From: John Glover [jglover@gloverconstruction.com]
Sent: 3/11/2015 2:23:44 PM
To: Michael A Glagola (Generation - 34) [/O=DOMINION/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Mic0210]
Subject: Re: FW: Eagle & Mechanical Dredge

All,

Please see the comments below, I made them in blue.

Thanks

On Wed, Mar 11, 2015 at 1:08 PM, Michael A Glagola (Generation - 34) <michael.a.glagola@dom.com> wrote:

John and John,

Based on the positive outcome of the meeting with Prince William County today Glenn Bishop is ready to submit the eagle letter. Could you review the letter and mainly with the red highlighted questions either confirm or make changes. If you could provide your feedback by tomorrow noon that would be great.

Thanks,

Mike Glagola

Mike Glagola

Dominion Resources Services, Inc.

5000 Dominion Blvd.

Glen Allen, VA 23060

Tel: 804 273-2362

Cell: 804 513-8219

From: Glenn Bishop (Services - 6)
Sent: Wednesday, March 11, 2015 10:51 AM
To: Michael A Glagola (Generation - 34)
Cc: Cathy C Taylor (Services - 6); Bob Jackson (Generation - 34); Karen K Canody (Services - 6); Matt Overton (Services - 6)
Subject: Eagle & Mechanical Dredge

Mike,

That is good news regarding the mechanical dredging. Included within this email is the text and figures for the eagle consult letter to reflect mechanical dredging as the option of choice. I've highlighted some final questions I have. Please review for accuracy and forward to others as appropriate.

Mike, I understand you'll set up a brief conference call later this week for final discussion prior to submittal. Thank you.

VDGIF Project Review – Pond E Dredging at Possum Point Power Station

Please find attached information prepared to notify you of planned dredging of ash pond E at our Possum Point Power Station. Since a very limited portion of the dredging activity needs to occur within the protective 660' buffer zone for eagle nest PW1103 (see attached Figure 1), we are providing this information in accordance with the bald eagle consultation recommendations within the *VDGIF Bald Eagle Management Guidelines 2012.*

Project Description

Dominion is currently preparing to remove the ash from pond E and to potentially convert this pond to a lined, Low Volume Waste Pond to serve the ongoing needs of the power station. As part of this effort, we are also taking steps in the planning of our work to avoid and minimize any potential impact from the project to the site's nesting population of bald eagles. The timing of the dredging is needed to ensure that project schedules allow for completion of this and other work within anticipated regulatory deadlines in EPA's forthcoming Coal Combustion Residuals (CCR) rule.

Site work is set to begin on or about April 1 and to be completed by September 30 The work will involve mechanically dredging and moving the accumulated ash from pond E to pond D. Prior to dredging, a sump and series of ditches will be constructed to dewater pond E through an existing NPDES outfall. If necessary, electric pumps with muffled generators will augment this process. Additionally, an ash haul road will be constructed to transport the ash from pond E to pond D. The operation will proceed on a 5 day a week schedule with the major excavation complete in 100 days? Yes 5 days is the plan. If it would be better to finish earlier we could go with a 6 day schedule?

Bald Eagle Nesting

We are aware of 3 bald eagle nests within the project work area and are integrating them into our work plan. None of the nests will be removed, and the vast majority of site work will take place at a safe distance, outside of established eagle buffer zones. These nests and their associated protective distance buffers are shown in the attached Figure 1 and described below:

Nest PW1103 – This nest is located on the Quantico Creek side of the site's entrance road, opposite pond E. Work activities within pond E will occur largely outside of the protective 660' buffer for this nest. A limited amount of dredging to include ~7% of the ponds acreage will need to occur within the 660' buffer, but no closer than 420' to the nest. Topographically, a landscape buffer (~230' of forested ground) will remain intact on both sides of the entrance road between the work zone and the nest, thus limiting the potential visual impact (Figure 2). Work in the southwest corner of the pond within the buffer for nest PW1103 will be restricted to 2 pieces of equipment (1 load unit and 1 haul unit)? *The question of how long we'll need to be inside the buffer for this nest is relevant. I'd like an estimate from someone if possible. 14 days*

Nest PW0201 – Ash placement within pond D will occur to the north and west, well outside of the buffer and as from this nest as reasonably possible. No ash transport or placement will encroach upon the 660' protective buffer. The 660' radius of nest PW0201 does overlap an access road that parallels Cockpit Point Road. Traffic associated with the dredging project will NOT be allowed on the portion of this access road protected by the eagle buffer.

Nest PW1101 – This nest was destroyed last year, most likely by a sudden storm event. It is currently being rebuilt directly adjacent to existing railroad tracks where it previously existed. Project activities, with the exception of minimal work traffic on Cockpit Road, will not occur within the protective eagle buffer. As with nest PW1103, landscape buffers will limit visibility of traffic from the nest.

Pre-Existing Site Conditions

Bald eagles at Possum Point Power Station have demonstrated a high degree of tolerance to a wide range of pre-existing site conditions. All 3 nests within the project footprint were established under conditions associated with the existing power station including the following activities:

- Conversion of the power station fuel source from coal to natural gas
- Seasonal increases in traffic and noise during outage maintenance work
- Upgrades and perimeter security enhancements to nearby switchyard equipment (current work site shown in Figure 3)
- Installation of fiber optic cable on site transmission structures

These birds have also shown a high tolerance level to pre-existing noise from watercraft and waterfowl hunting on Quantico Creek, the constant presence of military aircraft, intermittent artillery testing and daily railroad traffic.

Bald Eagle Avoidance & Minimization Plan

In addition to those mitigating elements of the project described above (distance and landscape buffers, demonstrated eagle tolerance), the project scope of work incorporates the following measures to specifically address bald eagle protection:

- Access to pond E is restricted to those areas outside of the protective 660' bald eagle buffer. This would include equipment entry to and exit from the pond, equipment refueling and associated maintenance/repair if necessary.

- Access to pond D is restricted to those areas outside of the protective 660' bald eagle buffer. This would include those activities necessary for transport and placement of ash in the pond.

- Any staging of equipment, facilities or materials on the site is restricted to those areas outside of the protective 660' bald eagle buffers associated with ponds E and D.

- Equipment movement within pond E is restricted to those areas outside of the protective 660' bald eagle buffer. The only exception to this requirement will allow for a limited presence inside the 660' buffer, estimated to occur no closer than 420' to the nest, necessary to reach this area of the pond. Again, ~how long? 14 days

- Work within the pond E eagle buffer must be sequenced to begin after tree leaf out to provide an enhanced noise and visual buffer.

Dominion is pleased to provide the above information for this project. Please review and let us know if you have any concerns or additional questions regarding the necessary work. Thanks.

Glenn Bishop

Biological Consultant - DES

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