



COMMONWEALTH of VIRGINIA

Department of Wildlife Resources

Stefanie K. Taillon
*Secretary of Natural and
Historic Resources*

Ryan J. Brown
Executive Director

August 20, 2025

David L. Davis
Virginia Department of Environmental Quality
Manager, Office of Permitting Assistance
1111 East Main Street
Richmond, VA 23228

Re: Southeast Supply Enhancement Project
§ 401 Upland Certification (ESSLog
#45119); Pittsylvania County, Virginia

Dear Mr. Davis:

The Virginia Department of Wildlife Resources (DWR) has reviewed the Southeast Supply Enhancement Project (SSEP) Joint Permit Application as submitted by Transcontinental Gas Pipe Line Company, LLC (Transco) dated June 2025. The SSEP is an expansion of Transco's existing natural gas transmission system in Pittsylvania County, Virginia, and proposes to construct approximately 26.8 miles of the 42-inch-diameter Eden Loop pipeline and add two electric motor-driven compressor units at an existing compressor station.

As the Commonwealth's wildlife and freshwater fish management agency, the DWR exercises enforcement and regulatory jurisdiction over those resources, including state or federal endangered or threatened species, but excluding listed insects. We are a consulting agency under the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), and we provide environmental analysis of projects or permit applications coordinated through the Virginia Department of Environmental Quality (DEQ), the Virginia Marine Resources Commission (MRC), the Virginia Department of Transportation (DOT), the Army Corps of Engineers (ACOE), the Federal Energy Regulatory Commission (FERC), and other state or federal agencies. Our role in these procedures is to determine likely impacts upon fish and wildlife resources and habitat, and to recommend appropriate measures to avoid, reduce, or compensate for those impacts.

We have reviewed the Southeast Supply Enhancement Project Joint Permit Application and offer the following recommendations pertaining to the § 401 Upland Certification. The § 401 Upland

Certification covers additional upland conditions necessary to protect water quality, as required under § 401 of the Clean Water Act for natural gas transmission pipelines greater than 36 inches inside diameter subject to § 7c of the Natural Gas Act (§ 62.1-44.15:80). The DWR provided separate comments for the § 401 Certification of SSEP's Virginia Water Protection Permit (No. 25-1277) on August 20, 2025.

To minimize adverse impacts of the proposed project on wildlife resources, we recommend avoiding and minimizing impacts to undisturbed forest, wetlands, and streams to the fullest extent practicable. We recommend maintaining naturally vegetated buffers of at least 100 feet in width around wetlands and on both sides of perennial and intermittent streams, where practicable. We support Transco's proposal to not conduct routine vegetation maintenance over the full width of its permanent 50-foot right-of-way within wetlands.

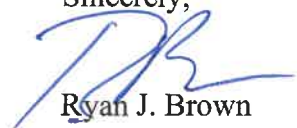
We recommend implementing and maintaining appropriate erosion and sediment controls throughout project construction and site restoration. To minimize potential wildlife entanglements resulting from the use of synthetic/plastic erosion and sediment control matting, we recommend the use of matting made from natural/organic materials such as coir fiber, jute, and/or burlap.

We recommend that stormwater controls for this project be designed to replicate and maintain the hydrographic condition of the site prior to the change in landscape. We support restoration of the proposed impacts to preconstruction contours once construction is completed. We support Transco's proposed permanent erosion controls in upland areas, including slope breakers or waterbars and vegetative cover. We recommend the use of native species for all plantings and coordination with the Department of Conservation and Recreation Division of Natural Heritage regarding seed mixes and invasive species management. We support the proposed use of trench plugs in upland slopes adjacent to wetlands and on either side of waterbodies to prevent trench erosion and subsurface drainage along the pipeline that could modify the hydrology of aquatic resources. We support the proposed permanent slope breakers across the construction right-of-way at the base of slopes greater than five percent less than 50 feet from the waterbody, or as needed, to prevent sediment transport into waterbodies.

We understand that adherence to these recommendations may be infeasible in some situations and are happy to work with the applicant to further develop project-specific measures as necessary to minimize project impacts upon the Commonwealth's wildlife resources.

Thank you for the opportunity to provide comments on the Southeast Supply Enhancement Project § 401 Upland Certification. Please contact Hannah Schul, Environmental Services Program Manager, at Hannah.Schul@dwr.virginia.gov or (804) 968-8546 if you have any questions or require further information.

Sincerely,



Ryan J. Brown
Executive Director