

## **APPENDIX C: PUBLIC SCOPING DOCUMENTS**



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Project Home

[APPA > Dooms-Bremo Transmission Line Crossing \(38582\)](#)

### Public Documents

[Create Public Document](#)

1 Project Setup

2 Funding

[Documents List \(found total ' 1 ' \)](#)

*(Note: Only Regional and Park Administrators can delete documents. Only documents without 'Review Start' and 'Review End' Dates can be deleted.)*

3 Internal Scoping / IDT Tasks

Status:

4 Natural/Cultural Compliance

Action	Document/Project	Published to Public:	Yes	No	Review Dates
	Project Home Page	Yes	Yes		Posted 10/05/2012
	Newsletter & Public Scoping	Yes	Yes		10/05/12 - 11/30/12

5 Internal Documents / Comments

6 Public Communication

1 - 1 of 1

7 Public Documents & Comment Analysis

Text:

Dominion Virginia Power (DVP) has requested permits from the NPS to upgrade its existing transmission facilities across approximately 3,000 feet of NPS lands inside the boundaries of Shenandoah National Park and the Appalachian National Scenic Trail near Waynesboro, Virginia. The proposed project, which is a part of the company's larger effort to upgrade the entire 45 miles of its electrical transmission line between Dooms and Bremo, Virginia, would replace an existing 115-kilovolt (kV) line and associated structures with a new 230-kV line and structures, within the existing right-of-way (ROW). DVP needs permission from the NPS to construct the part of this line that lies on federal lands managed by the NPS. As such, the NPS is preparing an Environmental Assessment (EA) pursuant to the National Environmental Policy Act to analyze the impacts to the environment and park resources that might occur as a result of this portion of the line's upgrade.

Public Documents

Manage Codes for Entire Project  
[View](#) | [Edit](#)

Entire Project Code Analysis Report

Demographics Report

8 Close Project

DVP identified the need to upgrade its 115-kV transmission facilities between Dooms and Bremo (the "Dooms-Bremo" line) as part of its regional transmission planning process. According to DVP, demand on the line is increasing, and the upgrade is needed to maintain reliable electrical service and avoid violations of the National Electric Reliability Commission (NERC) standards. The line upgrade is scheduled to be completed in the summer of 2014.

The existing Dooms-Bremo line currently crosses two units of the NPS system: Shenandoah National Park and the Appalachian National Scenic Trail. DVP (the applicant) has applied for permits from the NPS to authorize construction and use of park lands for installing the new facilities. A construction permit is needed to authorize construction activities that would occur within the parks as part of the project. A ROW permit to operate and maintain the line is needed for the portion of the line that crosses Shenandoah National Park because the applicant does not own an easement there, so the existing authorization would need to be changed to describe the new facilities.

Therefore, the federal action under consideration in the EA is deciding whether and under what conditions to issue DVP the requested permits. The analysis in the EA will focus on the area where the transmission line crosses NPS land. This will help the NPS to determine the significance of any environmental effects and to examine reasonable alternatives and modifications to assist in meeting its NPS resource management objectives. At this point, the EA will analyze two alternatives: build (action) and no build (no action).

- The EA will discuss potential impacts and several topics including:
- biotic communities, including vegetation, wildlife, and wildlife habitat
  - visitor use and experience
  - soundscapes
  - scenic resources
  - cultural landscapes & historic districts

We will be providing opportunities for public input soon. Please check back here for updates.

#### Project Contact for Public:

Morgan McCosh Elmer, Project Manager  
NPS Denver Service Center - Planning

12795 W Alameda Pkwy  
PO Box 25287  
Denver CO 80225

Image:



Short Link: \*

none

[PEPC Guide](#) - [Inside NPS](#) - [NPS.gov](#) - [USA.Gov](#) - [Disclaimer](#) - [Accessibility](#) - [Privacy Policy](#)



## How to Comment...

There are several ways to provide comments:

- Submit comments electronically at: <http://parkplanning.nps.gov/SHEN>
- Submit written comments by mail to:  
Morgan Elmer  
Attn: Doods - Bremo NPS Crossing  
NPS - Denver Service Center  
P.O. Box 25287  
Denver, CO 80225-0287

The comment period will be open until November 30, 2012.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment -- including your personal identifying information -- may be made publicly available at any time.



Electric Transmission Line Upgrade Permit on NPS Lands  
Shenandoah National Park  
3655 U.S. Highway 211 East  
Luray, VA 22835

# Electric Transmission Line Upgrade Permit on NPS Lands

PUBLIC SCOPING NEWSLETTER

Fall 2012

## We want to hear from you!

Dear Neighbors and Visitors,

The National Park Service (NPS) would like your input on a proposed project affecting Shenandoah National Park and the Appalachian National Scenic Trail in Virginia. Dominion Virginia Power (DVP) has requested permits from the NPS to upgrade its existing transmission facilities across approximately 3,000 feet of NPS lands inside the boundaries of Shenandoah National Park and the Appalachian National Scenic Trail near Waynesboro, Virginia. The proposed project, which is a part of the company's larger effort to upgrade the entire 45 miles of its electrical transmission line between Doods and Bremo, Virginia, would replace an existing 115-kilovolt (kV) line and associated structures with a new 230-kV line and structures, within the existing right-of-way (ROW). DVP needs permission from the NPS to construct the part of this line that lies on federal lands managed by the NPS. As such, the NPS is preparing an Environmental Assessment (EA) pursuant to the National Environmental Policy Act to analyze the impacts to the environment and park resources that might occur as a result of this portion of the line's upgrade.

At this time, we invite your participation in our effort to analyze potential environmental impacts. To help us "scope out" the important issues, we would like to give you the opportunity to share with us your ideas and concerns about the project so we can take them into consideration. During this scoping period, interested parties may submit written comments online or by mail as described at the end of this newsletter. The scoping period will end on November 30, 2012. Once we have completed the impact analysis, you will also have another opportunity to review and comment on the final document.

We appreciate and look forward to your comments.

Martha Bogle, Superintendent  
Shenandoah National Park

Pamela Underhill, Superintendent  
Appalachian National Scenic Trail

# Background

DVP identified the need to upgrade its 115-kV transmission facilities between Doods and Brems (the "Doods-Brems" line) as part of its regional transmission planning process. According to DVP, demand on the line is increasing, and the upgrade is needed to maintain reliable electrical service and avoid violations of the National Electric Reliability Commission (NERC) standards. The line upgrade is scheduled to be completed in the summer of 2014.

The existing Doods-Brems line currently crosses two units of the NPS system: Shenandoah National Park and the Appalachian National Scenic Trail. DVP (the applicant) has applied for permits from the NPS to authorize construction and use of park lands for installing the new facilities. A construction permit is needed to authorize construction activities that would occur within the parks as part of the project. A ROW permit to operate and maintain the line is needed for the portion of the line that crosses Shenandoah National Park because the applicant does not own an easement there, so the existing authorization would need to be changed to describe the new facilities.

Therefore, the federal action under consideration in the EA is deciding whether and under what conditions to issue DVP the requested permits. The analysis in the EA will focus on the area where the transmission line crosses NPS land. This will help the NPS to determine the significance of any environmental effects and to examine reasonable alternatives and modifications to assist in meeting its NPS resource management objectives. At this point, the EA will analyze two alternatives: build (action) and no build (no action).

The EA will discuss potential impacts and several topics including:

- biotic communities, including vegetation, wildlife, and wildlife habitat
- visitor use and experience
- soundscapes
- scenic resources

# Purpose and Need

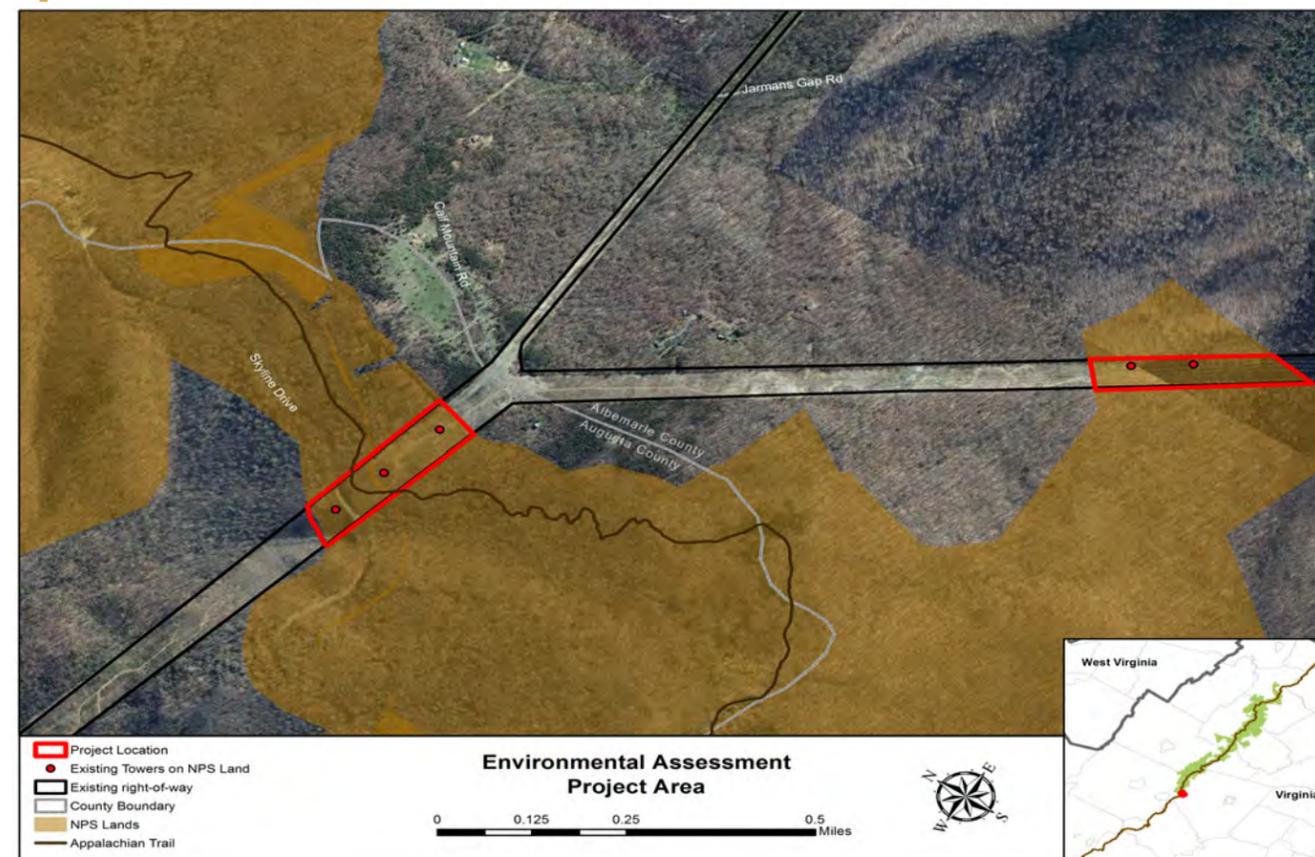
The purpose component of an EA broadly describes the goals that the NPS intends to fulfill through taking action, and the need component explains why taking action at this time is necessary. The purpose of and need for action by the NPS is distinct from that of the applicant.

As explained above, DVP asserts that its action is needed to increase capacity of the line, continue to provide reliable electrical service to customers served by the line, and maintain compliance with the NERC Reliability Standards. The NPS' action is needed because DVP has requested permission to rebuild some of its transmission facilities on park land. The purpose of NPS' action is to determine how best to respond to DVP's request while protecting park resources and experiences.

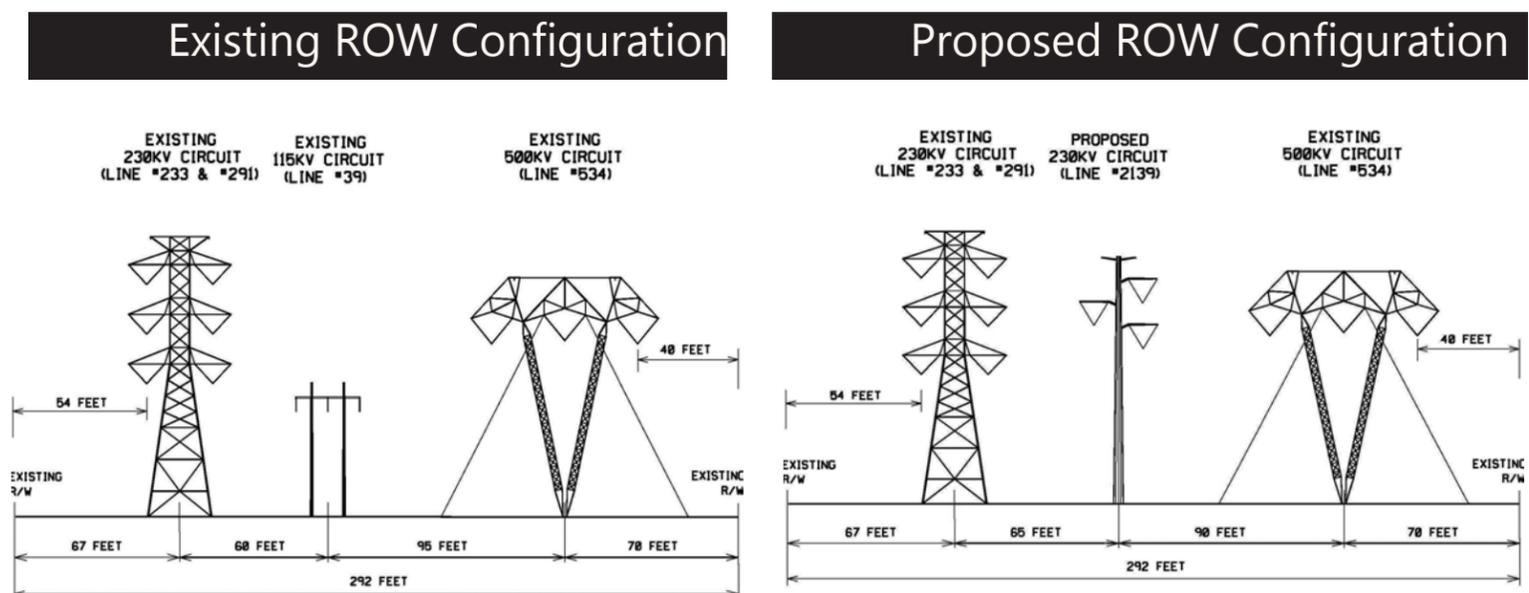
## Project Timeline

Fall 2012	Public scoping period
Winter 2013	Internal review of EA
Spring 2013	Release of public EA
Fall 2013	Decision announced

# Project Area



# Preliminary Tower Design



**PEPC Project ID: 38582, Document ID: 50076**  
**Correspondence: 1**

**Author Information**

Keep Private: No  
Name: N/A N/A  
Organization:  
Organization Type: I - Unaffiliated Individual  
Address: Washington, VA 22747  
USA  
E-mail:

**Correspondence Information**

Status: New Park Correspondence Log:  
Date Sent: 10/09/2012 Date Received: 10/09/2012  
Number of Signatures: 1 Form Letter: No  
Contains Request(s): No Type: Web Form  
Notes:

**Correspondence Text**

Look forward to reviewing and commenting on the final document once potential impacts have been identified.  
Thank you for keeping us posted.

# PEPC Project ID: 38582, Document ID: 50076

## Correspondence: 2

### Author Information

Keep Private: No  
Name: Karen L. Lutz  
Organization: Appalachian Trail Conservancy  
Organization Type: I - Unaffiliated Individual  
Address: 4 East First Street  
Boiling Springs, PA 17007  
USA  
E-mail: klutz@appalachiantrail.org

### Correspondence Information

Status: New Park Correspondence Log:  
Date Sent: 11/30/2012 Date Received: 11/30/2012  
Number of Signatures: 1 Form Letter: No  
Contains Request(s): No Type: Web Form  
Notes:

### Correspondence Text

November 27, 2012

Morgan Elmer  
Attn: Dooks ? Bremo Transmission Line Crossing  
NPS ? Denver Service Center  
P.O. Box 25287  
Denver, CO 80225-0287

Dear Ms. Elmer:

The Appalachian Trail Conservancy appreciates the opportunity to comment on Dominion Virginia Power's proposed Dooks ? Bremo power-line upgrade, which would cross the Appalachian National Scenic Trail within Shenandoah National Park just north of Beagle Gap. We request consideration of these comments in your analysis of the environmental effects of the proposed project.

The 2,184-mile long Appalachian Trail (Trail, A.T.) was designated as the first national scenic trail with the passage of the National Trails System Act in 1968. Although formally recognized by the Act, the Trail was actually conceived well before then by planner and conservationist Benton MacKaye in 1921. He envisioned the A.T. as a path for foot travel across the remote and scenic high ridges of the Appalachian Mountains—a place where people could seek respite from the rapidly developing landscape of the eastern seaboard. Over the years the Trail has become recognized as a world renowned greenway and recreational resource and is visited each year by some 2 million people. It is an historic resource and has been determined eligible for listing on the National Register of Historic Places by several of the 14 states through which the Trail passes.

The Appalachian Trail Conservancy (ATC) is dedicated to protecting this important resource. As a private nonprofit organization, our mission is to work in concert with our 31 affiliated volunteer Trail clubs, the National Park Service and other "Trail management partners" to preserve and manage the Appalachian Trail-ensuring that its vast natural beauty and priceless cultural heritage can be shared and enjoyed today, tomorrow, and for centuries to come. This is increasingly a challenge as pressure from a variety of utility proposals and other developments in the vicinity of the A.T. continues to expand.

To help protect the Trail and to meet this challenge, ATC has adopted a policy regarding roads, power-lines and other utility infrastructure. The main objective of this policy is to ensure that the final outcome of any proposal will result in no net loss to the natural, scenic, cultural and recreational experience provided by the Trail. (See the Roads and Utilities Policy at <http://www.appalachiantrail.org/docs/trail-management-policies/roads-and-utilities-2000.pdf>.)

According to the Dooms ? Brems Transmission Line Crossing Scoping Newsletter (Scoping Newsletter), Dominion proposes to upgrade its existing transmission facilities across approximately 3,000 feet of NPS lands inside the boundaries of Shenandoah National Park and the Appalachian National Scenic Trail near Waynesboro, Virginia. The proposed project would replace an existing 115-kilovolt (kV) line and associated structures with a new 230-kV line and structures within the existing right-of-way (ROW). The preliminary tower design shown in the Scoping Newsletter indicates that the existing double pole structures will be replaced with taller, monopole towers. The exact height of the existing and proposed towers is not shown; however it appears that the new towers would not be taller than the tallest towers on the adjacent "Line #233 & #291."

We believe that the following issues should be fully addressed in the environmental assessment of the proposed project:

#### GENERAL COMMENTS

ATC works closely with 31 Trail-maintaining clubs and other partners to protect and manage the A.T. The Potomac A.T. Club (PATC) maintains the Trail and associated facilities in the area of this project. We request that PATC, along with ATC, be invited to provide input on the EA, construction plan and any other planning efforts related to this project and that a site visit be conducted prior to the EA to provide A.T. managers with detailed information about what is being proposed.

#### POSSIBLE IMPACTS TO THE SCENIC ENVIRONMENT OF THE APPALACHIAN NATIONAL SCENIC TRAIL

As mentioned above, ATC strives to achieve no-net-loss to the scenic and other resources of the A.T. Although this project is proposed along an already developed power-line right-of-way, we believe that, at a minimum, there should be no new adverse impacts to the scenic resources of the Trail. If adverse impacts are unavoidable, they should be fully mitigated, and, to the greatest degree possible, should be mitigated at the site of impact. Any opportunities to adjust power-line features and design criteria (e.g., tower heights, styles, placement, color in relation to background) in order to mitigate and reduce adverse impacts to the Trail should be given full consideration. We request that visual impacts of the line be assessed within the "Foreground" (out to one-half mile) and "Middleground" (out to 4 miles) zones of the A.T. as defined in the U.S. Forest Service's Scenery Management System.

#### POSSIBLE IMPACTS TO NATURAL AND CULTURAL RESOURCES

We are confident that NPS will require Dominion to conduct studies to identify any potential cultural or natural resource values that may be present within the project area. Although we are not aware of any rare or threatened species in the immediate vicinity of the project, we expect that Dominion will be required to work closely with the

Virginia Division of Natural Heritage and NPS to identify any such resources and, if found, ensure that they are adequately protected.

As previously noted, several states through which the Trail passes have identified the A.T. as eligible for listing on the National Register of Historic Places. We expect that Dominion will be required to work closely with NPS and the Virginia Department of Historic Resources to adequately identify and protect the A.T. as a significant cultural resource as well as any other cultural resources within the project area.

#### POSSIBLE IMPACTS FROM UNAUTHORIZED USE OF ALL-TERRAIN AND OTHER MECHANIZED AND MOTORIZED VEHICLES ON A.T. LANDS ALONG THE TRANSMISSION LINE ROW

Unauthorized motor vehicle usage is a major problem on the Appalachian Trail and its associated lands. ATVs and other vehicles have adverse impacts on soils, vegetation, wildlife and visitor experiences. Volunteers from our Trail-maintaining clubs spend countless hours trying to address these impacts.

One major "corridor" for motorized vehicle access to Trail lands is via utility rights-of-way. The current ROW should be assessed for ATV trespass onto NPS lands. Any ATV trespass discovered should be mitigated through installation of barriers or other appropriate measures.

#### POSSIBLE IMPACTS TO VISITOR USE AND THE RECREATIONAL EXPERIENCE OF THE TRAIL

The Appalachian Trail is a recreational resource that is used year-round and cannot be closed, even temporarily. During peak hiking times the number of visitors hiking any given section of the Trail can reach as high as 20 to 100 people on a given day. It is imperative that Dominion provide hikers a well-defined, controlled and safe passage through the area during the entire term of the project.

#### POSSIBLE IMPACTS TO SOILS, VEGETATION AND OTHER PARK RESOURCES

It is unknown at this time whether any of the new towers will be within close proximity to the A.T. footpath. If so, adverse impacts should be fully assessed and mitigated through alternative tower placements or other options.

All soil disturbances caused by clearing, grading, road construction and other project activities should be restored to original contours and seeded with an NPS-approved seed mix. Any grading or construction of access roads should be temporary and be contained within the existing ROW clearing. Roads should be constructed of dirt or other on-site native materials. Any gravel or other off-site materials brought in during construction should be removed and the site restored at the end of the project.

The Project Description states that construction will be contained within the existing ROW, so we do not anticipate any clearing or cutting of vegetation outside the existing utility corridor. However, if any construction activities will be within close proximity to the boundary of the legal ROW these boundaries should be clearly marked and protected during project. Care should also be taken to protect any NPS boundary trees and other property markers that are in the vicinity of the project. It has been reported that an Appalachian National Scenic Trail boundary monument located within the ROW on the east side of the A.T. is damaged and has the cap missing. This monument should be marked and protected from further damage. Possible replacement of the monument as part of this project by a licensed surveyor should be considered.

Utility developments and construction projects are often avenues for the introduction and proliferation of non-native invasive plants. NPS should require that Dominion take the necessary steps to control the introduction of these species.

Finally, Dominion's ongoing vegetation management practices in the vicinity of the Trail should be reviewed by the Trail management partners and adapted if necessary to enhance the aesthetic values of the A.T. ATC suggests management techniques such as hand-clearing of vegetation, "feathering" of vegetation along the edges of the right-of-way, leaving low-growing vegetation, and limiting the use of herbicides. ATC also requests that Dominion notify NPS and the Trail management partners at least 30 days prior to any ROW maintenance activities, so that any potential concerns can be addressed in advance.

Thank you for consideration of our comments.

Sincerely,

Karen L. Lutz  
Regional Director

cc (via email): John Hedrick, Russell Riggs (PATC); Pamela Underhill, Brent Allen (NPS); Laura Belleville, Bob Proudman, Michele M. Miller (ATC)