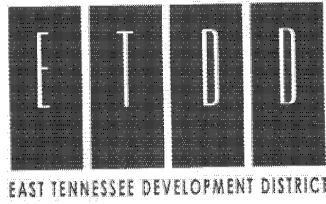


Tennessee



*paid
9/27/10*

September 22, 2010

Mr. Charles P. Nicholson
NEPA Compliance Manager
Tennessee Valley Authority
400 West Summit Hill Drive, WT 11D
Knoxville, TN 37902

Dear Mr. Nicholson:

SUBJECT: Result of Regional Review
Tennessee Valley Authority - Draft Environmental Impact Statement (EIS) for the Integrated Resource Plan

The East Tennessee Development District has completed its review of the above mentioned proposal, in its role as a regional clearinghouse to review state and federally-assisted projects.

ETDD review of this proposal has found no conflicts with the plans or programs of the District or other agencies in the region. However, ETDD or other reviewing agencies may wish to comment further at a later time.

We appreciate the opportunity to work with you in coordinating projects in the region.

Sincerely,

Terrence J. Bobrowski
Executive Director
TJB/tc

P.O. Box 249 Alcoa, TN, 37701-0249
Phone: (865)273-6003 Toll Free: (866)683-6003 Fax: (865)273-6010
Web Page: <http://www.discoveret.org/etdd>



September 30, 2010

Rec'd 10/4/10

Charles P. Nicholson, NEPA Compliance Manager
Tennessee Valley Authority
400 West Summit Hill Drive, WT 11D
Knoxville, Tennessee 37902

Re: Environmental Impact Statement For The Integrated Resource Plan For TVA
GNRC #2011-10

Dear Mr. Nicholson :

In accordance with the Project Review Process (approved by the Executive Committee at the April 1995 Executive Board Meeting), the Greater Nashville Regional Council has reviewed the above referenced project.

Our evaluation reveals no conflict with existing or proposed planning activities. We are notifying you that your proposal is deemed acceptable on the basis of information now available to this office, and received final approval by the Executive Committee at our GNRC Annual Meeting on September 28, 2010.

We may wish to comment further at a later time. This letter should be attached to your application. If we can be of further assistance, please do not hesitate to contact us.

Sincerely,

Sam H. Edwards
Executive Director

SHE/pyc



Rec'd 10/15/10



27 Conrad Drive
Suite 150
Jackson, TN 38305-2850
731-668-7112
731-668-6421
swtdd@swtdd.org

Joe W. Barker, Executive Director

Troy Kilzer, Chairman

Tim David Boaz, Vice Chairman

Jerry Gist, Secretary-Treasurer

CHESTER DECATUR HARDEMAN HARDIN HAYWOOD HENDERSON MADISON MCNAIRY

October 8, 2010

Mr. Charles P. Nicholson
NEPA Compliance Manager
Tennessee Valley Authority
400 West Summit Hill Drive, WT 11D
Knoxville, Tennessee 37902

**Subject: DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR
 THE INTEGRATED RESOURCE PLAN**

Dear Mr. Nicholson:

The Southwest Tennessee Development District is responding to your request for our agency's assessment of the document referenced above.

We have reviewed the information you sent and find no conflicts with the draft document and any needs, plans, or priorities of our agency.

If you require additional review, please contact Jeff Reece, Environmental Programs Coordinator for SWTDD, at 731-668-6408 or jreece@swtdd.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe W. Barker", is written over a printed name and title.

Joe W. Barker
Executive Director
Southwest Tennessee Development District

JWB/jr

Name: Bob Alexander

Tennessee Department of Environment and Conservation, Div. of Water Pollution Control

Comments: Comment on Chapter 4, Affected Environment:

A number of water bodies are listed as "None" under the heading Fish Consumption Advisories in Table 4-9, page 96. For these waters, TDEC has posted Fish Consumption Advisories, per <http://tn.gov/environment/wpc/publications/pdf/fishmercurylevels.pdf>, and shown below:

Clinch River portion of Norris Reservoir
Hiwassee River embayment of Chickamauga Reservoir
South Holston Lake
Watauga Lake
Cherokee Lake
Douglas Lake

Virginia



Rec'd 11/4/10

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

TDD (804) 698-4021

www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

November 1, 2010

Mr. Charles P. Nicholson
NEPA Compliance Manager
Tennessee Valley Authority
400 West Summit Hill Drive, WT 11D
Knoxville, Tennessee 37902

RE: Draft Programmatic Environmental Impact Statement: Tennessee Valley
Authority, Integrated Resource Plan (DEQ 10-137F)

Dear Mr. Nicholson:

The Commonwealth of Virginia has completed its review of the above-referenced draft programmatic environmental impact assessment (PEIS). The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of environmental documents prepared pursuant to the National Environmental Policy Act and responding to appropriate officials on behalf of the Commonwealth. The following agencies, locality and planning district commission joined in this review:

- Department of Environmental Quality
- Department of Game and Inland Fisheries
- Department of Agriculture and Consumer Services
- Department of Conservation and Recreation
- Department of Historic Resources
- Department of Mines, Minerals and Energy
- Mount Rogers Planning District Commission
- Lee County

The State Corporation Commission, Lenowisco Planning District Commission, Cumberland Plateau Planning District Commission, Scott County, Wise County, Russell County, Grayson County, Smyth County, Washington County, City of Bristol and the Town of Abingdon also were invited to comment.

EA: TVA PEIS Integrated Resource Plan
DEQ 10-137F

PROPOSED ACTION

The Tennessee Valley Authority (TVA) has submitted a draft PEIS for review as part of its Integrated Resource Plan. According to TVA, the purpose of the plan is to help TVA achieve environmental sustainability and meet electricity needs during the next 20 years. According to the TVA, planning process steps include developing planning strategies encompassing various approaches TVA can take on issues and future conditions (scenarios) used in evaluating the strategies. Capacity expansion plans (portfolios) are then developed for each combination of strategies and scenarios. The PEIS evaluates three final alternative strategies: 1) the Baseline Plan (No Action alternative); 2) the Diversity Focused Plan and 3) Energy Efficiency-Demand Response and Renewables Focused Plan. Under all of these strategies, coal-fired generation decreases and reliance on renewable resources increases. The strategies add varying amounts of new nuclear and natural gas-fueled generation. Air emissions decrease under all strategies. All alternatives would require the construction of new or upgraded transmission facilities. Renewable generation options are expected to be through power purchase agreements with non-TVA generators. At this time, TVA does not have a preferred alternative strategy.

The primary study area is the combined TVA power service area and the Tennessee River watershed, which consists of 59 million acres. In Virginia, TVA serves Lee and Scott counties and portions of Washington and Wise counties, covering approximately 1,941 square miles. TVA owns a 9 kilowatt solar energy facility in Scott County and a substation and nearly 11 miles of transmission line in Virginia. In addition, the upper half of the South Holston Reservoir extends into Virginia, and TVA manages about 250 acres around the reservoir. According to the PEIS, the locations of most of the future energy-generating facilities are not known. As a result, the PEIS describes general impacts mostly at a regional level.

COMMONWEALTH OF VIRGINIA COMMENTS

1. Water Quality and Wetlands. According the PEIS (page S-15), the potential for water quality impacts would decrease under all alternative scenarios. However, all of the scenarios would increase the volume of water use and consumption (evaporated) for cooling generating plants.

1(a) Agency Jurisdiction. The State Water Control Board promulgates Virginia's water regulations, covering a variety of permits to include Virginia Pollutant Discharge Elimination System Permit, Virginia Pollution Abatement Permit, Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit. The VWP Permit is a state permit which governs wetlands, surface water and surface water withdrawals/impoundments. It also serves as § 401 certification of the federal Clean Water Act § 404 permits for dredge and fill activities in waters of the United States. The VWP Permit Program is under the Office of Wetlands and Water Protection/Compliance within the DEQ Division of Water Quality Programs. In addition to central office staff who review and issue VWP permits for transportation and water withdrawal projects, the

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six DEQ regional offices perform permit application reviews and issue permits for the covered activities.

1(b) Agency Comments Pertaining to Future Projects.

Wetland Delineation

The DEQ Office of Wetlands and Water Protection (OWWP) states that a wetland delineation should be conducted to determine the location, extent and type of surface waters present at future project sites. The delineation should be conducted using the 1987 U.S. Corps of Engineers (Corps) Wetlands Delineation Manual, which defines wetlands for the Clean Water Act Section 404 permit program. The improvements should be designed to avoid and minimize impacts to surface waters to the greatest extent practicable.

Application and Permitting Process

If impacts to state waters are proposed, a Joint Permit Application (JPA) should be submitted to the Virginia Marine Resources Commission (VMRC). The DEQ Southwest Regional Office (SWRO) will make the final permit decision regarding potential impacts to state waters.

If unavoidable impacts to wetlands or surface waters are proposed, a Virginia Water Protection (VWP) permit may be required for the proposed project. DEQ provides 401 certification to the Corps' nationwide and general permits. Compensation for unavoidable impacts may also be required.

If the project qualifies for a Nationwide Permit 12 (NWP 12) from the Corps and if the impacts to streams are less than 1500 linear feet, then a VWP permit is not necessary. If (a) stream impacts exceed the thresholds outline above, or (b) the project proposes to permanently impact more than one half (1/2) acre of wetlands, or (c) the project does not qualify for a NWP 12 from the Corps, then a VWP permit may be required from DEQ.

Unavoidable permanent impacts to all wetlands or to streams in excess of three hundred linear feet will require mitigation through the creation, enhancement or preservation of wetlands or streams within the project's watershed, or through the purchase of mitigation bank credits.

DEQ implements its own state laws and regulations regarding activities in surface waters, regardless of the federal laws and regulations that may apply, such as those of the Federal Energy Regulatory Commission (FERC).

For purposes of a VWP permit for surface water withdrawals, the timing of application submittal is important when a FERC license is also being sought. To avoid delays in the VWP permit process, applicants should have clearly a defined project purpose and

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need, alternatives analysis, and infrastructure details at the time of applications such that DEQ staff can determine what if any impacts will occur to beneficial uses.

Applicants seeking a VWP permit for surface water supply involving a reservoir should consider the feasibility of flow release augmentation as a component of the project. Applicants for VWP permits for surface water withdrawals can expect the permit to contain limits on the volume or rate of surface water to be withdrawn and a requirement to pass certain flows downstream to protect beneficial uses.

DEQ coordinates all applications for VWP permits with other state resource agencies and must fully consider comments and recommendations made by those agencies. Applicants should be prepared to address comments made by these agencies, and if a federal license applies, the comments and recommendations made by any federal resource agencies as well. Studies and surveys may be required that are season-dependent. Mitigation of species impacts may be required.

Future projects may have the potential to intercept shallow, localized aquifers during trenching activities, requiring temporary dewatering of the work area. Discharge of any trench water associated with groundwater infiltration should be performed in accordance with National Pollutant Discharge Elimination System (NPDES) permit conditions. The registration statement for 9VAC25-120 (VAG 83) - Petroleum Contaminated Sites, Ground Water Remediation and Hydrostatic Tests is available on the DEQ website at www.deq.virginia.gov/export/sites/default/vpdes/pdf/VAG83RegistrationStatement2008.pdf.

Protection and Mitigation Methods

- Once a final strategy has been developed, any activities requiring instream work should be performed in the dry, utilizing cofferdams, stream diversions and/or working during low flow conditions.
- Heavy equipment should work from uplands to the greatest extent possible and utilize mats and strict erosion and sediment controls for work that must be conducted from within surface waters.
- Caution should be taken to ensure prevention of the release of any oil or fuel from heavy equipment into surface waters.
- All disturbed stream beds should be restored to their original contours prior to redirecting the stream into the work area.
- For larger stream crossings, TVA should address the feasibility of using directional drilling to bore beneath the channels and completely avoid impacts to the stream beds.
- Restore temporary impact areas to their original contours and revegetate with the same or similar species.
- DEQ encourages consideration of off-stream water storage to supplement natural sources in times of low flow, declining aquifer levels, and low precipitation.

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1(c) Agency Recommendations. DEQ has the following recommendations:

- Conduct pre-application coordination with all applicable state agencies, including DEQ (Allen Newman at 276-676-4804) and VMRC (Justin Worrell at 757-247-8063), that may have jurisdiction over the proposed project.
- Conduct wetland delineations at future project sites.
- Contact DEQ SWRO (including Allen Newman, Water Permit Manager, at 276-676-4804) for permit coverage and requirements regarding hydrostatic test discharge water.
- Ensure that environmental documents for site-specific projects include adequate descriptions of wetlands and surface waters within the project area and proposed project site, potential impacts, protection and mitigation methods, coordination with appropriate agencies, and permitting and regulatory requirements, including local requirements, and any other applicable information.

2. Subaqueous Lands.

2(a) Agency Jurisdiction. The Virginia Marine Resources Commission (VMRC) regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to § 28.2-1200 through 1400 of the *Code of Virginia*.

The VMRC serves as the clearinghouse for the Joint Permit Application (JPA) used by the:

- Corps for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act;
- DEQ for issuance of a VWP permit;
- VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands; and
- local wetlands board for impacts to wetlands.

The VMRC will distribute the completed JPA to the appropriate agencies. Each agency will conduct its review and respond.

2(b) Agency Recommendation. Contact VMRC (Justin Worrell at 757-247-8063) for information on submitting a JPA for future construction projects in Virginia.

3. Erosion and Sediment Control, and Stormwater Management.

3(a) Agency Jurisdiction. The Department of Conservation and Recreation (DCR) Division of Soil and Water Conservation (DSWC) administers the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and Virginia Stormwater Management Law and Regulations (VSWML&R).

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3(b) Recommendations.

- Ensure that future site-specific projects are in accordance with the following laws and regulations, as applicable:
 - Virginia Erosion and Sediment Control Law §10.1-563.D;
 - Virginia Erosion and Sediment Control Regulations §4VAC50-30-30 and §4VAC50-30-40;
 - Virginia Stormwater Act §10.1-603.1 *et seq.*;
 - Virginia Stormwater Management Program Permit Regulations §4VAC50 *et seq.*
- Site-specific environmental documents should adequately describe site conditions, potential impacts, protection and mitigation methods, permitting and regulatory requirements, including local requirements, and any other applicable information.

Questions regarding annual erosion and sediment control specifications should be directed to DCR (Larry Gavan at 804-786-4508). Specific questions regarding the VSMP General Permit for Construction Activities requirements should be directed to DCR DSWC (Holly Sepety at 804-225-2613).

4. Air Quality Impacts. The PEIS (page S-15) states that all three alternative strategies will result in significant long-term reductions in total emissions of sulfur dioxide, nitrogen oxides (NO_x) and mercury.

4(a) Agency Jurisdiction. DEQ's Division of Air Quality is responsible for carrying out the mandates of the Virginia Air Pollution Control Law, as well as meeting Virginia's federal obligations under the Clean Air Act. The objective is to protect and enhance public health and the environment by controlling present and future sources of air pollution. The division ensures the safety and quality of the air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality.

4(b) National Ambient Air Quality Standards. The primary goals of the Federal Clean Air Act are the attainment and maintenance of the National Ambient Air Quality Standards (NAAQS) and the prevention of significant deterioration of air quality in areas cleaner than the NAAQS. The NAAQS establish the maximum limits of pollutants that are allowed in the outside ambient air. The Environmental Protection Agency (EPA) requires the submission of a State Implementation Plan (SIP) that includes laws and regulations necessary to enforce the plan and shows how the air pollution concentrations will be reduced to levels at or below these standards (attainment). Once pollution levels are within the standards, the SIP must also demonstrate how the state will maintain the air pollution concentrations at the reduced levels (maintenance).

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The standards have been attained for most pollutants in most areas. However, attainment for the pollutant, ozone, has proven problematic. While ozone is needed at the earth's outer atmospheric layer to protect us from the sun's ultraviolet and other harmful rays, excess concentrations at the surface have an adverse effect on animal and plant life. Ozone is formed by a chemical reaction between volatile organic compounds (VOCs) and NO_x in the presence sunlight. When VOC and NO_x emissions are reduced, ozone is reduced.

4(c) Ozone Attainment Area. According to the DEQ Air Division, the TVA coverage area in Virginia is located in an ozone attainment area.

4(d) Agency Recommendations. Site-specific environmental documents should address the applicable regulatory requirements for air emissions due to the construction and operation of any proposed facility or transmission line, including 9VAC5-50-60 *et seq.* governing fugitive dust emissions; 9VAC5-130 *et seq.* for open burning; and 9VAC5-40-5490 *et seq.* for asphalt paving operations. Permits may be required for any boilers or fuel-burning equipment for any proposed facility.

4(e) Agency Comment. The DEQ Division of Air Program Coordination states that site-specific projects in Virginia are subject to additional review.

5. Solid and Hazardous Wastes and Hazardous Materials. The PEIS (page S-16) states that the largest amounts of solid waste produced by the alternative strategies are coal ash and scrubber waste.

5(a) Agency Jurisdiction. Solid and hazardous wastes in Virginia are regulated by DEQ, the Virginia Waste Management Board and EPA. They administer programs created by the federal Resource Conservation and Recovery Act, Comprehensive Environmental Response Compensation and Liability Act, commonly called Superfund, and the Virginia Waste Management Act. DEQ administers regulations established by the Virginia Waste Management Board and reviews permit applications for completeness and conformance with facility standards and financial assurance requirements. All Virginia localities are required, under the Solid Waste Management Planning Regulations, to identify the strategies they will follow on the management of their solid wastes to include items such as facility siting, long-term (20-year) use, and alternative programs such as materials recycling and composting.

5(b) Agency Comments. The DEQ Waste Division states that the scope of this multi-state project is extensive. For each area in Virginia where any work is to take place, the applicant needs to conduct an environmental investigation on and near the property to identify any solid or hazardous waste sites or issues before work can commence. This investigation should include a search of waste-related databases (table attached).

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5(c) Agency Recommendations.

- For future projects, conduct an environmental investigation on and near the property for each area in Virginia where any work is to take place to identify any solid or hazardous waste sites or issues before work can commence, and include a search of waste-related databases.
- DEQ encourages all projects and facilities to implement pollution prevention principles, including:
 - the reduction, reuse and recycling of all solid wastes generated; and
 - the minimization and proper handling of generated hazardous wastes.
- Site-specific environmental documents should describe how solid waste, hazardous waste and hazardous materials will be managed in accordance with all applicable federal, state and local environmental laws and regulations, including the following state and federal laws and regulations:
 - Virginia Waste Management Act (Code of Virginia Section 10.1-1400 *et seq.*);
 - Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC20-60);
 - Virginia Solid Waste Management Regulations (VSWMR) (9VAC20-80);
 - Virginia Vegetative Waste Management Regulations (9VAC20-101 *et seq.*);
 - Virginia Regulations for the Transportation of Hazardous Materials (9VAC20-110);
 - Resource Conservation and Recovery Act (RCRA) (42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations); and
 - U.S. Department of Transportation Rules for Transportation of Hazardous materials (49 Code of Federal Regulations Part 107).

Contact the DEQ Waste Division (Paul Kohler at 804-698-4208) for additional information.

6. Natural Heritage Resources.

6(a) Agency Jurisdiction. The mission of DCR is to conserve Virginia's natural and recreational resources. The DCR Division of Natural Heritage's (DNH) mission is conserving Virginia's biodiversity through inventory, protection and stewardship. The Virginia Natural Area Preserves Act, 10.1-209 through 217 of the Code of Virginia, was passed in 1989 and codified DCR's powers and duties related to statewide biological inventory: maintaining a statewide database for conservation planning and project review, land protection for the conservation of biodiversity, and the protection and ecological management of natural heritage resources (the habitats of rare, threatened

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and endangered species, significant natural communities, geologic sites, and other natural features).

6(b) Agency Comment. DCR states that it supports green energy initiatives (renewable resources) with proper siting criteria.

6(c) Agency Findings. According to the information currently in DCR's files:

- There are many natural heritage resources and conservation sites (table attached) within the project area.
- Future projects may either overlie or be adjacent to a karst landscape characterized by sinkholes, caves, disappearing streams and large springs. Discharge of runoff to sinkholes or sinking streams, filling of sinkholes and alteration of cave entrances can lead to surface collapse, flooding, erosion and sedimentation, groundwater contamination and degradation of subterranean habitat for natural heritage resources.

6(d) State Natural Area Preserves. DCR's files do not indicate the presence of any State Natural Area Preserves under the agency's jurisdiction in the TVA service area.

6(e) Threatened and Endangered Plant and Insect Species. Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and DCR, DCR has the authority to report for VDACS on state-listed plant and insect species.

- Listed plant and insect species are included in the attached table of natural heritage resources in the TVA area.
- VDACS states that several federally- and state-listed endangered and threatened plant and insect species are known to occur within the TVA Power Service boundary in Virginia. Suitable habitat to support other listed species also occurs within the TVA boundary.

6(f) Agency Recommendations. DCR and VDACS have the following recommendations:

- Coordinate with DCR DNH to access potential impacts to natural heritage resources as individual projects are identified.
- Since new and updated information is continually added to the Biotics Data System, contact DCR DNH at (804) 786-7951 for site-specific information.
- Continue to evaluate impacts to natural resources regarding development and maintenance planning and implementation.

7. Wildlife Resources.

7(a) Agency Jurisdiction. DGIF, as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife

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and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects (Virginia Code Title 29.1). DGIF is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 *et seq.*) and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce or compensate for those impacts.

7(b) Agency Comments.

- Overall, DGIF states that it supports energy plans that hope to reduce reliance on sources of energy resulting in high emissions of air pollutants and other adverse impacts upon the environment. DGIF also supports consideration of renewable energy sources and those that result in a reduction of such impacts.
- The Tennessee Valley in Virginia is known to support a globally significant diversity of species which deserves protection and which should be considered during the development of any energy projects in the region.
- DGIF is willing to assist TVA in the review of energy projects to evaluate impacts upon wildlife, planning for such projects, and integrating the protection of Virginia's natural resources into energy projects.

7(c) Agency Recommendations.

- Closely coordinate and integrate the development of the Integrated Resources Plan with TVA's Natural Resources Plan to ensure that TVA's energy projects meet its goals.
- Ensure that planning for the protection of the natural resources in the Tennessee Valley is part of the energy development planning process.
- Closely coordinate with DGIF to ensure that any new energy projects or significant changes or upgrades to existing energy projects located in Virginia, or which may affect natural resources in Virginia, are protective of the unique wildlife known from the Tennessee Valley.

Contact DGIF (Amy Ewing at 804-367-2211) for assistance and additional information.

8. Historic Architectural Resources.

8(a) Agency Jurisdiction. The Department of Historic Resources (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation at 36 CFR Part 800. The preservation act requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as

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licenses, permits, approvals or funding. DHR also provides comments to DEQ through the state environmental impact report review process.

8(b) Agency Comment. DHR states that it will respond directly to the TVA.

9. Geologic and Mineral Resources.

9(a) Agency Jurisdiction. The Virginia Department of Mines, Minerals and Energy (DMME), through its six divisions, regulates the mineral industry, provides mineral research and offers advice on wise use of resources. The Department's mission is to enhance the development and conservation of energy and mineral resources in a safe and environmentally sound manner in order to support a more productive economy.

9(b) Agency Comment. DMME states that it will not comment on this project.

Additional information about the geology and mineral resources of Virginia is available on the DMME website at www.dmme.virginia.gov/divisionmineralresources.shtml.

10. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in the planning of construction projects. Effective planning will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design and operational procedures that will facilitate the reduction of wastes at the source. The DEQ Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques. If interested, please contact Sharon Baxter at (804) 698-4344.

11. Local and Regional Comments.

11(a) Jurisdiction. In accordance with the Code of Virginia, Section 15.2-4207, planning district commissions encourage and facilitate local government cooperation and state-local cooperation in addressing, on a regional basis, problems of greater than local significance. The cooperation resulting from this is intended to facilitate the recognition and analysis of regional opportunities and take account of regional influences in planning and implementing public policies and services. Planning district commissions promote the orderly and efficient development of the physical, social and economic elements of the districts by planning, and encouraging and assisting localities to plan for the future.

11(b) Comments. The Mount Roger Planning District Commission states that it is in agreement with TVA's conclusions. However, TVA should include more green technology in its plans. A large power company like the TVA needs to create more opportunities to use green power sources, including solar and the recycling of waste material into energy. Lee County has no comment.

The Lenowisco Planning District Commission, Cumberland Plateau Planning District Commission, Scott County, Wise County, Russell County, Grayson County, Smyth

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County, Washington County, City of Bristol and Town of Abingdon did not respond to DEQ's request for comments.

REGULATORY AND COORDINATION NEEDS FOR FUTURE PROJECTS

1. Surface Waters and Wetlands. Conduct pre-application coordination with all applicable state agencies, including DEQ (Allen Newman at 276-676-4804) and VMRC (Justin Worrell at 757-247-8063), that may have jurisdiction over the proposed project. Contact DEQ SWRO (Allen Newman, Water Permit Manager, at 276-676-4804) for permit coverage and requirements regarding hydrostatic test discharge water.

2. Subaqueous Lands. Contact VMRC (Justin Worrell at 757-247-8063) for information on submitting a JPA regarding site-specific projects.

3. Natural Heritage Resources.

- Contact the DCR DNH at (804) 786-7951 for an update on natural heritage information for site-specific projects.
- Coordinate with DCR DNH at (804) 786-7951 to access potential impacts to natural heritage resources as individual projects are identified.

4. Protected Species. Closely coordinate with DGIF (Amy Ewing at 804-367-2211) to ensure that any new energy projects or significant changes or upgrades to existing energy projects located in Virginia, or which may affect natural resources in Virginia, are protective of the unique wildlife known from the Tennessee Valley.

5. Site-Specific Reviews.

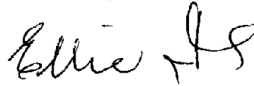
- DEQ encourages TVA to submit site-specific environmental documents as required under the National Environmental Policy Act (NEPA) and the State Corporation Commission's laws and regulations. Other state approvals which may apply to future site-specific projects may not be included in this review. TVA must ensure that future projects in Virginia are constructed and operated in accordance with all applicable federal, state and local laws and regulations.
- Site-specific environmental documents should be submitted to the DEQ Office of Environmental Impact Review (Attention: Ms. Ellie Irons), P.O. Box 1105, Richmond, VA 23218. Please submit one hard copy for DEQ and each affected locality and associated planning district commission as well as 16 compact discs (CDs) with electronic copies or provide a website or FTP site for distribution during a coordinated review.

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CONCLUSION

Thank you for the opportunity to review the PEIS. We look forward to reviewing future, site-specific projects located in Virginia as well as those located outside the Commonwealth with the potential to affect Virginia's environment and natural resources. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4325 or Julia Wellman at (804) 698-4326 for clarification of these comments.

Sincerely,



Ellie L. Irons, Manager
Office of Environmental Impact Review

Enclosures

cc: Dave Barrett, Mount Rogers PDC
Glen Skinner, Lenowisco PDC
Jim Baldwin, Cumberland Plateau PDC
Mark K. Reeter, Washington County
Dane Poe, Lee County
Rufus Hood, Scott County
Shannon C. Scott, Wise County
James A. Gillespie, Russell County
Jonathan Sweet, Grayson County
Ediwn Whitmore, Smyth County
James F. Rector, City of Bristol
Greg Kelly, Town of Abingdon

ec: Amy Ewing, DGIF
Robbie Rhur, DCR
Keith Tignor, VDACS
Paul Kohler, DEQ ORP
Kotur S. Narasimhan, DEQ OADA
Allen Newman, DEQ SWRO
Roger Kirchen, DHR
David Spears, DMME
Melanie Allen, VDOT
Wayne Smith, SCC

