



The Mount Vernon Council of Citizens Associations, Inc.

P.O. Box 203, Mount Vernon, VA 22121-9998

<http://www.mvcca.org>

Supervisor Dan Storck
2511 Parkers Lane
Alexandria, VA 22306

June 6, 2016

Dear Supervisor Storck

Ref: MVCCA Resolution E&R 2016-01 Dominion Power Project PUE 2015-00133

On behalf of the MVCCA I am transmitting the attached resolution to you for your action. MVCCA General Council approved this resolution unanimously at our May 25th 2016 meeting. The protection of Huntly Meadows Park environmentally sensitive flora and fauna as well as the view shed of Huntly House is critical to maintaining the livability of our area.

Your support and action will be greatly appreciated.

Sincerely,

Katherine Ward
Co-Chair
MVCCA

Enclosed: MVCCA Resolution ER 2016-01 Dominion Power Project impacting Huntly Meadows Park
With attachment

CC: State Corporation Commission Public Comments

MVCCA Resolution 2016-01 (Environment & Recreation)
Important Elements Missing from Dominion Virginia Power's Project #PUE-2015-00133, the
Transmission Line Rebuild of the Belvoir – Gum Springs Double Circuit 230 Kilovolt (kV) Lines
#204 and #220

1. **WHEREAS** Dominion Virginia Power (Dominion) has submitted an application to the Virginia State Corporation Commission (regulatory agency) on December 16, 2015 for approval and certification of electric facilities; this project, with an estimated cost of \$10.4 million, proposes to rebuild approximately 2.6 miles of existing 230 Kilovolt (kV) transmission lines, Jefferson Street-Gum Springs Line #204 and Ox-Gum Springs Line #220 located in Fairfax County, Virginia within an existing easement;
2. **WHEREAS** the wood pole section of these lines was originally constructed in the late 1960s with some sections replaced as part of a temporary rebuild project in the summer of 2014 with additional work done in the summer of 2015; Dominion proposes rebuilding these lines, stating that this rebuild would keep the structural integrity and reliability of its transmission system and facilitate needed maintenance;
3. **WHEREAS** the project area is located along the southern boundary of Huntley Meadows Park (on park property), an important conservation area with sensitive natural, cultural, historical and archaeological resources located in the easement;
4. **WHEREAS** the project will impact Mount Vernon District residents who live nearby the project area;
5. **WHEREAS critical elements are missing** from the application that are necessary to fully assess the environmental impact of the project including:
 - a. **An analysis of alternatives** including any detailed justification that presents the rationale for increasing the height of the poles to up to 125 feet, what the minimum pole height would be to carry the same power load and provide for the one pole design down the center of the easement [the May 13, 2016 State Corporation Commission Staff Report states that “constructing the Project at the lower structure height (90 feet) is feasible”], and the cost and design of undergrounding the power transmission lines;
 - b. **Results of the Balloon test performed on April 20, 2016** that will determine if there would be adverse impacts on the historic viewshed for Historic Huntley; if viewshed impacts are identified a project redesign should be considered;
 - c. **A detailed explanation of Dominion's methods for avoiding bird collisions** from the proposed taller poles (125 feet) and the use of guy wires;
 - d. **A detailed alignment sheet** that identifies each pole's placement in the easement along with the precise location of rare plants, vernal pools, wetlands, the George Washington Double-ditches, the Coastal Plain Depression Swamp, and other sensitive resources in the easement in order-to verify that the pole locations will avoid damage to these;
 - e. **Compensatory mitigation plan** for adverse impacts from pre-application work and to compensate for adverse impacts on sensitive resources in the easement and on the viewshed;
 - f. **Confirmation that all materials (including concrete) used in the project are environmentally safe.**
 - g. **Recommended Rules for Contractors** working in the easement area (see attached for a list).

THEREFORE BE IT RESOLVED that the MVCCA recommends that the Mount Vernon District Supervisor

- a. Support this Dominion project **ONLY** if the aforementioned missing elements are fully brought into the decision-making process and in consultation with stakeholders including the MVCCA, such that adverse environmental impacts are fully identified, avoided and mitigated; a project redesign may be needed.
- b. Bring this resolution to the Fairfax County Attorney's office urging the County Attorney to follow up on these requests.

Approved by the MVCCA General Council May 25, 2016

MVCCA E&R Resolution # 2016-01

Attachment

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

- (1) Before exiting the work site each day, all trash and construction debris needs to be removed from the site;
- (2) Workers need to remain within the area of the easement, avoiding flagged or marked areas;
- (3) Toilet facilities for workers must be provided. Outdoor wooded areas (bushes or trees) should not be used for this purpose;
- (4) 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;
- (5) We recommend that equipment or machinery be removed from the site daily, rather than stored on-site;
- (6) Vehicles should be cleaned off-site before entering the project site each day to ensure no transmission of invasive plants into the project areas;
- (7) Workers must not capture, harass or harm any wildlife;
- (8) Any disturbance to native vegetation in the right-of-way must be avoided, minimized and restored if needed.

Approved by the MVCCA General Council May 25, 2016