

What Do We Want?

1. Acceptable Pole Height and Placement

a. Lowering of the pole height so that the top line is at or below the current tree line, instead of the proposed height of up to 125 feet, would

- i. Eliminate or reduce the adverse impacts on the historic viewshed and
- ii. Significantly reduce bird collisions (if not eliminate them entirely).

Adequate analysis of alternatives is needed. To date, Dominion has only presented details on the current proposed pole height of up to 125 feet. An Analysis of Alternatives should include options for lower poles or even undergrounding.

Historic Viewshed: Following pressure from Friends of Huntley Meadows Park and the Fairfax County Park Authority, Dominion conducted a balloon test (April 20, 2016) to assess the impact of the project on the viewshed from Historic Huntley. We await the official report from the test. Volunteers tell us that the test balloon was visible from the Historic Huntley back porch and seen by the naked eye when it was up at a height of 125 feet in the easement. This tells us that the project is likely to adversely impact the viewshed.

Bird Collisions. Dominion has not explained the methods it would use to avoid or minimize bird collisions with the power lines and guy wires. This was requested by Fairfax County (October 22, 2015 and February 2, 2016); also the lack of explanation in the application of December 2015 was noted by Virginia DEQ.

b. Proper Pole Placement. Detailed site mappings are needed of natural, historical, and cultural resources that must not be damaged. This should include pole foundation locations so that we can verify that sensitive resources are being avoided. These sensitive resources need to be flagged, surrounded by protective, sturdy fencing, and marked on a map that the contractor can use when working on the site. This should include all findings from surveys required by the VA SCC and VA DEQ. Adequate analysis of alternative pole locations is needed.

2. Proper Construction Practices.

a. Site Supervision: Dominion Virginia Power senior project staff are requested to be on-site during the entire implementation period of the project.

b. Rules for Contractors need to be confirmed before work begins, including the following requirements:

- (i) Before exiting the work site each day, all trash and construction debris needs to be removed from the site;
- (ii) Workers need to remain within the area of the easement, avoiding flagged or marked areas;
- (iii) Toilet facilities for workers must be provided. Outdoor wooded areas (bushes or trees) should not be used for this purpose;
- (iv) Ensure no oil or fuel spills or leaking of other engine fluids occurs onto the project work area, adjacent areas, or in neighborhoods and areas through which the construction vehicles pass daily to access the site;
- (v) We recommend that equipment or machinery be removed from the site daily, rather than stored on-site;
- (vi) Vehicles should be cleaned off-site before entering the project site each day to ensure no transmission of invasive plants into the project areas;
- (vii) Workers must not capture, harass or harm any wildlife;
- (viii) Any disturbance to native vegetation in the right-of-way must be avoided, minimized and restored if needed.

3. No Toxic Substances Used. All materials used in the project overall must be environmentally safe including the concrete, which must not include any coal ash (including fly ash).

4. Compensatory Mitigation. A compensatory mitigation plan is needed to address adverse impacts from the pre-application work and to compensate for adverse impacts on sensitive resources in the right-of-way.

Pre-application work: Dominion began this same work in July - August of 2015 under a Maintenance Work Permit before the State Corporation Commission intervened requiring this extensive application and review process to be followed. Possible damage from Dominion's pre-application work (July - August 2015) to the sensitive natural, historical, archeological, and cultural resources in the project area must be independently assessed. If found liable Dominion should be fined or compensatory mitigation measures should be required by the State Corporation Commission.

Friends of Huntley Meadows Park can only support this project if and when these issues are properly examined, adverse impacts are avoided and mitigated, and appropriate solutions are agreed upon.

We thank you in advance for your important public comments. This will send a clear message to the SCC that this power line project must be redesigned to respect and avoid damaging the natural, historical, and cultural resources in this section of Huntley Meadows Park, and, protect the viewshed for Historic Huntley.