



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Director

20 June 2025

Transcontinental Gas Pipe Line Company, LLC
Attn: Joseph Dean
2800 Post Oak Boulevard
Suite 600
Houston, TX 77056

SENT VIA EMAIL: joseph.dean@williams.com

Re: Joint Permit Application No. 25-1277
Southeast Supply Enhancement Project
Pittsylvania County, Virginia
Comment Letter No. 1

Dear Mr. Dean:

On 6 June 2025, the Virginia Department of Environmental Quality (DEQ) received your Joint Permit Application (JPA) for the above-referenced project. DEQ is evaluating your application for a Virginia Water Protection (VWP) individual permit in accordance with VWP Permit Program Regulation 9VAC25-210-10 *et seq.* The following information is required to complete your application:

1. Section 2.2 of the JPA narrative notes project capacity would be provided along five (5) paths and long-term, binding agreements are in place. Pursuant to 9VAC25-210-80 B.1(f), please provide documentation of end user agreement, if available.
2. Pursuant to 9VAC25-210-80 B.1(g) please provide the following additional information for Section 3.5 (System Alternatives):
 - a) For Loop Intensive System Alternative, please provide additional data or a table comparing surface water impacts, cost, threatened/endangered species impacts. Please also provide mapping of loop locations.
 - b) The narrative states consideration of the MVP Amendment Project as a potential system alternative; please advise if other existing system alternatives pipelines could be considered, what limitations (e.g. retrofits) would be necessary, cost, and potential surface water impacts.
3. Pursuant to 9VAC25-210-80 B.1(g), please provide the following additional information for Section 3.6 (Route Alternatives):
 - a) In review of the MP 1388.30 Alternative, the proposed route crosses two (2) streams (L-124-1 and L-130-1), with the confluence located within the limit of disturbance. Though the narrative notes a straight route would result in greater temporary impact, please advise if constructability,

- sequence of construction, and maintenance of streamflow are problematic at this crossing. Would a straight alignment that would avoid impacts to the confluence and result in less potential constructability and restoration issues than the proposed route?
- b) The proposed route at MP 1401.80 incurs higher wetland and open water impacts alternative. The narrative cites constructability concerns for selection of the proposed route. As the alternative impacts the fringe of the pond, please advise if sheet pile or bladder dams can be installed as a temporary measure to allow construction of the pipeline, with the dam then restored. As the dam appears to be comprised solely of dredged spoils, could it be restored in kind after installation of the pipeline? Additionally, given the proximity of the roadway, please advise if a horizontal directional drilling (HDD) crossing is feasible at this location.
 - c) Table 3.3 shows that the proposed route, in comparison to MP 1412.40, would incur over less than 250 linear feet of stream impacts. Attachment 18, Sheet 5 shows the temporary easement approximately overlaying a parallel stream. Would impact to this stream be avoided?
4. The proposed MVP Southgate Amendment Project, referenced in the JPA narrative and for which a JPA is currently under review by DEQ (25-0752), projects a concurrent construction schedule as the proposed project. These two (2) pipelines may be undergoing active construction immediately adjacent to each other simultaneously. Please describe, in detail, efforts to minimize impacts by sharing limits of disturbance, sequencing of construction activities so as not to incur greater, cumulative impacts, and any additional efforts to reduce impacts to surface waters between the two (2) projects.
5. Sections 5.2.7 and 5.2.8 of the JPA narrative state that temporarily impacted resources will be restored to preconstruction contours. Profiles contained within Attachment 21D note elevation data was obtained with Airborne LIDAR Point Cloud. Will survey grade elevations be provided to restore streambank and wetlands to preconstruction elevations and contours, such that previous wetland acreage and functions or surface water functions are restored?
6. Pursuant to 9VAC25-210-80.m.1, please address the following comments on the proposed permittee-responsible mitigation (PRM) site:
- a) In accordance with 9VAC25-210-90 m.1 (viii), "A conceptual planting scheme including suggested plant species and zonation of each vegetation type proposed;" On the Planting Plan (Sheets 16-18), the legend includes Planting Area. However, on the Seed Planting Zone (Sheet 19), it is unclear which areas will be planted with the "Upland Wetland Buffer Seed Mix." DEQ recommends the planting map matches with the planting list for consistency and to consider the label "Forested Buffer Vegetation."
 - b) On the Planting Schedule (Sheet 19) white oak (*Quercus alba*), which is designated as facultative upland (FACU), is included on the PFO planting list. DEQ recommends this species be replaced with a facultative (FAC) or wetter species appropriate for the habitat type in this area.
 - c) In accordance with 9VAC25-210-80.m (xi) "inclusion of buffer areas;" DEQ recommends revising the label of "Upland Buffer" to "Forested Buffer." This revision will need to be addressed within the narrative and credit tracking table. The current label is a point of confusion as the buffer area includes wetlands and has wetland woody stems planned for planting.
 - d) In accordance with 9VAC25-210-80 m.1 (xiii) "the schedule for compensatory mitigation site construction", please clarify if time-of-year restrictions (TOYR) will be incorporated within the construction schedule.

- e) In accordance with 9VAC25-210-80 m.3, “[...] the conceptual compensatory mitigation plan shall also include a draft of the intended protective mechanism or mechanisms...”, please revise the draft conservation easement to remove all mention of the IRT and replace with USACE and DEQ. Additionally, replace all mention of an MBI within the Compensatory Mitigation Plan and Long-Term Management Plan.
 - f) In accordance with 9VAC25-210-80 m3.b, “The following minimum restrictions: [...] or DEQ-approved activities described in the approved final compensatory mitigation plan or long-term management plan;” the long-term management plan, Section IV.B indicates the site will be fenced. If so, please include the fence on the plan sheets and remove “or appropriately marked.” DEQ recommends the mitigation site is fenced to prevent encroachment from adjacent, ongoing agricultural activities.
 - g) The Sponsor Address on the Plan Cover Sheet differs from the Sponsor address on the Cherrystone Mitigation Site – Project Narrative.
 - h) In the Monitoring Requirements, a Table 2 is referenced in the Wetland and Upland Buffer Vegetation Monitoring but is not attached. Please include this table.
 - i) Please update the Long-Term Management Plan signature page to reflect the current manager of the DEQ Office of Wetland and Stream Protection.
 - j) In the Long-Term Management Plan, Section VI Funding and Task Prioritization A. Funding, there remain blank spaces in the template. Please fill in the missing information.
 - k) The Project Description and Location narrative describes two (2) proposed temporary impacts, which are described as impacts limited to the proposed wetland creation and for the in-kind replacement of an existing culvert. These impacts are depicted on Sheet 26 of the plan set. However, Sheet 11 shows a temporary diversion dike outside of the wetland creation/enhancement area. As a significant portion of the temporary diversion dike is located in wetlands outside of the proposed creation/enhancement area, please account for temporary impacts incurred by the temporary diversion dike both in the narrative and on Sheet 26. Also, please note how this area will be restored. The impact calculation should include temporary impacts from the boundary of the proposed wetland/creation/enhancement area to the limit of disturbance.
 - l) In relation to the temporary diversion dike, please describe the impact to hydrology on and offsite during construction and if secondary impacts may be incurred.
7. Pursuant to 9VAC25-210-80.B.1.p., a permit application fee is among items required to consider the application complete. DEQ has determined that the application fee is \$23,960. Please find attached Water Division Permit Application Fee Form. Please follow the instructions on the form and send to DEQ.

The following section contains additional information necessary to assist in DEQ’s review of the application or advises on the status of application review:

1. The JPA narrative and Virginia Attachment 05 indicates coordination with the U.S. Fish and Wildlife Service (USFWS) is ongoing. Please provide updates and/or concurrences upon receipt.
2. Section 4.2.4 requests a waiver for time-of-year restriction (TOYR) for warm water fisheries (15 April – 15 July). DEQ is in the process of requesting comments from The Department of Wildlife Resources (DWR). Additional TOYRs may be required, pending coordination with DWR and

USFWS. DEQ is concurrently initiating coordination with Department of Conservation and Recreation, the Virginia Marine Resources Commission, and the Department of Health.

3. DEQ is in the process of review the impact maps, impact numbers, and associated documentation. DEQ will provide additional comments either as an addendum or within the next comment letter.

We look forward to future coordination for this project. Please contact me at (804) 659-1986 or michael.mussomeli@deq.virginia.gov if you have any questions.

Respectfully,



Michael J. Mussomeli, PWS
Environmental Specialist II

cc (via email): Christie Blevins, Wetland Studies and Solutions, Inc.
 Steven VanderPloeg, USACE
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