Chesapeake Bay Preservation Act, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by the local government.

- RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores. RPAs also include a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow.
- RMAs, which require less stringent performance criteria, include one hundred year floodplains, highly erodible soils (including steep slopes), and a minimum 100-foot area landward of the inland boundary of the RPA.

11(c) Agency Findings. The DEQ Water Division states that based on the EA, the proposed project will involve minor modifications to existing compressor stations and existing meter and regulating stations in Prince William and Fairfax counties. Other localities in Virginia that are part of the scope of the overall project are not subject to the Chesapeake Bay Preservation Act and associated regulations.

11(d) Requirements. Section 9VAC25-830-150 of the Regulations exempt natural gas pipelines and their appurtenant structures on the condition that the construction, installation, operation and maintenance of such pipelines and structures are in accord with the following:

- regulations promulgated pursuant to the Erosion and Sediment Control Law and the Virginia Stormwater Management Law,
- an erosion and sediment control plan and a stormwater management plan approved by DEQ, or
- local water quality protection criteria at least as stringent as the above state requirements.

11(e) Conclusion. Land-disturbing activities associated with the proposed project in Prince William and Fairfax counties would be consistent with the Chesapeake Bay Preservation Act and the Regulations, provided the above referenced requirements (Item 11(d)) for exempt activities are met.

12. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning and on-site best management practices will help to ensure that environmental

impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design and operational procedures that will facilitate the reduction of wastes at the source.

12(a) Agency Recommendations. We have several pollution prevention recommendations that may be helpful during the construction:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to minimizing its environmental impacts, setting environmental goals and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure and building construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.

The DEQ Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques. If interested, please contact DEQ (Sharon Baxter at 804-698-4344).

13. Pesticides and Herbicides. In general, when pesticides or herbicides must be used, their use should be strictly in accordance with manufacturers' recommendations. In addition, DEQ recommends that the responsible agent use the least toxic pesticides or herbicides effective in controlling the target species. For more information on pesticide or herbicide use, please contact the Virginia Department of Agriculture and Consumer Services at (804) 786-3501.

14. Regional and Local Comments. As customary, DEQ invited the affected localities and planning district commissions to participate in the Commonwealth's environmental review of this proposal.

14(a) Agency Jurisdiction. In accordance with the Code of Virginia, Section 15.2-4207, planning district commissions encourage and facilitate local government cooperation and state-local cooperation in addressing, on a regional basis, problems of greater than local significance. The cooperation resulting from this is intended to

facilitate the recognition and analysis of regional opportunities and take account of regional influences in planning and implementing public policies and services. Planning district commissions promote the orderly and efficient development of the physical, social and economic elements of the districts by planning, and encouraging and assisting localities to plan, for the future.

14(b) Local Comments.

- Fairfax, Prince William, Fauquier, Culpeper, Louisa, Buckingham, Appomattox, Campbell and Pittsylvania counties were invited to participate in DEQ's review.
- Fluvanna County states that it has no comments on the project.
- Orange County states that it is unable to respond in a comprehensive and thoughtful manner to the proposed project. County staff did not have a reasonable amount of time to review and evaluate the 474-page document.

14(c) Local Recommendation. Orange County recommends that FERC and Transco adhere to all applicable local, state, and federal rules and regulations if the project proceeds.

14(d) Regional Comments. The West Piedmont Planning District Commission (PDC), Virginia 2000, Commonwealth Regional Council, Thomas Jefferson PDC, Rappahannock-Rapidan PDC and the Northern Virginia PDC were invited to comment.

REGULATORY AND COORDINATION NEEDS

1. Water Quality and Wetlands. DEQ regulates impacts to waters and wetlands pursuant to 9VAC25-210 *et seq.* If the proposed activities require impacts to wetlands or surface waters, contact the appropriate DEQ regional office (<http://www.deq.virginia.gov/Locations.aspx>) to ensure compliance with the Virginia Water Protection Program (VWPP).

2. Subaqueous Lands Impacts. Pursuant to section 28.2-1204 of the Code of Virginia, the VMRC has jurisdiction over any encroachments in, on or over any state-owned rivers, streams or creeks in the Commonwealth. Contact VMRC (Mike Johnson at Mike.Johnson@mrc.virginia.gov) regarding the submittal of a JPA.

3. Erosion and Sediment Control and Stormwater Management.

3(a) Erosion and Sediment Control Plan and Stormwater Management Plan. Implementation of the project must adhere to the requirements of the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and the Virginia Stormwater Management Law and Regulations (VSWML&R). Contact the DEQ Office of Stormwater Management (OSM) (Larry Gavan at Larry.Gavan@deq.virginia.gov) for additional information.

3(b) VSMP Regulation. The owner/operator of projects involving land-disturbing activities of equal to or greater than one acre is required to apply for registration coverage under the General Permit for Discharges of Stormwater from Construction Activities. The owner/operator must also develop a project-specific SWPPP. Specific questions regarding the Stormwater Management Program requirements should be directed to the DEQ Water Division (Holly Sepety at Holly.Sepety@deq.virginia.gov or 804-698-4039) (Reference: VSWML § 62.1-44.15 *et seq.*; VSMP §9VAC25-880 *et seq.*).

4. Air Quality Regulations. Construction and operation of the transmission lines are subject to air pollution control regulations administered by DEQ. All precautions are to be taken to restrict the emissions of VOCs and NO_x in Fairfax, Prince William & Culpeper counties. The following sections of Virginia Administrative Code may be applicable:

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

Contact the appropriate DEQ regional office (<http://www.deq.virginia.gov/Locations.aspx>) for additional information about air quality regulations and to determine air permitting or registration needs.

5. Solid Waste and Hazardous Substances. All soil that is suspected of contamination, solid waste, hazardous waste and hazardous materials must be managed in accordance with all applicable federal, state and local environmental regulations.

Applicable state regulations may include:

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

Applicable federal regulations may include:

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

Contact the appropriate DEQ regional office (<http://www.deq.virginia.gov/Locations.aspx>) for information on waste management.

6. Natural Heritage Resources.

- Contact the DCR DNH (804-371-2708) and resubmit project information if the scope of the project changes and/or six months has passed before it is utilized.
- Conduct an inventory for natural heritage resources at the Pleasant Valley Interconnect facility due for the potential for this site to support rare plants.
- Contact DCR DNH (J. Christopher Ludwig, Natural Heritage Inventory Manager, at chris.ludwig@dcr.virginia.gov or 804-371-6206) to discuss arrangements for field work.
- Coordinate with DCR DNH (Rene Hypes at Rene.Hypes@dcr.virginia.gov) regarding inventory results and coordination needs.

7. Wildlife Resources.

- DGIF's database may be accessed at <http://vafwis.org/fwis/> or by contacting DGIF (Gladys Cason at 804-367-0909 or Gladys.Cason@dgif.virginia.gov).
- Provide DGIF (Amy Ewing at Amy.Ewing@dgif.virginia.gov) with shapefiles and location maps for site-specific comments and recommendations.

8. Protected Species. The implementation of the project must comply with the Federal Endangered Species Act (16 U.S.C. sections 1531 *et seq.*) (as applicable), the Virginia protected species legislation (Virginia Code §29.1-563 *et seq.*) (as applicable) and the Virginia Endangered Plant and Insect Species Act of 1979 as amended (Chapter 39 of Virginia Code Section 3.1-1020 through 1030) (as applicable). Coordinate with FWS (Cindy Schulz at 804-693-6694 or cindy_schulz@fws.gov), DGIF (Amy Ewing at Amy.Ewing@dgif.virginia.gov), VDACS (Keith Tignor at Keith.Tignor@vdacs.virginia.gov) and DCR DNH (Rene' Hypes at Rene.Hypes@dcr.virginia.gov) regarding compliance with threatened and endangered species legislation.

9. Forest Resources. Coordinate with DOF (Gregory Evans at Gregory.Evans@dof.virginia.gov) regarding forest resources.

10. Historic Resources. Continue to consult directly with DHR (Roger Kirchen at Roger.Kirchen@dhr.virginia.gov), as necessary, pursuant to Section 106 of the National Historic Preservation Act (as amended) and its implementing regulations codified at 36 CFR Part 800 which require Federal agencies to consider the effects of their undertakings on historic properties.

11. Federal Consistency Certification. Transco must submit a federal consistency certification pursuant to the Coastal Zone Management Act (CZMA) of 1972, as amended (16 USCA, CZMA § 307, § 1456(c)(3)(A)) and its implementing federal consistency regulations (15 CFR Part 930, subpart D) to DEQ OEIR. Information on document submission is available at www.deq.virginia.gov/Programs/EnvironmentalImpactReview/DocumentSubmissions.aspx. Information on federal consistency certification is available at www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistencyReviews.aspx#cert. Attachment 1 provides a list of the enforceable policies of the VCP which must be addressed in the FCC. We encourage the applicant to consider the advisory policies of the VCP as well.

12. Chesapeake Bay Preservation Act. The project must satisfy the applicable requirements of the Chesapeake Bay Preservation Act (Virginia Code §62.1-44.15:67 – 62.1-44.15:78) and Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations). Section 9VAC25-830-150 of the Regulations exempt natural gas pipelines and their appurtenant structures on the condition that the construction, installation, operation and maintenance of such pipelines and structures are in accord with the following:

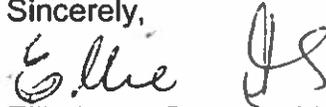
- regulations promulgated pursuant to the Erosion and Sediment Control Law and the Virginia Stormwater Management Law,
- an erosion and sediment control plan and a stormwater management plan approved by DEQ, or

- local water quality protection criteria at least as stringent as the above state requirements.

Contact DEQ (Daniel Moore at Daniel.Moore@deq.virginia.gov) for additional information as necessary.

Thank you for the opportunity to comment on the EA. Detailed comments of reviewing agencies are attached for your review. If you have questions, please do not hesitate to call me at (804) 698-4325 or Julia Wellman at (804) 698-4326.

Sincerely,



Ellie Irons, Program Manager
Environmental Impact Review

Enclosures

ec: Amy Ewing, DGIF
Keith Tignor, VDACS
Robbie Rhur, DCR
Barry Matthews, VDH
Steve Coe, DEQ ORP
Kotur S. Narasimhan, DEQ DAPC
Daniel Moore, DEQ NRO
Keith Flower, DEQ VRO
Mike Cholko, DEQ BRRO
Daniel Moore, DEQ
Larry Gavan, DEQ
Holly Septey, DEQ
Shantelle Nicholson, DEQ
Roger Kirchen, DHR
Gregory Evans, DOF
Mike Johnson, VMRC
Woody Speed, Ecology and Environment
Jessica Harris, FERC
Fred Selden, Fairfax County
Raymond Utz, Prince William County
Paul McCulla, Fauquier County
Frank Bossio, Culpeper County
Christian Goodwin, Louisa County

Gregg Zody, Orange County
Steven Nichols, Fluvanna County
Rebecca Carter, Buckingham County
Aileen Ferguson, Appomattox County
R. David Laurrell, Campbell County
Clarence Monday, Pittsylvania County
Leah Manning, West Piedmont PDC
Gary F. Christie, Virginia 2000
Mary Hickman, Commonwealth Regional Council
Chip Boyles, Thomas Jefferson PDC
Jeffrey Walker, Rappahannock-Rapidan PDC
Mark Gibb, Northern Virginia PDC



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

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Attachment 1

Enforceable Regulatory Programs comprising Virginia's Coastal Zone Management Program (VCP)

- a. **Fisheries Management** - The program stresses the conservation and enhancement of finfish and shellfish resources and the promotion of commercial and recreational fisheries to maximize food production and recreational opportunities. This program is administered by the Marine Resources Commission (VMRC) (Virginia Code §28.2-200 to §28.2-713) and the Department of Game and Inland Fisheries (DGIF) (Virginia Code §29.1-100 to §29.1-570).

The State Tributyltin (TBT) Regulatory Program has been added to the Fisheries Management program. The General Assembly amended the Virginia Pesticide Use and Application Act as it related to the possession, sale, or use of marine antifoulant paints containing TBT. The use of TBT in boat paint constitutes a serious threat to important marine animal species. The TBT program monitors boating activities and boat painting activities to ensure compliance with TBT regulations promulgated pursuant to the amendment. The VMRC, DGIF, and Virginia Department of Agriculture Consumer Services (VDACS) share enforcement responsibilities (Virginia Code §3.2-3904 and 3.2-3935 to §3.2-3937).

- b. **Subaqueous Lands Management** - The management program for subaqueous lands establishes conditions for granting or denying permits to use state-owned bottomlands based on considerations of potential effects on marine and fisheries resources, tidal wetlands, adjacent or nearby properties, anticipated public and private benefits, and water quality standards established by the Department of Environmental Quality (DEQ). The program is administered by the Virginia Marine Resources Commission (VMRC) (Virginia Code §28.2-1200 to §28.2-1213).
- c. **Wetlands Management** - The purpose of the wetlands management program is to preserve wetlands, prevent their despoliation, and accommodate economic development in a manner consistent with wetlands preservation.
- (1) The tidal wetlands program is administered by VMRC (Virginia Code §28.2-1301 through §28.2-1320).
 - (2) The Virginia Water Protection Permit program administered by DEQ includes protection of wetlands - both tidal and non-tidal - (Virginia Code §62.1-44.15:5) and Water Quality Certification pursuant to Section 401 of the Clean Water Act.

Attachment 1 continued

Page 2

- d. Dunes Management - Dune protection is carried out pursuant to The Coastal Primary Sand Dune Protection Act and is intended to prevent destruction or alteration of primary dunes. This program is administered by VMRC (Virginia Code §28.2-1400 through §28.2-1420).
- e. Non-point Source Pollution Control - (1) Virginia's Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. This program is administered by DEQ (Virginia Code §62.1-44.15:51 *et seq.*).

(2) Coastal Lands Management is a state-local cooperative program administered by DEQ's Water Division and 84 localities in Tidewater (see i) Virginia (Virginia Code §62.1-44.15:67 – 62.1-44.15:79 and Virginia Administrative Code 9 VAC 25-830-10 *et seq.*).
- f. Point Source Pollution Control - The point source program is administered by the State Water Control Board (DEQ) pursuant to Virginia Code §62.1-44.15. Point source pollution control is accomplished through the implementation of:
 - (1) The National Pollutant Discharge Elimination System (NPDES) permit program established pursuant to Section 402 of the federal Clean Water Act and administered in Virginia as the Virginia Pollutant Discharge Elimination System (VPDES) permit program.
 - (2) The Virginia Water Protection Permit (VWPP) program administered by DEQ (Virginia Code §62.1-44.15:5) and Water Quality Certification pursuant to Section 401 of the Clean Water Act.
- g. Shoreline Sanitation - The purpose of this program is to regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health (VDH) (Virginia Code §32.1-164 through §32.1-165).
- h. Air Pollution Control - The program implements the federal Clean Air Act to provide a legally enforceable State Implementation Plan for the attainment and maintenance of the National Ambient Air Quality Standards. This program is administered by the State Air Pollution Control Board (DEQ) (Virginia Code §10-1.1300 through §10.1-1320).
- i. Coastal Lands Management - A state-local cooperative program administered by DEQ's Water Division and 84 localities in Tidewater, Virginia established pursuant to the Chesapeake Bay Preservation Act (Virginia Code §62.1-44.15:67 – 62.1-44.15:79) and Chesapeake Bay Preservation Area Designation and Management Regulations (Virginia Administrative Code 9 VAC 25-830-10 *et seq.*).



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Attachment 2

Advisory Policies for Geographic Areas of Particular Concern

- a. Coastal Natural Resource Areas - These areas are vital to estuarine and marine ecosystems and/or are of great importance to areas immediately inland of the shoreline. Such areas receive special attention from the Commonwealth because of their conservation, recreational, ecological, and aesthetic values. These areas are worthy of special consideration in any planning or resources management process and include the following resources:
 - a) Wetlands
 - b) Aquatic Spawning, Nursery, and Feeding Grounds
 - c) Coastal Primary Sand Dunes
 - d) Barrier Islands
 - e) Significant Wildlife Habitat Areas
 - f) Public Recreation Areas
 - g) Sand and Gravel Resources
 - h) Underwater Historic Sites.

- b. Coastal Natural Hazard Areas - This policy covers areas vulnerable to continuing and severe erosion and areas susceptible to potential damage from wind, tidal, and storm related events including flooding. New buildings and other structures should be designed and sited to minimize the potential for property damage due to storms or shoreline erosion. The areas of concern are as follows:
 - i) Highly Erodible Areas
 - ii) Coastal High Hazard Areas, including flood plains.

- c. Waterfront Development Areas - These areas are vital to the Commonwealth because of the limited number of areas suitable for waterfront activities. The areas of concern are as follows:
 - i) Commercial Ports
 - ii) Commercial Fishing Piers
 - iii) Community Waterfronts

Although the management of such areas is the responsibility of local government and some regional authorities, designation of these areas as Waterfront Development Areas of Particular Concern (APC) under the VCP is encouraged.

Designation will allow the use of federal CZMA funds to be used to assist planning for such areas and the implementation of such plans. The VCP recognizes two broad classes of priority uses for waterfront development APC:

- i) water access dependent activities;
- ii) activities significantly enhanced by the waterfront location and complementary to other existing and/or planned activities in a given waterfront area.

Advisory Policies for Shorefront Access Planning and Protection

- a. Virginia Public Beaches - Approximately 25 miles of public beaches are located in the cities, counties, and towns of Virginia exclusive of public beaches on state and federal land. These public shoreline areas will be maintained to allow public access to recreational resources.
- b. Virginia Outdoors Plan - Planning for coastal access is provided by the Department of Conservation and Recreation in cooperation with other state and local government agencies. The Virginia Outdoors Plan (VOP), which is published by the Department, identifies recreational facilities in the Commonwealth that provide recreational access. The VOP also serves to identify future needs of the Commonwealth in relation to the provision of recreational opportunities and shoreline access. Prior to initiating any project, consideration should be given to the proximity of the project site to recreational resources identified in the VOP.
- c. Parks, Natural Areas, and Wildlife Management Areas - Parks, Wildlife Management Areas, and Natural Areas are provided for the recreational pleasure of the citizens of the Commonwealth and the nation by local, state, and federal agencies. The recreational values of these areas should be protected and maintained.
- d. Waterfront Recreational Land Acquisition - It is the policy of the Commonwealth to protect areas, properties, lands, or any estate or interest therein, of scenic beauty, recreational utility, historical interest, or unusual features which may be acquired, preserved, and maintained for the citizens of the Commonwealth.
- e. Waterfront Recreational Facilities - This policy applies to the provision of boat ramps, public landings, and bridges which provide water access to the citizens of the Commonwealth. These facilities shall be designed, constructed, and maintained to provide points of water access when and where practicable.
- f. Waterfront Historic Properties - The Commonwealth has a long history of settlement and development, and much of that history has involved both shorelines and near-shore areas. The protection and preservation of historic shorefront properties is primarily the responsibility of the Department of Historic Resources. Buildings, structures, and sites of historical, architectural, and/or archaeological interest are significant resources for the citizens of the Commonwealth. It is the policy of the Commonwealth and the VCP to enhance the protection of buildings, structures, and sites of historical, architectural, and archaeological significance from damage or destruction when practicable.

Wellman, Julia (DEQ)

From: Ewing, Amy (DGIF)
Sent: Wednesday, September 03, 2014 2:28 PM
To: Wellman, Julia (DEQ)
Cc: Cason, Gladys (DGIF)
Subject: ESSLog# 35052_14-140F_Leidy Southeast Expansion Project

Julia,

As depicted in the note attached to your review request, without additional time and better locational information (shapefiles, site maps) for the affected sites in VA, we cannot provide any comments regarding impacts upon listed species or resources under our jurisdiction or provide CZMA consistency for the project. If you receive additional locational information or additional review time, let me know.

Thanks, Amy

Amy Ewing ☉ Environmental Services Biologist/FWIS Manager ☉ VA Dept. of Game and Inland Fisheries ☉
4010 West Broad St. Richmond, VA 23230 ☉ 804-367-2211 ☉ www.dgif.virginia.gov



Think before you print.

Wellman, Julia (DEQ)

From: Ewing, Amy (DGIF)
Sent: Thursday, September 04, 2014 3:59 PM
To: Wellman, Julia (DEQ); Tignor, Keith (VDACS)
Cc: Cason, Gladys (DGIF)
Subject: RE: FERC Leidy Southeast Expansion Project DEQ 14-140F (ESSLog# 35052)

We recommend coordination with us regarding listed species and resources known from the project area and as identified by DCR-NH. I will need a shapefile of the project areas in VA in order to perform that coordination.

Thanks, I appreciate the opportunity to provide input.

Amy

Amy Ewing ☺ Environmental Services Biologist/FWIS Manager ☺ VA Dept. of Game and Inland Fisheries ☺
4010 West Broad St. Richmond, VA 23230 ☺ 804-367-2211 ☺ www.dgif.virginia.gov



From: Wellman, Julia (DEQ)
Sent: Wednesday, September 03, 2014 4:02 PM
To: Tignor, Keith (VDACS); Ewing, Amy (DGIF)
Subject: FERC Leidy Southeast Expansion Project DEQ 14-140F

Based on DCR's comments regarding the above-referenced project, do you have any comments or recommendations?

From: Rhur, Robbie (DCR)
Sent: Wednesday, September 03, 2014 3:56 PM
To: Wellman, Julia (DEQ)
Cc: ProjectReview (DGIF); troy_andersen@fws.gov
Subject: DCR

Julia:

Please find out attached comments

Thanks

Robbie Rhur
Environmental Review Coordinator/DCR
600 E Main Street 17th Floor
Richmond VA 23219

Molly Joseph Ward
Secretary of Natural Resources

Clyde E. Cristman
Director



Joe Elton
Deputy Director of Operations

Rochelle Altholz
Deputy Director of Administration
and Finance

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

600 East Main Street, 24th Floor
Richmond, Virginia 23219
(804)786-6124

MEMORANDUM

DATE: September 3, 2014
TO: Julia Wellman, DEQ
FROM: Roberta Rhur, Environmental Impact Review Coordinator
SUBJECT: DEQ 14-140F, Leidy Southeast Expansion Project

Division of Natural Heritage

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

Brookneal; Virginia Fibre; MLV 180-15; MLV 165-20; Valve Site 175-10; Lousia Road; Boswells Tavern

According to the information currently in our files, natural heritage resources have not been documented within two miles of the project boundary. The absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks natural heritage resources.

Gordonsville; MLV 175-20; Valve Site 185-13

Biotics historically documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Alta Vista Meter Station; Bull Run; Compressor Station 185; Compressor Station 165; Compressor Station 170; Compressor Station 175; Fredericksburg; Lynchburg; MLV 180-20; MLV 185-10

Biotics documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Herndon

According to the information currently in our files, the Difficult Run – Stream Valley Park Stream Conservation Unit (SCU) is located downstream from the project area. SCUs identify stream reaches that

contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Difficult Run – Stream Valley Park SCU has been given a biodiversity ranking of B5, which represents a site of general biodiversity. The natural heritage resource associated with this site is:

Glyptemys insculpta

Wood turtle

G3/S2/NL/LT

The Wood turtle ranges from southeastern Canada, south to the Great Lake states and New England. In Virginia, it is known from northern counties within the Potomac River drainage (NatureServe, 2009). The Wood turtle inhabits areas with clear streams with adjacent forested floodplains and nearby fields, wet meadows, and farmlands (Buhlmann et al., 2008; Mitchell, 1994). Since this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994).

Threats to the wood turtle include habitat fragmentation, urbanization, and automobile or farm machinery mortality (Buhlmann et al., 2008). Please note that the Wood turtle is currently classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

In addition, Difficult Run has been designated by the VDGIF as a “Threatened and Endangered Species Water.” The species associated with this T & E Water is the Wood turtle.

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

Scottsville

According to the information currently in our files, the Hardware River SCU is located downstream from the project area. The Hardware River SCU has been given a biodiversity ranking of B2, which represents a site of very high significance. The natural heritage resource associated with this site is:

Pleurobema collina

James spiny mussel

G1/S1/LE/LE

The James spiny mussel is a freshwater mussel endemic to Virginia and is known from the James and Roanoke River watersheds. It occurs in a variety of substrata, ranging from sand and silt mixtures to gravel and sand mixed with rubble, and in a variety of flow regimes (Clarke & Neves, 1984; Hove & Neves, 1994). It is now restricted to small headwater streams of this watershed (Neves, 1991).

Threats to the James spiny mussel include competition with the exotic clam (*Corbicula fluminea*), erosion and sedimentation from logging, road construction, and livestock grazing, sewage effluent, and water quality degradation (Neves, 1991). Please note that this species is currently classified as endangered by the United States Fish and Wildlife Service (USFWS) and the Virginia Department of Game and Inland Fisheries (VDGIF).

In addition, Hardware River has been designated by VDGIF as a T & E Water for the James spiny mussel.

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations. Due to the legal status of the James spiny mussel, DCR also recommends coordination with the USFWS and Virginia’s regulatory authority for the

management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 - 570).

Bear Garden

According to the information currently in our files, the James River at Scottsville Stream Conservation Unit is downstream from the proposed project area. The James River at Scottsville SCU has been given a biodiversity ranking of B4, which represents a site of moderate significance. The natural heritage resource associated with this site is:

<i>Lasmigona subviridis</i>	Green floater	G3/S2/NL/LT
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The Green floater, a rare freshwater mussel, ranges from New York to North Carolina in the Atlantic Slope drainages, as well as the New and Kanawha River systems in Virginia and West Virginia (NatureServe, 2009). In Virginia, there are records from the New, Roanoke, Chowan, James, York, Rappahannock, and Potomac River drainages. Throughout its range, the Green floater appears to prefer the pools and eddies with gravel and sand bottoms of smaller rivers and creeks, smaller channels of large rivers (Ortman, 1919) or small to medium-sized streams (Riddick, 1973). Please note that this species has been listed as state threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.

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

Prince William

According to the information currently in our files, the Broad Run SCU is downstream of the project area. The Broad Run SCU has been given a biodiversity significance ranking of B3, which represents a site of high significance. The natural heritage resources of concern associated with this SCU are:

<i>Alasmidonta varicosa</i>	Brook floater	G3/S1/NL/LE
<i>Elliptio lanceolata</i>	Yellow lance	G2G3/S2S3/SOC/NL

The Brook floater, a small freshwater mussel species, is known from the northeastern United States primarily in the Atlantic Slope drainages (NatureServe, 2009). In Virginia, it is recorded from the Potomac River basin with a possible record from the James River. Of 14 documented records in Virginia, only two are thought to be viable. Population declines have been documented throughout its range (NatureServe, 2009). The Brook floater typically inhabits flowing-water habitats in and near riffles and rapids of smaller creeks with rocky or gravelly substrates (Nedeau et al., 2000 per NatureServe, 2009). Many facets of its life history are unknown including its fish host. Threats for the Brook floater in particular include poor water quality as this species does not tolerate silt or nutrient pollution well (Stevenson and Bruenderman, 1995). Please note that this species is currently listed as endangered by the Virginia Department of Game and Inland Fisheries (VDGIF).

The Yellow lance occurs in mid-sized rivers and second and third order streams. To survive, it needs a silt-free, stable streambed and well-oxygenated water that is free of pollutants. This species has been the subject of taxonomic debate in recent years (NatureServe, 2009). Currently in Virginia, the Yellow lance is recognized from populations in the Chowan, James, York, and Rappahannock drainages. Its range also extends into Neuse-Tar river system in North Carolina. In recent years, significant population declines have been noted across its range (NatureServe, 2009). Please note that this species is currently classified as a species of concern by the United States Fish and Wildlife Service (USFWS) however, this designation has no official legal status.

In addition, Broad Run has been designated by VDGIF as a T & E Water for the Brook floater.

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

Existing Launcher Site, Campbell County

According to the information currently in our files, the Orangefin madtom (*Noturus gilberti*, G2/S2/SOC/LT) has been historically documented downstream in the Roanoke River. The Orangefin madtom is native to the Roanoke and James River systems of North Carolina and Virginia (NatureServe, 2009). The Orangefin madtom inhabits moderate to strong riffles and runs having little or no silt in moderate-gradient, intermontane and upper Piedmont streams. This species is an intersticine dweller, found in or near cavities formed by rubble and boulders (Jenkins and Burkhead, 1993). Please note that this species is currently classified as a species of concern (not a legal designation) by the United States Fish and Wildlife Service (USFWS) and as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

Threats to the Orangefin madtom include channelization, siltation, various forms of chronic pollution, catastrophic chemical spills, impoundment, dewatering, and bait-seining (NatureServe, 2009). Its low reproductive rate and short life span (Simonson 1997, Simonson and Neves 1992, Simonson 1987) exacerbate these threats (Burkhead and Jenkins 1991).

In addition, the Roanoke River has been designated by VDGIF as a T & E Water for the Orangefin madtom.

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

Antioch

According to the information currently in our files, the Middle Fork Cunningham Creek Stream Conservation Unit is located downstream of the project area. The Middle Fork Cunningham SCU has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resources of concern associated with this SCU are:

Aquatic Natural Community

G1G2/S1S2/NL/NL

The documented Aquatic Natural Community is based on Virginia Commonwealth University's **INSTAR** (*Interactive Stream Assessment Resource*) database which includes over 2,000 aquatic (stream and river) collections statewide for fish and macroinvertebrate. These data represent fish and macroinvertebrate assemblages, instream habitat, and stream health assessments. The associated Aquatic Natural Communities are significant on multiple levels. First, these streams are a grade B, as per the VCU-Center for Environmental Sciences (CES), indicating their relative regional significance, considering the aquatic community composition and the present-day conditions of other streams in the region. These stream reaches also hold as a "Healthy" stream designation as per the INSTAR Virtual Stream Assessment (VSS) score. This score assesses the similarity of this stream to ideal stream conditions of biology and habitat for this region. Lastly, this stream contributes to high Biological Integrity at the watershed level (6th order) based on number of native/non-native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present.

Threats to these significant Aquatic Natural Communities and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species. To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations, establishment/enhancement of riparian buffers with native plant species and maintaining natural stream flow.

Compressor Station 180

According to the information currently in our files, the Mountain Run-Mill Run Stream Conservation Unit is located adjacent to the project area. The Mountain Run-Mill Run SCU has been given a biodiversity significance ranking of B3, which represents a site of very high significance. The natural heritage resource of concern associated with this SCU is:

The documented Aquatic Natural Community is based on Virginia Commonwealth University's **INSTAR** (*Interactive Stream Assessment Resource*) database which includes over 2,000 aquatic (stream and river) collections statewide for fish and macroinvertebrate. These data represent fish and macroinvertebrate assemblages, instream habitat, and stream health assessments. The associated Aquatic Natural Community is significant on multiple levels. First, this stream is a grade B, as per the VCU-Center for Environmental Sciences (CES), indicating its relative regional significance, considering its aquatic community composition and the present-day conditions of other streams in the region. This stream reach also holds as a "Healthy" stream designation as per the INSTAR Virtual Stream Assessment (VSS) score. This score assesses the similarity of this stream to ideal stream conditions of biology and habitat for this region. Lastly, this stream contributes to high Biological Integrity at the watershed level (6th order) based on number of native/non-native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present.

Threats to the significant Aquatic Natural Community and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species. To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations, establishment/enhancement of riparian buffers with native plant species and maintaining natural stream flow.

Marsh Run and Remington

According to the information currently in our files, the Dwarf wedgemussel has been historically documented in Marsh Run. The Dwarf wedgemussel grows to a length of approximately 30 mm. This species inhabits creeks of varying sizes, residing in muddy sand, sand, and gravel bottoms, in areas of slow to moderate current and little silt deposition (USFWS, 1993). Currently, this species exists in widely scattered, small populations in the Chowan, James, York, Rappahannock, and Potomac River drainages. Its native host fishes include Mottled sculpin (*Cottus bairdi*), Johnny darters (*Etheostoma nigrum*), Tessellated darters (*Etheostoma olmstedi*) and Sculpins (*Cottus* sp.) (Michaelson and Neves, 1995). Please note that this species is currently classified as endangered by the United States Fish and Wildlife Service (USFWS) and the Virginia Department of Game and Inland Fisheries (VDGIF).

In addition the Upland sandpiper (*Bartramia longicauda*, G5/S1B/NL/LT) has been historically documented in the project vicinity. Upland sandpipers breeds from Alaska, across most of Canada and south into northern and central United States (Bazuin, 1991). They nest in open farming areas with mixed habitats that include medium-height grasses and fallow or early-stage old-fields (Bazuin, 1991). Plowed fields and/or short grass, heavily grazed pastures, or sod farms, as well as airports, are also used, especially during migration (Bazuin, 1991). The nest is a cup pressed into the roots of a clump of grass or a slight hollow scooped in the ground and lined with fine grasses in dense growth. Please note that this species is currently classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

Threats to the Upland sandpiper include loss of nesting habitat as preferred field habitats are changed to other land uses such as development (Bazuin, 1991). Also, as a ground-nesting species, this species may face increasing predation pressure as areas are more urbanized and fragmented.

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

Nokesville

According to the information currently in our files, the Kettle Run Stream Conservation Unit is located adjacent to the project area. The Kettle Run SCU has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resource of concern associated with this SCU is:

Aquatic Natural Community

G2/S2/NL/NL

The documented Aquatic Natural Community is based on Virginia Commonwealth University's **INSTAR** (*Interactive Stream Assessment Resource*) database which includes over 2,000 aquatic (stream and river) collections statewide for fish and macroinvertebrate. These data represent fish and macroinvertebrate assemblages, instream habitat, and stream health assessments. The associated Aquatic Natural Community is significant on multiple levels. First, this stream is a grade B, as per the VCU-Center for Environmental Sciences (CES), indicating its relative regional significance, considering its aquatic community composition and the present-day conditions of other streams in the region. This stream reach also holds as a "Healthy" stream designation as per the INSTAR Virtual Stream Assessment (VSS) score. This score assesses the similarity of this stream to ideal stream conditions of biology and habitat for this region. Lastly, this stream contributes to high Biological Integrity at the watershed level (6th order) based on number of native/non-

native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present.

Threats to the significant Aquatic Natural Community and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species. To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations, establishment/enhancement of riparian buffers with native plant species and maintaining natural stream flow.

Valve Site 185-05 and Valve Site Cove Point

According to the information currently in our files, Purple milkweed (*Asclepias purpurascens*, G5?/S2/NL/NL) has been documented in the project areas (Bull Run Loop and Replacement of Transco's Mid -Atlantic Connector MP 1586.2-treeline along the western edge of the powerline ROW and MP 1586.1-southern edge of the maintained ROW). Purple milkweed occurs in prairies, woodland openings/edges, and thickets, and in wet situations as well as on dry, rocky ridgetops, along roadsides and rights-of-way (NatureServe, 2004). The plant flowers in June and July. It occurs in eastern North America from Ontario and New Hampshire south to Georgia and west as far as South Dakota and Texas. However, distribution is spotty in parts of the range, especially along the northeastern seaboard, in the southeast (Virginia to Mississippi), and in the northern midwest. Purple milkweed is currently known from 9 locations in Virginia.

DCR recommends avoidance of the documented occurrences of natural heritage resources and implementation of maintenance activities including the use of a native seed mix free of invasive species when re-vegetating the project area to minimize impacts.

Pleasant Valley Interconnect

According to the information currently in our files, the Cub Run Stream Conservation Unit is located downstream of the project area. The Cub Run SCU has been given a biodiversity ranking of B5, which represents a site of general biodiversity. The natural heritage resource associated with this site is:

Glyptemys insculpta

Wood turtle

G3/S2/NL/LT

Cub Run has also been designated by VDGIF as a T & E water for the Wood turtle.

In addition, Stiff goldenrod (*Solidago rigida var. rigida*, G5T5/S2/NL/NL) has historically been documented within or immediately adjacent to the project area. Stiff goldenrod is a species of goldenrod that ranges from Rhode Island, Connecticut, western Massachusetts and New York, south to Georgia, and west to Minnesota and Missouri. Stiff goldenrod is a perennial herb that grows in the spring and summer, and blooms in the late summer. This plant is considered imperiled in Virginia (NatureServe, 2009). Please note, this occurrence of Stiff goldenrod has not been field verified since 1990.

Due to the potential for this site to support rare plants, DCR recommends an inventory for natural heritage resources in the project area. With the survey results we can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources.

DCR-Division of Natural Heritage biologists are qualified and available to conduct inventories for rare, threatened, and endangered species. Please contact J. Christopher Ludwig, Natural Heritage Inventory Manager, at chris.ludwig@dcr.virginia.gov or 804-371-6206 to discuss arrangements for field work.

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

The Elklick Woodlands Natural Area Preserve has been documented within two miles of the project boundary. However, due to the scope of the activity proposed, DCR does not anticipate any negative impacts to the natural area preserve and associated natural heritage resources.

Potomac South

According to the information in our files, the Potomac River- Yellow Falls Stream Conservation Unit is adjacent to the project area. The Potomac River – Yellow Falls SCU has been given a biodiversity ranking of B3, which represents a site of high significance. The natural heritage resources associated with this site are:

<i>Gomphus fraternus</i>	Midland clubtail	G5/S2/NL/NL
	Aquatic Natural Community	G2/S2/NL/NL
	Aquatic Natural Community	G3/S3S4/NL/NL

Adult Odonata (dragonflies and damselflies), commonly seen flitting and hovering along the shores of most freshwater habitats, are accomplished predators. Adults typically forage in clearings with scattered trees and shrubs near the parent river. They feed on mosquitoes and other smaller flying insects, and are thus considered highly beneficial. Odonates lay their eggs on emergent vegetation or debris at the water's edge. Unlike the adults, the larvae are aquatic and typically inhabit the sand and gravel substrates. Wingless and possessing gills, the larvae crawl about the submerged leaf litter and debris stalking their insect prey. The larvae seize unsuspecting prey with a long, hinged "grasper" that folds neatly under their chin. When larval development is complete, the aquatic larvae crawl from the water to the bank, climb up the stalk of the shoreline vegetation, and the winged adult emerges (Hoffman 1991; Thorpe and Covich 1991).

Because of their aquatic lifestyle and limited mobility, the larvae are particularly vulnerable to shoreline disturbances that cause the loss of shoreline vegetation and siltation. They are also sensitive to alterations that result in poor water quality, aquatic substrate changes, and thermal fluctuations.

The documented Aquatic Natural Communities are based on Virginia Commonwealth University's **INSTAR** (*Interactive Stream Assessment Resource*) database which includes over 2,000 aquatic (stream and river) collections statewide for fish and macroinvertebrate. These data represent fish and macroinvertebrate assemblages, instream habitat, and stream health assessments. The associated Aquatic Natural Communities are significant on multiple levels. First, these streams are a grade B, per the VCU-Center for Environmental Sciences (CES), indicating its relative regional significance, considering its aquatic community composition and the present-day conditions of other streams in the region. These stream reaches also hold a "Healthy" stream designation per the INSTAR Virtual Stream Assessment (VSS) score. This score assesses the similarity of this stream to ideal stream conditions of biology and habitat for this region. Lastly, these streams contribute to high Biological Integrity at the watershed level (6th order) based on number of native/non-native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present.

Threats to these significant Aquatic Natural Communities and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species.

In addition, Nichols Run and Unnamed trib of Potomac River 1 and 2 are within two miles of the project area and have been designated as T & E Waters for the Wood turtle by VDGIF.

To minimize adverse impacts to the aquatic ecosystems as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations, establishment/enhancement of riparian buffers with native plant species and maintaining natural stream flow. Due to the legal status of the Wood turtle, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 - 570).

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

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

The VDGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Gladys Cason (804-367-0909 or Gladys.Cason@dgif.virginia.gov). According to the information currently in our files, Sugarland Run designated by VDGIF as a T & E Water for the Wood turtle is within two miles of the Valve Site 185-13 project area. Due to the legal status of the Wood turtle, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 - 570).

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

CC: Troy Andersen, USFWS
Ernie Aschenbach, VDGIF

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Wellman, Julia (DEQ)

From: Tignor, Keith (VDACS)
Sent: Wednesday, September 03, 2014 5:07 PM
To: Wellman, Julia (DEQ)
Subject: RE: FERC Leidy Southeast Expansion Project DEQ 14-140F

Julia,

Thank you for forwarding DCR's response. We concur with their comments regarding state-listed plant and insect species.

Sincerely,
Keith Tignor
Office of Plant Industry Services
Virginia Dept. of Agriculture & Consumer Services

From: Wellman, Julia (DEQ)
Sent: Wednesday, September 03, 2014 4:02 PM
To: Tignor, Keith (VDACS); Ewing, Amy (DGIF)
Subject: FERC Leidy Southeast Expansion Project DEQ 14-140F

Based on DCR's comments regarding the above-referenced project, do you have any comments or recommendations?

From: Rhur, Robbie (DCR)
Sent: Wednesday, September 03, 2014 3:56 PM
To: Wellman, Julia (DEQ)
Cc: ProjectReview (DGIF); troy_andersen@fws.gov
Subject: DCR

Julia:

Please find out attached comments

Thanks

Robbie Rhur
Environmental Review Coordinator/DCR
600 E Main Street 17th Floor
Richmond VA 23219

Wellman, Julia (DEQ)

From: Dufore, Ezekiel (VDH)
Sent: Thursday, August 28, 2014 2:34 PM
To: Wellman, Julia (DEQ)
Cc: Soto, Roy (VDH)
Subject: 14-104F | Leidy Southeast Expansion Project

Leidy Southeast Expansion Project

Project #: 14-140F

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

The following public groundwater wells are within a 1 mile radius of the project site:

Falling River Country Club Drilled well is approximately 0.7 miles from Compressor Station 170.

Tenaska Well 1 & Tenaska Well 2 are located approximately 0.44 miles from the project site Antioch Meter and Regulation Station.

Battlefield Farms Well 1 is located approximately 0.3 miles from Compressor Station 180.

No public surface water intakes are located within a 5 mile radius of the project site.

The project is not within Zone 1 (up to 5 miles into the watershed) of any public surface water sources.

There are no apparent impacts to public drinking water sources due to this project.

Ezekiel Dufore

Office of Drinking Water

Virginia Department of Health

James Madison Building

109 Governor Street

Richmond, VA 23219

(w) 804-864-7201

ezekiel.dufore@vdh.virginia.gov

DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Julia H. Wellman

DEQ - OEIA PROJECT NUMBER: 14 - 140F

PROJECT TYPE: STATE EA / EIR FEDERAL EA / EIS SCC
 CONSISTENCY DETERMINATION

PROJECT TITLE: LEIDY SOUTHEAST EXPANSION PROJECT

PROJECT SPONSOR: DOE / FEDERAL ENERGY REGULATORY COMMISSION

PROJECT LOCATION: PARTLY OZONE NONATTAINMENT/MAINTENANCE AND
EMISSION CONTROL AREA FOR NOX & VOC

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: CONSTRUCTION
 OPERATION

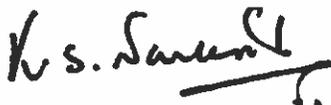
STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E - STAGE I
2. 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F - STAGE II Vapor Recovery
3. 9 VAC 5-45-780 et seq. - Asphalt Paving operations
4. 9 VAC 5-130 et seq. - Open Burning
5. 9 VAC 5-50-60 et seq. Fugitive Dust Emissions
6. 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to _____
7. 9 VAC 5-50-160 et seq. - Standards of Performance for Toxic Pollutants
8. 9 VAC 5-50-400 Subpart _____, Standards of Performance for New Stationary Sources, designates standards of performance for the _____
9. 9 VAC 5-80-1100 et seq. of the regulations - Permits for Stationary Sources
10. 9 VAC 5-80-1700 et seq. Of the regulations - Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
11. 9 VAC 5-80-2000 et seq. of the regulations - New and modified sources located in non-attainment areas
12. 9 VAC 5-80-800 et seq. Of the regulations - Operating Permits and exemptions. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

All precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO_x) in Fairfax, Prince William & Culpeper Counties.

Any revision to existing permits for the modifications involved in compressor stations involved in Virginia, our Lynchburg, Blue Ridge and northern Virginia Regional Offices may be consulted.



(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: August 29, 2014



MEMORANDUM

TO: Julia Wellman, Environmental Program Planner

FROM: Steve Coe, Division of Land Protection & Revitalization Review Coordinator

DATE: August 27, 2014

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

SUBJECT: Environmental Impact Statement: Project #14-140F Leidy Southeast Expansion Project Transco (multi-state, includes Virginia sites)

The Division of Land Protection & Revitalization (DLPR) has completed its review of the Environmental Review Request for Project #14-103F Leidy Southeast Expansion Project Transco (multi-state, includes Virginia sites). Project scope as associated with Virginia-based sites: 1) modification of existing compressor stations (5 facilities), and 2) modification of existing meter and regulating stations (10 sites). The Department has these comments concerning potential waste issues associated with this project review request.

Solid and hazardous waste issues were addressed in the submittal, and the submittal indicated a search of solid and hazardous waste databases. Specifically, the submittal states, in part:

2.4.7 Hazardous Waste

As stated in Sections 2.1.2 and 2.2.1, Transco reviewed federal and state regulatory databases to identify known and potential water and soil contaminated and hazardous waste sites within 0.25 mile of the project. Based on these results several sites of potential contamination were identified in the Project area:

...potentially contaminated sites were identified within 0.25 mile of existing Compressor Stations...185, 180, 175, and 165.

Based upon our review of the environmental databases and alignment sheets, the Project would not cross any potentially contaminated sites. However, Transco is currently consulting with the state project managers to determine if construction activities associated with the Project may interfere with investigation and/or remediation efforts. In addition, Transco has developed an Unanticipated Discovery of Contamination Plan, which includes measures that it would implement in the event contaminated media is encountered during construction.

DLPR staff has reviewed the submittal, we acknowledge the search of federal and state databases by Transco, and we offer the following comments concerning possible waste issues associated with the Project:

Environmental Impact Review – General Guidance for database searches

When the environmental impact report is written or compiled for specific sites and specific projects, it should include an environmental investigation on and near the properties selected in order to identify any solid or hazardous waste sites or issues related to the (project area). The report author should analyze the data in the web-based Waste Division databases to determine if the project would affect or be affected by any sites identified in the databases. The databases include the Permitted Solid Waste Management Facilities, Virginia Environmental Geographic Information Systems (Solid Waste, Voluntary Remediation Program, and Petroleum Release sites), CERCLA Facilities, and Hazardous Waste Facilities databases.

The Permitted Solid Waste Management Facilities Database

A list of active solid waste facilities in Virginia.

CERCLA Facilities Database

A list of active and archived CERCLA (EPA Superfund Program) sites.

Hazardous Waste Facilities Database

A list of hazardous waste generators, hazardous waste transporters, and hazardous waste storage and disposal facilities. Data for the CERCLA Facilities and Hazardous Waste Facilities databases are periodically downloaded by the Waste Division from U.S. EPA's website.

Virginia Environmental Geographic Information Systems (VEGIS)

The "What's in My Backyard" application displays cross-media geographical features in proximity to a selected site/address for different facility search parameters.

Accessing the DEQ Databases:

The report author should access this information on the DEQ website at

<http://www.deq.virginia.gov/Programs/LandProtectionRevitalization/ReportsPublications/OriginalReports.aspx>.

Scroll down to the databases which are listed under **Real Estate Search Information** heading.

Initially, the *solid waste information* can be accessed by clicking on the Permitted Solid Waste Management Facilities link and opening the file. You can search by city/county or region (zip code) for active permitted waste facilities. (Note: A targeted solid waste facility search can be accomplished through the VEGIS link - see information below re: VRP search).

The *Superfund information* will be listed by clicking on the Search EPA's CERCLIS database tab and clicking on the **Search Superfund Site Information** button (blue box). On this form, enter either 1) the zip code for the project site, or, 2) the name of the city or county and select Virginia in the State drop down box. Click "Search" at the bottom of the form. A facilities list will be appear.

The *hazardous waste* information can be accessed by clicking on the Hazardous Waste Facilities link. Go to the Geography Search section and fill in the 1) zip code of the project, or 2) the name of the city or county and VA in the state block, and click on "Search". The hazardous waste facilities in the locality will be listed.

The *Voluntary Remediation Program (VRP)*, *Solid Waste Facilities*, and *Petroleum Release Sites* GPS databases can be accessed from the www.deq.virginia.gov website by clicking on VEGIS link under the **Resources & Tools** category. Then click on the “What’s in my backyard” in the **Mapping Applications** block to the left. On the web map page, click on the “Pick a Quick Search Here” drop down arrow, and select “Address Search”. In the adjacent block enter the zip code or address for the project site. Click on “Search”. On the map you will see a green “balloon” indicating the site.

On the map area click on the “Tools” drop down arrow, and the select “Identify”. A normal search looks like this: In the “Radius” block, type in [.5], and in the adjacent block select [miles] from the drop down options. Click on the “Layer” drop down arrow, select “VRP Sites”, and then click on the green balloon. All VRP sites within the indicated range will appear in the Map/Results block to the left. Clicking on the block by the identified site will result in a second green balloon on the map. With multiple sites identified by the search, you can select/unselect each site to visualize its location, or change the radius of the search as needed.

At this time you can also search for “Solid Waste” sites and “Petroleum Releases” information for the project area by selecting these topics from the “Layer” options and then clicking on the green balloon on the map after each selection.

These database searches will include most waste-related site information for each locality based upon the radius of the address selected (such as .5 miles, .25 miles, or .1 mile). In many cases, especially when the project is located in an urban area, the database output for that locality will be extensive. This information is important to identify possible environmental concerns that may impact a new project.

GENERAL COMMENTS

Soil, Sediment, and Waste Management

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

Asbestos and/or Lead-based Paint

All structures being demolished/renovated/removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-81-620 for ACM and 9VAC 20-60-261 for LBP must be followed. For questions contact DEQ’s Regional Office for the specific site where construction/modification activities are being done.

Pollution Prevention – Reuse - Recycling

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

If you have any questions or need further information, please contact Steve Coe at (804) 698-4029.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

www.deq.virginia.gov

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

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

MEMORANDUM

TO: Julia Wellman, DEQ Environmental Impact Review Coordinator

FROM: Daniel Moore, DEQ Principal Environmental Planner

DATE: August 27, 2014

SUBJECT: DEQ #14-140F: Federal Energy Regulatory Commission – Leidy Southeast Expansion of Natural Gas Pipeline Facilities Project, Prince William and Fairfax Counties, Virginia

We have reviewed the Environmental Assessment for the above-referenced project and offer the following comments regarding consistency with the provisions of the *Chesapeake Bay Preservation Area Designation and Management Regulations* (Regulations):

Based on the materials provided for review, the proposed project will involve minor modifications to existing compressor stations and existing meter and regulating stations in Prince William and Fairfax Counties in Virginia. Other localities in Virginia that are part of the scope of the overall project are located outside tidewater Virginia and thus are not subject to the Regulations or to the *Chesapeake Bay Preservation Act*.

In Fairfax and Prince William Counties, the areas protected by the Chesapeake Bay Preservation Act, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by each locality. RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores. RPAs also include a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. All areas of both Counties not included in the RPA are designated as RMAs.

Under the Federal Consistency Regulations of the Coastal Zone Management Act of 1972, federal actions in Virginia, such as those proposed by FERC, must be conducted in a manner “consistent to the maximum extent practicable” with the enforceable policies of the Virginia Coastal Zone Management Program. Those enforceable policies are administered through the Chesapeake Bay Preservation Act and Regulations.

9VAC25-830-150 of the Regulations exempt natural gas pipelines and their appurtenant structures as exempt from the Regulations on condition that the construction, installation, operation and maintenance of such pipelines and structures is in accord with (i) regulations promulgated pursuant to the Erosion and Sediment Control Law and the Virginia Stormwater Management Act, (ii) an erosion and sediment control plan and a stormwater management plan approved by DEQ, or (iii) local water quality protection criteria at least as stringent as the above state requirements.

As referenced in the EA documentation submitted for review by this office, land-disturbing activities associated with the proposed project to be carried out in Prince William and Fairfax Counties in Virginia would be consistent with the *Chesapeake Bay Preservation Act* and the Regulations, provided the above referenced requirements for exempt activities are met.

Wellman, Julia (DEQ)

From: Burstein, Daniel (DEQ)
Sent: Tuesday, September 02, 2014 9:55 AM
To: Wellman, Julia (DEQ)
Subject: RE: FERC: Leidy Southeast Expansion Project, Culpeper, Fairfax, Fauquier, Louisa, Orange, and Prince William Counties, DEQ #14-140F - Review

NRO comments regarding the Draft Environmental Assessment for the: Leidy Southeast Expansion Project, located in Culpeper, Fairfax, Fauquier, Louisa, Orange, and Prince William Counties are as follows:

Land Protection Division - The project manager is reminded that if any solid or hazardous waste is generated/encountered during construction, the facility would follow applicable federal, state, and county regulations for their disposal.

Air Compliance/Permitting - The project manager is reminded that during the construction phases that occur with this project; the project is subject to the Fugitive Dust/Fugitive Emissions Rule 9 VAC 5-50-60 through 9 VAC 5-50-120. In addition, should the project install fuel burning equipment (Boilers, Generators, Compressors, etc...), or any other air pollution emitting equipment, the project may be subject to 9 VAC 5-80, Article 6, Permits for New and Modified sources and as such the project manager should contact the Air Permit Manager DEQ-NRO prior to installation or construction, and operation, of fuel burning or other air pollution emitting equipment for a permitting determination. Lastly, should any open burning or use of special incineration devices be employed in the disposal of land clearing debris during demolition and construction, the operation would be subject to the Open Burning Regulation 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100.

Virginia Water Protection Permit (VWPP) Program - Based on the information provided, it appears the project will not impact streams or wetlands. Yet, the project manager is reminded that a VWP permit from DEQ may be required should impacts to surface waters be necessary. DEQ VWP staff recommends that the avoidance and minimization of surface water impacts to the maximum extent practicable as well as coordination with the US Army Corps of Engineers. Upon receipt of a Joint Permit Application for the proposed surface water impacts, DEQ VWP Permit staff will review the proposed project in accordance with the VWP permit program regulations and current VWP permit program guidance.

Water Permitting/VPDES Program/Stormwater: The project manager is reminded to follow all applicable regulations.

Daniel Burstein
Regional Enforcement Specialist, Senior II
Virginia Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193
Phone: (703) 583-3904
Fax: (703) 583-3821
daniel.burstein@deq.virginia.gov

Wellman, Julia (DEQ)

From: Kirchen, Roger (DHR)
Sent: Tuesday, September 02, 2014 10:14 AM
To: Wellman, Julia (DEQ)
Subject: Leidy Southeast Expansion Project (DHR File No. 2014-0507)

DHR has been in consultation with the FERC and its applicant regarding this project. We request that the FERC continue to consult directly with DHR, as necessary, pursuant to Section 106 of the National Historic Preservation Act (as amended) and its implementing regulations codified at 36 CFR Part 800 which require Federal agencies to consider the effects of their undertakings on historic properties.

Roger

*Roger W. Kirchen, Director
Division of Review and Compliance
Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221
phone: 804-482-6091 (NEW!)
fax: 804-367-2391
roger.kirchen@dhr.virginia.gov*

DHR is updating Virginia's Statewide Comprehensive Preservation Plan and we need public input. We invite you, as part of this public process, to complete a survey that takes approximately 15 minutes. The survey can be accessed from the link below. Thank you for your participation: :

<http://survey.constantcontact.com/survey/a07e971ruhjhua54md2/start>

Wellman, Julia (DEQ)

From: Johnson, Mike (MRC)
Sent: Friday, August 29, 2014 12:39 PM
To: Wellman, Julia (DEQ)
Subject: FW: NEW PROJECT FERC 14-140F
Attachments: FERC 14-140F ERR FORM.PDF

Good afternoon,

Please be advised that the Commission, pursuant to Section 28.2-1200 et seq of the Code of Virginia, has jurisdiction over any encroachments in, on, or over the beds of the bays, ocean, rivers, streams, or creeks which are the property of the Commonwealth. Accordingly, if any portion of the subject project involves any encroachments channelward of ordinary high water along natural rivers and streams above the fall line or mean low water below the fall line, a permit may be required from our agency. Any jurisdictional impacts will be reviewed by VMRC during the Joint Permit Application process. Thank you for the opportunity to comment.

Mike Johnson
Habitat Management Division
VMRC
2600 Washington Ave.
Newport News, Va 23607
757-247-2255

From: Watkinson, Tony (MRC)
Sent: Wednesday, August 27, 2014 11:10 AM
To: Johnson, Mike (MRC); Woodward, Justine (MRC)
Subject: FW: NEW PROJECT FERC 14-140F

This project also continues into Northern Virginia. Mostly in your areas. Not sure what it is about ,but coordinate with other Engineers for their territory if necessary.

From: Fulcher, Valerie (DEQ)
Sent: Tuesday, August 26, 2014 5:02 PM
To: dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Coe, Stephen (DEQ); Narasimhan, Kotur (DEQ); Gavan, Larry (DEQ); Moore, Daniel (DEQ); Nicholson, Shantelle (DEQ); Sepety, Holly (DEQ); Cholko, Michael (DEQ); Fowler, Keith (DEQ); Burstein, Daniel (DEQ); Kirchen, Roger (DHR); Kline, Everette (DOF); Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Cromwell, James R. (VDOT); Jordan, Elizabeth (VDOT); William.Chambliss@scc.virginia.gov; gmg@novaregion.org; Walker, jeff p; cboyles@tjpd.org; gchristie@region2000.org; mhickman@virginiashheartland.org; lmanning@wppdc.org
Cc: Wellman, Julia (DEQ)
Subject: NEW PROJECT FERC 14-140F

Good afternoon - attached is a new EIR review request/project:

FERC: Leidy Southeast Expansion Project
DEQ #14-140F

<https://vitashare.virginia.gov/fcweb/GET/6RWCJSTBRTWR2P12>
Transaction# 6RWCJSTBRTWR2P12

Please use the following PIN number to download the files: 981107

CHANGE IN PROCESS FOR THIS PROJECT ONLY: FERC provided insufficient time to perform a coordinated review of the proposed project. Therefore, we plan to respond to the EA, noting that the review period was insufficient, with general comments. However, if you can respond to Julia Wellman by **September 3, 2014**, she will include your comments in the DEQ Office of Environmental Impact Review's (OEIR) response.

If you do not submit comments to DEQ OEIR by **September 3**, please submit your comments directly to FERC and send a copy of your comments to Julia.Wellman@deq.virginia.gov. To submit your comments to FERC, follow the directions on the first four pages of the PDF document available at the VITAShare address below (please note that you will need to register your own username and password with FERC prior to filing your comments).

Valerie

Valerie A. Fulcher, CAP-OM, Executive Secretary Sr.

Department of Environmental Quality

Environmental Enhancement - Office of Environmental Impact Review

629 E. Main St., 6th Floor

Richmond, VA 23219

804/698-4330

804/698-4319 (Fax)

email: Valerie.Fulcher@deq.virginia.gov

www.deq.virginia.gov

Wellman, Julia (DEQ)

From: Fulcher, Valerie (DEQ)
Sent: Tuesday, September 02, 2014 1:19 PM
To: Mary Weaver
Cc: Wellman, Julia (DEQ)
Subject: RE: FERC Leidy SE Expansion

Thanks, Mary! Have a great afternoon!

Valerie

From: Mary Weaver [mailto:mweaver@fluvannacounty.org]
Sent: Tuesday, September 02, 2014 11:55 AM
To: Fulcher, Valerie (DEQ)
Subject: RE: FERC Leidy SE Expansion

I have not received any comments on this. I don't believe we'll have any. Thanks!

From: Fulcher, Valerie (DEQ) [mailto:Valerie.Fulcher@deq.virginia.gov]
Sent: Thursday, August 28, 2014 1:21 PM
To: Mary Weaver
Subject: FW: FERC Leidy SE Expansion

Here it is!

From: Fulcher, Valerie (DEQ)
Sent: Thursday, August 28, 2014 12:16 PM
To: 'Pamela.Nee@fairfaxcounty.gov'; 'rdube@louisa.org'; 'Patton, Justin S.'; 'aileen.ferguson@appomattoxcountyva.gov'; 'bcarter@buckinghamcounty.virginia.gov'; 'clarence.monday@pittgov.org'; 'bdavid@orangecountyva.gov'; 'dhoffman@culpepercounty.gov'; 'paul.mcculla@fauquiercounty.gov'
Subject: FERC Leidy SE Expansion

Sorry for the missing subject line—I wanted to make sure everyone knew what my original email (see below) was regarding.

The Department of Environmental Quality will be submitting comments next week; you can send your comments to Julia Wellman (Julia.Wellman@deq.virginia.gov), or you can submit them via FERC's webpage.

You can find this document on the Federal Energy Regulatory Commission's website at <http://www.ferc.gov/industries/gas/enviro/eis/2014/08-11-14-ea.asp>

The Notice and the Environmental Assessment are at the bottom of the webpage.

Valerie

From: Fulcher, Valerie (DEQ)
Sent: Wednesday, August 27, 2014 12:21 PM
To: 'Pamela.Nee@fairfaxcounty.gov'; 'rdube@louisa.org'; 'Patton, Justin S.'; 'administration@campbellcountyva.gov'; 'aileen.ferguson@appomattoxcountyva.gov'; 'bcarter@buckinghamcounty.virginia.gov'; 'clarence.monday@pittgov.org'; 'bdavid@orangecountyva.gov'; 'fbossio@culpepercounty.gov'; 'dhoffman@culpepercounty.gov';

'paul.mcculla@fauquiercounty.gov'

Cc: Wellman, Julia (DEQ)

Subject:

Good afternoon - attached is a new EIR review request/ project:

**FERC: Leidy Southeast Expansion Project
DEQ #14-140F**

<https://vitashare.virginia.gov/fcweb/GET/6RWCJSTBRTWR2P12>

Transaction# 6RWCJSTBRTWR2P12

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Valerie

Valerie A. Fulcher, CAP-OM, Executive Secretary Sr.

Department of Environmental Quality

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Richmond, VA 23219

804/698-4330

804/698-4319 (Fax)

email: Valerie.Fulcher@deq.virginia.gov

www.deq.virginia.gov

Wellman, Julia (DEQ)

From: Gregg Zody [gzody@orangecountyva.gov]
Sent: Wednesday, September 03, 2014 4:06 PM
To: Wellman, Julia (DEQ)
Cc: Bryan David; Thomas Lacheney
Subject: Orange County comments:Environmental Assessment regarding the Transcontinental Gas Pipe Line Company, LLC's proposed Leidy Southeast Expansion Project

Julia,

I sent the following the FERC email address provided in the documentation:

On behalf of Orange County, we are unable to respond in a comprehensive and thoughtful manner to the August 2014 FERC Environmental Assessment regarding the Transcontinental Gas Pipe Line Company, LLC's proposed Leidy Southeast Expansion Project.

County staff did not have a reasonable amount of time to review and evaluate the 474 page document. Having said that, it is Orange County's recommendation that if this project were to move forward, then all applicable local, state, and federal rules and regulations are followed.

Respectfully submitted,

Gregg Zody, AICP
Director, Planning and Zoning
County of Orange
128 West Main Street
Orange, Virginia 22960