



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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December 17, 2015

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

RE: Comments on the Preliminary Applicant Prepared Draft Environmental Assessment for the WB Xpress Project, Columbia Gas Transmission, LLC (FERC Docket No. PF15-21-000; DEQ 15-187F).

Dear Secretary Bose:

The Commonwealth of Virginia has completed its review of the above-referenced document. The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents submitted under the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. This is in response to the November 20, 2015 Preliminary Applicant Prepared Draft Environmental Assessment (PDEA) for the above-referenced project. The following agencies participated in the review of this proposal:

Department of Environmental Quality (DEQ)
Department of Conservation and Recreation (DCR)
Department of Health (VDH)
Department of Historic Resources (DHR)
Department of Game and Inland Fisheries (DGIF)
Marine Resources Commission (VMRC)
Virginia Outdoors Foundation
Fairfax County

In addition, the Department of Agriculture and Consumer Services, Department of Forestry, Department of Mines, Minerals, and Energy, Department of Transportation, the Northern Shenandoah Valley Regional Commission, the Northern Virginia Regional Commission, and Shenandoah, Warren, Clarke, Fauquier, and Loudoun counties were invited to comment on the proposal.

PROJECT DESCRIPTION

The Federal Energy Regulatory Commission (FERC) is considering a request by Columbia Gas Transmission, LLC (Columbia) for a pre-filing review, pursuant to 18 CFR 157.21(b) of FERC's Rules and Regulations for the proposed construction and operation of the WB Xpress Project in Shenandoah, Loudoun, Warren, Clarke, Fauquier, and Fairfax counties in Virginia with additional facilities in West Virginia. The project activities include the construction and operation of approximately 28.9 miles of various diameter natural gas pipeline, modifications to seven existing compressor stations, construction of two new compressor stations, and uprating the maximum allowable operation pressure (MAOP) on various segments of the existing natural gas transmission pipeline systems. The purpose of the project is to expand the capacity of Columbia's existing natural gas pipeline system by 1.3 million dekatherms per day to meet growing market demands. The sections of the project in Virginia include 2.2 miles of new pipeline, Line VA-1, in Fairfax, MAOP restoration on line V-5 in Shenandoah, Warren, Clark, Fauquier, and Loudoun counties, a new compressor station in Chantilly, modifications to a compressor station in Loudoun, and modifications and upgrades to a compressor station in Strasburg.

CONCLUSION

Provided activities are performed in accordance with the recommendations which follow in the Environmental Impacts and Mitigation section of this report, this proposal is unlikely to have significant effects on ambient air quality, water quality, natural heritage resources, or historic resources. It is unlikely to adversely affect species of plants or insects listed by state agencies as rare, threatened, or endangered.

ENVIRONMENTAL IMPACTS AND MITIGATION

1. Water Quality and Wetlands. According to the PDEA (page 33), there are no Wellhead Protection Areas crossed or within 150 feet of the project in Virginia. Columbia will use municipal water for hydrostatic testing of pipeline facilities in Virginia (page 41). Following completion of the testing, the test water will be discharged into adjacent well-vegetated upland areas in a manner that would minimize the potential for erosion and sedimentation. The PDEA states that wetlands impacts will occur and that the necessary permits will be obtained. In areas crossed by the pipeline, erosion and sediment controls will be utilized to minimize the potential for wetlands impacts (page 44).

1(a) Agency Jurisdiction. The State Water Control Board promulgates Virginia's water regulations covering a variety of permits to include the Virginia Pollutant Discharge Elimination System Permit (VPDES) regulating point source discharges to surface waters, Virginia Pollution Abatement Permit regulating sewage sludge, storage and land application of biosolids, industrial wastes (sludge and wastewater), municipal wastewater, and animal wastes, the Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit regulating impacts to streams, wetlands, and other surface waters. The VWP permit is a state permit which governs wetlands, surface water, and surface water withdrawals and impoundments. It also serves as §401 certification of the federal Clean Water Act §404 permits for dredge and fill activities in waters of the U.S. The VWP Permit Program is under the Office of Wetlands and Stream Protection, within the DEQ Division of Water Permitting. In addition to central office staff that review and issue VWP permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities:

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

1(b) Agency Findings. The disturbance of surface waters or wetlands may require prior approval by DEQ and/or the U.S. Army Corps of Engineers. Even if there will be no intentional placement of fill material in jurisdictional waters, potential water quality impacts resulting from construction site surface runoff must be minimized.

The hydrostatic testing associated with this project is eligible for automatic coverage under the General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests (VAG83). Information on this permit is available at the following webpage:

<http://www.deq.virginia.gov/Programs/Water/PermittingCompliance/PollutionDischargeElimination/PermitsFees.aspx#petro>

1(c) Agency Recommendation.

- Avoidance and minimization of surface water impacts should be carried out to the maximum extent practicable;
- Coordinate with the U.S. Army Corp of Engineers on wetlands impacts; and
- Utilize Best Management Practices (BMPs) to minimize impacts to surface waters.

1(d) Agency Requirement. The project must comply with the VWP program as applicable.

The hydrostatic testing must comply with the VAG83 permit requirements including requirements for sampling and retention of results and DEQ notification within 14 days of the completion of the discharge.

2. Subaqueous Lands and Tidal Wetlands. The PDEA indicated that a Joint Permit Application will be submitted for a river and stream crossing permit from the VMRC (page 21).

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 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) Requirements. Based on a desktop review of the information provided, VMRC determined that a permit would be required from the VMRC for any crossing on, over, or beneath a tidal stream or a non-tidal stream with an upstream drainage area of 5 square miles or greater at the point of impact. Crossings of tidal wetlands might also require a permit from the wetlands board of the locality where the impact occurs.

2(c) Agency Recommendation. Coordinate with VMRC regarding the submittal of a JPA for distribution and review by Federal, State, and local environmental agencies.

3. Erosion and Sediment Control and Stormwater Management. The PDEA states that site-specific erosion and sediment control (ESC) plans will be developed for the project facilities (page 12). The ESC controls will be inspected and maintained throughout the construction and restoration phases of the project (page 13).

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

- Virginia Erosion and Sediment Control (ECS) Law (§ 62.1-44.15:51 *et seq.*) and Regulations (9VAC25-840);
- Virginia Stormwater Management Act (§ 62.1-44.15:24 *et seq.*);

- Virginia Stormwater Management Program (VSMP) regulation (9VAC25-870); and
- 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (9VAC25-880).

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

3(b) Requirements. The DEQ Office of Stormwater Management did not comment on the proposed project. Guidance on the regulatory requirements for erosion and sediment controls and stormwater management is provided below.

(i) Erosion and Sediment Control Annual Specifications, Stormwater Management and Local Program Compliance. In accordance with §62.1-44.15 *et seq.*, electric, natural gas and telephone utility companies, interstate and intrastate natural gas pipeline companies, and railroad companies shall, and authorities created pursuant to § 15.2-5102 may, file general erosion and sediment control standards and specifications annually with DEQ for review and approval. Such standards and specifications shall be consistent with the requirements of this article and associated regulations and the Erosion and Sediment Control Law and Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) and associated regulations where applicable. The specifications shall apply to:

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

(ii) General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (VAR10). The operator or owner of a construction activity involving land disturbance of equal to or greater than 1 acre is required to register for coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). 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 Pollution Control. The PDEA states that construction and operation of the project could have an effect on local and regional air quality (page 89). Localized emissions during the construction of the project are expected and operation of the project would result in emissions associated with the new and modified aboveground facilities (page 99).

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

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

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

4(b) Agency Findings. According to the DEQ Air Division, the project site is partly located in a designated ozone nonattainment area and an emission control area for oxides of nitrogen (NO_x) and volatile organic compounds (VOCs).

4(c) Recommendation. Precautions should be taken to restrict the emissions of VOCs and NO_x during construction in Loudoun and Fairfax counties.

4(d) Requirements.

(i) Fugitive Dust

During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 *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, of water or chemicals for dust control;

- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

(ii) Open Burning

If project activities include the open burning of construction material or the use of special incineration devices, this activity must meet the requirements under 9 VAC 5-130 *et seq.* of the *Regulations* for open burning, and may require a permit. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. The applicant should contact County officials to determine what local requirements, if any, exist.

(iii) Fuel-Burning Equipment. Installation/ operation/ modification of fuel-burning equipment (boilers, generators, compressors, etc.) or any other air-pollution-emitting equipment may be subject to registration or permitting requirements (Article 6, Permits for New and Modified Sources).

5. Solid and Hazardous Wastes and Hazardous Materials. The PDEA states that Columbia will implement measures to reduce the potential impacts on soils from spills that may occur during construction (page 32). Contaminated materials will be collected and removed from the work site promptly and disposed of or recycled in an appropriate manner.

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

Virginia:

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

- *Virginia Regulations for the Transportation of Hazardous Materials*, 9 VAC 20-110.

Federal:

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

5(b) Agency Findings. DEQ's Division of Land Protection and Revitalization (DLPR) reviewed the PDEA and found that solid and hazardous waste issues were generally addressed. DLPR staff conducted a cursory database search of solid and hazardous waste databases for waste sites in the project area and did not identify any sites in close proximity to the project site/corridor which may impact the activity.

5(c) Recommendations.

(i) Database Searches

DLPR recommends that database searches for solid or hazardous waste sites should be performed when putting together future NEPA documents. DLPR recommends the use of the following databases: Permitted Solid Waste Management Facilities Database, CERCLA Facilities Database, Hazardous Waste Facilities Database, and Virginia Environmental Geographic Information Systems (VEGIS) search. Detailed information provided by DLPR about the databases is attached.

(ii) Pollution Prevention. DEQ encourages all projects and facilities to implement pollution prevention principles, including:

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

5(d) Waste Management Requirements. Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. All demolition and construction waste, including excess soil, must be characterized in accordance with the *Virginia Hazardous Waste Management Regulations* prior to disposal at an appropriate facility. All solid wastes, hazardous wastes, and hazardous materials, including construction and demolition (C&D) wastes and universal wastes (batteries, fluorescent lights, refrigerants, mercury switches, mercury thermostats, etc.), must be managed in accordance with all applicable federal, state, and local environmental regulations.

6. Natural Heritage Resources. The PDEA states that the majority of pipeline facilities, both new and replacement, would be installed within or adjacent to existing rights-of-way (ROW) to minimize new and permanent impacts on vegetation (page 50). The proposed VA-1 route would cross the Elklick Diabase Flatwoods Conservation Site and the Elklick Woodlands Natural Area Preserve. The proposed route and workspace would be located within existing ROW and the project would have no permanent impacts on either area (page 51).

6(a) Agency Jurisdiction.

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

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

6(b) Agency Findings. DCR DNH searched its Biotics Data System (Biotics) for occurrences of natural heritage resources in the vicinity of the project area. The site-specific results are summarized below. See the attached DCR memorandum dated December 9, 2015 for greater detail.

Dysart Valve Site – Shenandoah County
Strasburg Compressor Station-Shenandoah County
Nineveh Meter Station- Warren County:

These project areas are situated on karst-forming carbonate rock and can be characterized by sinkholes, caves, disappearing streams, and large springs. Discharge of runoff to sinkholes or sinking streams, filling of sinkholes, and alteration of cave entrances can lead to surface collapse, flooding, erosion and sedimentation, groundwater contamination, and degradation of subterranean habitat for natural heritage resources.

Nineveh Meter Station is within the range of and overlies potential habitat for the state and federally threatened Madison Cave isopod (*Antrolana lira*, G2G4/S2/LT/LT). Projects involving the following components have potential to impact this species:

- 1) withdrawal of water from wells or lowering the water table,
- 2) alteration of sinkholes, cave entrances, or sinking streams,
- 3) waste water injection,
- 4) quarrying,
- 5) nutrient applications lacking a certified nutrient management plan, or
- 6) discharge of water to a conveyance that discharges to a karst feature downstream.

Loudoun Compressor Station-Loudoun County:

The Little River Stream Conservation Unit (SCU) is located downstream from the project site. The Little River SCU has been given a biodiversity ranking of B2, which represents a site of very high significance. The natural heritage resources associated with this site are:

<i>Lasmigona subviridis</i>	Green floater	G3/S2/NL/LT
	Aquatic Natural Community	G2/S2/NL/NL
	Aquatic Natural Community	G3G4/S3S4/NL/NL

The Green floater has been listed as state threatened by DGIF.

Chantilly Compressor Station and Chantilly Lateral-Fairfax County:

The Elklick Diabase Flatwoods and the Bull Run Diabase Flatwoods Conservation Sites are located within the project boundary. The Elklick Diabase Flatwoods Conservation Site has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resources associated with this site are:

- Purple milkweed
- Northern Hardpan Basic Oak Hickory Forest
- Torrey's mountain-mint

The Northern Hardpan Basic Oak – Hickory Forest is endemic to the Culpeper Basin and western Piedmont foothills of Virginia and Maryland.

Torrey's mountain mint is a globally rare perennial herb with a mint-like odor. Surveys for this species should be conducted during the July-September flowering/fruiting period. 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. There is a small subpopulation of Torrey's Mountain-mint at the edge of the woods within the Atlantic Seaboard / Columbia Gas Easement headed east north-east within the Elklick Woodlands Natural Area Preserve.

Purple milkweed have been documented within the project area along the existing

transmission lines. Purple milkweed is currently known from 9 locations in Virginia.

DCR has reviewed *Virginia Rare Plant Survey Report*, Fairfax, Virginia prepared by Natural Resource Group, dated November 2015. DCR concurs with the negative results for diabase plants within the “B” and “C” Areas identified in the report. However, despite the lack of identification of Purple milkweed or Torrey’s mountain-mint during the survey, DCR botanist believes the resources still may exist due to the Torrey’s mountain-mint being recently identified by DCR staff, and the rare plant survey was not conducted at a time of year appropriate to identify Purple milkweed. Suitable habitat for these rare plants can be found in areas mowed every year.

The Elklick Woodlands Natural Area Preserve is located immediately adjacent to the project area and is owned by the Fairfax County Parks Authority and jointly managed by the Fairfax County Parks Authority and DCR.

State-listed Plant and Insect Species:

Under a Memorandum of Agreement established between VDACS and 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.

6(c) Recommendations.

Dysart Valve Site – Shenandoah County

Strasburg Compressor Station-Shenandoah County

Nineveh Meter Station- Warren County: If karst features/terrain are encountered during the project, coordinate with Wil Orndorff (540-230-5960, Wil.Orndorff@dcr.virginia.gov) to document and minimize adverse impacts.

If the project involves filling or “improvement” of sinkholes or cave openings, submit detailed location information and copies of the design specifications to DCR. In cases where sinkhole improvement is for stormwater discharge, copies of VDOT Form EQ-120 will suffice. New “Karst Assessment Guidelines” developed by the Virginia Cave Board for land development can be found at http://www.dcr.virginia.gov/natural_heritage/documents/karst_assessment_guidelines.pdf.

If the project meets one or more of the criteria that may result in possible impacts to the Madison Cave isopod listed above ([Environmental Impacts and Mitigation](#), Section 6(b)), coordinate with the DCR Karst Protection Coordinator Wil Orndorff (Wil.Orndorff@dcr.virginia.gov or 540-230-5960). Due to the legal status of the Madison Cave isopod, DCR recommends coordination with the US Fish and Wildlife Service (USFWS) to ensure compliance with protected species legislation.

Loudoun Compressor Station-Loudoun County: 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.

Chantilly Compressor Station and Chantilly Lateral -Fairfax County: Submit the project's site plan, including the location of the pipeline footprint within the right-of-way, to DCR so biologists can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources.

DCR recommends continued coordination with the DCR Northern Region Natural Area Steward, Mike Lott (540-658-8690) and the Fairfax County Parks Authority regarding the Elklick Woodlands Natural Area Preserve which is located immediately adjacent to the project area.

General Recommendation: DCR supports the alternate location of the pipeline Right-of-Way (ROW) within and south of the existing Virginia Power Electric Easement that avoids the Elklick Woodlands Natural Area Preserve as submitted by Natural Resource Group to DCR Division of Natural Heritage on November 25, 2015.

Recommended Survey Windows for Federally Listed Plants:

On page 68 of the Preliminary Draft Environmental Assessment, Table B. 4.1-2 includes survey timing windows for federally listed plants in Virginia. DCR recommends the following surveys windows for these plants:

- | | |
|---|----------------------|
| • Small whorled pogonia (<i>Isotria medeoloides</i>) | May 25-July 15 |
| • Shale barren rock cress (<i>Arabis serotina</i>) | July 15-October 15 |
| • Northeastern bulrush (<i>Scirpus ancistrochaetus</i>) | July 1-September 30 |
| • Smooth coneflower (<i>Echinacea laevigata</i>) | June 15-October 31 |
| • Sensitive joint vetch (<i>Aeschynomene virginica</i>) | August 15-October 15 |
| • Swamp pink (<i>Helonias bullata</i>) | April 15-May 31 |

Contact DCR DNH to secure updated information on natural heritage resources if the scope of the project changes and/or six months has passed before it is utilized. New and updated information is continually added to the Biotics Data System.

7. Wildlife Resources, Fisheries, and Protected Species. According to the PDEA, there are no commercial fisheries in any of the waterbodies that would be crossed by the project. The document concludes that no long-term impacts are expected to occur to fisheries as a result of the project.

Impacts on wildlife are expected to be short-term and limited to the construction phase of the project (page 57). The project will not permanently alter significant tracts of habitat.

7(a) Agency Jurisdiction. The Virginia Department of Game and Inland Fisheries (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.Code §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 Findings. DGIF previously responded to a scoping request on this project in August 2015 and submitted the scoping comments (email dated 8/20/2015 attached) to DEQ in response to the PDEA review request. DGIF noted wildlife species and resources from the project area in the scoping response.

Strasburg Facility, Shenandoah County:

- Threatened wood turtles are documented from the project site.
- Cedar Creek and Meadow Brook have been designated Threatened and Endangered Species Waters due to the presence of the wood turtle.
- North Fork Shenandoah River has been designated a Threatened and Endangered Species Water due to the presence of state Threatened green floaters and state Endangered brook floaters.

Dysart Facility, Shenandoah County:

- The state Threatened wood turtles is documented from the project site.
- DGIF does not currently designate any nearby waters for their protection.

Nineveh Facility, Warren County:

- The Threatened upland sandpipers are documented from the project area.
- DGIF is currently developing justification to remove this species from Virginia's listed species list.

Loudoun Facility, Loudoun County:

- Goose Creek and Little River have been designated Threatened and Endangered Species Waters due to the presence of state Threatened green floaters.

New Pipeline Installation, Fairfax County:

- Cub Run has been designated a Threatened and Endangered Species Water due to the presence of state Threatened wood turtles.

7(c) Recommendations.

- Update the EA to include consideration of the species and resources documented (Item 7(b)) from the project areas.
- Coordinate water withdrawals (such as for hydrostatic testing, dust suppression) with DGIF, whether permanent or temporary in nature, to ensure protection of instream habitats. To best protect resident aquatic species from harm, DGIF typically recommends that water withdrawals not take more than 10% instantaneous flow, that the intake is fitted with a 1mm mesh screen, and that the intake velocity not exceed 0.25 fps.

Strasburg Facility, Shenandoah County:

- Any proposed impacts within 900 feet of Cedar Creek and Meadow Brook, within these streams, and/or within any perennial tributaries to them should be closely coordinated with DGIF to ensure protection of the wood turtle and the habitats that support it.
- Any impacts within the North Fork Shenandoah River and/or its perennial tributaries should be closely coordinated with DGIF to ensure protection of the state-listed threatened green floaters and the endangered brook floaters.

Dysart Facility, Shenandoah County: Any proposed impacts within 900 feet of streams and/or within streams should be closely coordinated with DGIF to ensure protection of the wood turtle and the habitats that support it.

Loudoun Facility, Loudoun County: Any impacts within Goose Creek and Little River and/or their perennial tributaries should be closely coordinated with DGIF to ensure protection of the state-listed threatened green floater.

New Pipeline Installation, Fairfax County: Any proposed impacts within 900 feet of Cub Run, within the stream, and/or within any perennial tributaries to it should be closely coordinated with DGIF to ensure protection of the wood turtle species and the habitats that support it.

At all sites DGIF recommends:

- Conduct any in-stream activities during low or no-flow conditions, using non-erodible cofferdams or turbidity curtains to isolate the construction area, blocking no more than 50% of the streamflow at any given time.
- Stockpile excavated material in a manner that prevents reentry into the stream.
- Restoration of original streambed and streambank contours.
- Revegetation of barren areas with native vegetation.
- Implementation of strict erosion and sediment control measures.

To minimize harm to the aquatic environment and its residents resulting from use of the Tremie method to install concrete, installation of grout bags, and traditional pouring of concrete, DGIF recommends that such activities occur only in the dry, allowing all concrete to harden and cure prior to contact with open water. Due to future maintenance costs associated with culverts, and the loss of riparian and aquatic habitat, DGIF recommends stream crossings to be constructed via clear-span bridges. However, if this is not possible, DGIF recommends countersinking any culverts below the streambed at least 6 inches, or the use of bottomless culverts, to allow passage of aquatic organisms. DGIF also recommends the installation of floodplain culverts to carry bankfull discharges.

Site and Corridor Development (as applicable): To minimize the adverse impacts of the linear utility and site development on wildlife resources, DGIF offers the following general recommendations:

- Avoid and minimize impacts to undisturbed forest, wetlands and streams to the fullest extent practicable.
- Avoidance and minimization of impact may include relocating stream channels as opposed to filling or channelizing as well as using, and incorporating into the development plan, a natural stream channel design and wooded buffers.
- Maintain naturally vegetated buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams, where practicable.
- Maintain wooded lots to the fullest extent practicable.
- Conduct tree removal and ground clearing activities outside of the resident and migratory songbird nesting season of March 15 through August 15 of any year.
- Implement and maintain appropriate erosion and sediment controls throughout construction of the project and site restoration.

DGIF will work with the applicant to develop project-specific measures as necessary to minimize project impacts upon wildlife resources.

DGIF recommends that the stormwater controls for this project be designed to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to, utilizing bioretention areas, and minimizing the use of curb and gutter in favor of grassed swales. Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.

Coordinate with the USFWS regarding potential impacts on the federal-listed threatened

northern long-eared bats associated with tree removal, if such is proposed.

7(d) Additional Information. DGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams and anadromous fish waters. The database may be accessed at <http://vafwis.org/fwis/>.

8. Chesapeake Bay Preservation Areas. The PDEA (page 78) states that the Chantilly Compressor Station and Line VA-1 are located in Fairfax County, in Virginia's coastal zone. The document states that the Joint Permit Application for the project will contain a statement certifying that the project will be consistent with the Coastal Zone Management Program.

8(a) Agency Jurisdiction. The DEQ Office of Local Government Programs administers the Chesapeake Bay Preservation Act (Virginia Code §62.1-44.15:67 *et seq.*) and Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 25-830-10 *et seq.*). Each Tidewater locality must adopt a program based on the Chesapeake Bay Preservation Act and the Chesapeake Bay Preservation Area Designation and Management Regulations. The Act and regulations recognize local government responsibility for land use decisions and are designed to establish a framework for compliance without dictating precisely what local programs must look like. Local governments have flexibility to develop water quality preservation programs that reflect unique local characteristics and embody other community goals. Such flexibility also facilitates innovative and creative approaches in achieving program objectives. The regulations address nonpoint source pollution by identifying and protecting certain lands called Chesapeake Bay Preservation Areas. The regulations use a resource-based approach that recognizes differences between various land forms and treats them differently.

8(b) Agency Comments. In Fairfax County, 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;
- tidal shores; and
- 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 the County not included in the RPA are designated as RMAs.

8(c) Requirements.

Construction, installation, operation and maintenance of public utilities and their appurtenant structures are conditionally exempt from the Regulations provided they are constructed in accordance with:

1. Regulations promulgated pursuant to the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act;
2. An erosion and sediment control plan and a stormwater management approved by the Virginia Department of Environmental Quality and
3. Local water quality protection criteria at least as stringent as the above state requirements.

8(d) Conclusion.

Provided adherence to the above stated requirements (Environmental Impacts and Mitigation Section 8(c)), the proposed activity would be consistent with the Bay Act and *Regulations*.

9. Historic Impacts. The PDEA (page 87) indicates that historic and architectural surveys will be performed for the project areas.

9(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 1962 (NHPA), as amended, and its implementing regulation at 36 CFR Part 800. The NHPA 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 environmental impact report review process.

9(b) Agency Recommendation. DHR has been in consultation with the FERC and its applicant regarding this project. DHR requests 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.

10. Public Water Supply. The PDEA (page 34) did not identify any groundwater wells within 150 feet of the project areas in Virginia. The document states there is one surface water intake within two miles of the Strasburg Compressor Station (page 36).

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 and surface water intakes). VDH administers both federal and state laws governing waterworks operation.

10(b) Agency Findings. VDH-ODW states that there may be impacts to public drinking water sources due to this project if the mitigation efforts recommended below are not

implemented. VDH-ODW found the following public water sources near to the project sites:

Loudoun Compressor Station: The project is within the watershed of the City of Fairfax and the Fairfax County Water Authority public surface water sources.

Chantilly Compressor Station: The project is within the watershed of the Fairfax County Water Authority and the City of Manassas public surface water sources.

Line VA-1 Receiver Site: The project is within the watershed of the Fairfax County Water Authority and the City of Manassas public surface water sources.

Nineveh Meter Station: The project is within the watershed of the Town of Berryville, Mount Weather, and Town of Leesburg public surface water sources.

VDH were unable to provide information about public water sources that may be impacted by activities at the Strasburg Compressor Station and Dysart Valve Site due to insufficient locational information for the sites.

10(c) Recommendation. Employ BMPs on the project sites including ESCs as well as Spill Prevention Controls & Countermeasures.

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

11. Open Space. According to the PDEA, the proposed project facilities would be located within a quarter of a mile of four conservation easements (page 78). The project is expected to have no impact on these conservation easements.

11(a) Agency Jurisdiction. The Virginia Outdoors Foundation (VOF) was created by the General Assembly in 1966 and established in the Code of Virginia under § 10.1-1800, which states: " The Virginia Outdoors Foundation is established to promote the preservation of open-space lands and to encourage private gifts of money, securities, land or other property to preserve the natural, scenic, historic, scientific, open-space and recreational areas of the Commonwealth. The Virginia Outdoors Foundation is a body politic and shall be governed and administered by a board of trustees composed of seven trustees from the Commonwealth at large to be appointed by the Governor for four-year terms."

11(b) Agency Comments. The VOF stated that, as of 14 December 2015, there are no existing or proposed VOF open-space easements within the immediate vicinity of construction related to the WB Xpress project.

11(c) Agency Recommendation. Contact the VOF or further review if the project area changes or if the project does not begin within 24 months of this review.

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

12(a) Fairfax County Comments. Fairfax County stated that the project could result in significant new impacts in the western part of the county which is in the watershed for the county's water supply. There are also extensive environmentally and culturally sensitive lands in that section of the county. The construction phase of the project will result in permanent loss of natural resource and habitat due to the land disturbance for the proposed facilities. Fairfax County stated that more detailed drawings would be required for the proposed Chantilly Compressor Station, pipeline alignment, and staging area in order for a full determination to be made on the extent of possible short- and long-term impacts of the proposed work. In general noise in excess of 55 decibels, erosion, uncontrolled runoff and the need for screening are anticipated impacts.

12(b) Fairfax County Recommendation. Include the following in the Environmental Assessment for the WB Xpress Project:

- Identify existing and planned residences near the proposed project site and document the impacts that may occur to these residences. Of particular concern are noise impacts, fugitive dust during construction, drainage impacts, and emissions from the completed compression station and receiver facility. County standards related to noise from stationary sources should be met, as should County requirements related to dust control and stormwater management.
- Consider the proximity of the proposed pipeline to existing and planned future residential development and address pipeline safety and potential exposure to nearby residents.
- Provide alternative alignments which:
 - 1) collocate the new compressor station and new receiver facility on other compatible sites with available land area, in order to minimize potential new land disturbance and;
 - 2) collocate the new pipeline within existing Columbia pipeline easements or collocate within other pipeline easements.
- Avoid significant surface land and water disturbance, through installation of new pipeline by means of directional drill, wherever possible.

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

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed project is committed to minimizing its environmental impacts, setting environmental goals and achieving improvements in its environmental performance. DEQ offers EMS development assistance and it recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.

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

14. Pesticides and Herbicides. In general, when pesticides or herbicides must be used, their use should be strictly in accordance with manufacturers' recommendations. In addition, we recommend that Columbia use the least toxic pesticides or herbicides effective in controlling the target species to the extent feasible. For more information on pesticide or herbicide use, contact VDACS at (804) 786-3501.

15. Water Conservation. The following recommendations will result in reduced water use associated with the operation of the facility.

- Grounds should be landscaped with hardy native plant species to conserve water as well as lessen the need to use fertilizers and pesticides.
- Convert turf to low water-use landscaping such as drought resistant grass, plants, shrubs and trees.
- Improve irrigation practices by:
 - upgrading sprinkler clock; water at night, if possible, to reduce evapotranspiration (lawns need only 1 inch of water per week, and do not need to be watered daily; overwatering causes 85% of turf problems);
 - installing a rain shutoff device; and
 - collecting rainwater with a rain bucket or cistern system with drip lines.

REGULATORY AND COORDINATION NEEDS

1. Surface Waters and Wetlands. The project must comply with the Virginia Water Protection Program (Virginia Code § 62.1-44.15 *et seq.*). DEQ regulates impacts to waters and wetlands pursuant to 9VAC25-210 *et seq.* If the proposed activities require impacts to wetlands or surface waters, coordinate with the appropriate DEQ Regional Office regarding potential permitting requirements (NRO 703-583-3800, VRO 540-574-7800).

The hydrostatic testing must comply with the VAG83 general permit requirements. Coordinate with the appropriate DEQ Regional Office with questions regarding the reporting requirements (NRO 703-583-3800, VRO 540-574-7800).

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 (Mark Eversole at 757-247-2028) regarding the submittal of a JPA.

3. Erosion and Sediment Control and Stormwater Management.

3(a) Erosion and Sediment Control and Stormwater Management. In accordance with §62.1-44.15 *et seq.*, electric, natural gas and telephone utility companies, interstate and intrastate natural gas pipeline companies, and railroad companies shall, and authorities created pursuant to § 15.2-5102 may, file general erosion and sediment control standards and specifications annually with DEQ for review and approval. Such standards and specifications shall be consistent with the requirements of this article and associated regulations and the Erosion and Sediment Control Law and Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) and associated regulations where applicable.

Contact the DEQ Office of Stormwater Management (Larry Gavan, 804-698-4040) for additional information.

3(b) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities (VAR10). For projects involving land-disturbing activities of equal to or greater than one acre the applicant is required to register for coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-870-1 *et seq.*).

Specific questions regarding the Stormwater Management Program requirements should be directed to DEQ, Holly Sepety at (804) 698-4039.

4. Air Quality Regulations. This project is subject to air regulations administered by

the Department of Environmental Quality. The following sections of the Code of Virginia and Virginia Administrative Code (VAC) are applicable:

- fugitive dust and emissions control (9 VAC 5-50-60 *et seq.*); and
- open burning restrictions (9 VAC 5-130 *et seq.*).

The installation, operation and/or modification of stationary or portable fuel-burning equipment or other sources of air pollutants may be subject to registration requirements.

Coordinate with the appropriate DEQ Regional Office regarding potential permitting requirements for the new and modified compressor stations (NRO 703-583-3800, VRO 540-574-7800).

5. Solid and Hazardous Wastes. All solid waste, hazardous waste, and hazardous materials must be managed in accordance with all applicable federal, state, and local environmental regulations.

For additional information concerning location and availability of suitable waste management facilities in the project area or if free product, discolored soils, or other evidence of contaminated soils are encountered, coordinate with the appropriate DEQ Regional Office (NRO 703-583-3800, VRO 540-574-7800).

6. Natural Heritage Resources. Contact DCR DNH (Robbie Rhur 804-371-2594) with questions regarding DCR's site-specific recommendations and requirements laid out in the Environmental Impacts and Mitigation Sections 6(c) and 6(d), respectively.

Due to the legal status of the Madison Cave isopod, coordinate with the U.S. Fish and Wildlife Service.

Contact DCR DNH, Rene Hypes at (804) 371-2708, to secure updated information on natural heritage resources if the scope of the project changes and/or six months has passed before the project is implemented, since new and updated information is continually added to the Biotics Data System.

7. Wildlife Resources and Protected Species.

- Coordinate with DGIF (Amy Ewing, 804-367-2211) regarding its site-specific recommendations for the protection of wildlife resources and protected species.
- DGIF maintains a database (<http://vafwis.org/fwis/>) of wildlife locations, including threatened and endangered species, trout streams and anadromous fish waters.
- Coordinate with the U.S. Fish and Wildlife Service regarding protection of the Northern long-eared bat, a federally listed threatened species under the Federal Endangered Species Act.

8. Chesapeake Bay Preservation Areas. The project must satisfy the applicable Chesapeake Bay Preservation Act (Virginia Code 62.1-44.15 *et seq.*) and the Chesapeake Bay Preservation Area Designation and Management Regulations (9VAC25-830 *et seq.*) (Regulations). Section 9VAC25-830-160 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:

1. Regulations promulgated pursuant to the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act;
2. An erosion and sediment control plan and a stormwater management approved by the Virginia Department of Environmental Quality and
3. Local water quality protection criteria at least as stringent as the above state requirements.

9. Historic and Archaeological Resources. If applicable, Columbia should coordinate the project with the responsible federal agency and DHR to ensure compliance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations at 36 CFR 800. Contact DHR (Roger Kirchen at 804-367-2323, extension 153 or Roger.Kirchen@dhr.virginia.gov) regarding its recommendations and coordination as necessary.

For additional information and coordination, contact DEQ-OLGP, Daniel Moore at (804) 698-4520.

10. Public Water Supply and Sanitary Sewer Distribution Systems. Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility. Contact VDH, Roy Soto, with questions regarding its recommendations (804-864-7516).

11. Open Space. Contact the VOF (Mike Hallock-Solomon, 804-371-0114) with questions regarding its comments, if the project area changes, or if the project does not begin within 24 months of this review.

12. Fairfax County Comments. Coordinate with Fairfax County (John Bell, 703-324-1380) regarding its recommendations for additional considerations that should be made in the Environmental Assessment.

13. Federal Consistency Certification. Columbia must submit a federal consistency certification (FCC) pursuant to the Coastal Zone Management Act (CZMA) of 1972, as amended, and the federal consistency regulations implementing the CZMA (15 CFR, Part 930, Subpart D, Section 930.50 *et seq.*) to DEQ OEIR. Information on document submission is available at <http://www.deq.virginia.gov/Programs/EnvironmentallImpactReview/DocumentSubmission>

WB Xpress Project, 15-187F
Preliminary Applicant Prepared Draft EA

[ns.aspx](#). Information on FCCs is available at <http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistencyReviews.aspx>. Attachment 1 provides a list of the enforceable policies of the Coastal Zone Management Program which must be addressed in the FCC.

CONCLUSION

Thank you for the opportunity to review and respond to the Preliminary Applicant Prepared Draft Environmental Assessment for the WB Xpress Project. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4204 or Janine Howard at (804) 698-4299 for clarification of these comments.

Sincerely,



Bettina Sullivan, Program Manager
Environmental Impact Review

Ec:

Robbie Rhur, DCR
Amy Ewing, DGIF
Keith Tignor, VDACs
Roy Soto, VDH
Roger Kirchen, DHR
David Spears, DMME
Greg Evans, DOF
Tony Watkinson, VMRC
Jin Cromwell, VDOT
Chip Ray, VDOT
Elizabeth Jordan, VDOT
Martha Little, Virginia Outdoors Foundation
Denise James, Fairfax County
Mary T. Price, Shenandoah County
Scott K. York, Loudoun County
David Ash, Clarke County
Paul McCulla, Fauquier County
Douglas P. Stanley, Warren County
Gail Crigler, Northern Shenandoah Valley Regional Commission
Mark G. Gibb, Northern Virginia Regional Commission
Nancy Fox-Fernandez, FERC
Jennifer Cannon, Columbia Gas



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4020
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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.

- 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.*).

Howard, Janine (DEQ)

From: Burstein, Daniel (DEQ)
Sent: Wednesday, December 16, 2015 11:15 AM
To: Howard, Janine (DEQ)
Subject: RE: RE: DOE/Federal Energy Regulatory Commission: WB Xpress Project – Columbia Gas - DEQ #15-187F - Review

From the air permit manager

A permit may be required for the new compressor station and the one that will be modified; however, until we know details of the project itself (i.e., whether electric driven compressors or natural gas fired compressor engines will be used), can't say what type or that definitely an A6 permit is required.....Let me know if you have other questions.

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
daniel.burstein@deq.virginia.gov

From: Howard, Janine (DEQ)
Sent: Wednesday, December 16, 2015 10:16 AM
To: Burstein, Daniel (DEQ)
Subject: RE: RE: DOE/Federal Energy Regulatory Commission: WB Xpress Project – Columbia Gas - DEQ #15-187F - Review

Okay. Thank you!

Janine L. Howard

Environmental Impact Review Coordinator

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From: Burstein, Daniel (DEQ)
Sent: Wednesday, December 16, 2015 10:11 AM
To: Howard, Janine (DEQ)
Subject: RE: RE: DOE/Federal Energy Regulatory Commission: WB Xpress Project – Columbia Gas - DEQ #15-187F - Review

I am trying to get a response from the air folks.

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

From: Howard, Janine (DEQ)
Sent: Wednesday, December 16, 2015 10:05 AM
To: Burstein, Daniel (DEQ)
Subject: RE: RE: DOE/Federal Energy Regulatory Commission: WB Xpress Project – Columbia Gas - DEQ #15-187F - Review

Thanks Daniel. That is helpful!

Janine L. Howard
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From: Burstein, Daniel (DEQ)
Sent: Wednesday, December 16, 2015 10:00 AM
To: Howard, Janine (DEQ)
Subject: RE: RE: DOE/Federal Energy Regulatory Commission: WB Xpress Project – Columbia Gas - DEQ #15-187F - Review

Janine,

Yes, they are covered by the regulations automatically. Therefore they will need to follow the specific requirements set forth in the regulations, i.e. sampling and retention of results, and DEQ notification 14 days after completion of the project.

Hope this helps,

Dan

Daniel Burstein
Regional Enforcement Specialist, Senior II
Virginia Department of Environmental Quality
Northern Virginia Regional Office

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Phone: (703) 583-3904
daniel.burstein@deq.virginia.gov.

From: Howard, Janine (DEQ)
Sent: Wednesday, December 16, 2015 9:47 AM
To: Burstein, Daniel (DEQ)
Subject: RE: RE: DOE/Federal Energy Regulatory Commission: WB Xpress Project – Columbia Gas - DEQ #15-187F - Review

Good Morning, Daniel.

I have a couple of follow-up questions to your comments on the WB Xpress Pipeline project.

Firstly, this project includes hydrostatic testing of the pipeline. I suspect that VPDES General Permit VAG83 would apply to this project and, if so, we should probably include something about it in the state review response. Table A.10-1 on page 21 of the EA document states that the VAG83 permit is not applicable (exempt) for this project. I notice on our webpage (<http://www.deq.virginia.gov/programs/water/permittingcompliance/pollutiondischargeelimination/permitsfees.aspx>) that hydrostatic testing of natural gas pipelines is included in this permit and that short-term projects (less than 14 days in duration) are automatically covered under the permit (no registration statement is required). Perhaps Columbia Gas marked the permit N/A because of the automatic coverage. In any case, would this permit apply to this project?

Secondly, this project includes a new compressor station in Chantilly and modifications to a compressor station in Loudoun. Presumably the new compressor station will require a permit. Does Article 6 cover a new source review for the compressor station?

I need to send this project out tomorrow so please let me know your thoughts ASAP.

Thanks,

Janine

Janine L. Howard
Environmental Impact Review Coordinator

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From: Burstein, Daniel (DEQ)
Sent: Tuesday, December 08, 2015 2:27 PM
To: Howard, Janine (DEQ)
Subject: RE: DOE/Federal Energy Regulatory Commission: WB Xpress Project – Columbia Gas - DEQ #15-187F - Review

Howard, Janine (DEQ)

From: Burstein, Daniel (DEQ)
Sent: Tuesday, December 08, 2015 2:27 PM
To: Howard, Janine (DEQ)
Subject: RE: DOE/Federal Energy Regulatory Commission: WB Xpress Project – Columbia Gas - DEQ #15-187F - Review

NRO comments regarding the Draft Environmental Assessment for the **DOE/Federal Energy Regulatory Commission: WB Xpress Project – Columbia Gas Transmission, LLC, located in Loudoun and Fairfax Counties, Virginia** are as follows:

Land Protection Division – The project manger is reminded that if any solid or hazardous waste is generated/encountered during construction or implementation of the plans, DCR 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 - The project manger 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 related to stormwater management and erosion and sediment controls.

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

Howard, Janine (DEQ)

From: Fowler, Keith (DEQ)
Sent: Wednesday, December 16, 2015 12:06 PM
To: Howard, Janine (DEQ)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Here you go:

Although they are not required to submit a Registration Statement, they are still required to comply with the other requirements of the regulation at <http://law.lis.virginia.gov/admincodeexpand/title9/agency25/chapter120/>, which include certain notifications, monitoring, and effluent limits for discharges which could reach surface waters.

I also double-checked the info they provided re Air regulations, and it appears that they are aware of those regulatory requirements. They will still need to contact Janardan for likely air permitting associated with the Strasburg Compressor Station upgrade.

From: Fowler, Keith (DEQ)
Sent: Wednesday, December 16, 2015 11:38 AM
To: Howard, Janine (DEQ)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Actually, short term doesn't appear to have anything to do with hydrostatic test discharges. I'll get you our response soon after lunch, I think.

From: Howard, Janine (DEQ)
Sent: Wednesday, December 16, 2015 11:32 AM
To: Fowler, Keith (DEQ)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Thanks Keith. I heard back from NRO and they said that VAG83 does apply and that the project is automatically covered due to the short term duration of the discharge. Hopefully VRO agrees!

Janine L. Howard

Environmental Impact Review Coordinator

Office of Environmental Impact Review
Division of Environmental Enhancement
Virginia Department of Environmental Quality
629 E. Main Street
Richmond, VA 23219

t: (804) 698-4299

f: (804) 698-4032

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From: Fowler, Keith (DEQ)
Sent: Wednesday, December 16, 2015 10:00 AM
To: Howard, Janine (DEQ)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

OK. I'm checking.

From: Howard, Janine (DEQ)
Sent: Wednesday, December 16, 2015 9:56 AM
To: Fowler, Keith (DEQ)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Good Morning Keith,

I have one quick follow-up question to your comments on the WB Xpress Pipeline project.

This project includes hydrostatic testing of the pipeline. I suspect that VPDES General Permit VAG83 would apply to this project and, if so, we may want to include something about it in the state review response. Table A.10-1 on page 21 of the EA document states that the VAG83 permit is not applicable (exempt) for this project. I notice on our webpage (<http://www.deq.virginia.gov/programs/water/permittingcompliance/pollutiondischargeelimination/permitsfees.aspx>) that hydrostatic testing of natural gas pipelines is included in this permit and that short-term projects (less than 14 days in duration) are automatically covered under the permit (no registration statement is required). Perhaps Columbia Gas marked the permit N/A because of the automatic coverage. In any case, would this permit apply to this project?

I need to send this project out tomorrow so please let me know your thoughts ASAP.

Thanks,

Janine

Janine L. Howard

Environmental Impact Review Coordinator

Office of Environmental Impact Review
Division of Environmental Enhancement
Virginia Department of Environmental Quality
629 E. Main Street
Richmond, VA 23219

t: (804) 698-4299

f: (804) 698-4032

For program updates and public notices please subscribe to the [OEIR News Feed](#)

From: Fowler, Keith (DEQ)
Sent: Tuesday, November 24, 2015 8:53 AM
To: Fulcher, Valerie (DEQ); Howard, Janine (DEQ)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Below are DEQ Valley Regional Office review comments for the subject project. These comments apply only to the Strasburg Compressor Station upgrade, as that is the only part of this project within the DEQ Valley Region. Other than the information provided below, I have no additional recommendations re this project. Please let me know if you need any additional information.

1. Water Quality and Wetlands. Measures must be taken to avoid and minimize impacts to surface waters and wetlands during construction activities. The disturbance of surface waters or wetlands may require prior approval by DEQ and/or the U.S. Army Corps of Engineers. The Army Corps of Engineers is the final authority for an official confirmation of whether there are federal jurisdictional wetlands or other surface waters that may be impacted by the proposed project. DEQ may confirm additional waters as jurisdictional beyond those under federal authority. Review of National Wetland

Howard, Janine (DEQ)

From: Fowler, Keith (DEQ)
Sent: Tuesday, November 24, 2015 8:53 AM
To: Fulcher, Valerie (DEQ); Howard, Janine (DEQ)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Below are DEQ Valley Regional Office review comments for the subject project. These comments apply only to the Strasburg Compressor Station upgrade, as that is the only part of this project within the DEQ Valley Region. Other than the information provided below, I have no additional recommendations re this project. Please let me know if you need any additional information.

1. Water Quality and Wetlands. Measures must be taken to avoid and minimize impacts to surface waters and wetlands during construction activities. The disturbance of surface waters or wetlands may require prior approval by DEQ and/or the U.S. Army Corps of Engineers. The Army Corps of Engineers is the final authority for an official confirmation of whether there are federal jurisdictional wetlands or other surface waters that may be impacted by the proposed project. DEQ may confirm additional waters as jurisdictional beyond those under federal authority. Review of National Wetland Inventory maps or topographic maps for locating wetlands or streams may not be sufficient; there may need to be a site-specific review of the site by a qualified professional. Even if there will be no intentional placement of fill material in jurisdictional waters, potential water quality impacts resulting from construction site surface runoff must be minimized. This can be achieved by using Best Management Practices (BMPs). If construction activities will occur in or along any streams (perennial, intermittent, or ephemeral), open water or wetlands, the applicant should contact Eric Millard at DEQ-VRO (540-574-7813, Eric.Millard@deq.virginia.gov) to determine the need for any permits prior to commencing work that could impact surface waters or wetlands.

2. Erosion and Sediment Control and Storm Water Management. DEQ has regulatory authority for the Virginia Pollutant Discharge Elimination System (VPDES) programs related to municipal separate storm sewer systems (MS4s) and construction activities. Erosion and sediment control measures are addressed in local ordinances and State regulations. Additional information is available at <http://www.deq.virginia.gov/Programs/Water/StormwaterManagement.aspx>. Non-point source pollution resulting from this project should be minimized by using effective erosion and sediment control practices and structures. Consideration should also be given to using permeable paving for parking areas and walkways, and denuded areas should be promptly revegetated following construction work. If the total land disturbance exceeds 10,000 square feet, an erosion and sediment control plan will be required. Some localities also require an E&S plan for disturbances less than 10,000 square feet. A stormwater management plan may also be required. For any land disturbing activities equal to one acre or more, you are required to apply for coverage under the VPDES General Permit for Discharges of Storm Water from Construction Activities. The Virginia Stormwater Management Permit Authority may be DEQ or the locality. Specific questions regarding the Stormwater Management Program requirements should be directed to Gary Flory at DEQ-VRO (540-574-7840, Gary.Flory@deq.virginia.gov).

3. Other Site Development Considerations. Fugitive dust generated during construction should be controlled by using measures such as the prompt removal of spilled or tracked dirt or other materials from paved streets, limited application of water to suppress dust, and washing of construction vehicles and paved roadways immediately adjacent to construction sites. Do not use water for dust control to the extent that it results in runoff to surface waters or wetlands. Land clearing wastes (vegetative debris) generated during construction should be properly managed in accordance with applicable regulations and local ordinances. Shredding/chipping of vegetative debris and reuse on-site is usually recommended over open burning. Any open burning of vegetative debris must be performed in accordance with the Open Burning Regulation and coordinated with the local fire official to ensure that all local ordinances are met. A copy of DEQ's open burning regulation and related information are accessible from <http://www.deq.virginia.gov/Programs/Air/AirQualityPlans/OpenBurning.aspx>. Also, no open burning should take place in violation of the Virginia Waste Management Regulations, <http://law.lis.virginia.gov/admincode/title9/agency20/>. Contact Keith Fowler at DEQ-VRO (540-574-7812, Keith.Fowler@deq.virginia.gov) for any questions related to the proper control of fugitive dust, or open burning requirements and prohibitions.

4. Air Quality. Installation / operation / modification of stationary or portable fuel burning equipment (e.g., generators, wood chippers/grinders, boilers, etc.) or other sources of air pollutants may be subject to registration and/or air permitting requirements (<http://www.deq.virginia.gov/Programs/Air/PermittingCompliance/Permitting/TypesofAirPermits.aspx>); for questions regarding this, please contact Janardan Pandey at DEQ-VRO (540-574-7817, Janardan.Pandey@deq.virginia.gov).

5. Petroleum Storage Tanks. Installation / operation / modification of tanks used for the storage of petroleum and CERCLA substances may be subject to registration and/or other regulatory requirements (<http://www.deq.virginia.gov/Programs/LandProtectionRevitalization/PetroleumProgram/StorageTanks.aspx>). If petroleum-contaminated soils or water are encountered during excavation work, or if old petroleum tanks need to be removed or replaced, contact DEQ. For questions regarding any of this, please contact David Forrer at DEQ-VRO (540-574-7837, David.Forrer@deq.virginia.gov).

6. Solid and Hazardous Wastes, and Hazardous Substances. DEQ administers the Virginia Waste Management Regulations, <http://law.lis.virginia.gov/admincode/title9/agency20/>. All solid wastes, hazardous wastes, and hazardous materials, including construction and demolition (C&D) wastes and universal wastes (batteries, fluorescent lights, refrigerants, mercury switches, mercury thermostats, etc.), must be managed in accordance with all applicable federal, state, and local environmental regulations. The generation of hazardous wastes should be minimized and solid wastes generated at the site should be reduced at the source, reused, or recycled. DEQ encourages the management of certain organic wastes by on-site composting or reuse as animal feed or soil amendment. Also, if you encounter any improperly disposed solid or hazardous wastes, or petroleum contaminated soils, you should contact DEQ-VRO. You may wish to refer to the web link for "What's in My Back Yard?", <http://www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx>, to help you determine areas where residual contamination may be more likely. Contact Graham Simmerman at DEQ-VRO (540-574-7865, Graham.Simmerman@deq.virginia.gov) for any questions related to waste management / disposal. Manage / dispose of any asbestos-containing materials (ACMs) in accordance with Virginia Department of Labor and Industry (DOLI) regulations. Contact Doug Wiggins at DOLI (Richard.Wiggins@doli.virginia.gov, 540-562-3580, ext. 131) for any questions related to management / disposal of ACMs. Any open burning must be conducted in compliance with the Open Burning Regulation, <http://law.lis.virginia.gov/admincode/title9/agency5/chapter130/>. Contact Keith Fowler at DEQ-VRO (540-574-7812, Keith.Fowler@deq.virginia.gov) for any questions related to open burning requirements and prohibitions.

7. Pesticides and Herbicides. DEQ recommends that herbicides or pesticides for construction or landscape maintenance, when necessary, be used in accordance with the principles of integrated pest management, and that the least toxic pesticides that are effective in controlling the target species be used. Please contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information. If applying aquatic pesticides to surface waters, the applicant must comply with the DEQ's Pesticide General Permit, <http://www.deq.virginia.gov/Programs/Water/PermittingCompliance/PollutionDischargeElimination/PermitsFees.aspx#pest>

8. Natural Heritage Resources. The Virginia Department of Conservation and Recreation (DCR) Division of Natural Heritage (DNH) can search its Biotics Data System for occurrences of natural heritage resources from the area indicated on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered animal and plant species, unique or exemplary natural communities, and significant geologic communities. We recommend that the DNH be contacted at (804) 786-7951 to secure updated information on natural heritage resources before commencing the project.

9. Wildlife Resources. The Virginia Department of Game and Inland Fisheries (DGIF) exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species. DGIF determines likely impacts on 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 <http://www.dgif.virginia.gov> or contact Ray Fernald at (804) 367-6913.

10. Historic and Archaeological Resources. *Section 106 of the National Historic and Preservation Act of 1966*, as amended, requires that activities that receive federal funding must consider effects to properties that are listed or eligible for listing on the National Register of Historic Places. The Department of Historic Resources (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources. If applicable, contact DHR. In the event that archaeological resources are encountered during construction, immediately contact Ms. Ethel Eaton, DHR, at (804) 367-2323.

11. Pollution Prevention. DEQ recommends that construction projects incorporate the principles of pollution prevention including the following recommendations:

- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content and toxicity level should be considered.
- Consider contractors' commitment to the environment when choosing contractors. Also, specifications regarding raw material selection (alternative fuels and energy sources) and construction practices can be included in contract documents and requests for proposals.

- Choose sustainable practices and materials in infrastructure and construction and design. These could include asphalt and concrete containing recycled materials and integrated pest management in landscaping.
- Integrate pollution prevention techniques into maintenance and operation activities to include source reduction (fixing leaks, energy efficient products).

Pollution prevention measures are likely to reduce potential environmental impacts and reduce costs for material purchasing and waste disposal. DEQ's Office of Pollution of Prevention hosts a number of programs and initiatives that provide non-regulatory assistance to businesses, institutions, and communities including the Virginia Environmental Excellence Program and Virginia Green. For more information, please visit our web site at <http://www.deq.virginia.gov/Programs/PollutionPrevention.aspx>.

12. Energy Conservation. Any structures should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency. For example, energy efficiency of the structures can be enhanced by maximizing the use of the following:

- thermally-efficient building shell components (roof, wall, floor, and insulation);
- high efficiency heating, ventilation, air conditioning systems; and
- high efficiency lighting systems.

Matt Heller at the Department of Mines, Minerals and Energy, (434) 951-6351, may be contacted for assistance in meeting this challenge.

13. Potable Water. Installation of potable water lines and appurtenances must comply with the State's Waterworks Regulations. The Virginia Department of Health (VDH), <http://www.vdh.state.va.us/ODW/>, administers both federal and state laws governing waterworks operation. For more information, contact the VDH's Lexington Office of Water Programs at (540) 463-7136.

14. Wastewaters. DEQ has approval authority over wastewater discharges per the State Water Control Law and corresponding regulations. This includes discharges or land application of any wastewaters generated from washing of vehicles or other practices relevant to this project. DEQ also has approval authority over plans and specifications for sewage collection systems and treatment works (except drainfields and other on-site systems approved by the local health department), per the Sewage Collection and Treatment (SCAT) Regulations, <http://law.lis.virginia.gov/admincode/title9/agency25/chapter790/>. Any wastewaters generated by this project must be properly managed and disposed. For additional information and assistance, contact Brandon Kiracofe at DEQ-VRO (540-574-7892, Brandon.Kiracofe@deq.virginia.gov).

B. Keith Fowler | Deputy Regional Director | DEQ-Valley Regional Office | 4411 Early Road | P. O. Box 3000 | Harrisonburg, VA 22801 | 540-574-7812 | Keith.Fowler@deq.virginia.gov

From: Fulcher, Valerie (DEQ)

Sent: Monday, November 23, 2015 4:46 PM

To: dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Coe, Stephen (DEQ); Narasimhan, Kotur (DEQ); Gavan, Larry (DEQ); Sepety, Holly (DEQ); Moore, Daniel (DEQ); Burstein, Daniel (DEQ); Fowler, Keith (DEQ); Kirchen, Roger (DHR); Spears, David (DMME); Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Shickle, Martha (DHCD); gmg@novaregion.org; mprice@shenandoahcountyva.us; coadmin@loudoun.gov; James, Denise; ImpactReview (VOF)

Cc: Howard, Janine (DEQ)

Subject: NEW PROJECT FERC WB XPRESS 15-187F

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

Document Type: Applicant Prepared Draft EA

Project Sponsor: DOE/Federal Energy Regulatory Commission

Project Title: WB Xpress Project – Columbia Gas
Transmission, LLC

Location: Shenandoah, Loudoun, and Fairfax Counties

Project number: DEQ #15-187F

The document is available at www.deq.virginia.gov/filesare/oeir in the "FERC" folder.

Howard, Janine (DEQ)

From: Eversole, Mark (MRC)
Sent: Wednesday, December 16, 2015 8:42 AM
To: Howard, Janine (DEQ)
Cc: Woodward, Jay (MRC)
Subject: FW: NEW PROJECT FERC WB XPRESS 15-187F

Janine, based on a desktop review of the information provided, permits may be required from the Marine Resources Commission for proposed crossings of State owned submerged lands. A Joint Permit Application (JPA) should be submitted for distribution and review by Federal, State and Local environmental agencies.

Thank you for the opportunity to comment on this proposal.

Mark Eversole
Virginia Marine Resources Commission
2600 Washington Avenue, 3rd Floor
Newport News, Virginia 23607
Office: (757)-247-8028
email: mark.eversole@mrc.virginia.gov

From: Watkinson, Tony (MRC)
Sent: Monday, November 23, 2015 4:48 PM
To: Woodward, Jay (MRC); Eversole, Mark (MRC)
Subject: FW: NEW PROJECT FERC WB XPRESS 15-187F

From: Fulcher, Valerie (DEQ)
Sent: Monday, November 23, 2015 4:46 PM
To: dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Coe, Stephen (DEQ); Narasimhan, Kotur (DEQ); Gavan, Larry (DEQ); Sepety, Holly (DEQ); Moore, Daniel (DEQ); Burstein, Daniel (DEQ); Fowler, Keith (DEQ); Kirchen, Roger (DHR); Spears, David (DMME); Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Shickle, Martha (DHCD); gmg@novaregion.org; mprice@shenandoahcountyva.us; coadmin@loudoun.gov; James, Denise; ImpactReview (VOF)
Cc: Howard, Janine (DEQ)
Subject: NEW PROJECT FERC WB XPRESS 15-187F

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

Document Type: Applicant Prepared Draft EA
Project Sponsor: DOE/Federal Energy Regulatory Commission
Project Title: WB Xpress Project – Columbia Gas
Transmission, LLC
Location: Shenandoah, Loudoun, and Fairfax Counties
Project number: DEQ #15-187F

The document is available at www.deq.virginia.gov/files/oeir in the "FERC" folder.

Howard, Janine (DEQ)

From: Eversole, Mark (MRC)
Sent: Friday, December 11, 2015 1:25 PM
To: Howard, Janine (DEQ)
Cc: Eversole, Mark (MRC)
Subject: Fwd: NEW PROJECT FERC WB XPRESS 15-187F

Janine, based on a desktop review of the information provided, VMRC offers the following comments.

A permit would be required from the Marine Resources Commission for any crossing on, over, or beneath a tidal stream or a non-tidal stream with an upstream drainage area of 5 square miles or greater at the point of impact. Crossings of tidal wetlands might also require a permit from the wetlands board of the locality where the impact occurs. Thank you for the opportunity to comment on this proposal.

Mark Eversole
Environmental Engineer
Va. Marine Resources Commission
Sent from my iPhone

From: Howard, Janine (DEQ)
Sent: Wednesday, December 09, 2015 4:54 PM
To: dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); odwreview (VDH); Gavan, Larry (DEQ); Sepety, Holly (DEQ); Kirchen, Roger (DHR); Spears, David (DMME); Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Shickle, Martha (DHCD); gmq@novaregion.org; mprice@shenandoahcountyva.us; coadmin@loudoun.gov; James, Denise; ImpactReview (VOF)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Good Afternoon,

This is a reminder that comments on the WB Xpress Project are due to DEQ for inclusion into the state review response. There is an extremely tight timeframe on this project that was set by the sponsor. I will be drafting the review response in the next day or two so please submit comments ASAP. Comments may also be sent directly to the sponsor.

Thank you,

Janine

DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Janine L. Howard

DEQ - OEIA PROJECT NUMBER: 15 - 187F

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

CONSISTENCY DETERMINATION

PROJECT TITLE: FERC WB XPRESS

PROJECT SPONSOR: DOE / FEDERAL ENERGY REGULATORY COMMISSION

PROJECT LOCATION: PARTLY OZONE NONATTAINMENT
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 5-45-760 et seq. - Asphalt Paving operations
3. 9 VAC 5-130 et seq. - Open Burning
4. 9 VAC 5-50-60 et seq. Fugitive Dust Emissions
5. 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to _____
6. 9 VAC 5-60-300 et seq. - Standards of Performance for Toxic Pollutants
7. 9 VAC 5-50-400 Subpart _____, Standards of Performance for New Stationary Sources, designates standards of performance for the _____
8. 9 VAC 5-80-1100 et seq. of the regulations - Permits for Stationary Sources
9. 9 VAC 5-80-1605 et seq. Of the regulations - Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
10. 9 VAC 5-80-2000 et seq. of the regulations - New and modified sources located in non-attainment areas
11. 9 VAC 5-80-800 et seq. Of the regulations - State Operating Permits. 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) during construction in Loudoun & Fairfax counties.



(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: December 3, 2015



MEMORANDUM

TO: Janine Howard, Environmental Program Planner

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

DATE: December 3, 2015

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

SUBJECT: Environmental Impact Review: EIR Project #15-187F FERC WB Xpress Project Columbia Gas Transmission, Chantilly, VA 20151

The Division of Land Protection & Revitalization (DLPR) has completed its cursory review of the Environmental Review Request for the DOE/ FERC WB Xpress Project Columbia Gas Transmission, Chantilly, VA 20151. The Department offers the following comments concerning potential waste issues associated with this project.

Project Scope: construction of one new electric motor driven compressor station and modify pipeline appurtenances at an existing compressor station (Loudoun).

Solid and hazardous waste issues were generally addressed in the submittal. DLPR staff conducted a cursory search of solid and hazardous waste databases for waste sites in the project area, and did not identify any sites in close proximity to the project site/corridor which might impact the project activity. The DEQ DLPR staff has reviewed the submittal and has the following comments concerning possible waste issues associated with this proposed program/project:

When the environmental impact report is written or compiled for specific sites, 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 or project engineers should access this information on the DEQ website at

<http://www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx>, and click on "What's in my backyard?" link to access search page.

The ***Voluntary Remediation Program (VRP)***, ***Solid Waste Facilities***, and ***Petroleum Release Sites*** GPS databases can be accessed from this search page. 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 "Petroleum Release Sites", and then click on the green balloon. All Petroleum Release 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 "VRP" 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.

RCRA and Cerclis site information can be accessed from www.deq.virginia.gov, following links Programs - Land Protection and Revitalization - Reports and Publications - Real Estate Search Reports - then separate search links - CERCLA ([Search EPA's CERCLIS database](#) - includes archive sites, and RCRA Hazardous Waste ([Hazardous Waste Facilities](#)).

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.

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.

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. Contact the DEQ Northern Virginia Regional Office at 703-583-3800 (Tanks Program) with questions.

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 Northern Virginia Regional Office, Ms. Katherine Perszyk at 703-583-3856.

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.

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

David Dowling
Deputy Director of
Soil and Water and Dam Safety

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

MEMORANDUM

DATE: December 9, 2015
TO: Janine Howard, DEQ
FROM: Roberta Rhur, Environmental Impact Review Coordinator
SUBJECT: DEQ 15-187F, WB Xpress Project, Columbia Gas Transmission, LLC

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.

Dysart Valve Site - Shenandoah County, Strasburg Compressor Station-Shenandoah County and Nineveh Meter Station- Warren County

These project areas are situated on karst-forming carbonate rock and can be characterized by sinkholes, caves, disappearing streams, and large springs. If such features are encountered during the project, please coordinate with Wil Orndorff (540-230-5960, Wil.Orndorff@dcr.virginia.gov) to document and minimize adverse impacts. Discharge of runoff to sinkholes or sinking streams, filling of sinkholes, and alteration of cave entrances can lead to surface collapse, flooding, erosion and sedimentation, groundwater contamination, and degradation of subterranean habitat for natural heritage resources. If the project involves filling or "improvement" of sinkholes or cave openings, DCR would like detailed location information and copies of the design specifications. In cases where sinkhole improvement is for stormwater discharge, copies of VDOT Form EQ-120 will suffice. New "Karst Assessment Guidelines" developed by the Virginia Cave Board for land development can be found at http://www.dcr.virginia.gov/natural_heritage/documents/karst_assessment_guidelines.pdf.

In addition, Nineveh Meter Station is within the range of and overlies potential habitat for the state and federally threatened Madison Cave isopod (*Antrolana lira*, G2G4/S2/LT/LT). Because this species is a groundwater obligate crustacean, knowledge of its presence at specific locations within its range is poor, and sampling to determine its presence is difficult and frequently inconclusive. Projects involving the following components have potential to impact this species: 1) withdrawal of water from wells or lowering the water table, 2) alteration of sinkholes, cave entrances, or sinking streams, 3) waste water injection, 4) quarrying, 5) nutrient applications lacking a certified nutrient management plan, or 6) discharge of water to a conveyance that discharges to a karst feature downstream. If the project meets one or more of these criteria, please coordinate with the DCR Karst Protection Coordinator Wil Orndorff (Wil.Orndorff@dcr.virginia.gov or 540-230-5960). In addition, due to the legal status of the Madison Cave

isopod, DCR recommends coordination with the US Fish and Wildlife Service (USFWS) and Virginia Department of Game and Inland Fisheries (VDGIF) to ensure compliance with protected species legislation.

Loudoun Compressor Station-Loudoun County

According to the information currently in our files, the Little River Stream Conservation Unit (SCU) is located downstream from the project site. 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 Little River SCU has been given a biodiversity ranking of B2, which represents a site of very high significance. The natural heritage resources associated with this site are:

<i>Lasmigona subviridis</i>	Green floater	G3/S2/NL/LT
	Aquatic Natural Community	G2/S2/NL/NL
	Aquatic Natural Community	G3G4/S3S4/NL/NL

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.

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 Community is significant on multiple levels. First, one stream is a grade A- and the other stream is 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. The first stream reach also holds an "Exceptional" stream designation and the second stream reach holds 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 the 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. 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).

Chantilly Compressor Station and Chantilly Lateral -Fairfax County

According to the information currently in our files, the Elklick Diabase Flatwoods and the Bull Run Diabase Flatwoods Conservation Sites are located within the project boundary. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. The Elklick Diabase Flatwoods Conservation Site has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resources associated with this site are:

<i>Asclepias purpurascens</i>	Purple milkweed	G5?/S2/NL/NL
	Northern Hardpan Basic Oak Hickory Forest	G3S3/NL/NL
<i>Pycnanthemum torreyi</i>	Torrey's mountain-mint	
G2/S2/SOC/NL		

The Northern Hardpan Basic Oak – Hickory Forest is endemic to the Culpeper Basin and western Piedmont foothills of Virginia and Maryland. This community is a subxeric to submesic oak-hickory forest occurring in association with soils weathered from Triassic diabase but occasionally on soils weathered from other mafic rocks and siltstone. Most soils occupied by this community have plastic, hardpan subsoil or are shallow over bedrock, and some have pronounced shrink-swell properties. Forest canopies can be open to closed, sometimes stunted, with variable combinations of oaks (*Quercus alba*, *Quercus rubra*, *Quercus stellata*), hickories (*Carya glabra*, *Carya ovalis*, *Carya alba*), and *Fraxinus americana*. The lower strata contain eastern redbud (*Cercis canadensis*) and other plants indicative of base-rich soils, and the herb layer usually has a prominent component of forest grasses. Many stands of this community have been destroyed by suburban development and virtually all stands have been impacted to some extent by timber removal, conversion to pine silviculture, and grazing.

Torrey's mountain mint is a globally rare perennial herb with a mint-like odor. It measures 3 feet in height and has small white to purple flowers arranged in dense, terminal clusters that bloom in July - September (Strausbaugh & Core, 1978). It occurs in dry, rocky deciduous woods, along roadsides, powerline rights-of-way, calcareous seepage, and in thickets near streams. Populations of Torrey's mountain mint are found as small, dense colonies and are sensitive to minor habitat disturbances as well as stochastic events. Additional threats include woody plant succession, invasive species, herbicide use in rights-of-way and roadside locations, road maintenance work, and general habitat destruction (NatureServe, 2011). Surveys for this species should be conducted during the July-September flowering/fruiting period.

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.

There is a small subpopulation of Torrey's Mountain-mint at the edge of the woods within the Atlantic Seaboard / Columbia Gas Easement headed east north-east within the Ellick Woodlands Natural Area Preserve (see attached map).

In addition, Purple milkweed (*Asclepias purpurascens*, G5?/S2/NL/NL) have been documented within the project area along the existing transmission lines (see attached map). 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 supports the alternate location of the pipeline Right-of-Way (ROW) within and south of the existing Virginia Power Electric Easement that avoids the Ellick Woodlands Natural Area Preserve as submitted by Natural Resource Group to DCR Division of Natural Heritage on November 25, 2015(see attached map).

DCR has reviewed *Virginia Rare Plant Survey Report*, Fairfax, Virginia prepared by Natural Resource Group, dated November 2015. While DCR concurs with the negative results for diabase plants within the "B" and "C" Areas identified in the report. However, despite the lack of identification of Purple milkweed or Torrey's mountain-mint during the survey, DCR botanist believes the resources still may exist due to the Torrey's mountain-mint being recently identified by DCR staff, and the rare plant survey was not conducted at a time of year appropriate to identify Purple milkweed. Please note suitable habitat for these rare plants can be found in areas mowed every year. Therefore, DCR recommends a re-review of the project's site plan including the location of the pipeline footprint within the right-of-way, so that DCR can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources.

The Ellick Woodlands Natural Area Preserve is located immediately adjacent to the project area and is owned by the Fairfax County Parks Authority and jointly managed by the Fairfax County Parks Authority and DCR. DCR recommends continued coordination with the DCR Northern Region Natural Area Steward, Mike Lott (540-658-8690) and the Fairfax County Parks Authority.

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.

On page 68 of the Draft Environmental Assessment Table B. 4.1-2 includes survey timing windows for federally listed plants in Virginia. DCR recommends the following surveys windows for these plants:

Small whorled pogonia (<i>Isotria medeoloides</i>)	May 25-July 15
Shale barren rock cress (<i>Arabis serotina</i>)	July 15-October 15
Northeastern bulrush (<i>Scirpus ancistrochaetus</i>)	July 1-September 30
Smooth coneflower (<i>Echinacea laevigata</i>)	June 15-October 31
Sensitive joint vetch (<i>Aeschynomene virginica</i>)	August 15-October 15
Swamp pink (<i>Helonias bullata</i>)	April 15-May 31

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.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and 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 project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The Virginia Department of Game and Inland Fisheries (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 Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dgif.virginia.gov.

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

CC: Troy Anderson, USFWS
Wil Orndorff-DCR-Karst
Ernie Aschenbach, VDGIF

Howard, Janine (DEQ)

From: dgif-ESS Projects (DGIF)
Sent: Thursday, December 10, 2015 10:46 AM
To: Howard, Janine (DEQ)
Subject: Additional INFO: RE: NEW PROJECT FERC WB XPRESS 15-187F
Attachments: ESSLog# 35937_WBXpressProject_Columbia Gas of VA_SCOPING (pre-App)

Janine,

They need to update the EA to include consideration of the species and resources we document from the project area. In addition, we recommend the following:

If any water withdrawals (such as for hydrostatic testing, dust suppression), whether permanent or temporary in nature, should be closely coordinated with us to ensure protection of instream habitats. To best protect resident aquatic species from harm, we typically recommend that water withdrawals not take more than 10% instantaneous flow, that the intake is fitted with a 1mm mesh screen, and that the intake velocity not exceed 0.25 fps.

Amy

Amy Ewing

Environmental Services Biologist/FWIS Manager
VA Dept. of Game and Inland Fisheries
7870 Villa Park Dr., Henrico, VA 23228
804-367-2211 www.dgif.virginia.gov

 Please consider the environment before printing this email.

From: Howard, Janine (DEQ)
Sent: Wednesday, December 09, 2015 4:54 PM
To: dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); odwreview (VDH); Gavan, Larry (DEQ); Sepety, Holly (DEQ); Kirchen, Roger (DHR); Spears, David (DMME); Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Shickle, Martha (DHCD); gmg@novaregion.org; mprice@shenandoahcountyva.us; coadmin@loudoun.gov; James, Denise; ImpactReview (VOF)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Good Afternoon,

This is a reminder that comments on the WB Xpress Project are due to DEQ for inclusion into the state review response. There is an extremely tight timeframe on this project that was set by the sponsor. I will be drafting the review response in the next day or two so please submit comments ASAP. Comments may also be sent directly to the sponsor.

Thank you,

Janine

Janine L. Howard

Environmental Impact Review Coordinator

Office of Environmental Impact Review
Division of Environmental Enhancement
Virginia Department of Environmental Quality
629 E. Main Street

Howard, Janine (DEQ)

From: Ewing, Amy (DGIF)
Sent: Thursday, August 20, 2015 2:34 PM
To: Fulcher, Valerie (DEQ)
Cc: Bugas, Paul (DGIF); Kleopfer, John (DGIF); Watson, Brian (DGIF); nhreview (DCR)
Subject: ESSLog# 35937_WBXpressProject_Columbia Gas of VA_SCOPING (pre-App)

Valerie,

Please see below the SCOPING comments I plan on providing to FERC on the subject project. Because of the way I have to submit comments to FERC, I was unable to simply copy you on them. Let me know if you have any questions.

We have reviewed the WBXpress project (shapefiles provided August 2015), including upgrades to existing facilities, development of additional facilities, and installation of pipeline in Virginia. Based on our review, we offer the following SCOPING comments:

Strasburg Facility, Shenandoah County

We document state Threatened wood turtles from the project site. Cedar Creek and Meadow Brook have been designated Threatened and Endangered Species Waters due to the presence of this species. Any proposed impacts within 900 feet of these streams, within these streams, and/or within any perennial tributaries to them should be closely coordinated with us to ensure protection of this species and the habitats that support it.

North Fork Shenandoah River has been designated a Threatened and Endangered Species Water due to the presence of state Threatened green floaters and state Endangered brook floaters. Any impacts within this river and/or its perennial tributaries should be closely coordinated with us to ensure protection of these species.

This project is located within 2 miles of a documented occurrence of a state or federal threatened or endangered plant or insect species and/or other Natural Heritage coordination species. Therefore, we recommend coordination with VDCR-DNH regarding the protection of these resources.

Dysart Facility, Shenandoah County

We document state Threatened wood turtles from the project site. However, we do not currently designate any nearby waters for their protection. Any proposed impacts within 900 feet of streams and/or within streams should be closely coordinated with us to ensure protection of this species and the habitats that support it.

This project is located within 2 miles of a documented occurrence of a state or federal threatened or endangered plant or insect species and/or other Natural Heritage coordination species. Therefore, we recommend coordination with VDCR-DNH regarding the protection of these resources.

Nineveh Facility, Warren County

We document state Threatened upland sandpipers from the project area. However, we are currently developing justification to remove this species from Virginia's listed species list and are, therefore, not making protective recommendations for this species at this time.

This project is located within 2 miles of a documented occurrence of a state or federal threatened or endangered plant or insect species and/or other Natural Heritage coordination species. Therefore, we recommend coordination with VDCR-DNH regarding the protection of these resources.

Loudoun Facility, Loudoun County

Goose Creek and Little River have been designated Threatened and Endangered Species Waters due to the presence of state Threatened green floaters. Any impacts within these waters and/or their perennial tributaries should be closely coordinated with us to ensure protection of this species.

This project is located within 2 miles of a documented occurrence of a state or federal threatened or endangered plant or insect species and/or other Natural Heritage coordination species. Therefore, we recommend coordination with VDCR-DNH regarding the protection of these resources.

New Pipeline Installation, Fairfax County

Cub Run has been designated a Threatened and Endangered Species Water due to the presence of state Threatened wood turtles. Any proposed impacts within 900 feet of this stream, within this stream, and/or within any perennial tributaries to it should be closely coordinated with us to ensure protection of this species and the habitats that support it.

This project is located within 2 miles of a documented occurrence of a state or federal threatened or endangered plant or insect species and/or other Natural Heritage coordination species. Therefore, we recommend coordination with VDCR-DNH regarding the protection of these resources.

Comments relevant to all projects, depending on proposed activities

We recommend conducting any in-stream activities during low or no-flow conditions, using non-erodible cofferdams or turbidity curtains to isolate the construction area, blocking no more than 50% of the streamflow at any given time, stockpiling excavated material in a manner that prevents reentry into the stream, restoring original streambed and streambank contours, revegetating barren areas with native vegetation, and implementing strict erosion and sediment control measures. To minimize harm to the aquatic environment and its residents resulting from use of the Tremie method to install concrete, installation of grout bags, and traditional pouring of concrete, we recommend that such activities occur only in the dry, allowing all concrete to harden and cure prior to contact with open water. Due to future maintenance costs associated with culverts, and the loss of riparian and aquatic habitat, we prefer stream crossings to be constructed via clear-span bridges. However, if this is not possible, we recommend countersinking any culverts below the streambed at least 6 inches, or the use of bottomless culverts, to allow passage of aquatic organisms. We also recommend the installation of floodplain culverts to carry bankfull discharges.

Site Development:

To minimize overall impacts to wildlife and our natural resources, we offer the following comments about development activities: We recommend that the applicant avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable. Avoidance and minimization of impact may include relocating stream channels as opposed to filling or channelizing as well as using, and incorporating into the development plan, a natural stream channel design and wooded buffers. We recommend maintaining undisturbed naturally vegetated buffers of at least 100 feet in width around all on-site wetlands and on both sides of all perennial and intermittent streams. We recommend maintaining wooded lots to the fullest extent possible. We generally do not support proposals to mitigate wetland impacts through the construction of stormwater management ponds, nor do we support the creation of in-stream stormwater management ponds.

We recommend that the stormwater controls for this project be designed to replicate and maintain the hydrographic condition of the site prior to the change in landscape. This should include, but not be limited to, utilizing bioretention areas, and minimizing the use of curb and gutter in favor of grassed swales. Bioretention areas (also called rain gardens) and grass swales are components of Low Impact Development (LID). They are designed to capture stormwater runoff as close to the source as possible and allow it to slowly infiltrate into the surrounding soil. They benefit natural resources by filtering pollutants and decreasing downstream runoff volumes.

We recommend that all tree removal and ground clearing adhere to a time of year restriction protective of resident and migratory songbird nesting from March 15 through August 15 of any year. We recommend coordination with the USFWS regarding potential impacts upon federally Threatened northern long-eared bats associated with tree removal, if such is proposed.

We recommend adherence to erosion and sediment controls during ground disturbance.

Corridor development:

To minimize the adverse impacts of linear utility project development on wildlife resources, we offer the following general recommendations: avoid and minimize impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable; maintain naturally vegetated buffers of at least 100 feet in width around wetlands and on both sides of perennial and intermittent streams, where practicable; conduct significant tree removal and ground clearing activities outside of the primary songbird nesting season of March 15 through August 15; and, implement and maintain appropriate erosion and sediment controls throughout project construction and site restoration. We understand that adherence to these general recommendations may be infeasible in some situations. We are happy to work with the applicant to develop project-specific measures as necessary to minimize project impacts upon the Commonwealth's wildlife resources.

Thanks, Amy

Amy Ewing

Environmental Services Biologist/FWIS Manager



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: Janine Howard, DEQ Environmental Impact Review Coordinator

FROM: Daniel Moore, DEQ Principal Environmental Planner

DATE: November 24, 2015

SUBJECT: DEQ #15-187F: DOE/FERC: WB Xpress Project– Columbia Gas Transmission Fairfax County, Virginia

We have reviewed the Draft Environmental Assessment (DEA) application 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):

The proposed project involves the construction and installation of 2.2 miles of 12-inch natural gas transmission line, one new measurement station with two new compressors, and one new receiver facility at the terminus of the proposed line in Fairfax County. In Fairfax County, 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 the County not included in the RPA are designated as RMAs.

Construction, installation, operation and maintenance of public utilities and their appurtenant structures are conditionally exempt from the Regulations provided they are constructed in accordance with:

1. regulations promulgated pursuant to the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act;
2. an erosion and sediment control plan and a stormwater management approved by the Virginia Department of Environmental Quality and
3. local water quality protection criteria at least as stringent as the above state requirements.

Provided adherence to the above requirements, the proposed activity would be consistent with the *Chesapeake Bay Preservation Act* and the Regulations.

Howard, Janine (DEQ)

From: Kirchen, Roger (DHR)
Sent: Thursday, December 10, 2015 8:49 AM
To: Howard, Janine (DEQ)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

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

From: Howard, Janine (DEQ)
Sent: Wednesday, December 09, 2015 4:54 PM
To: dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); odwreview (VDH); Gavan, Larry (DEQ); Sepety, Holly (DEQ); Kirchen, Roger (DHR); Spears, David (DMME); Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Shickle, Martha (DHCD); gmg@novaregion.org; mprice@shenandoahcountyva.us; coadmin@loudoun.gov; James, Denise; ImpactReview (VOF)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Good Afternoon,

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Thank you,

Janine

Janine L. Howard

Environmental Impact Review Coordinator

Office of Environmental Impact Review
Division of Environmental Enhancement
Virginia Department of Environmental Quality
629 E. Main Street
Richmond, VA 23219

Howard, Janine (DEQ)

From: Warren, Arlene (VDH)
Sent: Thursday, December 10, 2015 9:06 AM
To: Howard, Janine (DEQ)
Cc: Fulcher, Valerie (DEQ); Soto, Roy (VDH)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Project Name: WB Xpress Project – Columbia Gas Transmission, LLC
Project #: 15-187F
UPC #: N/A
Location: Shenandoah, Loudoun and Fairfax Counties

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.

- **Loudoun Compressor Station:**

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

There no surface water intakes located within a 5 mile radius of the project site.

The project is within the watershed of the following public surface water sources (intakes where the project falls within 5 miles into their watershed are formatted in **bold**):

PWSID	SYSNAME	FACNAME
6600100	FAIRFAX, CITY OF	GOOSE CREEK
6059501	FAIRFAX COUNTY WATER AUTHORITY	OCCOQUAN RESERVIOR INTAKE

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

There may be impacts to public drinking water sources due to this project if the mitigation efforts outlined above are not implemented.

- **Chantilly Compressor Station:**

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

There no surface water intakes located within a 5 mile radius of the project site.

The project is within the watershed of the following public surface water sources (intakes where the project falls within 5 miles into their watershed are formatted in **bold**):

PWSID	SYSNAME	FACNAME
6059501	FAIRFAX COUNTY WATER AUTHORITY	OCCOQUAN RESERVIOR INTAKE
6685100	MANASSAS, CITY OF	LAKE MANASSAS DAM

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

There may be impacts to public drinking water sources due to this project if the mitigation efforts outlined above are not implemented.

- **Line VA-1 Receiver Site:**

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

There no surface water intakes located within a 5 mile radius of the project site.

The project is within the watershed of the following public surface water sources (intakes where the project falls within 5 miles into their watershed are formatted in **bold**):

PWSID	SYSNAME	FACNAME
6059501	FAIRFAX CO WATER AUTHORITY	OCCOQUAN RESERVIOR INTAKE
6685100	MANASSAS, CITY OF	LAKE MANASSAS DAM

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

There may be impacts to public drinking water sources due to this project if the mitigation efforts outlined above are not implemented.

- **Nineveh Meter Station:**

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

There no surface water intakes located within a 5 mile radius of the project site.

The project is within the watershed of the following public surface water sources (intakes where the project falls within 5 miles into their watershed are formatted in **bold**):

PWSID	SYSNAME	FACNAME
2043125	TOWN OF BERRYVILLE	SHENANDOAH RIVER
2043634	MOUNT WEATHER	SHENANDOAH RIVER
6107300	LEESBURG, TOWN OF	POTOMAC INTAKE

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

There may be impacts to public drinking water sources due to this project if the mitigation efforts outlined above are not implemented.

Information for the below list of sites is not a part of this reply due to insufficient locational information needed to fulfill this request.

- **Strasburg Compressor Station:**
- **Dysart Valve Site:**

Best Regards,

Arlene Fields Warren

Howard, Janine (DEQ)

From: Hallock-Solomon, Michael (VOF)
Sent: Monday, December 14, 2015 7:54 AM
To: Howard, Janine (DEQ)
Cc: Little, Martha (VOF); Richardson, Erika (VOF)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Ms. Howard,

The Virginia Outdoors Foundation has reviewed the project referenced above. Based on information previously provided, as of 14 December 2015, there are not any existing nor proposed VOF open-space easements within the immediate vicinity of construction related to the project.

Please contact VOF again for further review if the project area changes or if this project does not begin within 24 months. Thank you for considering conservation easements.

Thanks,
Mike Hallock-Solomon

Mike Hallock-Solomon, AICP
GIS/IT Specialist
Virginia Outdoors Foundation
(804) 371-0114 voice
(804) 337-9780 cell
(804) 225-3236 fax

From: Howard, Janine (DEQ)
Sent: Wednesday, December 09, 2015 4:54 PM
To: dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); odwreview (VDH); Gavan, Larry (DEQ); Sepety, Holly (DEQ); Kirchen, Roger (DHR); Spears, David (DMME); Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Shickle, Martha (DHCD); gmg@novaregion.org; mprice@shenandoahcountyva.us; coadmin@loudoun.gov; James, Denise; ImpactReview (VOF)
Subject: RE: NEW PROJECT FERC WB XPRESS 15-187F

Good Afternoon,

This is a reminder that comments on the WB Xpress Project are due to DEQ for inclusion into the state review response. There is an extremely tight timeframe on this project that was set by the sponsor. I will be drafting the review response in the next day or two so please submit comments ASAP. Comments may also be sent directly to the sponsor.

Thank you,

Janine
Janine L. Howard
Environmental Impact Review Coordinator

Office of Environmental Impact Review
Division of Environmental Enhancement
Virginia Department of Environmental Quality
629 E. Main Street
Richmond, VA 23219



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

December 11, 2015

Janine L. Howard, Environmental Impact Review Coordinator
Office of Environmental Enhancement
Virginia Department of Environmental Quality
629 E. Main Street
Richmond, VA 23219

Dear Ms. Howard:

Department of Planning and Zoning staff appreciates the opportunity to provide comments for Fairfax County regarding the environmental impacts for the WB Xpress Project (Docket No. PF15-21-000) for the Draft Environmental Assessment (EA). This proposal could potentially involve significant new impacts in western Fairfax County which is a watershed for the County's water supply, and which encompasses extensive environmentally and culturally sensitive land area. Temporary impacts from the project will be more expansive in the construction phase resulting in permanent loss of natural resource and habitat due to the ultimate land disturbance for the proposed facilities.

Based on the description of the project areas, maps and aerial photos which were included with the Draft EA, more detailed drawings would be required for the proposed Chantilly Compressor Station, pipeline alignment (as depicted on sheets B-35 and B-36) and staging area in order to more fully determine the extent of possible short and long-term impacts of the proposed work. In general, impacts which could be anticipated from the proposed work include noise in excess of 55 db, erosion, uncontrolled runoff and the need for screening.

The summary facts define that Columbia Gas is seeking enough land area for the following elements:

- a new electric driven compressor station,
- a new receiver facility,
- 2 miles of new 12 inch diameter pipeline.

Staff urges that the EA for the Columbia Gas WB Xpress Project include the following considerations:

- Identify existing and planned residences near the proposed project site and document the impacts that may occur to these residences. Of particular concern are noise impacts, fugitive dust during construction, drainage impacts, and emissions from the completed compression station and receiver facility. County standards related to noise from stationary sources should be met, as should be County requirements related to dust control and stormwater management.
- Consider the proximity of the proposed pipeline to existing and planned future residential development and address pipeline safety and potential exposure to nearby residents.

Janine L. Howard
Virginia Department of Environmental Quality
December 11, 2015
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- Provide alternative alignments which 1) collocate the new compressor station and new receiver facility on other compatible sites with available land area, in order to minimize potential new land disturbance, and; 2) collocate the new pipeline within existing Columbia pipeline easements or collocate within other pipeline easements.
- Avoid significant surface land and water disturbance, through installation of new pipeline by means of directional drill, wherever possible;

Thank you for the opportunity to provide comments for the Draft EA for the Columbia Gas WB Xpress Project. If you have any questions about our comments, please do not hesitate to contact John Bell of my staff at 703-324-1380.

Sincerely,


Marianne Gardner, Director
Planning Division
Department of Planning and Zoning

MAG: JRB

cc:

Board of Supervisors
Edward L. Long, Jr., County Executive
Robert A. Stalzer, Deputy County Executive
Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission
Kirk W. Kincannon, Director, Park Authority
Fred R. Selden, Director, Department of Planning and Zoning (DPZ)
Chris Caperton, Chief, Facilities Planning Branch, DPZ
Denise M. James, Chief, Environment and Development Review Branch, DPZ
John R. Bell, Environment and Development Review Branch, DPZ