

Memorandum for DCR's Study Report for Mt. Storm – Valley 550kv Rebuild

To: S. René Hypes – Natural Heritage Project Review Coordinator

From: Stacey Ellis – Dominion Energy Environmental Services

Date: 3/12/2020

Re: Mt. Storm-Valley 550 kV Transmission Line Rebuild

Dominion Energy (Dominion) is pleased to provide this memorandum in response to the recent database search received from the Department of Conservation and Recreation's Division of Natural Heritage (DCR) on February 26, 2020 for the Mt. Storm-Valley 550 kV Transmission Line Rebuild (the Project). This memorandum is also aimed to supplement the verbal discussion held on March 10, 2020 between DCR and Dominion specifically discussing the various bee species, Cow Knob salamander, and core fragmentation data outlined in the report.

Since March 2018, Dominion has also been coordinating with the U.S. Forest Service (USFS) to address similar concerns for protected species. As discussed, we wanted to provide detailed information related to that coordination and associated surveys to determine if our previous and continued compliance with the USFS would satisfy DCR's recommendations for the Project.

Rare Bees and Rusty Patch Bumble Bee

In summer 2019, surveys completed by the Virginia Department of Conservation and Recreation (VDCR) and Virginia Department of Natural Heritage (VDNH) in Rockingham County, Virginia resulted in three observations of rusty patched bumble bee (*Bombus affinis*) (RPBB). Based on these observations, USFWS has created a new High Potential Zone for RPBB in Rockingham County. **The Project does not intersect this High Potential Zone, but the majority of the Project ROW now occurs in a Low Potential Zone. Per current USFWS direction, Low Potential Zones for the species are considered to be maximum dispersal potential for RPBB, and projects occurring within them can conclude that "rusty patched bumble bee not present" and do not require Section 7 consultation.**

Many areas within and near the 2019 study were surveyed for bees in 2018 as part of the Forest's North Shenandoah Mountain Project, and no RPBBs were found. Since no portions of the project are located within High Potential Zones and no RPBBs were identified in the area during 2018 surveys, we concluded the Project is outside the known range of RPBB and therefore, no surveys were completed. While surveys for RPBBs were not specifically conducted, field surveyors familiar with

the species completed rare plant and habitat assessments in May, June, and August 2019 and did not observe any RPBBs during field efforts.

During the Forest's 2018 surveys, three potentially rare bee species (*Osmia illinoensis*, *Osmia felti*, and *Melitta eickworthi*) were found near the ROW and proposed access roads for the Project. The presence of the ROW and ongoing maintenance is likely to create beneficial habitat for bee species. When preparing our study plan for surveying rare plants and animals on the Forest, we concluded that these three bees were present in the ROW due to the habitat provided by the ROW. Since their presence had been determined by the 2018 surveys, we assumed presence throughout the ROW rather than proposing additional surveys. The Forest agreed to this assumption. Rebuilding the transmission line will result in the ROW habitat remaining in place, continuing to support the bees. While the ROW likely provides habitat for the bees, construction activities have the potential to impact individual bees or their nests. To reduce the potential impact, ground disturbance will be reduced to the extent feasible, with towers replaced near existing towers and use of existing Forest Roads and road prisms established when the line was originally constructed in the 1960s.

Based on the assumption of presence and the measures to reduce short term construction activities, we question the value of additional surveys for the three bees and request that surveys not be required. The most recent report from DCR added *Epeolus americanus* and *Bombus terricola* to the list of bees. We believe that assuming presence of these species would also be appropriate.

Cow Knob Salamanders

On the George Washington National Forest the ROW is located in Management Prescription Area 5C – Designated Utility Corridors, an area dedicated to the transmission line. This utility corridor passes through two portions of Management Prescription Area 8E7-Shenandoah Mountain Crest. Shenandoah Mountain Crest was established, in part, to protect known habitat for Cow Knob salamander. The first portion of Shenandoah Crest that intersects with the utility corridor is at one tower at lower elevation from Rader Knob. The rest of the Shenandoah Crest that intersects with the utility corridor is on Dictum Ridge and Second Mountain.

The entire Project area was assessed for suitable habitat for Cow Knob salamanders and other forest sensitive salamanders concurrent with rare plant surveys between 20 May and 1 June 2019. Potential Cow Knob salamander habitat was observed in 10 discrete areas within the study corridor. Areas of potentially suitable habitat were ranked as follows: three areas were low suitability, three areas were moderate suitability, and four areas were high suitability. Low suitability sites predominantly consisted of open talus slopes and rocky outcrops. Moderate suitability sites were wooded talus slopes with north facing aspect, and high suitability sites were mossy wooded talus with scattered woody debris and rock. No Cow Knob salamanders or Shenandoah Mountain salamanders were observed within, or adjacent to, the Area of Interest (AOI) during habitat surveys, but searches were not conducted during nighttime or when the species are active and more likely observed. Some casual daytime searches were conducted, but cover objects were dry underneath, indicating little likelihood of successful detection. Salamander habitat was identified in areas potentially impacted by the Project, but further revisions to the Project design result in avoidance to these areas.

To protect Cow Knob salamanders, no new road construction will occur in the Shenandoah Crest Zone outside the currently cleared ROW. Identified potential habitat areas will not be disturbed by construction activities. If the Project design changes such that identified potential habitat would be disturbed, a survey for individual salamanders would be completed before work would be authorized.

Core Fragmentation

We have reviewed the Project in relation to ecological cores identified in the Virginia Natural Landscape Assessment. This project includes a rebuild of an existing transmission line. The existing transmission line ROW forms the boundary of three Outstanding Cores, three Very High quality cores, three High quality cores and several Moderate quality cores. These cores are located predominantly on federal lands in the George Washington National Forest. The ROW width will not change. Towers will be located adjacent to existing towers. Existing roads will be used for most access to the towers. Approximately 5.2 miles of roads will be constructed on the Forest, but these roads will be on the existing road prisms from the access roads used for the original construction. All but 0.5 miles of these roads will be closed and revegetated after use. This 5.2 miles is in 36 separate segments, to include short roads extending from existing roads to towers. These roads will not fragment core habitat. A total of about 12 acres of trees will be cleared for temporary crane pads at tower sites (up to 60 tower sites). Based on early project design, preliminary estimates indicated that there will be select locations up to approximately 290 feet from the edge of the ROW and at most one acre in size. These areas will be revegetated after use and will return to forested cover. These small clearings along the edge of the existing ROW will not fragment habitat, will have minimal impact on any core, and be temporary. None of the cores will be fragmented nor be noticeably reduced in size due to clearing activities.

Thank you for your review and assistance with this project. Please provide your comments and/or questions based on this information at your earliest convenience. I can be reached at (434) 532-9034 or via email at Stacey.T.Ellis@DominionEnergy.com.