

NAPSEIS Comment Resource

From: Amy.Ewing@dgif.virginia.gov
Sent: Thursday, March 12, 2009 8:45 AM
To: jefisher@deq.virginia.gov
Cc: Ernie.Aschenbach@dgif.virginia.gov; Brian.Watson@dgif.virginia.gov;
Ray.Fernald@dgif.virginia.gov; John.Kauffman@dgif.virginia.gov; Alicia Williamson
Subject: RE: Comments on North Anna SEIS (DEQ 09-001F)

John,

Upon further discussion, we have decided that further comments are appropriate. Please see them below. Thanks, Amy

Upon review of the Early Site Permit and associated Coastal Consistency for the proposed addition of a third reactor at North Anna Power Station (NAPS), we expressed concerns about the operation of the third reactor and the reservoir as they relate to maintenance of downstream flows in the North Anna and Pamunkey rivers. To address our concerns, we and other state resource agencies recommend that Dominion perform an Instream Flow Incremental Methodology (IFIM) study in the North Anna River below the Lake Anna dam and in downstream waters of the Pamunkey River. We worked closely with Dominion and the permitting agencies on the design of the study and the analysis of the results. As stated in the SEIS, the primary goal of the IFIM is to determine whether possible changes in dam releases resulting from the operation of the third reactor are likely to adversely impact aquatic resources below the dam.

The IFIM is complete and we are currently working with Dominion, the permitting agencies, and other natural resource agencies to finalize the results and develop operating rules for the proposed third reactor (including reservoir management procedures) that reduce the frequency of dam releases below 40 cfs, thereby protecting downstream aquatic resources. We will continue to work with Dominion, the permitting agencies, and other natural resource agencies to develop operating rules that avoid adverse impacts upon downstream resources, including recreational uses, or to mitigate unavoidable impacts.

According to our records, we do not currently document listed wildlife resources under our jurisdiction from the site proposed for placement of the third reactor. Therefore, impacts upon such resources are not likely to result from site preparation or construction of the third reactor. According to our data and those from VDCR, downstream waters have been known to support federal Endangered dwarf wedgemussel, federal Endangered James spiny mussel, state Endangered Atlantic pigtoe, and state Threatened green floater. Possible impacts upon these species and the waters that support them will be considered in our final comments and recommendations resulting from review of the IFIM results.

We have reviewed the proposed corridor for the additional 500kV line required to carry the output of the existing Lake Anna units and the proposed third unit. We do not currently document any listed wildlife or resources under our jurisdiction from the project area. Therefore, impacts upon such species and resources are not likely to result from the construction of this line. In addition, as this new line will be co-located within an existing power line corridor, it does not appear that significant wildlife habitat alterations will occur.

We recommend that all land disturbing activities adhere to erosion and sediment controls. We recommend conducting any in-stream activities during low or no-flow conditions, using non-erodible cofferdams to isolate the construction area, blocking no more than 50% of the streamflow at any given time, stockpiling excavated material in a manner that prevents reentry into the stream, restoring original streambed and streambank contours, revegetating barren areas with native vegetation, and implementing strict erosion and sediment control measures. Due to future maintenance costs associated with culverts, and the loss of riparian and aquatic habitat, we prefer stream crossings to be constructed via clear-span bridges.

Thank you. Amy

Amy M. Ewing
Environmental Services Biologist
Virginia Dept. of Game and Inland Fisheries
4010 West Broad Street
Richmond, VA 23230

804-367-2211
amy.ewing@dgif.virginia.gov

From: Ewing, Amy
Sent: Tuesday, March 10, 2009 4:41 PM
To: Fisher, John (DEQ)
Cc: Aschenbach, Ernie; Watson, Brian; Fernald, Ray; Kauffman, John
Subject: RE: Comments on Noth Anna SEIS (DEQ 09-001F)

John,
I have no record of receiving a request for comments on this document from DEQ OEIR. I did receive the document from the NRC with a request for comments. We discussed it and determined that there was no need for us to provide further comments on the EIS/SEIS at this time. We are heavily involved in review of and commenting on the Lake Anna project through meetings with Dominion, other state agencies, and the stakeholders. We will continue to provide comments to Dominion and the NRC (as appropriate) through that process. I provided the NRC with our comments regarding the new transmission lines associated with new power generation at Lake Anna last year. Those are attached for your files/information. Thanks, Amy

Amy M. Ewing
Environmental Services Biologist
Virginia Dept. of Game and Inland Fisheries
4010 West Broad Street
Richmond, VA 23230
804-367-2211
amy.ewing@dgif.virginia.gov

From: Fisher, John (DEQ)
Sent: Tuesday, March 10, 2009 11:56 AM
To: Hartshorn, David (DEQ); Aschenbach, Ernie; Ewing, Amy; Watkinson, Tony (MRC)
Subject: Comments on Noth Anna SEIS (DEQ 09-001F)

Reviewers:

I don't have record of receiving comments on the supplemental EIS prepared for the Combined License for the North Anna Power Station Unit 3 (DEQ 09-001F). Please let me know if you plan to submit comments.

Thanks,
John

John E. Fisher
Virginia Department of Environmental Quality
Division of Environmental Enhancement
Office of Environmental Impact Review
629 East Main Street, #633
Richmond, Virginia 23219
(804) 698-4339
(804) 698-4319 fax
jefisher@deq.virginia.gov
www.deq.virginia.gov

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Created By: Amy.Ewing@dgif.virginia.gov

Recipients:

"Ernie.Aschenbach@dgif.virginia.gov" <Ernie.Aschenbach@dgif.virginia.gov>
Tracking Status: None
"Brian.Watson@dgif.virginia.gov" <Brian.Watson@dgif.virginia.gov>
Tracking Status: None
"Ray.Fernald@dgif.virginia.gov" <Ray.Fernald@dgif.virginia.gov>
Tracking Status: None
"John.Kauffman@dgif.virginia.gov" <John.Kauffman@dgif.virginia.gov>
Tracking Status: None
"Alicia Williamson" <Alicia.Williamson@nrc.gov>
Tracking Status: None
"jefisher@deq.virginia.gov" <jefisher@deq.virginia.gov>
Tracking Status: None

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