

APPENDIX E
SUPPLEMENTAL DEIS COMMENT RESPONSE SUMMARY

McClellanville Supplemental DEIS Comment Matrix

Commenter Number	Internal Comment Number	Organization	First Name	Last Name	Public Comment on DEIS	Concern, Issue, and/or Resource Topic(s)	EIS Resource	Response to Comment
P-001	P-001-001	Individual	Kendy	Altizer	<p>Opposed to The Belle Isle proposed alternative because it will come within a quarter mile of the Peachtree Ruin and will adversely impact that cultural resource both in view shed and direct impacts to the historical plantation landscape. The transmission poles you are proposing must be set with vibracore technology. The vibration from this type of installation, as well as vibrations from ground disturbing activities and heavy equipment related to installation, will cause irreparable damage to the house ruin. In addition to standing structure, there is the potential for disturbance of unmarked enslaved cemeteries and settlements. At least one cemetery and two settlements are in the immediate vicinity of the Belle Isle Alternative where it crosses the Peachtree parcel. Because I have not conducted systematic pedestrian survey in this section of the Peachtree Parcel, the extent of additional cultural resources is unknown.</p> <p>The SDEIS is based on desktop research and no natural or cultural pedestrian surveys have been conducted. In addition, there is the potential for disturbance of unmarked enslaved cemeteries and settlements. At least one cemetery and two settlements are in the immediate vicinity of the Belle Isle Alternative where it crosses the Peachtree parcel. Their project, as it is currently designed on the Belle Isle alternative, will adversely impact fragile cultural resources on the Peachtree parcel.</p>	Opposed to the Belle Isle Corridor; Cultural resources	General recommendation	The two Belle Isle corridors evaluated in the SDEIS have been eliminated from further consideration in the final EIS, due in part to potential impacts to cultural resources. More detailed and extensive cultural studies would be performed after the final 75-foot ROW is identified within the selected corridor. The procedures for identification and evaluation; assessment of effects; and, as appropriate, mitigation would be agreed to through the ongoing Section 106 process and the signing of a Programmatic Agreement.
P-002	P-002-001	Individual	Diane	Lehder	I can't fathom why the feds, in charge of making route decisions, would even consider allowing Central Electric Power Cooperative to run new transmission lines through the environmentally fragile and unique Santee Delta when there is an existing alternative right of way. I urge you to require any expansion be via the Charity route.	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	The two Belle Isle corridors evaluated in the SDEIS have been eliminated from further consideration, due in part to public concerns about crossing the Santee Delta. The EIS provides an analysis of potential impacts to the biologically rich FMNF. The Applicant has performed 13 field surveys for wildlife on National Forest System lands within the proposed corridors, focused on bats, red-cockaded woodpeckers, large birds (kites, eagles, wood storks, etc.), fish, reptiles and amphibians, lepidoptera, and flora). The Applicant would perform additional pre-construction biological surveys, including wetland delineations. These surveys will serve to identify sensitive habitats and inform the siting of the final ROW within the proposed corridor.

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P-003	P-003-001	Individual	Mallory	Norvell	I am writing to strongly encourage Central Electric Power to use the Charity route for new power line(s) to the McClellanville area. Please do not jeopardize the natural beauty and ecosystem of the Santee Delta by running power lines through it. The Santee Delta is a national treasure; it is unfathomable this proposal is even a consideration when options exist for a far less invasive route.	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-004	P-004-001	Individual	Clyde/Mari anne	Allen Jr/Allen	Please add our names to those who advocate for the Charity route that goes through the existing right of way to provide more power to northern Charleston county. We adamantly oppose the Belle Isle route that would cut through the Santee Delta.	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-005	P-005-001	Individual	Sarah	McDaniel	I am strongly opposed to any power lines crossing the Santee delta. Other options like solar need to be considered and explored. The delta cannot be replaced. Leave it alone.	Opposed to the Belle Isle Corridor; Alternative technologies	Biology	Section 2.2.1.1 discusses solar considerations and the two Belle Isle corridors have been eliminated from further consideration.
P-006	P-006-001	St. James-Santee Brick Church Restoration Committee	Howell	Morrison	The areas to be crossed by one or more of the proposed transmission line routes are located within what was known as St. James-Santee Parish, established in 1706. To construct a transmission line over the Santee Delta would impose a needless manmade scar on a precious historic and natural area.	Opposed to the Belle Isle Corridor	Cultural Resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-001).
P-007	P-007-001	Individual	Bill	Brenizer	It is critically important that we do all we can to protect and preserve the Santee Delta, one of the most important and unique environmental assets of South Carolina.	Opposed to the Belle Isle Corridor	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-008	P-008-001	Individual	William	Bradford Jr.	My family is part of the ownership of the Hampton Plantation which I am sure you are familiar with. This land's innate beauty and resources usurped money and profit. To the economic detriment of our entire family, we conveyed the development rights to the Nature Conservancy and agreed to allow this property to remain in its current state into perpetuity. I would like you to ponder this as well. Multiple generations of many family's unanimously agreeing on a common principle fact about this land. With no disrespect intended, it would be catastrophic to place proposed power lines in this area in my humble opinion. Please do not undo what our family has fought to preserve.	Opposed to the Belle Isle Corridor	Cultural Resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
P-009	P-009-001	Individual	James	Morris	If Santee Cooper is going to provide the power for this transmission line and the people need it is ok but, this line should be maintained by all parties involved in this. By maintained means every inch of this line should be and must be plowed and planted in rotating crops year round. Crops of corn, beans, millet, oats, wheat and rye. If not planted the line should not be put in.	ROW should be planted	General recommendation	Sections 2.4.15 discusses the transmission line ROW maintenance, and Section 2.4.17 details vegetation management.

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P-010	P-010-001	Individual	Sheryl	Browne	After attending the public meeting in McClellanville about the three proposed routes being considered for the 115 kv Transmission and given the comments of residents at the meeting, I feel the less disruptive and costly would be the Charity route . If I'm understanding what is laid out on the map handed out at the meeting, the route leading from Charity to 45 is already in place with 230 kv. I'm not understanding why it bares off from the 230kv pipeline right before HWY 45 and then joins back to 45 coming into the McClellanville substation, even so to me this is the less disruptive route, especially if we could bury the line coming down hwy 45 to the village substation that both the Jamestown and the Charity route would use. The Jamestown route is putting new power poles and lines in the forest, disturbing habitats, swamp and land. I am against putting more poles and wires in the forest when we it already have a transmission line in place with the Charity line. I'm not going to even discuss the over the delta route, I think you have enough reasons given and recorded at our meeting for a thumbs down on that proposal.	Support the Charity Corridor; Bury line along highway	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). With respect to burying the transmission line, see response below to comment number P-095.
P-011	P-011-001	Individual	Francine	Dionne	Please do not run any power lines through the lovely and wild Delta or through the Francis Marion.	Opposed to the Belle Isle Corridor and FMNF options	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-012	P-012-001	Individual	John	Brubaker	<p>None of the corridors offered in the SDEIS are acceptable. The proposed service areas is growing at a rate of 2%. A moderate increase in voltage to the substation will be adequate to solve that element of the electrical service problem. The proposed 460% increase from 25 to 115kV, can only be considered a greedy overreach by Central Electric to access public money in order to increased private company profits. Elimination of all corridors across the footprint of the Francis Marion National Forest is appreciated. The only acceptable route considered to date generally follows the SCE&G line that currently provides electricity to the area.</p> <p>Pp. 144 – 191, including Tables 5-9 and 5-10, of the SDEIS seek to identify and discuss plight and impact upon state-listed plant and animal species potentially occurring within the vicinity of the proposed Project corridors. Those are only the most imperiled of a far greater number of threatened species that find their homes in what is proposed to become the power line corridor. Clearly, the proposed ROW poses substantial irreversible impact upon those, the most imperiled of our precious biota. No acceptable plans for avoiding or otherwise mitigating that loss are put forward. Statements like “These wetlands could be relatively easily protected during any ROW expansion.” regarding Eastern Tiger Salamander are nothing more than the author’s assumption void of specifics, and there is no plan at</p>	Opposed to all corridors; Proposes an option parallel to Hwy 17; Endangered species; Herbicide application; Seeding practices; Alternative energy	Biology	<p>Section 1.2 and the Independent Engineering Study (McGavran 2017) forecast load growth and provide additional details about system reliability as a justification for the Project, which is consistent with industry standards and requirements to provide improved electric service in the McClellanville area. This information has led to the conclusion that there is a need for need for a higher efficiency transmission line over the outdated distribution networks currently serving the area. Section 2.2.2.2 and the Independent Engineering study (McGavran 2017) provide justification for eliminating a corridor option originating from Mt. Pleasant, co-located with the existing power line and along US Hwy 17 (Commonwealth Corridor).</p> <p>Approved seed to restore groundcover would be consistent with USFS special use permit requirements. The Applicant</p>

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					<p>all put forward for support of that species into the future as the animal, already stressed to the point of being endangered, contends with the new obstacles of the ROW in his former minimally adequate habitat. The even rarer frosted flatwoods salamander (<i>Ambystoma cingulatum</i>) is noted in Table 5-9, but I find no mention of the species in the discussion. <i>A. cingulatum</i> are known to occur from the vicinity of Cainhoy to the Santee Coastal Reserve. This proposed ROW is in that rare salamander’s habitat.</p> <p>Direct seeding with “approved” seed to restore groundcover in the FMNF is not acceptable (2.5.7). Plugs from selected on-site seed collections should be propagated and planted on disturbed sites as indicated. The measure is necessary to avoid pollution of resident gene pools, preclude the introduction of inappropriate species, including noxious weeds, eliminate the need for excessive ground disturbance by leveling, and eliminate the introduction of exotic mulch.</p> <p>If the transmission line corridor in the FMNF can be maintained without the application of herbicides or other noxious chemicals (2.5.8), those chemicals should be excluded over the entire corridor. The fact that the EPA and other regulatory agencies permit their use does not indicate that they are noxious. Material Safety Data Sheets (MSD) for virtually all include death as a potential risk.</p> <p>Elevated mercury levels in South Carolina waterways are generally attributed to coal burning power plants. Where does mercury noted on this map come from? Coal burning electricity generating plants? Where will the 460% increase in McClellanville power come from? Coal burning electricity generating plants? Would it not be in the best interest to the health and well-being of all to minimize consumption of electricity at least until less injurious methods of generating it come on line? A number who have spoken-out on the matter during public meetings have expressed a desire to conserve and generate residential power on site with solar panels. Pursuit of that alternate is a prudent alternative to the proposed polluting mega power transmission line.</p>			<p>would develop a non-native invasive plant management plan to address the potential introduction and spread of invasive plants during construction, which would identify the plant species to be targeted, including those on the official SC plant pest list. The plan would include strategies for prevention, detection, and control of non-native invasive plants. Construction equipment would be inspected for seeds and thoroughly cleaned before mobilizing to the Project area. Post-control monitoring would be conducted as necessary.</p> <p>Section 2.4.17 describes the Applicant’s proposed vegetation management and Appendix E provides Santee Cooper’s Vegetation Management Program and Unit Plan dated April 2022, including herbicide use, which would follow the Applicant’s standard policies and practices. There would be no use of herbicides on national forest lands. Herbicides would be used on other lands due to its large economic advantages over manual and mechanical weed control. The Applicant would apply herbicides following USEPA guidelines and use a low volume, selective treatment approach to application. Despite their advantages, the EIS acknowledges that herbicide use may have some low-intensity impacts on the environment (see Section 3.3.2, for example).</p> <p>The Applicant would comply with the FMNF Land Management Plan standards and guidelines on national forest lands, which include measures to avoid and minimize impacts to the eastern tiger salamander and other state-listed species, and FMNF species of conservation concern.</p>

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								Considering the indirect effects of the power source for the Project (e.g., coal) is beyond the scope of this environmental analysis.
P-013	P-013-001	Individual	Devon	Beaty	I want to express my adamant disapproval of a line through this East Coast's most pristine wilderness shoreline. Please do not disrupt this rare and important natural resource. Find another, already developed route.	Opposed to the Belle Isle Corridor	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-014	P-014-001	Individual	Don	Rutledge	Supports comment P-008	Opposed to the Belle Isle Corridor	Cultural Resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
P-015	P-015-001	Individual	Marylou	High	I am 100% against the 115kV Transmission Lines proposed for McClellanville via the Santee Delta or Francis Marion National Forest. I live in McClellanville and am a retired Georgetown County teacher. For 31 years I commuted crossing the Santee Delta twice daily. I marveled at the occasional sightings of swallow tail kites, wood storks and even sometimes a bald eagle. The Santee Delta and Francis Marion National Forest are beautiful, pristine areas that need to be protected and left alone from such disruptions as the 115kV Transmission Lines.	Opposed to the Belle Isle Corridor and FMNF options	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-016	P-016-001	Individual	Tom	Young	I write this email in support of running a high-voltage line through the existing right of way that cuts through the Francis Marion National Forest. Please do not (1) run the transmission line through the Santee River delta, or (2) cut a new path west to east through the national forest from Jamestown to McClellanville. Both would be disastrous to the community. Please use the Charity route.	Support the Charity Corridor	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-017	P-017-001	Individual	Keith	Campbell	I sincerely hope you will reconsider the running of the high voltage lines over Santee coastal and Santee Delta WMA's . These areas are historically and environmentally significant areas for waterfowl in the low country and would be devastated by running wires over them .	Opposed to the Belle Isle Corridor	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
P-018	P-018-001	Individual	Clarkson	Mclean	Absolutely NO to Santee Delta route. Use Charity route or better still, no route. Upgrade existing lines. We cannot continue to destroy the environment citing the false concept of "progress".	Opposed to the Belle Isle Corridor; Support the Charity Corridor	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-019	P-019-001	Individual	Steve	Werber	I am writing in support of the Post & Courier editorial in today's newspaper urging the CEPC to avoid disturbing the fragile Santee Delta by running power lines through sensitive areas there. I also agree with the Coastal Conservation League that the CEPC should look to avoid new power lines altogether by looking further into alternative sources of power. Please keep the Santee Delta free of power lines, so	Opposed to the Belle Isle Corridor; Alternative technologies	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 2.2.1.1 describes solar considerations

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					that future generations may enjoy and benefit from this important region.			
P-020	P-020-001	Individual	Craig	Knowlton	<p>The ecologically sensitive Santee River delta should be protected from the environmentally destructive and unreasonably costly project of installing a transmission line across it. The McClellanville area is in need of improved utility grid infrastructure. However, installing high voltage power lines across the water from the north is not the most pragmatic or conscionable solution.</p> <p>Currently, the Berkeley Electric Cooperative (BEC) service territory for McClellanville is powered by a long distribution line stretched from Mt. Pleasant. Similar to a 15-mile long extension cord with a power-strip on the end, it's subject to frequent trips and outages. There are no redundancies in place, no power coming from another route that can be used in an emergency or when customer demands peak.</p> <p>The most effective and quickest-to-implement solution is to construct a large-scale solar-plus-battery-storage farm in McClellanville. Such an installation could provide emergency power to the grid, shave peak demands, and regulate voltage. Central Electric Power Cooperative and Berkeley Electric Cooperative are in the preliminary assessment phase for a proposal to construct a distribution grid connected solar-plus-storage facility in the local area. Such a project, which will provide on-site power generation and energy distribution, should be considered a cost-effective, least disruptive option. Protected national forest lands and river wildlife will not have to be disturbed. Also, its design, permitting, and construction can likely be completed in 2 years, which is a faster timeline than federal approvals and construction will be for the Charity or Santee Delta transmission lines.</p>	Opposed to the Belle Isle Corridor; Support for solar and battery solutions	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 2.2.1 describes the evaluation of alternative technologies, including solar and battery storage solutions.
P-021	P-021-001	Individual	Jean	Everett, Ph.D	I absolutely oppose any plan that strings power lines across our beautiful Santee River Delta. My preference is for any plan that utilizes the currently heavily impacted corridors. I oppose any plan that cuts new ROW through the Francis Marion. I may comment again with more detail, but I wanted to get my opposition to the Delta plan on record.	Opposed to the Belle Isle Corridor; Support for using existing ROWs	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-022	P-022-001	Individual	Vincent	DiGangi	This is a great opportunity to do the right thing for our environment. There are at least two alternatives to avoiding running lines through the Delta. Make the power companies do the right thing and do not allow them to take the easiest least expensive way, at the cost of destroying our pristine environment.	Opposed to the Belle Isle Corridor	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).

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P-023	P-023-001	Individual	Henry	Rutledge	This e-mail letter is supplemental to my comment sent to you October 22, 2019. I am part owner of Hampton Plantation in Charleston County, South Carolina. I understand that RUS is reconsidering approving new transmission lines to McClellanville , SC, and that several of these reconsidered routes again cross the Santee Delta, and many of the properties in the area protected by conservation easements. I note that only one of the six proposed routes approaches McClellanville from the south, even though there is an existing right of way along U. S. Route 17. Most of the proposed routes are unquestionably in conflict with the longstanding efforts of national, state, local and individual parties to protect and preserve for the public the natural and unspoiled environment we all now enjoy. Recently I traveled with my two sons in a small boat down Wambaw Creek into the South Santee. It was a marvelous journey, and easy to imagine we were experiencing the same sights, sounds and impressions as the native Indians and the early colonists did. Obviously these impressions could never be recreated for future generations if the landscape were to be despoiled by electric wires strung on giant, 100 foot towers. Please add my name to your notice list and count me as opposed to any transmission lines across the Santee, or the environmentally protected lands in the area.	Opposed to the Belle Isle Corridor; Recommends following Hwy 17	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 2.2.2.2 and the Independent Engineering study (McGavran 2017) provide justification for eliminating a corridor option originating from Mt. Pleasant along US Hwy 17 (Commonwealth Corridor).
P-024	P-024-001	Individual	David	Strickland	I strongly oppose any right of way as to this project that may require a transect through the Santee Delta or the Francis Marion National Forest. Neither of these two areas need to have any more habitat altering, destruction or development that will further hinder the endangered species, wild game and other wildlife that call these non-developed areas their home. Further, if a ROW is to be needed it should most certainly follow the exact course of HWY 17 to avoid such disruption as mentioned above.	Opposed to the Belle Isle Corridor and FMNF options; Recommends following Hwy 17	General recommendation; Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-025	P-025-001	Individual	Marshall	Finch	I am not sure how you calculate the amount of destruction that plowing a line through the last green chunk of land in the state as seen from satellite imagery would cause. I certainly can't image how anyone could believe this is a good Idea. I'm sure money must be involved and exchanging hands. I have spoken with people in my community of honey hill (the yellow and white chunk on the map in between Jamestown and McClellanville that some engineer was dumb enough to turn the line through), and we are 100% not ok with a transmission line coming anywhere near our property and we don't think it should go through the forest either. We also don't appreciate y'all doing this in the shadows behind our backs with vague plans that are inconsistent and contradict each other. One set shows the line going through my house the next shows it going through my neighbors across the street. More information is certainly needed. You can't just draw a line on a map through my property and expect me to be ok	Opposed to options going through Honey Hill	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 1.2 describes the purpose and need for the Project and section 1.4 details the extensive evaluation of potential Project corridors. Section 2.2.1 describes the alternative technologies considered, including solar power.

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					with that. Expect us to fight this project till its dead. It doesn't make sense to anyone except the people trying to get the contract. Last I checked the power is on and well in McClellanville. Furthermore, its almost 2020 we don't need to burn dinosaur juice for energy anymore. Solar, wind, and tidal could power McClellanville just fine without butchering the last chunk of green on the map. I guess there's no money in renewable energy. No one in McClellanville even thinks this is a good idea I'm perplexed as to how this is even up for discussion. I have never once in my 30 year life not had power in that area.			
P-026	P-026-001	Individual	Philip	Kaufman	I advocate the Charity route. Please preserve the beautiful Santee River delta. My wife and I just recently visited this unspoiled area from our home in Summerville.	Support the Charity Corridor; Opposed to the Belle Isle Corridor	General recommendation	See response above to comments numbers P-001 and P-002.
P-027	P-027-001	Individual	Judy	McMaster	SC is my home state and I value our coast. Please use existing route to add more power options for the Charleston area. As I understand it, this will have the least potential environmental damage of all existing options. You have an opportunity to protect or damage, if not destroy the marsh and fragile wildlife. There is no "fixings" it once destroyed. Please choose the least damaging option.	Support for using existing ROWs	General recommendation	Comment noted.
P-028	P-028-001	Individual	Pat	Scott	No! No! NEVER! Please be responsible stewards of one of the most unique, if not THE MOST!, special, delicate, and must-be-protected areas in the United States!! Please, please, for once in your corporate lives, be stewards for South Carolinians - now and future. No lines through our beautiful Santee Cooper!	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-029	P-029-001	Individual	Melanie	McClellan-Harnett	As a native of McClellanville, SC, hoping that justice will empower the rights of the people instead of bowing to corporate money, I am writing to oppose the proposed McClellanville 115kV Transmission Line and any subsequent proposals like it. The citizens of McClellanville have repeatedly made our opposition clear. The fact that this current proposal exists is proof that the corporations involved are not interested in the wishes of the people who will be directly affected by the actions of the corporations. McClellanville and the Santee Delta contain cultural and ecological treasures from remnants of the nearly vanished Gullah Geechie culture to myriad flora and fauna-- also vanishing under the relentless reach of development. The people of McClellanville wish to preserve and protect both. I call upon the government of the United States of America, particularly of South Carolina, to be a government of the people by the people, and deny the proposed McClellanville 115kV Transmission Line.	Opposed to all corridors	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-001).
P-030	P-030-001	Individual	Patricia	Marino	The best way to get electricity to North Charleston County is to run a high-voltage line through an existing right of way that cuts through the Francis Marion National Forest - the "Charity Route".	Support the Charity Corridor	General recommendation	Comment noted.

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P-031	P-031-001	Individual	Linda	Minson	It appears that this project has been under discussion since at least 2014. As a homeowner, my brief glance of the complex document appears to include Berkeley Electric Cooperative (BEC) members. BEC Board of Trustees are “charged with keeping up-to-date on industry trends and emerging technologies.” Will Berkeley Electric Cooperative hold its annual meeting of members this November? Over the years have profits been paid to members in the form of capital credits? Please explain what sustainable technologies, actionable sustainable developments and cutting-edge technologies have been invested by the cooperative in community in recent decades? since 2014? For example, if St. James-Santee Elementary has an issue with low voltage periods then what effort has been led by the cooperative utility to implement solar or alternate technology to mitigate the issue for its member needs first before the utilities profit? I am not a statistician. I am not a politician. I am a resident of South Carolina who pays taxes and believe it to be an ethical injustice to place a distorting Transmission Project in areas of protected coastal resources, especially in cases where landowner(s) (perhaps now deceased without a voice) have entrusted the State or Nation to protect what they provided to conserve as a public treasure for the generational betterment of the State and nation and to protect against future encroachment of development or exploitation. Recognize and forever protect watershed areas vital to the survival our State’s coastal population and deny the approval of permanently damaging our cultural and heritage landscapes and “sense of place”. Impacted areas from my perspective would not be limited to Francis Marion National Forest, Santee Delta, Coastal Preserve and one of our nation's premier wildlife refuges known as Cape Romain Wildlife Refuge. Engage our state and national universities to provide alternative innovation and solutions to "repair what exists" rather than approve this Transmission Project.	Opposed to all corridors	General recommendation	Section 2.2.1 describes the alternative technologies considered, including solar power and battery storage.
P-032	P-032-001	Individual	Julia	Ralston	I heartily agree with the opinion in today’s Post and Courier editorial expressing a preference for the Charity Route over the other options. We have to place the highest priority on preserving our natural resources including trees, water, and all other life forms besides ourselves.	Support the Charity Corridor	General recommendation	Comment noted.
P-033	P-033-001	Individual	William	Cooper	I suggest the power company look for alternative ideas and routes for the proposed power line to cross the Santee Delta. Main reason, the word Delta; this environment is not conducive for the responsibility of providing power to the city. It’s to be wild and offer a place for water to ebb and flow. A place to remain wild, a place for rivers to cleanse themselves, a place to carry other responsibilities to run a successful South Carolina. The insulation cost will go over budget, maintaining it	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).

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					will be very expensive and go over budget, it will be eye sore and it will sink and fall down.			
P-034	P-034-001	Individual	Palmer and Curtiss	Brown	my wife and I adamantly oppose the Belle Isle route. We advocate the Charity route. It makes more sense to use the existing route of way, cost wise and environmental wise.	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-035	P-035-001	Individual	Leon	Rice	I live in Murrells Inlet, but I hunt , fish, and boat ride very often in the Santee Delta. I do this because it is pristine, beautiful, and unspoiled, except for highway 17, which went in years ago. The road is intrusive enough. Utility wires strung across ruins our environment, and creates an eye sore of "progress" coming to our natural area. Running the lines through the National Forest would be a better idea, but also not favorable to our environment or hunting and hiking endeavors there. Pls., if they have to go in, do not cross the Santee Delta in its natural state from Monks Corner to the ocean. You must find an alternative to intruding upon our beautiful natural areas which are slowly by surely being degraded.	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-036	P-036-001	Individual	Catherine and Joseph	Day	Please add our names to those who advocate for the Charity route that goes through the existing right of way to provide more power to northern Charleston county. We adamantly oppose the Belle Isle route that would cut through the Santee Delta	Support the Charity Corridor; Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-037	P-037-001	Individual	Sara and Gregg	Pavone	Please add our names to those who advocate for the Charity route that goes through the existing right of way to provide more power to northern Charleston county. We adamantly oppose the Belle Isle route that would cut through the Santee Delta.	Support the Charity Corridor; Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-038	P-038-001	Individual	Trey and Kiki	Lofton	Please add our names to those who advocate for the Charity route that goes through the existing right of way to provide more power to northern Charleston county. We adamantly oppose the Belle Isle route that would cut through the Santee Delta.	Support the Charity Corridor; Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-039	P-039-001	Individual	A.L. and Deborah	Lofton	Please add our names to those who advocate for the Charity route that goes through the existing right of way to provide more power to northern Charleston county. We adamantly oppose the Belle Isle route that would cut through the Santee Delta.	Support the Charity Corridor; Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-040	P-040-001	Individual	Janet Dargan	Trent Moore	Please add our names to those who advocate for the Charity route that goes through the existing right of way to provide more power to northern Charleston county. We adamantly oppose the Belle Isle route that would cut through the Santee Delta.	Support the Charity Corridor; Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-041	P-041-001	Individual	Eddie	Collins	There are fewer and fewer ecologically pristine places in this world - especially the low country of South Carolina. Two remaining bastions are being threatened, and need strong protection. One is the Francis Marion National Forest, and another is the Santee Delta between Georgetown and McClellanville. I know these areas well and have frequented them happily and non-invasively, for decades. I hope this	Support the Charity Corridor; Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).

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					will be taken into account when planning more electric service to northern Charleston County. Please use the existing right-of-way (the "Charity" route) - not a route that will destroy untouched treasures.			
P-042	P-042-001	Individual	Margaret	Lamb	Regarding proposal to expand power to North Charleston, I urge you to use the Charity route that goes through the existing right of way. Going thought the Santee would be destructive for this environmental treasure. Please do not put it at risk. The Santee Delta is a jewel of the East Coast and, simply put, "they're not making 'em like that anymore."	Support the Charity Corridor; Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-043	P-043-001	Individual	Cheves	Leland	I oppose power lines coming across the Santee Delta or through new routes in the Francis Marion National Forest. I suggest that the existing lines be used, updated as needed for existing residents. We are not interested in becoming a suburb of Mount Pleasant or anywhere else and do not see the need to provide lines for non-existent households. Please do not destroy this natural area. In addition to the wildlife and native plants and trees, there are a lot of historic sites scattered throughout the Forest and in the Delta.	Opposed to the Belle Isle Corridor and FMNF options	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 1.2 describes the purpose and need for the Project, and explains the power reliability issues that residents experience in the McClellanville area.
P-044	P-044-001	Individual	Mitch	Binnarr	I am opposed to the construction and establishment of power lines through the FM Nat Forest and Santee Delta. I grew up in that area and it is truly one of the last natural resources our coastal region has. The development of the Charleston area is out of control and is reaching a point of no return. I'm for growth, but measured. Once we lose these areas we cannot get them back. It's time to take a breather on unchecked development in the Low country.	Opposed to all corridors	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-045	P-045-001	Individual	Russell	Horres	The Santee Delta is a national treasure that should not be despoiled by an above ground transmission line. The undisturbed vistas reflect the tragedy of man's inhumanity to man where thousands of enslaved people toiled in expansive rice fields and lived in remote delta villages. Interpretation of this part of our history is the provenance of Hampton Plantation from which no modern interventions can be seen nor should ever be seen. Of the options being considered, Option 2 of connecting McClellanville via the Francis Marion National Forest will be the least intrusive from a historical perspective.	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-046	P-046-001	Individual	Carol	Crawford	I am writing to tell that I am in favor of the Charity route for the transmission line. I cannot fathom anyone picking the Belle Isle route. I am strongly opposed to it and fear for the damage it would create to the fragile Santee Delta. Please choose the Charity route.	Support the Charity Corridor; Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-047	P-047-001	Individual	Llyn	Drumbor	It is vital to protect the Santee Delta. Please run the high-voltage line through an existing right of way. Electricity is important but not vital. Our environment is our future.	Opposed to the Belle Isle Corridor; Support for using existing ROWs	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-048	P-048-001	Individual	R. Pringle	Franklin	I am writing in support of the Charity route for the high-voltage line. This afternoon, I read in the Post & Courier that CEPC is making a decision which could mean placing this line through the Santee River	Opposed to the Belle Isle Corridor;	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further

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					Delta. Please leave this pristine area alone. Our planet is very fragile, and we must do whatever we can to protect wildlife and wild places. As you know, we in the Low country are especially blessed because our little section of the Eastern Seaboard has not yet been over-developed. I hope your Electric Cooperative will decide to make use of the existing right-of-way in the Francis Marion Forest.	Support for using existing ROWs		consideration in the final EIS (see response above to comment number P-002).
P-049	P-049-001	Individual	Marcia	Rosenberg	Please preserve our precious ecosystem, and the natural beauty of the Santee Delta by not taking additional lands for high voltage lines. Please stay within the boundaries already in existence as a right of way. Choose the Charity route. It is the only sensible choice.	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-050	P-050-001	Individual	Mary-Catherine	Marin	Please do not run a power transmission line through the Santee Delta. This is a wild and beautiful place - very rare in the Low country. Please use the Charity route. Please decide to preserve the Delta and keep it now and for the future.	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-051	P-051-001	Individual	Francine	Dionne	In reviewing the editorials in post & courier and other material provided, an electric route thru the Santee Delta is very destructive to environment. Also, McClellanville is happy with current system as it is. People also feel this option by electric company, along with hurting the environment, will increase development. No doubt about that! Please don't do this. There are several less sensitive options as outlined in editorials. We don't want to wreck what others have worked so hard to preserve.	Opposed to the Belle Isle Corridor; Opposed to all corridors	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 1.2 describes the purpose and need for the Project based on an independent engineering study. Section 3.9.1 describes the population growth for the town of McClellanville from 2010-2020
P-052	P-052-001	Individual	Fred	Palm	Can we not have beautiful places unencumbered by our own presence? We are going to need these places for nurseries and habitats. Please find a way around and not through the beautiful Santee Delta.	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
P-053	P-053-001	Individual	Jeanine	Johnson	Please consider the damage to the Delta if you do not use the Charity route	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
P-054	P-054-001	Individual	William	Baldwin	I'm 74 years old and have been living close by the Santee Delta for most of that time. I've fished there and worked there, and for the last ten years have been paddling and photographing there at least one day a week. Without realizing I was even in the path of your bizarre project I paddled between Harris Landing and the North River Pole yard three times in the last five days. This is one of God's great places of beauty and joy. I cannot believe what you are proposing is necessary. Pick another way.	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-055	P-055-001	Individual	Don	Balderson	As a resident of S.C. and an advocate for our natural areas and in particular, the Santee Delta region, I would recommend that if the	Opposed to the Belle Isle Corridor;	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further

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					power line does need to be built, that it follow the Charity route along the existing right of way . Preferably it does not need to be built at all as potential for alternate sources of power are explored.	Support the Charity Corridor; Alternative technologies		consideration in the final EIS (see response above to comment number P-002). Section 2.2.1 describes the alternative technologies considered, including solar power and battery storage.
P-056	P-056-001	Individual	Riley	Younger	Please understand the ecological damage new power lines will do to the Santee Delta biome. Creating allopatric barriers and implementing dangerous, high voltage power lines could cause fragile species to deplete or die off. This would cause a chain reaction in so many other ecosystems in South Carolina, dooming natural resources and the beautiful landscapes that so many people travel here to see. There are alternative ways to provide power to McClellanville, such as solar power or alternate routes. I agree with the statement made by an editorial written by The Post and Courier staff, "Specifically, the Charity alternative along the existing gas line right of way through the national forest should be recommended in order to minimize further impact to the natural landscape." Please ensure that all the available options are exhausted before putting these ecosystems at risk.	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 2.2.1 describes the alternative technologies considered, including solar power and battery storage.
P-057	P-057-001	Individual	Garry	Anthony	I am writing to oppose the Central Electric's proposed electric transmission line across the Santee Delta near McClellanville, SC. The line would destroy and disturb an ecologically sensitive area. There are other routes available that would track lines that are already built and has existing right of way. The ecological damage done would be minimal. Also, I also understand there are questions of the necessity of the additional electricity coming to the area. In any respect there are options to the line that would cause minimal damage and not involve the Santee Delta in any construction.	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-058	P-058-001	Individual	Nikki	Hardin	I am opposed to the proposal to run power lines through the Delta and Francis Marion Forest. Our wild places and nature preserves are increasingly endangered by development. Please say no to this plan by utilities. Thank you for your consideration.	Opposed to the Belle Isle Corridor and FMNF options	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-059	P-059-001	Individual	Morgan	Flake	I am a resident of McClellanville, SC and I oppose any transmission lines through the Santee River Delta.	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
P-060	P-060-001	Individual	Pam	Powers	Please do not allow the transmission line to be constructed in the Santee Delta. Choose the Charity route	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
P-061	P-061-001	Individual	Betty	Milner	Please choose the Charity route that goes through an existing route of way. We cannot ruin all beautiful places for ourselves. Think of the view, the quiet, the peace and the wildlife, the uniqueness of this area	Support the Charity Corridor	General recommendation	Comment noted.

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					and let's keep it that way. It seems many decisions we make that are not wise for all happen to not be needed down the road.			
P-062	P-062-001	Individual	Jeff	Glitzenstein	<u>Section 4.3.14</u> , with respect to Francis Marion NF, I oppose seeding of any but outer Coastal Plain local ecotypes, preferably seed collected from FMNF itself. In fact, my preferable alternative would be no seeding whatsoever. Native species will re-establish readily from the seed or sprout bank if soils are backfilled following construction. In sections of the ROW with limited soil disturbance groundcover communities would recover rapidly if not impeded by unneeded and counterproductive soil preparation and seeding activities. Also, who would be involved in the "agreed upon seed mixture" should this action take place? South Carolina Native Plant Society should have input into this decision. Due to the lack of tree canopy, frequently mowed and burned ROWs free from herbicide make excellent habitats for rare herbs and low shrubs, and I advocate experimental plantings of such species, including federally endangered ones, in the ROW corridors especially on federal land. Such plantings could be incorporated as part of ESA section 7 mitigation measures recommended by USFWS.	ROW seeding post construction in FMNF	Biology	Section 2.4.17 describes the Applicant's proposed vegetation management following ground disturbance. Natural regeneration would generally be preferred but there could be specific sites where targeted restoration actions are needed, such as areas with suitable habitat for rare plants. The Applicant would comply with the USFS requirements for the restoration of ground-disturbance during construction on national forest lands. In accordance with Forest Service policy per Section 512 of FLPMA (43 U.S.C. 1772), the Applicant would be required to develop an operating plan for powerline facilities on National Forest System lands, including how the Applicant would address inspection, operation and maintenance, and vegetation management within the ROW and felling and pruning of hazard trees on NFS lands adjacent to either side of the ROW.
P-063	P-062-002	Individual	Jeff	Glitzenstein	<u>Section 4.3.17</u> : I do not understand the need for herbicide treatment if the ROW is to be mowed every 2.5-3 years. Please identify the plant species that can become tall enough to interfere with transmission lines under this mowing cycle. Also, I object to use of any herbicide in wetlands given the well documented catastrophic effects of herbicides on wetland herpetofauna. Most wetlands dry out occasionally and those opportunities should be taken for mechanical treatment. Mowing every 2.5-3 years should gradually reduce vigor	Opposed to herbicide use; Support for mechanical vegetation clearing within the ROW	Biology	A non-native invasive plant management plan would be developed to address the potential introduction and spread of non-native invasive plants during construction, which would identify the plant species to be targeted, including those on the official SC plant pest list . Post-control monitoring would be conducted as necessary. Herbicide use would follow the Applicant's standard policies and practices, and there would be no use of herbicides on national forest lands. Herbicides would be used on other lands due to its large economic advantages over manual and mechanical weed control. The Applicant would apply herbicides following USEPA guidelines and use a low volume, selective treatment approach to application. Despite their advantages, the EIS acknowledges that

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								herbicide use may have some low-intensity impacts on the environment. .
P-064	P-062-003	Individual	Jeff	Glitzenstein	<p><u>Section 5.6.1.1:</u> “The vegetative community within the existing ROWs consists of fescue grass (<i>Festuca</i> spp.), Bermuda grass (<i>Cynodon</i> spp.), crabgrass (<i>Digitaria</i> spp.), and a variety of common herbaceous and woody species, including: wiregrass (<i>Aristida beyrichiana</i>); earleaf greenbrier (<i>Smilax articulate</i>); spurge nettle (<i>Cnidoscolus urens</i> var. <i>stimulosus</i>); sandy-woods chaffhead (<i>Carphephorus bellidifolius</i>); small black blueberry (<i>Vaccinium tenellum</i>); American ipecac (<i>Euphorbia ipecacuanhae</i>); yankeeweed (<i>Eupatorium compositifolium</i>); narrowleaf silkgrass (<i>Pityopsis graminifolia</i>); and wax myrtle (<i>Morella cerifera</i>) (NatureServe 2018a)”. This listing of vegetation within existing ROWs is both inaccurate and incomplete. For example, <i>Aristida beyrichiana</i> is essentially absent from FMNF and vicinity. Many of the existing ROWs contain numerous groundcover plants of longleaf pine forests and savannas including rare (SCC) species <i>Sarracenia rubra</i> and <i>Rhexia alifanus</i> among others. Failure to accurately represent the current quality and diversity of existing ROW vegetation understates the biological value of these corridors and the potential impacts of new intensive disturbances in those corridors. The final EIS should provide detailed mapping using some valid measure of ecological integrity of distribution and quality of existing plant communities with the current ROWs.</p> <p>This section inaccurately states that the desired condition within the ROW is early seral stage. In fact, native longleaf groundcover consists of long-lived perennials than can be 100’s of years old. The desired condition is restoration of mature pineland groundcover not early seral ruderal specialists that occur on disturbed ground. Based on existing plant communities it can be inferred that much of FMNF was never in agriculture although it is accurate that the old growth longleaf pine trees were logged or otherwise degraded for naval stores.</p>	ROW vegetation concerns	Biology	<p>The text in Section 3.3.1.1 has been revised to include information from preliminary flora surveys performed on national forest lands (Gaddy 2017, 2018). Appendix E provides Santee Cooper’s Vegetation Management Plan. The EIS uses satellite-based vegetation mapping but the Applicant has performed 11 field surveys for wildlife and 2 flora surveys on National Forest System lands within the proposed corridors. The Applicant would perform additional pre-construction biological surveys, including wetland delineations. These surveys will serve to identify sensitive habitats and describe ecological integrity in order to inform the siting of the final ROW within the proposed corridor. The desired condition of plant communities within the ROW would be detailed in an operating plan, as required for special use authorizations of transmission lines.</p> <p>The EIS text has been revised to remove mention of early-seral vegetation being part of the desired condition for ROW vegetation. However, vegetation would be managed the proposed ROW would be managed in accordance with Santee Cooper’s Vegetation Management Plan (Appendix E of the EIS), which complies with FERC standard FAC-003-4, <i>Transmission Vegetation Management</i>. The purpose of this standard is to improve the reliability of the electric transmission systems by preventing outages from vegetation located on transmission ROWs and minimizing outages from vegetation located adjacent to ROW, and maintaining clearances between transmission lines and vegetation on and along transmission ROWs.</p>

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P-065	P-062-004	Individual	Jeff	Glitzenstein	Table 5-6 contains several inaccuracies, particularly the suggestion that loblolly pine and less frequent fire is appropriate in wetter pine stands. Frequent fire is critical across the moisture gradient and frequent fires will favor longleaf pine and rich herbaceous groundcover regardless of soil moisture. It is also inaccurate that fires were limited to the dormant season when growing season fire during the lightning season (roughly May-August) is widely recognized as the “natural” fire season.	Inaccuracies related to fire and forest discussion	Biology	Text has been revised to note that growing-season prescribed burns also occur. As noted, the source for these ecosystem descriptions is Appendix G of the FMNF Revised Land Management Plan.
P-066	P-062-005	Individual	Jeff	Glitzenstein	<p>Section 5.5.1.1: The information in the tables and maps is insufficient to make an informed judgement. The map of ecosystems must be coupled with some measure of ecological integrity. For example, pinelands with a history of less frequent fire will generally exhibit higher shrub dominance and will be of lower integrity than more frequently burned sites.</p> <p>The preferred alternative in my opinion is one that preferentially avoids sites of higher ecological integrity. On the other hand, routing a ROW through low diversity infrequently burned habitats might improve ecological integrity.</p>	Need better info to understand ecological quality and integrity	Biology	Section 2.3 provides a description of alternatives and all factors considered. The Applicant and/or its contractors would perform site-specific ecological surveys prior to construction, including wetland delineations and surveys for rare plants, raptors and selected migratory and non-migratory birds (e.g., bald eagle, swallow-tailed kite, wood stork, etc.), and threatened and endangered species.
P-067	P-062-006	Individual	Jeff	Glitzenstein	<p>Table 5-8: The habitat as stated for federally endangered <i>Lindera melissifolia</i> is somewhat incorrect. While this species occurs in bottomland forests in western USA it is limited to the margins and occasionally the interior of pineland ponds in southeast USA including FMNF and vicinity.</p> <p>The table also states incorrectly that <i>Oxypolis canbyi</i> does not occur in the project vicinity. This species was documented for Tibwin Bay in the proximity of McClellanville (I saw it myself and so did Patrick McMillan, perhaps the most respected botanist in SC and head of South Carolina Botanical Garden). I agree with Dr. Chick Gaddy that there have been several incorrect reports of this species, but the Tibwin Bay site was not one of them.</p>	Make corrections to habitat for RTE species and opposes findings presented in the report	Biology	The Applicant would hire a professional biologist to survey the final Project ROW for habitat and likely presence of federally listed plants. Additional site-specific analysis would be conducted to confirm the lack of any potential adverse effect. The Applicant would follow FMNF standard S35 by not constructing temporary or permanent roads in population sites for at-risk plant species.
P-068	P-062-007	Individual	Jeff	Glitzenstein	Ecological Conditions (Impacts from Project Construction): This analysis is flawed because it fails to account for ecological condition. For example, the total acres of wetland pine forest or upland pine forest within a corridor is not a good measure of possible impacts unless one also knows the ecological integrity breakdown of those acres. Additional surveys that take place for the final EIS must provide a breakdown by ecological integrity category. As I have tried to emphasize, widespread destruction of high-quality habitat could be disastrous but ROWs in low quality habitat might be an improvement.	Understanding the current ecological integrity and quality is important for evaluation	Biology	The Applicant has performed 13 field surveys for wildlife on National Forest System lands within the proposed corridors, focused on bats, red-cockaded woodpeckers, large birds (kites, eagles, wood storks, etc.), fish, reptiles and amphibians, lepidoptera, and flora). The Applicant would perform additional pre-construction biological surveys, including wetland delineations. These surveys will serve to identify sensitive habitats and inform the

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								siting of the final ROW within the proposed corridor. .
P-069	P-062-008	Individual	Jeff	Glitzenstein	<p>Page 5-124, pondberry. Gaddy’s failure to detect pondberry in the Conifer Rd/Halfway Creek Road vicinity is perplexing since I documented several populations/subpopulations there within the last 5 yrs. Also, I have done most of the prior censuses for the Honey Hill population/subpopulations and know all the pondberry there. I would volunteer my time if that’s what it takes to get accurate and up to date maps of extant pondberry. Moreover, I would be happy to meet with anyone to show them the pondberry locations.</p> <p>In summary, I believe I know the vegetation and flora of FMNF better than anyone with the possible exceptions of Richard Porcher and Patrick McMillan. Once the final ROW determination is made and the final plant surveys are carried out, I would like to see those results as soon as possible so that I can map any overlooked rare plant sites and carry out volunteer surveys if those seem needed.</p>	Disagrees with pondberry assessment in the Honey Hill areas; Rare plant sites	Biology	The text describing the occurrence of pondberry has been updated with the latest monitoring data available from the USFS. The Applicant has performed 11 field surveys for wildlife and 2 flora surveys (Gaddy 2017, 2018) on National Forest System lands for the Jamestown and Charity alternatives. The Applicant would perform additional pre-construction biological surveys, including wetland delineations. These surveys will serve to identify sensitive habitats and describe ecological integrity in order to inform the siting of the final ROW within the proposed corridor.
P-070	P-062-009	Individual	Jeff	Glitzenstein	My personal assessment is that the Belle Isle route is the one that should be selected since it will impact a much lesser portion of the FMNF. The FMNF is one of the last remaining strongholds of the endangered longleaf pine ecosystem and it should be impacted as little as possible. I am troubled by impacts to Santee bottomlands by the Belle Isle corridor, but overall impacts to rare and threatened biota and ecosystems would appear to be much reduced under this alternative.	Support the Belle Isle Corridor; Opposed to the FMNF options	Biology	Section 3.3. describes the ecological values of the FMNF and discusses the Project’s potential impacts to its resources. The potential impacts to threatened and endangered species are not fully quantified due to a lack of surveys on private lands and the uncertainty about the final ROW alignment within the corridors evaluated. Section 7 consultation with FWS would be conducted to determine whether the Project may affect federally listed species or their critical habitat. The outcome of the consultation would ensure that the Project does not jeopardize the continued existence of a federally listed species.
P-071	P-071-001	Private Company	Randal	McClure	As the Director of The Village Museum, I obviously share in the museum board’s opposition to the Belle Isle Corridor Alternatives. The Santee Delta is a national treasure and placing it there would be the equivalent of running a transmission line over the National Mall in Washington, DC), but I have concerns regarding the other routes, and a few additional comments, which I would like to share as well. I am appreciative of the many thoughtful considerations illustrated in the SDEIS, and I have concerns for not only the Delta, everyone’s main concern but also the Honey Hill related routes which will bisect the parish along French Santee Rd. crossing Wambaw Creek and plowing	Opposed to the Belle Isle Corridor; Proposes an option that starts with Charity but then follows other ROWs rather than the current Charity route all the way	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). The suggested new corridor that extends from the Charity Substation to the Awendaw metering point would not solve the electric reliability issues in the McClellanville area. As discussed in Section 2.2.2.2, a new transmission system

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					new ground much like the Belle Isle routes all in an effort to reach the designate target in adjacent to the town limits. It is my belief however, that a line starting at the Charity Substation that parallels the existing ROW of the Charity-Winyah Line, then turns right and parallels the Steed Creek Rd ROW, then proceeds at a diagonal crossing Hwy 17 to proceed north a short distance paralleling the Hamlin 25kW feed ROW and culminating at a substation near the Awendaw Meter Point at 10236 Highway 17 N. Next to Buck Hall, is more appropriate. This route takes advantage of the existing ROWs, effects very few buildings and sensitive new costly crossing of wetlands and private parcels and has to be, by far, the most economical route. The connection to the Dominion line can switch from there when needed, eliminating 20 miles of the feed from Hamlin, and BEC will have more ready access to feed the Awendaw market where the real growth is set to explode.			that originates from the same power source as the Awendaw metering point would not provide an alternate source in case of voltage loss at Hamlin. The existing distribution line serving the McClellanville area originates from the Hamlin Substation, and a new transmission line originating from the same area would locate both lines into the same corridor and expose both the new transmission line and what would become the back-up distribution line to a common outage scenario (e.g., a hurricane). The location of the proposed McClellanville Substation is at the geographic center of the load for the existing 40-mile circuit.
P-072	P-072-001	Senator	Chip	Campsen	The Santee Delta is the largest and perhaps most protected river delta on the east coast. This was made possible by the countless efforts of public and private partnerships and conservation easements that will leave this land in an unspoiled state to be enjoyed by current and future South Carolinians for generations to come. The proposed project by Central Electric, outlined in detail in its supplemental draft economic impact statement (EIS), threatens to undue years of effort to protect the delta by placing up to twenty miles of 115kV transmission lines directly across it. I am vigorously opposed to any proposal impacting the Santee Delta, and urge the consideration of alternatives with the least amount of environmental impact.	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-073	P-073-001	Individual	Paul	Pearson	I am in full support of running a high-voltage line through the existing right of way that cuts through the Francis Marion National Forest. Please do not run the transmission line through the Santee River delta, or cut a new path west to east through the national forest from Jamestown to McClellanville. Either of these options would be disastrous to the Santee River delta and its surrounding community. Please use the Charity route.	Opposed to the Belle Isle and Jamestown Corridors; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-074	P-074-001	Individual	Winthrop	Taylor	I am opposed to the construction of the proposed transmission line within northern Charleston County. The proposed routes through either the Santee delta or the Francis Marion National Forest should not be considered as alternatives. Furthermore, the proposed construction of this transmission line would result in increased urban sprawl leading to additional environmental degradation.	Opposed to all corridors	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 3.9.1 describes the population growth for the town of McClellanville from 2010-2020. Improving the reliability of the power supply in McClellanville has the potential to contribute to increased development, although there are

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								numerous other factors that influence urban sprawl in the region.
P-075	P-075-001	Individual	Catherine	Young	I am in full support of running a high-voltage line through the existing right of way that cuts through the Francis Marion National Forest. Please do not run the transmission line through the Santee River delta, or cut a new path west to east through the national forest from Jamestown to McClellanville. Either of these options would be disastrous to the Santee River delta and its surrounding community. Please use the Charity route.	Opposed to the Belle Isle and Jamestown Corridors; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-076	P-076-001	Individual	Kathleen	Jordan	I just wanted to add my thoughts to the public opinion process. It seems to make the best sense and probably least expense to put any new transmission lines along the same path that has already been cleared and right of way purchased. The Charity Route would disrupt the landscape the least for years to come especially for when growth and development comes (which is what is being planned for, right?). Please consider totally scraping the Belle Isle route for the sake of those of us who currently enjoy the landscape and natural beauty of the Low country and for those in generations to come.	Opposed to the Belle Isle Corridor; Support the Charity Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
P-077	P-077-001	Individual	Jim	Nimmich	Through The Delta??? Have you lost your friggin minds???!!!!	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
P-078	P-078-001	Individual	Angela	Kroft	Please do not disturb our pristine wetlands of the Santee Delta or our national forest for the new line. If it is truly needed then use the Charity route. We need to protect our existing “wild areas” for future generations, not to mention the wonderful creatures who call them home. Earth was not created for the exclusive use of man. Indeed, man will not survive without natural, untouched areas which are rapidly dwindling along with so many species of life.	Opposed to the Belle Isle Corridor and FMNF; Support the Charity Corridor if a line must be built	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-079	P-079-001	Individual; Public Meeting Comment	Mayor Leland		The Town of McClellanville is served by Dominion Electric, and so we're not directly involved except for about ten people I think in town that are actually Berkeley members. I looked at the list of speakers here, and it pretty much confirms what I told some of the officials that I have been meeting with over the last few weeks concerning this. Leave the darn Delta alone, but they still put it up there. I'm not going to get into all that. I do have a letter here from Senator Campsen in which he strongly urges people not to use the Delta as any part of the program, to not put anything across the Santee Delta. I'm sure you all read the article in the Post & Courier which kind of brings that to light. I do want to see good, reliable power for the people in this area. If this substation can be activated, I think at some point the Town of McClellanville would probably use it. That would have to be some sort of an agreement with Dominion. I just wanted to make those brief	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).

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					comments. I think Senator Campsen's letter will be submitted directly, but I will leave a copy of it here with you all tonight. That's about it. Thank you all.			
P-080	P-080-001	Individual; Public Meeting Comment	Bud	Hill	I'm the Director Emeritus of the Village Museum of McClellanville. You all, the richest area of history within St. James Santee Parish is not McClellanville. It ain't Awendaw. It's the Santee Delta. One of the power sources that they're talking about, they're talking about bringing it across the most historic areas in South Carolina and in my opinion one of the most historic in the nation. They're going to bring it across land that the nature conservancy and every other conservation agency in this country has fought for years to conserve and preserve and protect. Everything on the Delta is protected land all the way up past Hampton plantation and into our wonderful national forest. We've got to act responsibly. We have got a treasure within our community, and if we don't protect it now, right now tonight, we are doomed. We are doomed because more will happen and more will pile on this. Do not let them do this. Write your letters, put up placards, march on them. I don't care what you have to do, but do not stand for this. Do it anywhere else, but not across the Santee Delta. Thank you.	Opposed to the Belle Isle Corridor	Cultural Resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-001).
P-081	P-081-001	Individual; Public Meeting Comment	Lee Anne	Leland	For years the Santee Delta has suffered greatly at the hands of man. Its swamps were cleared for rice fields. Its majestic Cypress trees felled for timber. It has only recently been allowed to recover from the damage man inflicted upon it from our destructive ways. Do not let selfish man or greedy interests skin your country of its beauty, its riches, or its romance. Wallace Stegner in his book The Sound of Mountain Water said something will have gone out of us as a people if we ever let the remaining wilderness be destroyed. We simply need that wild country available to us even if we never do more than drive to its edge and look in. I don't think he would appreciate looking in and seeing a high-power transmission line. Thank you.	Opposed to the Belle Isle Corridor	General recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).
P-082	P-082-001	Individual; Public Meeting Comment	Mr.	Graham	Certainly, I join the chorus on opposition to anything in any shape or form coming across the Santee Delta. I think we have a lot more at stake here than just the Delta. Because of the way those proposed power lines run, I don't see a winner in the lot of them. I certainly don't want the one across the Delta. The Francis Marion Forest is sacred to me. The Cape Romain Refuge is sacred to me. Are we going to have a highway on Cape Romain next? I think there are places that are off limits, and the Francis Marion to me should be off limits, too. I've seen incursions there from gas lines, and now there will be more and more and more. I personally question the need for this approach to having better electric service in McClellanville. I don't see any point in the world in taking a nine-year-old plan that ignored the Delta and its treasures in the first round and beating that dead horse until they	Opposed to the Belle Isle Corridor and FMNF options	Cultural Resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 1.2 describes the purpose and need for the Project based on an independent engineering study. Section 3.9.1 describes the population growth for the town of McClellanville from 2010-2020.

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					get a power station in McClellanville. You have to have a permit and a description of the work to get the power there. What is going to be there? Then they're going to need more permits.			
P-083	P-083-001	Individual; Public Meeting Comment	Middleton	Rutledge	I would like to ask that the proposed transmission line that you had of each route be put up here. I would like to point out a few things. In the meantime, on behalf of the Rutledge family I would like to say we adamantly oppose the transmission lines built over the Santee Rivers and over the Santee Delta. The Delta is one of most unspoiled, ecologically diverse areas in the United States. There have been multiple generations of conservation-minded individuals like Belle Baruch, Tom Yawkee, Peter Manigault, and Archibald Rutledge who have gone to great lengths to conserve this unique natural resource. In 2010 our family put a conservation easement on 1,215 acres on Hampton Plantation for the sole purpose of protecting the area from future development and any commercial use, any commercial use. Constructing transmission lines from Belle Isle over the Delta would run right by our property and would basically be a slap in the face for all the generations of people who worked hard to protect this area. In addition this route would go through several historic rice plantations, cultural sites, and it would be a nightmare to service and repair those ugly power lines. The only place where transmission lines should be constructed is where they already exist period. We would ask that Berkeley Electric immediately drop all proposed plans to construct transmission lines over the Santee Delta and anywhere over the Santee Rivers.If you have time, could you go to the proposed lines from Belle Isle where it goes to the plantations? I would like to point something out that wasn't pointed out. It was another slide there that showed the conservation areas. There we go. You will notice on this slide none of the plantations are marked, Santee Delta, Hopsewee Plantation, The Oaks Plantation -- a lot of people that own those properties are here today -- Thomas Lynch's plantation owned by the Mantigo family, the Romney Plantation owned by the Gilberts, the Hampton Plantation, all these are historical rice plantations, and none of them are labeled on this.	Opposed to the Belle Isle Corridor, Cultural resources	Cultural Resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
P-084	P-084-001	Individual; Public Meeting Comment	Bob	Raynor	I am a Berkeley Electric customer. I am also on the board of the Friends of Coastal South Carolina. We are the friend's group for the three coastal refuges, Cape Romain, Waccamaw, and ACE Basin as well as the friends group for the Francis Marion National Forest. Tommy Graham was looking at and discussing the amount of energy that's needed, and I would like to enter that question in for that to get considered by the RUS in this project. How much energy is really needed? What do we need? I think that goes into what Tommy was saying. Are we projecting for these new communities everywhere? Is that what we're looking at? So I really think that needs to be asked,	Opposed to the Belle Isle Corridor; Alternative technologies	General recommendation	Section 1.2 describes the purpose and need for the Project, and explains the power reliability issues that residents experience in the McClellanville area. Electric reliability within the McClellanville Area has been problematic for years and the magnitude of the problems is increasing as demand grows, projected at about 2% annually. This is detailed in Section 1.2.2 and the Independent

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					and besides alternative routes, I think we need to look at alternative energy and the amount that's needed. Thank you very much.			Engineering Study (McGavran 2017). Section 3.9.1 describes the population growth for the town of McClellanville from 2010-2020.
P-085	P-085-001	Individual; Public Meeting Comment	Jason	Crowley	<p>Director of Communities and Transportation for the Coastal Conservation League. As you have been hearing tonight, there is a lot of concern about the impact that this will have on the cultural resources and environmental resources, particularly in the Santee Delta, but, of course, also the Francis Marion National Forest. These are two of the most treasured and prized places in the Lowcountry, and there has been an incredible amount of effort over the last several decades of private landowners, local governments, state, and federal working together collectively to protect these resources, and all four of these alternatives would have a very detrimental impact on all of them.</p> <p>The Coastal Conservation League remains presently opposed to any transmission lines that would cross the Santee Delta, and we have a lot of concerns about the two new proposed lines that would go through the Francis Marion National Forest. These are areas with a lot of prime habitat for some of our most endangered species, particularly the red-cockaded woodpecker. The Charity corridor in particular would impact numerous colonies that were documented and clusters that were documented as noted in the supplemental EIS.</p> <p>We believe that there has not been enough investigation and analysis of non-wire alternatives to provide the purpose and need of this project. We believe that there needs to be more analysis looking at generation backup supply sources that utilize renewables like solar. Charleston County has worked with local communities out here to ensure that this is not a growth area. We have an urban growth boundary and low density zoning in this part of Charleston County for a reason, and that is to protect the natural resources that everybody here is so concerned about, and we encourage an entirely new analysis of what has been proposed here tonight.</p>	Opposed to all corridors; Endangered species along the Charity corridor; Alternative energy	Biology	<p>Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).</p> <p>The final EIS provides an analysis of potential impacts to the biologically rich FMNF. The Applicant has performed 13 field surveys for wildlife on National Forest System lands within the proposed corridors, focused on bats, red-cockaded woodpeckers, large birds (kites, eagles, wood storks, etc.), fish, reptiles and amphibians, lepidoptera, and flora). The Applicant would perform additional pre-construction biological surveys, including wetland delineations. These surveys will serve to identify sensitive habitats and inform the siting of the final ROW within the proposed corridor.</p> <p>Section 7 consultation with FWS would be conducted to determine whether the Project may affect federally listed species or their critical habitat. The outcome of the consultation will ensure that the Project does not jeopardize the continued existence of a federally listed species.</p>
P-086	P-086-001	Individual; Public Meeting Comment	John	Brubaker	There are about 2,500 species of plants that are found along the coastal plain. It's considered that more than 20 percent of those are in danger of going extinct. Of that number fully 50 percent are totally dependent upon the Francis Marion National Forest for their future. I support all the comments with regard to the Santee Delta. There is nothing that should happen to that, but I don't see how you are now settling on consuming the route that consumes the most acreage within the Francis Marion National Forest. That is all we have left of the coastal plain longleaf pine ecosystem that is secure. It has been	Opposed to the Belle Isle Corridor and Charity Corridor, Endangered species	Biology	<p>Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002).</p> <p>Section 1.2 describes the purpose and need for the Project, and section 1.2.2 explains the power reliability issues that residents experience in the McClellanville area. The Applicant would comply with</p>

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					mentioned already that why do we need 115 kv of energy? The only explanation that I have been able to get from authorities with regard to that is that's what it takes to be cost effective to improve the power, the electrical power available in McClellanville to serve the residents that are there. The idea that this is for the residents of the area rings hollow. We have had electricity since basically 1890. Certainly, we have the wherewithal to serve the people in this area without destroying a huge swath of the Francis Marion National Forest.			the FMNF Land Management Plan standards and guidelines on national forest lands, which include measures to avoid and minimize impacts to the federally listed and state-listed species, and FMNF species of conservation concern.
P-087	P-087-001	Individual; Public Meeting Comment	Katherine	Pemberton	<p>I am with the Historic Charleston Foundation. The Foundation will submit a formal letter of opposition for this process, but for tonight we wanted to add our voice to the sort of overwhelming opposition that you've heard tonight from residents and folks concerned about this proposed transmission project. Of particular concern to us are impacts to all of the routes for historical and cultural resources across the Santee Delta, the Francis Marion National Forest, the Santee Coastal Reserve. All of these places that are within your map fall into the Gullah-Geechee Heritage Corridor, which is a national designation, very important to African-American history up and down the East Coast, obviously the Francis Marion, the Santee Delta.</p> <p>The visual character of all of these districts is really important as well as individual impacts to particular cultural and national resources, so taken as a whole we feel that a lot of these transmission lines will have a very negative impact to the visual character of these districts. We remain opposed and concerned with Belle Isle corridors, both routes. We know that in the draft EIS and the supplemental draft EIS there has been discussion of some cultural resources that will be impacted. We have particular familiarity with plantations that have been mentioned as well as Peach Tree ruin settlements, African-American settlements, the Kings Highway. These are all resources that we know about that have been touched on in the EIS; however, we don't really feel that the project has had the detailed physical survey that's needed to address impacts.</p> <p>We also would urge this process to investigate other energy alternatives, but to really conduct much more an in-depth cultural and historical survey before any decisions of routes are made.</p>	Cultural resources; Visual resources; Alternative energy	Cultural resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-001). The cultural resources section of the EIS relies on survey efforts that aren't fully publicly available, and additional info about sites shared through the public comment process. Prior to Project construction, a cultural resource survey would be conducted within the ROW for archaeology and the area of potential effects for aboveground resources, and mitigation measures would be developed, where required, as identified in a Programmatic Agreement with the South Carolina State Historic Preservation Office.
P-088	P-088-001	Individual; Public Meeting Comment	Howell	Morrison	I am here as co-chair of the St. James Santee Brick Church on Kings Highway, Old Georgetown Road along with my co-chair, George Geer, who may speak. It's hard to add anything to the unanimous opinions that have been voiced here today, all of which we agree with. On behalf of the church, however, I would like to simply say that this is an architectural and cultural and religious resource that is probably	Cultural resources	Cultural resources	Section 3.6 identifies known cultural and paleontological resources crossed by the proposed alternatives. Cultural resources would continue to be identified as consultation under Section 106 of the

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					<p>unmatched anywhere in coastal South Carolina. It is astounding to me and breathtaking frankly that any electric cooperative outfit would even bring to the public a suggestion of crossing the Santee Delta and some of these other areas that are being discussed with a project like this.</p> <p>However, on behalf of the church I would like to at least make the point that the preservation committee of which I am a member now has labored for over 30 years to bring that church back from the threat of vandalism and ruin to a position now where it is in the finest condition it has been in since it was built. Kings Highway in that area from 45 up through Germantown Road is one of the most beautiful roads you will ever go on anywhere. We would consider it immoral and a human outrage to put a piece of construction like this anywhere that infringed on any property of that nature and, of course, anywhere on the Santee Delta.</p>			NHPA and through preparation of a Programmatic Agreement.
P-089	P-089-001	Individual; Public Meeting Comment	Ted	Rosengarten	<p>I'm here speaking both as a 40-year plus member of the Berkeley County Electric Cooperative, but also as a member of the Santee Preservation Society. I want to say the Santee Preservation Society has kind of a long history in attempting to protect areas in and around the Santee Delta. In 1980 or so we Conservation League in opposing any solution to the kind of electrical needs of the area that includes stringing new power lines across the Santee Delta.</p> <p>The Santee Delta is at the heart of the Gullah-Geechee Cultural Heritage Corridor, which is a federal national heritage area in the United States. It's supposed to be administered as a national heritage area in partnership between the National Park Service and local government and cultural authorities. The last thing these historic communities need are towering transmission lines bisecting the communities, destroying property values, violating the connectiveness of families and neighbors.</p> <p>To go on to build electric capacity for communities that don't yet exist at the cost of bisecting and raking through historic communities that do exist is immoral and contradicts the spirit of the cooperative. We're building for people who aren't here. There are much better solutions, and we wonder why they haven't been pursued. These include using existing rights of way including using even solar power. We talked about this. Ten years ago, people would have laughed at us, but Santee Cooper just announced that they're going to be taking off coal-powered plants and including solar power into a new kind of menu of options for electrical supply. Why doesn't Berkeley Co-op do the same?</p>	Cultural resources, alternative energy	Cultural resources	<p>Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-001). Section 1.2 describes the purpose and need for the Project, and explains the power reliability issues that residents experience in the McClellanville area. Section 2.2.1 describes the development of alternative technologies, which has included the consideration of onsite renewables and batteries (i.e., industrial solar and battery combination).</p>

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P-090	P-090-001	Individual; Public Meeting Comment	Herbert	Butler	<p>I had heard about it a while back, and then when it came back, I was outraged to see that they were still talking about something that would destroy such a historical area as the Santee delta. I'll go to the historical importance of some of the properties, Peachtree, Hopsewee, The Oaks Plantation over across on the North Santee river.</p> <p>I'm glad I came because I looked on the chart over here, and it's going to run right across next to Commander Island from Hampton, across both rivers about three miles onto The Oaks, in my mother's front yard, across her rice fields, and across Powell Road, the Mt. Zion community. I just don't know how that could still be on the table. So I appreciate your time, and we won't let that happen.</p>	Cultural resources	Cultural resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-001).
P-091	P-091-001	Individual; Public Meeting Comment	Bernadette	Humphrey	We have enough power. What we don't have is the alternative power. I said this before and I'll say it again. It needs to be on every municipality, every school, every fire department. Then you don't need as much power as you think you do, and if you had power stations like Frank is doing out at Hopsewee, that would help, too. You're not looking at that. Why? You can't make enough money on that I do think the bigger plan is for more growth, and we are against that in case you haven't gotten that. I could go on and on, but I won't because I'm too riled up about this. The answer is no.	Alternative energy	General Recommendation	Section 1.2 describes the purpose and need for the Project, and section 1.2.2 explains the power reliability issues that residents experience in the McClellanville area.
P-092	P-092-001	Individual; Public Meeting Comment	Michael	Prevost	I particularly commend you for deleting or dropping, no longer considering four of the so-called Belle Isle alternatives -- thank you for that -- as well as considering other alternatives that may be compatible, may be. The Santee Delta and the Bulls Bay, Cape Romain National Wildlife Refuge, Francis Marion National Forest is arguably one of the most outstanding landscapes not only in South Carolina, but certainly the East Coast and in terms of coastal ecosystems outstanding in the United States of America. Of particular concern in terms of resource values are forested wetlands, estuary wetlands, longleaf pine ecosystem, and the extraordinary cultural resources, some of which have been listed this evening. I will say in closing I personally strongly object to the two remaining Belle Isle alternatives and look forward to submitting detailed comments to RUS.	Opposed to all corridors, especially the Belle Isle Corridor; Biological resources	Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002). Section 2.5 describes the measures or best management practices that would be implemented for stormwater management, which would be required by state and federal permits. The Applicant would also obtain a Special Use Permit from the USFS and would be required to comply with the FMNF Land Management Plan standards and guidelines on national forest lands. Section 2.5 details additional environmental mitigation for potential Project impacts.
P-093	P-093-001	Individual; Public Meeting Comment	Grace	Gasper	I'm executive director of Friends of Coastal South Carolina. We are the friends group to Waccamaw, Cape Romain, and ACE Basin National Wildlife Refuges and the Francis Marion National Forest. On behalf of Friends of Coastal South Carolina I would like to say that we absolutely recognize the need for all of our coastal communities to have safe and clean and reliable energy sources. We are very concerned about the impact of running miles and miles and miles of	Energy reliability; Alternative energy (localized power generation)	Biology	Section 1.2.2 describes the susceptibility of the current system to storm events. While a new transmission line would also be exposed to tree fall or flooding during storms, or wildfire, it would provide a second, more reliable source of electricity. Furthermore, the proposed Jamestown

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					<p>line not only on our national resources, the Santee Delta and through the Francis Marion National Forest, but I'm also very concerned about how that impacts reliability of power distribution. We're in an area of the coast that is becoming more and more vulnerable to stronger and stronger hurricanes, and one of the things that the on-the-ground line crew said after Hurricane Matthew is that the hardest thing they had to restoring power was accessing lines that were in flooded wooded areas where trees were down, and it seems as though running miles and miles of line, especially if these will at some point serve larger population areas does not seem like a reliable way to provide energy, and we hope that more localized options for clean energy will be considered</p> <p>We're very concerned certainly about the ecological impacts, but also about the reliability of a plan like this and the fact that it may very well in a catastrophic storm leave millions of people without power for long, long periods of time or at least hundreds of thousands, but we hope that other alternatives of clean energy and more localized supplies will be considered, and we look forward to submitting written comments.</p>			and Charity alternatives are more inland than the existing distribution line from Awendaw and as such, are less exposed to the risk of damage from tropical storms or hurricanes.
P-094	P-094-001	Individual; Public Meeting Comment	Miriam	Green	I'm the mayor of the Town of Awendaw. After this meeting I hope that we could develop a plan in some kind of way because the electric supplier -- I'm on Dominion Energy now, and we were off for six days, and to me that is just not good for the elderly population. So let us get together and form or become a part of the coastal friends, some foundation that you have. Let us all get together and sit around a table we can meet right here -- and let's voice our opinion because if we don't, they will.	Energy Supplier; Project need	General recommendation	Comment noted.
P-095	P-095-001	Individual; Public Meeting Comment	Thomas	Colleton	<p>You can put it underground. There are other ways of doing this. That's what I'm trying to say. There are other ways, so just let's get off of this money thing and do it in a better way where it will not impact the environment and it will provide better power. My power was down for three days because a tree fell on the wire, a tree, three days without power. My daughter in Charleston didn't lose power because most of their power is underground. So come in. There are better ways to do this. Spend the money. Do it in a more economical way than to make people suffer because we do need better power. This school needs a better source of power because we get brown-outs all the time, so we need a better source of energy in this area, but I think there are other ways we can do it. Spend the money.</p> <p>It's all about the money. It's all about the money. So if it costs 10 billion dollars more to run it in a better route where it doesn't have the environmental impact, then spend the money. GM is going</p>	Opposed to the Charity Corridor; Endangered species; Alternative energy supply; Underground lines	General recommendation	As the commenter suggests, the Applicant has proposed the Project to improve the reliability of its electric service to its customers and costs are certainly a factor that they must consider. Section 2.2.2.3 explains why an underground crossing of the North and South Santee River (for the Belle Isle corridor) was dismissed from analysis. While it is not an impossible solution, the costs involved and the potential long-term outage exposure when compared to more reliable, industry standard solutions has eliminated it from the current discussion. However, based on input from the USFS, the proposed action may include horizontal directional drilling

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					<p>through the same crazy thing now. You're making the money, but you don't want to put the money back to the people. Berkeley is making money. I see the report every year. I get the little check at the end of the year. They're not supposed to be making a profit, so spend the money to make power better for the community.</p> <p>I understand the high tension line because I am an electrician. You can transmit 15 hundred thousand volts in a little wire, but if you try to transmit that same amount of energy, then you need bigger wire, so you bring it in at a higher tension, and then you transform it down at a substation. I understand all that. You talked about coming from Charity, but that's the woodpecker. The woodpecker has more impact than human beings. God will provide for the woodpecker.</p>			(HDD) to bury the transmission line in places where it may be required by FMNF for a Special Use Permit. This could include the Wambaw Creek crossing and at Carolina Bays and other wetlands along Halfway Creek Road between Honey Hill and Shulerville Road.
P-096	P-096-001	Individual; Public Meeting Comment	Harriott	Leland	<p>As an independent researcher and historian as well as a lover of nature and a protector as I can be of the wild, the Delta and the Francis Marion National Forest contain a lot of known and unknown resources both Native American, black, and white American, but probably even more unknown and buried resources and remains that we don't know about. I protest greatly that those areas would be disturbed. They're sacred ground, as somebody said earlier.</p> <p>I would also like to encourage the use of alternative sources of energy, not power wires and stuff going overhead, but put solar, do other things that we can do here, and that should be used instead of the wires going across the Delta. I can't read anything else I wrote, but I think everybody else covered it, so thank you very much.</p>	Cultural resources; Alternative energy supply	Cultural resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 2.2.1 describes the evaluation of alternative technologies, including solar and battery storage solutions.
P-097	P-097-001	Individual; Public Meeting Comment	Clarissa	Brown	I asked that same question to a gentleman the other day when we had a meeting at the electrical place last week about putting the power lines down in the ground, the same thing that Mr. Carlson just talked about, and he was saying that there wouldn't be a way that you could do it because the power lines would get shorted out from the water. I thought that if you put the power lines down in the ground, that you could tube it. You know, you put those wires in a tube, and then they wouldn't get shorted out.	Alternative Project; Underground lines	General Recommendation	See response above to comment number P-095.
P-098	P-098-001	Individual; Public Meeting Comment	John	McClellan	<p>The physical power line, the first -- one of the first things you showed, the physical structure, would it be a single line or a double line? Pole? Would it be two poles or one pole?</p> <p>Will this be in addition to what we already -- because this thing is going to be running right by my house if it's where it's supposed to be now, which I think if it's going to McClellanville, it will stay in Charleston County. Will the existing lines still be there and -- with this, or will this take place of the existing line, and will our power feed off of this now instead of what we have?</p>	General questions re: line design	General questions	Section 2.4.10 describes the Project structures, which would be single pole structures, typically 70 to 80 feet above ground and spaced 300 to 400 feet apart. Section 1.2 discusses the purpose and need of the proposed action and section 1.2.2 explains the power reliability issues that residents experience in the McClellanville area, and describes that the Project would provide a power source to a

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								new McClellanville Substation, where Berkeley Electric would be able to separate the existing distribution line into three circuits to serve the customers in the McClellanville area. This would reduce the number of customers affected by an outage and bring the frequency and duration of outages more in line with other circuits on Berkeley Electric's system.
P-099	P-099-001	Individual; Public Meeting Comment	Edwardine	Morris	<p>I wanted to ask about these lines. They are huge. They're so tall and ugly. And I know that they can emit radiation or whatever from them. How close to them -- if your house is close, I mean, could you get cancer from it? I don't like this meeting. The fact that we can't have any of our questions answered, that's just -- to me that's crazy.</p> <p>The maps also show it's coming through Schulerville. That's where I live. And it shows actually one of the proposed sites. And it doesn't show what the different little roads are. I'll have to check that out because I think one of them is very close to my land. I would not want this in my neighborhood. If it's not going to benefit us -- also, is our bills going to go up? These lines have to cost -- I saw the prices and stuff, and it's a fortune. And so are we going to be -- our bills are going to go up because we're going to help McClellanville? If it's not going to benefit us, why do we have to have them running through our farms and stuff?</p>	General questions; Opposed to all corridors; EMF; Economic impacts to Berkeley Electric customers	General questions	Section 2.4.10 describes the Project structures. Section 1.2 discusses the purpose and need of the Project. Section 3.12 addresses concerns over electric and magnetic fields and other health and safety concerns.
P-100	P-100-001	Individual; Public Meeting Comment	Donna	Shuler-Rodin	<p>If this is going to benefit McClellanville, it should really go through Charleston County. The shortest route is, of course, across the Santee Delta, which no one wants that to happen either. But it is not going to be a very attractive thing. I don't know what the right-of-way is for this property -- I mean, for this process. But I do know and I have to agree with several things. It should run along existing right-of-ways that have already been set aside for that pipeline and other power lines and things like that. Let's not destroy something else to build a new power line.</p> <p>Also the fact that there was an article in the paper a couple of weeks ago that said that that when you-all-- generating station is going to be phased out. And from what I can understand, that's where this power is coming from. I'm not an engineer, but it seems to me like someone is not thinking real far down the line. And with all the alternative sources of power, some other things ought to be considered. Those are just my comments. Thank you. One more thing I forgot. Also, I just want just say that I also think that the least amount of private</p>	Support for using existing ROWs; Alternative energy supply	General recommendation	Section 3.3.2.2, and summarized in Table 3.3-8 provides an analysis of the length of the proposed corridors parallel to other transmission lines, roads, and/or pipelines. Text has been added to Section 2.3.2 and 2.3.3 to describes that the Winyah Generating Station is the energy source of the proposed corridors. Santee Cooper plans to close the coal-fired plant at Winyah by 2029. When it closes, the jointly operated Central-Santee Cooper system will lose 1,150 MW of electric generation capacity. Even with a reduced reliance on Santee Cooper, Central expects to receive more than half of its wholesale power supply from Santee Cooper and plans to achieve adequate reserves with the addition of new capacity

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					property that's impacted the better for this. I know all those may be conflicting ideas, but all of those should be considered.			via purchases from existing power plants; aggregated consumer-level resources such as voluntary programs that help consumers limit their peak power needs; large-scale initiatives such as battery installations; and the pursuit of power from any new generators that might be built in the state.
P-101	P-101-001	Individual; Public Meeting Comment	Pat	McClellan	I know that you can't answer questions. We have not seen this document. We're looking at the maps. But it's difficult for me, personally, to follow what the maps are showing exactly. We don't understand exactly where these transmission lines are going to run as far as Highway 45 or, as Edwardine Morris said, Schulerville Road or any of those other roads. I mean, you've got lines drawn on the map, but are those lines going to be immediately adjacent to Highway 45 or what? It's hard to tell, for me, from the maps.	General question about corridor/line routing process	General question	Sections 2.3.2 and 2.3.3.1 describe transmission paths near Highway 45. As the corridor alignment becomes finalized, adjustments to the ROW would be made based on constructability and impact avoidance within the proposed corridors depicted on the figures in the EIS.
P-102	P-102-001	Individual; Public Meeting Comment	David	Shuler	I personally think this is a joke. You can't answer questions. We've got a lot of questions. We need to know what the answers are going to be. Are we going to use the same substation that this one is in, or are we building another substation? Why are we running lines all the way to McClellanville, but if you come off the Charity line, going on, you got the new administrative building substation there and go both ways with the wire instead of going all way to McClellanville wasting all that cable and poles going out to McClellanville. It's a joke. This whole meeting is a joke.	General question	General recommendation	Section 2.4.12 describes a new McClellanville Substation, proposed to be located on a 16.87-acre parcel near the intersection of U.S. Highway 17 and State Highway 45. The EIS has been revised globally to ensure that this substation is referred to as a “new” or “proposed.”
P-103	P-103-001	Individual; Public Meeting Comment	Shawn	Shuler	And I'm here to tell you this is the preferred route. All that other stuff is just eye candy. And all of those maps is just eye candy. The Jamestown route is the preferred route. That's what they want. The State of South Carolina -- some of the agencies with the State and several private organizations told them either back in either 2010 or '14, bail out or you can forget it. It's not coming across that Delta. They said, no way no how is it coming across that Delta. But this is the preferred route. So whatever else is back there, don't even waste your time looking at it. And you've got a fight on your hands. And the only way to fight it -- I'm telling you, you've got to fight fire with fire and go to the meetings and do what you've got to do.	General statement on Jamestown Corridor	General recommendation	Comment noted.
P-104	P-104-001	Individual; Public Meeting Comment	Ashton	Lamb	So will this be early 2020 of the notice of availability of the final EIS? And from that process, how will that decision be made upon the final EIS be completed?	General question	General question	Comment noted.
P-105	P-105-001	Individual; Public Meeting Comment	Lisa	Safford	I just much prefer the Jamestown or the Charity options. I feel like the Santee Delta is sacred. It's a preserved area. And I don't feel like anybody should trample through that area. It's very pristine. There's	Support the Jamestown and Charity Corridors	Cultural resources	Alternatives crossing the Santee Delta have been eliminated from further

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					a lot of historic relevance and things in that area. And so I just feel like the -- I've studied the maps, and the other two new alternatives use public right-of-ways that are already in existence. There may not be public right-of-ways, but there are right-of-ways in that corridor that already exist for a transmission line. Maybe not of this caliber. So it's less intrusive to the entire area to use something that's already established. You know, the Belle Hall ones, like I said, they trampled it and it had a pristine area.			consideration in the final EIS (see response above to comment number P-002).
P-106	P-106-001	Business (non-profit)	Berkeley Electric Cooperative		We fully support the government led, environmental process, that is aimed at determining a preferred corridor for the proposed transmission line. However, we're troubled a how long it has taken, as the reliability of service in the project area has only gotten worse. Now, as of 2016, we are required to switch load at peak load periods. We are well aware of other possibilities to provide service to this area, and are engaged in those developments. However, we don't believe that they would cure the reliability problem and hope there is an acceptable transmission solution.	Support the public process; Recognize this process of new line solves the reliability issue	reliability	Comment noted.
P-107	P-107-001	Applicant	Central Electric		Central Electric would like to footnote that the Belle Isle B and C corridors do cross significant public lands owned by the State of South Carolina and bodies of water under jurisdiction of the USACE in the Santee Delta area. Central Electric also would like to correct the acreage calculation for the Charity corridor. It should be 196.4 acres of impact. The table 1-2a should be revised to reflect these numbers or an additional table should be added to take all State-owned and bodies of water under jurisdiction of the USACE.	Add text and update Charity corridor impact acreages	Section 2	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002). We have revised all tables describing impacts to National Forest System lands based on updated boundary data from the FMNF.
P-108	P-107-002	Applicant	Central Electric		Section 2.1 (pg. 2-1, para. 2) Berkeley Electric must provide reliable electric service and power quality to its customers <i>as equitably as practical.</i>	Additional, modifying text	Section 2	Text in section 1.2.1 has been edited as suggested.
P-109	P-107-003	Applicant	Central Electric		Section 2.2 (pg. 2-3, para. 1, sentence 4) Expanding on the current language in the SDEIS, the Dominion line that currently serves the McClellanville area is susceptible to reliability issues due to it being built on wood poles and located primarily to the east of Highway 17 and moves between road corridors and off-road ROW corridors parallel to the Intracoastal Waterway just inland from the coastal barrier islands and the Atlantic Ocean.	recommended text	Section 2	The text in section 1.2.2 has been revised as suggested to describe the reliability issues with power supply in the Project area.
P-110	P-107-004	Applicant	Central Electric		Section 2.3 Winter Weather Operating Agreement (pg. 2-7) The Winter Weather Operating Agreement ("WWOA") recognizes the limitations of supplying all electricity required during peak conditions. Central Electric believes it is more appropriate to recognize that the WWOA documents a current limitation in the existing Dominion Energy distribution source to serve all of the electrical needs of the McClellanville area and sets forth a plan to avoid catastrophic failure of the Dominion Energy source. The WWOA provides Dominion Energy the comfort of knowing under peak conditions they can serve	Interpretation of the Winter Weather Agreement	Section 2	Text in Section 1.2.3 has been edited as suggested.

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					their retail customers and places operational constraints on Berkeley Electric to comparably serve their members. Bottom line, the WWOA provides Dominion Energy the ability to curtail electricity to the Berkeley Electric system due to system limitations which requires Berkeley Electric to expose more of their members to a greater risk of electric outages.			
P-111	P-107-005	Applicant	Central Electric		Section 3.2.1 - New generation at McClellanville Substation Site (pg. 3-2) It is Central Electric’s opinion that a solar/battery combination CANNOT simulate a baseload source. By definition, a “baseload source” means a source than can operate continuously to provide the amount of power required to meet maximum demands based on reasonable expectations of customer requirements within a generally defined service area. The source must be able to supply the capacity required at any moment in time and have the endurance to supply constant voltage and frequency regardless of the load it is designed to serve. In other words, in order to be a baseload source, it must be available the majority of the time, hence it is a baseload source as opposed to an intermediate, peaking or intermittent source.	Clarifying definition of baseload sources relative to solar power	Section 3	This is addressed in Section 2.2.1.1, which concludes that a solar/battery alternative is impractical.
P-112	P-107-006	Applicant	Central Electric		Section 3.3.3.2 Belle Isle No. 2 Corridor (Underground) (pg. 3-8) Although the Belle Isle No. 2 (Underground) corridor was not carried forward due to all of the reasons mentioned in Section 3.3.3.2, it is not an impossible option. The costs involved and the potential long-term outage exposure when compared to more reliable, industry standard solutions has eliminated it from the current discussion.	Belle Isle underground too expensive not impossible	Section 3	See response above to comment number P-095.
P-113	P-107-007	Applicant	Central Electric		Section 5.6 biological resources (pg. 5-35) Based on the extensive biological and environmental studies performed on all corridors, Central Electric is not aware of there being any “critical habitat” designated for any of the listed species. The term “Critical habitat” is being used as a “term of art” in the SDEIS, yet it has an actual legal definition: <i>It is specific geographic areas that contain features essential to the conservation of an endangered or threatened species and that may require special management and protection.</i> As such, in the SDEIS the term “Critical Habitat” should not be used unless critical habitat has been designated for a listed species.	Use of 'critical habitat' in the EIS needs to be reevaluated and defined or fixed	Biology	Section 3.3.1.2 describes designated critical habitat for the frosted flatwoods salamander in the Project vicinity (see 74 FR 6700); several aquatic species covered in the EIS have designated critical habitat within the Project vicinity, but well outside of the Project area. The term “critical habitat” is only used in the EIS when referencing to areas designated by USFWS or NMFS
P-114	P-107-008	Applicant	Central Electric		Section 5.6.2.2 Proposed Action (pg. 5-111) Based on the environmental reports, Central Electric believes there are many positive effects resulting from the habitat created within the new ROW in the FMNF and would make specific reference to following language taken from the “Overall Management Recommendations for ROW Expansion” found in the ROW Herpetology Habitat Survey conducted by Buhlmann Ecological Research and Consulting, LLC (BERC) in 2019. The canopy removal described would have minimal ground level impact because ROW clearing, and maintenance does not impact the root systems of any	Recommended reinterpretation of habitat impacts within the ROW	Biology	Section 3.3.2 describes that the Applicant’s proposed measures and the required permit conditions would lessen impacts to wetlands habitats. The text about impacts to Forested Wetland Associates, under <i>FMNF Species of Conservation Concern and State-Listed Species</i> , describes that the proposed action would cut a ROW through many currently closed-canopy hardwood swamp

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					low growing vegetation. This would minimize serious impacts to the soil and water conditions. Thus, once the canopy was cleared to provide passage for the electric line, ground disturbing activities are minimized as much as possible to allow natural growth to remain and provide for many ecological benefits. It is likely that the proposed Central Electric ROW through present closed canopy hardwood swamp forest and isolated wetlands may provide some openings for sunlight to reach the swamp floor.			forest and isolated wetlands, which would provide openings for sunlight to reach the swamp floor and could improve habitat for amphibians and reptiles, if done in a manner the minimizes the initial construction footprint (Buhlmann and Grosse 2018).
P-115	P-107-009	Applicant	Central Electric		<p>Section 5.6.2.2 Burning (pg. 5-114) The new transmission line would not impact the ability of USFS to use prescribed burning as a technique to manage the forest. In fact, given that the electric ROW will travel through low lying swamp forest, mowing with machinery is likely to be problematic logistically, as well as detrimental to the habitat. The use of frequent fire would maintain the vegetation under the electric ROW in low-lying grasses which is needed for the electric line safety, resulting in an overall increase in habitat quality and diversity for amphibians and reptiles in this section of the National Forest. With regards to prescribed burning, the transmission line can be seen as a plus for at least two reasons. First it will change the vegetation from woody to more grasses which is preferred by many species. This in turn will create more diversity within the transmission line corridor. There are thousands of acres of woody habitat and very little of the grass or savannah type habitat. Secondly this habitat type will make burning easier as the grasses provide the fine fuels needed for a prescribed burn.</p> <p>The transmission line can also serve as a firebreak if needed. Central Electric would not utilize burning in any manner to manage the ROW in either wetland or upland areas. Burning is not a technique utilized by the electric utility industry to manage ROW's.</p>	Clarifying that new transmission line would not impact USFS prescribed burns and may improve habitats with more grasses	Biology	Section 3.3.2 discusses that the construction of a new transmission line could reduce opportunities for conducting prescribed fire to benefit native ecosystems.
P-116	P-107-010	Applicant	Central Electric		<p>Section 5.6.1.2 T&E species, red-cockaded woodpecker (pgs 5-50 & 5-118) Although, based on the various proposed R/W locations, it is likely there will be some adverse impacts to specific RCW territories the impacts will not have a population-level effect. Even the permanent loss of some territories would not be significant given the current population is 180 PBGs over its stated USFWS goal. Furthermore, as indicated above by WI LLC, local adverse impacts can be minimized, mitigated or eliminated by using: (1) strategic ROW locations; e.g. "on the opposite side of the road" and (2) artificial cavities to replace the loss of natural cavities and/or "shift" a cluster away from the ROW.</p>	RCW impacts	Biology	Section 3.3.2 has been revised to incorporate more information about preliminary surveys of red-cockaded woodpeckers on National Forest System lands. The added text notes that any unavoidable impacts to red-cockaded woodpecker clusters could be minimized by the construction of artificial cavities. Also, the Applicant would follow any reasonable and prudent measures, and terms and conditions resulting from ESA Section 7 consultation to minimize impacts on federally listed species. In the case of the red-cockaded woodpecker, such measures may include but are not

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								limited to installation of artificial cavities, avoidance of construction in red-cockaded woodpecker clusters during the breeding season and establishment of recruitment clusters.
P-117	P-107-011	Applicant	Central Electric		Northern Long-eared Bat (pgs 5-56 & 5-122) It should be noted that 47 of the 58 (81%) Northern Long-Eared Bat (“NLEB”) roost trees identified were pines. Lamar Comalander, an accepted expert in the Timber industry, has noted the FMNF has an abundance (millions) of pines and the ROW clearing would result in the loss of a very small percentage of available suitable bat roost trees regardless of the alternative selected: given that the total forest acreage cleared depending on the alternative is only 119 to 256 acres. Based on this it is highly unlikely that NLEBs roosting habitat would be impacted by loss of pines from ROW clearing.	NLEB and pine tree roots and the fraction of pines converted to ROW compared to total potential pines for NLEB roosts in the forest	Biology	The impact analysis text for northern long-eared bats in Section 3.3.2 acknowledges that suitable roost trees could be removed, but the number is inconsequential relative to the large number of loblolly and longleaf pines available in the surrounding forests. Formal consultation with the USFWS will be performed for the northern long-eared bat and any non-discretionary reasonable and prudent measures and implementing terms and conditions would be followed to minimize potential take of northern long-eared bat incidental to Project construction and O&M.
P-118	P-107-012	Applicant	Central Electric		Section 7.0 Mitigation Measures and Other NEPA Considerations (pg. 7-1) Mitigation efforts should be minimal in regard to most species surveyed along the proposed transmission line corridors. In accordance with the reports that were developed by the experts retained by Ralph Costa and Milliken to survey these corridor impacts to the species observed will be minimal for most surveyed. Mitigation protocols if needed are fairly well established for most species and should be easily implemented.	Overall impacts are expected to be minimal for species surveyed and mitigation, if needed, is established for most species and easily implemented	Biology	Comment noted.
P-119	P-119-001	Individual	Michael	Prevost	Are numbers (acres) expressed in the SDEIS regarding land cover/habitat gross or net numbers with respect to ROW in the various alternatives?	Question on acres	General recommendation	The EIS has been revised to more clearly describe how the potential impacts to various resources have been quantified. Because the final alignment of the Project ROW is not determined, existing conditions and impacts are quantified within a “600-foot study corridor” (300 feet on either side of the centerline). This width is used because it is suitable for micro-siting the final transmission line alignment. For resources where direct impacts are quantifiable at a finer scale using GIS (water resources, biological resources, and land use), calculations are

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								also made within a preliminary 75-foot ROW. Seventy-five feet is the maximum ROW width for both construction and O&M although the final ROW width could be less in places where it overlaps with existing road and utility ROWs. Calculating impacts within both the corridor and ROW widths provides two spatial scales for analysis, even if the small-scale buffer (75-foot) does not represent the final ROW alignment. For other resources, wider buffers are more appropriate for analysis, such as 1,000 feet and 0.5 miles for environmental justice.
P-120	P-120-001	Individual (EPA letter addition)	Herbert	Shuler	I have no objections to the running of the 115kV line along the Tiger Corner Road, even though the line will pass through our property. The people served by BEC need to have reliable power with minimum number of interruptions. There will be no environmental harm caused by the opening of forest. It will give animals (deer) some ground area to feed, compared to the current forest deserts being maintained by the Forest Service	Route alternative	General recommendation; Biology	Comment noted.
G-001	G-001-001	USFWS	DOI		The project has not changed significantly since our review of the 2014 Draft EIS. Therefore, we find that our previous comments and concerns should remain valid and request that they be considered by the U.S. Department of Agriculture as our official response for the latest Supplemental Draft EIS. The Service is concerned with the potential effects of migratory bird collisions. Service encourages RUS to re-examine 22-mile transmission route, which originates at Hamlin Substation in Mt. Pleasant and is presently owned and operated by SCE&G. The line is currently in use and serves the McClellanville area. SCE&G should evaluate upgrades to this line as a means to satisfy the project's purpose and need. Analysis should be conducted to evaluate the possibility of using directional boring under the Santee River Delta as a potential route.	Bird collisions; Hamlin Route, directional drill under delta	General recommendation	Section 2.2.2 discusses the siting studies and alternative locations proposed prior to and during the development of the EIS. It describes that upgrading the existing distribution line serving the McClellanville area, originating from the Hamlin Substation, would locate both lines in the same corridor and expose both lines to a common outage. The location of the proposed McClellanville Substation is at the geographic center of the load for the existing 40-mile circuit. Also, although the Belle Isle corridors have been eliminated from further consideration in the final EIS and crossing the Santee River is no longer analyzed, horizontal directional drilling is being considered to bury the transmission line in places where it may be required by FMNF for a Special Use Permit (see response above to comment number P-095).

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G-002	G-002-001	EPA			The SDEIS does not identify a preferred alternative. EPA has concerns regarding potential ecological impacts as all the alternatives cross the Santee Delta, Wambaw Creek, or other first order head water streams that drain into these sensitive ecosystems.	crossing first order headwater streams	Ecological Impacts, Biology	The final EIS identifies the Jamestown corridor as the preferred alternative. Section 2.5 lists several measures that would be implemented to minimize impacts during construction at streams and wetland crossings. Additionally, the Applicant would also obtain Clean Water Act permits from the USACE and SCDHEC and would comply with all nationwide or regional conditions set forth by these permits.
G-003	G-002-002	EPA			EPA did not receive a cover sheet as required by 40 CFR 1502.11, EPA recommends that the final EIS include the information required by Section 1502.11 and 1506.10	Generate cover sheet	General recommendation	Comment noted.
G-004	G-002-003	EPA			According to SDEIS, the Jamestown Corridor would cross Management area 29, a federally designated wilderness area, and the other alternatives cross or have potential impacts to the Santee River Delta. EPA recommends that alternatives that have the greatest potential to indirectly impact T & E species be eliminated.	avoid wilderness, delta and indirect impacts to T&E species	T&E Species, Biology	Section 3.7.2 provides an analysis of the Project's potential impacts to wilderness. Section 3.3.2 analyzes the potential impacts to threatened and endangered species, where possible, due to available data on national forest lands.
G-005	G-002-004	EPA			EPA notes that the proposed action is in an area that is subject to catastrophic weather events, which requires a greater emphasis on the hydrological impacts associated with storm water run-off, water quality, soil erosion, and flood routing on the lower elevations and downstream users. EPA recommends reviewing the environmental tools (NPDES general permit, Enviromapper, TMDL, Watershed Vulnerability Assessment Tool) to assist in the selection of the preferred alternative and incorporate information regarding efforts to reduce water resource impacts associated with catastrophic weather events.	Ensure the project doesn't impact floodwaters during large storms	Water Resources	Comment noted. These recommendations are incorporated into the analysis in Section 3.2.2.
G-006	G-002-005	EPA			EPA recommends reviewing the tools (HUD tribal locator and NEPA assist) to identify any other federally recognized tribes in the project area and provide letters of interest with tribe's response in final EIS.	tribal consultation	Cultural (tribal) consultation	Section 1.6 summarizes tribal outreach and correspondence.
G-007	G-007-001	SCDNR			Throughout the review process, the DNR has maintained a consistent position that any overhead high-voltage transmission line adjacent to US 17 across the Santee River Delta would cause unacceptable impacts to wetlands, sensitive species, intensively managed habitats, endangered species, migratory birds and result in avoidable viewshed impacts to a historic corridor. Despite efforts to emphasize the importance of the Santee Delta and to highlight the potential adverse impacts resulting from new transmission line construction through this sensitive area, alternatives that cross the Santee River Delta (Belle Isle) are still being considered for review in the SDEIS. The SDEIS fails to identify a preferred alternative.	Opposed to the Belle Isle Corridor; Avoiding and minimizing impacts to the FMNF	General recommendation, Biology	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002). The final EIS identifies the Jamestown corridor as the preferred alternative. The Jamestown and Charity alternatives were evaluated largely in response to the public opposition to the Belle Isle corridors.

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					The DNR has and will continue to recommend that the EIS for this project fully consider alternatives that minimize or eliminate potential impacts to the Francis Marion National Forest, properties titled to the citizens of South Carolina through DNR, private land conservation easement properties, sensitive species/habitats, and cultural and historic resources.			
G-008	G-007-002	SCDNR			A very important wetland type (managed wetlands) has not been described and/or quantified in the SDEIS. The Santee River Delta contains thousands of acres of managed wetlands in the form of tidal impoundments, owned and managed by the state and federal agencies and private landowners. Intact and functional managed wetlands have substantial ecological significance, providing important habitat for migratory birds.	Need to describe 'managed wetland' in the final EIS	Wetlands, Biology	The wetland habitat categorization of the National Wetland Inventory was used in Section 3.2.1 for the sake of comparing impacts among alternatives. Managed wetlands are therefore not discussed as a separate wetland type and would only apply to the Belle Isle corridors, which have been eliminated from further consideration.
G-009	G-007-003	SCDNR			The significance of the project area to a number of avian species and management plans is not well represented in the SDEIS, including large assemblages of wading birds that roost in forested habitats on the Santee River Delta in close proximity to US Highway 17, swallow-tailed kites nesting in the FMNF that use the Santee River Delta as foraging habitat, many thousands of migratory and local waterfowl including Atlantic flyway and dabbling ducks, important shorebird and seabird species, wood storks, bald eagles, and red-cockaded woodpecker.	Weak on avian descriptions/impacts	T&E Species, Biology	Comment noted.
G-010	G-007-004	SCDNR			Project area is also significant to the northern long-eared bat.	Weak on impacts	T&E Species	Section 3.3.1 details the findings from an initial species assessment of bats, focused on the northern long-eared bat, that was conducted along the proposed Jamestown and Charity corridors (Ecological Solutions, Inc. 2017a; Ecological Engineering, LLP 2018a), which demonstrate the Project area to be occupied habitat for the species.
G-010	G-007-005	SCDNR			The SDEIS includes evaluation of two new alternatives not previously considered in the 2014 DEIS (Jamestown and Charity). The analysis and comparison of the three alternatives considered is general in nature and not sufficiently comprehensive to compare the full range of effects.	Lacks a preferred alternative and detailed analysis	General comment	The EIS provides an analysis of potential impacts based on available public datasets and preliminary surveys of each proposed corridor. The Applicant would perform pre-construction biological surveys, including wetland delineations and surveys for special-status species. These surveys would serve to identify sensitive habitats and inform the siting of the final

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								ROW within the proposed corridor. The EIS has identified a preferred alternative.
G-011	G-011-001	SC SHPO			Given the length of time that has elapsed as RUS has studied various project corridors, substantial changes in the proposed action, the presence of significant historic properties (including buildings, structures, archaeological sites, historic districts, landscapes, objects, and Traditional Cultural Properties), and ongoing substantial public interest in the McClellanville Transmission Line, the SHPO recommends that RUS re initiate the Section 106 consultation process.	SHPO recommends reinitiating 106 process	cultural 106 process	RUS reinitiated the Section 106 Process in fall of 2021 and has drafted a Programmatic Agreement, included as Appendix I.
G-012	G-012-002	SC SHPO			Page 1-3: States biologists and archaeologists finalized fieldwork during summer 2018 to develop the SDEIS. The SHPO has not reviewed any reports of this fieldwork. Please provide any such information to the SHPO and consulting parties for review, and include in the final Supplemental EIS.	SHPO requests review of the final reports	cultural report reviews	A draft Programmatic Agreement, included as Appendix I.
G-013	G-012-003	SC SHPO			Page 5-185: RUS continues to propose a phased approach to identify historic properties and assess affects, and proposes to formalize procedures for identification, evaluation, assessment of effects and mitigation through a Programmatic Agreement. We are concerned that the phased historic property identification approach does not provide RUS with sufficient information to compare alternatives. Given the sensitivity of the proposed project corridors, the SHPO urges RUS and Central Electric to carefully consider the known historic properties and/or cultural resources that are present in each corridor, the likelihood of additional historic properties and/or cultural resources being identified in each corridor, and the potential levels of mitigation needed to resolve adverse effects when selecting a preferred 600-foot corridor if RUS elects to fund the project.	Need better understanding of historic properties within each corridor to make complete analysis	Historic properties, Cultural resources	A draft Programmatic Agreement, included as Appendix I.
G-014	G-012-004	SC SHPO			Page 5-185: Appendix E in the current SDEIS is "Priority Animal Species and Habitat Associations in the Coastal Plain Ecoregion of South Carolina" not the draft Programmatic Agreement. Please provide the current draft of the Programmatic Agreement	Appendix is labeled Programmatic Agreement but it is not included	Programmatic agreement	Comment noted. The draft Programmatic Agreement is included as Appendix I.
G-015	G-012-005	SC SHPO			Page 5-186: The direct APE is described as the 75-foot-wide ROW location that Central Electric would select. The SHPO recommends that any additional areas that are needed for construction of the transmission lines, such as materials and equipment staging and vehicle and machinery access should be included in the direct APE. (Page 5-207 notes pole locations, substation modifications, pull sites, access roads, and lay-down yards have the potential to affect cultural resources.)	APE needs to include all areas of project construction not just the ROW	Cultural APE	Comment noted.

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G-016	G-012-006	SC SHPO			Page 5-186: The indirect APE is proposed as a 0.5 mile-wide buffer from the transmission structures, based on the Federal Communications Commission’s 2004 Nationwide Programmatic Agreement. The SHPO agrees that the indirect APE will need further refinement, and will likely need be expanded to address visual effects, particularly in open areas lacking vegetative screening such as the Santee Delta.	Indirect APE will need further refinement	Cultural APE	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
G-017	G-012-007	SC SHPO			Section 5.9: Clarify that all future identification efforts will meet the South Carolina Standards and Guidelines for Archaeological Investigations and the Survey Manual South Carolina Statewide Survey of Historic Properties.	Recommendation to follow SC methods	Cultural Recommendation	Edited as suggested
G-018	G-012-008	SC SHPO			Section 5.9.1.6: The Historic Background needs to be expanded to include more thorough discussion of the history and significance of the Santee Delta, as well as the histories of specific historic resources and communities.	Historic background needs additional information around the Delta	Cultural Recommendation	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
G-019	G-012-009	SC SHPO			Page 5-199: In the second paragraph, revise the reference the SC Standards and Guidelines to reflect the current (2013) edition.	Update text with current guideline	Cultural Recommendation	Revised citation.
G-020	G-012-010	SC SHPO			Pages 5-201, 5-206, 5-210: Throughout the SDEIS update to reflect that the Old Georgetown Road is listed in the National Register of Historic Places. Please use current SC ArchSite Subscriber level, as the information is frequently updated, reflecting both newly identified sites, as well changes in status	Update text that Old Georgetown Road is listed on NRHP	Cultural Recommendation	Text about the Old Georgetown Road has been revised.
G-021	G-012-011	SC SHPO			Figures 5-28, 5-29, and 5-30: Please double check the properties included on the maps. It is not clear why some historic resources were noted and labelled on maps and others were not. For example on Figure 5-28 the Old Georgetown Road, the Proposed Addition to the Georgetown County Rice Culture Nomination, and Hobcaw Barony were not included. At least two eligible properties appear to be indicated by symbols, but not labelled (likely Battery Warren and Santee Gun Club Lodge.) Tibwin Plantation is not labelled on Figure 5-29, although nearby Laurel Hill is. Likewise the Old Georgetown Road is not included on Figure 5-29. The maps could also be more useful if the 300 foot area (page 5-198) on either side of the proposed corridor centerline, was labelled as the “Study Area.”	Update cultural figures	Cultural Recommendation	Maps have been revised to reflect an updated analysis of cultural resources.
G-022	G-012-012	SC SHPO			Table 5-28. Why does the table include a “Grand Total?” Clarify that this table includes only known resources / properties. Clarify that “Archaeological Sites” only includes those that are eligible or unevaluated or require further testing.	Update table	Cultural Recommendation	The numbers of cultural sites have been updated based on a more thorough review of USFS records.
G-023	G-012-013	SC SHPO			Page 5-205: Please add the SCDOT survey from 2018 for the “Rehabilitation of Bridges US 17 over North and South Santee”.	Add reference	Cultural Recommendation	Comment noted.
G-024	G-024-001	NMFS			As was the case with the 2014 EIS, the 2019 SDEIS has failed to describe or evaluate the potential environmental impacts of the proposed project on EFH and federally managed fishery species. The	Need to evaluate Essential Fish Habitat (reference	Aquatic Resources / Fish (EFH)	The EIS identifies the preferred alternative as the Jamestown corridor and alternatives crossing the Santee Delta

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					SDEIS does not include the EFH Assessment required by the Magnuson-Stevens Act. The NMFS notes that in our letter dated July 3, 2014, the descriptions provided of these requirements remain relevant. The NMFS recommends the USDA refer back to the 2014 NMFS letter to review this detailed information.	to 2014 comment letter)		have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
G-025	G-024-002	NMFS			The Belle Isle corridor study area, in addition to being designated EFH, provides habitat for two endangered species, shortnose sturgeon (<i>Acipenser brevirostrum</i>) and Atlantic sturgeon (<i>Acipenser oxyrinchus oxyrinchus</i>). This portion of the Santee River was designated Critical Habitat for Atlantic sturgeon under the Endangered Species Act (ESA) on August 17, 2017 (50 CFR § 226.225) because the habitat is essential for the species' recovery. Section 5.6.1.2 of the SDEIS failed to identify the presence of Atlantic sturgeon critical habitat in the study area and Section 5.6.2.2 of the SDEIS failed to assess potential impacts to critical habitat. Based on the general information provided, and local knowledge of NMFS staff, the NMFS concludes the Belle Isle corridor alternatives would adversely affect multiple types of EFH, and the Jamestown and Charity corridors may adversely affect tidal freshwater EFH. Section 305(b)(4)(A) of the Magnuson-Stevens Act requires NMFS to provide EFH conservation recommendations when an activity is expected to adversely impact EFH. The final EIS should include an EFH assessment examining impacts to EFH for all examined alternatives. The final EIS should incorporate avoidance and minimization strategies to reduce impacts to EFH from construction and maintenance activities. The final EIS should identify compensatory mitigation to offset all unavoidable impacts to EFH. In accordance with Section 305(b)(4)(B) of the Magnuson-Stevens Act and its implementing regulations at 50 CFR 600.920(k), USDA RUS is required to provide a written response to the EFH conservation recommendations within 30 days of receipt. The response must include a description of measures to be required to avoid, mitigate, or offset the adverse impacts of the proposed activity. If the response is inconsistent with the EFH conservation recommendations, USDA RUS must provide a substantive discussion justifying the reasons for not implementing the recommendations. If it is not possible to provide a substantive response within 30 days, USDA RUS should provide an interim response to NMFS, to be followed by the detailed response. The detailed response should be provided in a manner to ensure that it is received by NMFS at least ten days prior to final approval of the action.	Belle Isle alternative would adversely affect multiple types of EFH, and the Jamestown and Charity corridors may adversely affect tidal freshwater EFH	Aquatic Resources / Fish (EFH)	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).

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G-026	G-024-003	NMFS			In accordance with section 7 of the Endangered Species Act (ESA) of 1973, as amended, it is the responsibility of the USDA RUS to review and identify whether a proposed activity may affect endangered or threatened species and their designated critical habitat. Shortnose sturgeon, Atlantic sturgeon, and Atlantic Sturgeon Critical Habitat occur in the Belle Isle corridor study area and may be affected by the proposed project. Determinations involving species under the jurisdiction of the NMFS should be reported to the NMFS Protected Resources Division at the letterhead address.	critical habitat within the Belle Isle alternative could be affected; Determinations need to be coordinated with NMFS	T&E Species	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002). RUS has assessed potential Project impacts on Atlantic sturgeon and shortnose sturgeon and Atlantic sturgeon critical habitat as part of the EIS. By email dated June 1, 2020, NMFS stated that the crossing of the North and South Santee Rivers is the only pathway with potential effects to Atlantic and shortnose sturgeon, the project would have no effect on both fish species. Informal consultation with NMFS under Section 7 of the ESA will allow NMFS to concur that the Project would have no effect on resources under NMFS' jurisdiction.
G-027	G-024-004	NMFS			The Marine Mammal Protection Act (MMPA) discusses federal agency responsibilities in connection with actions, such as pile driving, that may disturb the behavior of a marine mammal in the wild, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering. Bottlenose dolphins occur frequently in the Belle Isle corridor study area of the proposed project. To determine if further consultation is needed under MMPA, the USDA RUS should contact the NMFS Office of Protected Resources in Silver Spring, Maryland (Jaclyn.Daly@noaa.gov).	Coordination with MMPA	T&E Species	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002). RUS would seek concurrence from NMFS that the Project has no potential for "take" of any marine mammal in accordance with the Marine Mammal Protection Act.

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G-028	G-028-001	USACE			The U.S. Army Corps of Engineers, Charleston District (Corps) agreed by letter dated June 6, 2011 to serve as a cooperating agency, and understands the current SDEIS is to be prepared consistent with the OFD process. The goal of the OFD process is to produce a single EIS that all cooperating agencies with federal authorization decisions can adopt to satisfy their respective NEPA obligations and produce a single joint Record of Decision. As of this date, the Corps has not received a permit application for any proposed impacts to Waters of the U.S., including wetlands, and cannot discern from the SDEIS document the magnitude of impacts and/or what type of permit may be required. The Corps has received no written request for any of the three concurrence points required by the MOU, or received any opportunity to comment on or provide Corps-specific permitting milestones for inclusion within the permitting timetable. We request a meeting with USDA and the cooperating agencies to discuss this project's NEPA process with respect to requirements of EO 13807 and the OFD process. We look forward to working with you on this infrastructure project. Please contact the Chief of our Special Projects Branch, Ms. Amanda Heath, at Amanda.L.Heath@usace.army.mil, or (843) 329-8025, with potential meeting dates and other project-related information.	Corps interest in coordinating as a cooperating agency	General NEPA process	It is anticipated that the Applicant would obtain a Nationwide Permit No. 57, which authorizes discharges of dredged or fill material into waters of the United States and structures or work in navigable waters for crossings of those waters associated with the construction, maintenance, or repair of electric utility lines and telecommunication lines.
NGO-001	NGO-001-001	White Oak Forestry			Santee Delta is a critical region for the conservation of migratory birds. WOFC owns and manages lands including estuarine and palustrine wetlands within the lower Santee Delta watershed. With respect to the SDEIS Belle Isle Alternative, we are concerned with transmission line bird strikes to the following priority and closely associated species: Waterfowl (wood duck, mallard, American Black duck, northern pintail), colonial wading birds (American wood stork, little blue heron) raptors (southern bald eagle, swallow-tailed kite, barn owl), songbirds (northern parula, painted bunting). The proposed Belle Isle Alternative extends some five miles through WOFC Charleston County lands that support high quality longleaf pine habitat and are integral in maintaining the functional integrity of the longleaf pine ecosystem surrounding FMNF. WOFC strongly objects the Belle Isle Alternative.	Opposition to the Belle Isle Corridor due to avian and ecological concerns	Avian and ecological impacts	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment number P-002). Section 3.3.2 describes the potential impacts of the Project on migratory birds and waterfowl, including measures proposed to avoid and minimize potential adverse impacts. The EIS relies upon satellite-based vegetation mapping but the Applicant has performed two flora surveys (Gaddy 2017, 2018) on National Forest System lands for the Jamestown and Charity alternatives. The Applicant would perform additional pre-construction biological surveys, including wetland delineations. These surveys will serve to identify sensitive habitats and describe ecological integrity in order to inform the siting of the final ROW within the proposed corridor. The desired condition of plant communities within the ROW would be detailed in an operating

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								<p>plan, as required for special use authorizations of transmission lines.</p> <p>and preliminary reconnaissance surveys, but the Applicant would perform pre-construction biological surveys that would allow the final ROW to be sited to avoid or accommodate the desired conditions of longleaf pine ecosystems.</p>
NGO-002	NGO-001-002	White Oak Forestry			The Peachtree tract, owned by WOFC, supports the ruins of the original Peachtree Plantation home and unmarked cemetery containing potential African American remains of historic significance. The Belle Isle alternative would negatively impact multiple historic resources along a 1.5 mile corridor through Peachtree Plantation. WOFC strongly objects to the Belle Isle alternative (routes b & c) described in the SDEIS and further recommends this alternative be eliminated from all future transmission line project consideration.	Objects to the Belle Isle alternative due to cultural resources	Cultural Resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001).
NGO-003	NGO-003-001	South Carolina Coastal Conservation League, Historic Charleston Foundation (submitted by Southern Environmental Law Center)			The failure to identify a preferred corridor this far into project planning is inexplicable and appears to have impeded thorough federal review. This document does not analyze how the various corridor alternatives would affect sensitive plant and animal species by, for example, altering prescribed fire regimes, increasing bird collisions, and destroying and fragmenting critical habitat, in addition to impacts to historic and cultural resources and gives no justification for RUS's decision to postpone the NHPA process.	EIS fails to analyze impacts to veg communities from changes in fire management	Vegetation/Fire	The final EIS identifies the Jamestown corridor as the preferred alternative. Section 3.3.2 addresses the potential impacts of the Project on fire management.
NGO-004	NGO-003-002	South Carolina Coastal Conservation League, Historic Charleston Foundation (submitted by Southern Environmental Law Center)			SDIES ignores factors that undercut the project purpose and need. RUS overstates population growth in McClellanville, SC and fails to consider land use plans and zoning designations in McClellanville, Jamestown, and Awendaw that limit growth potential. Central Electric should reconsider future load calculations based on land use plans already in place.	EIS overstates population growth and fails to consider land use plans	Population Growth and Land Use	Section 3.9.1 describes the population growth for the town of McClellanville from 2010-2020, obtained from the U.S. Census Bureau and the South Carolina Revenue and Fiscal Affairs Office.
NGO-005	NGO-003-003	South Carolina Coastal Conservation League, Historic Charleston			RUS does not include information regarding the Winyah Generating Station closure and the introduction of 1,000 MW of solar, 200 MW of battery storage, and 150 MW of near-term load management that will be introduced by Santee Cooper. RUS should consider non-wire, microgrid alternatives	Fails to consider changes in baseload from coal to new solar/battery	Alternative Energy	Text has been added to Section 2.3.2 and 2.3.3 to describes that the Winyah Generating Station is the energy source of the proposed corridors. Santee Cooper plans to close the coal-fired plant at

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		Foundation (submitted by Southern Environmental Law Center)				generation by Santee Cooper		Winyah by 2029. When it closes, the jointly operated Central-Santee Cooper system will lose 1,150 MW of electric generation capacity. Even with a reduced reliance on Santee Cooper, Central expects to receive more than half of its wholesale power supply from Santee Cooper and plans to achieve adequate reserves with the addition of new capacity via purchases from existing power plants; aggregated consumer-level resources such as voluntary programs that help consumers limit their peak power needs; large-scale initiatives such as battery installations; and the pursuit of power from any new generators that might be built in the state. Also, RUS considered other power supply solutions, which are described in Section 2.2.1.
NGO-006	NGO-003-004	South Carolina Coastal Conservation League, Historic Charleston Foundation (submitted by Southern Environmental Law Center)			The SDEIS use of N-1 criteria as the defining purpose and need restricts a holistic view at viable project alternatives. Southern Law Center also challenges the definition of reliability under which the N-1 criteria is applied and indicates the proposed project is excluded from the definition and not subject to NERC reliability standards. Thereby making the N-1 solution arbitrary to exclude alternative project possibilities to achieve the desired reliability.	Challenge to the N-1 criteria and definition and the need to consider alternatives that achieve the same reliability goals	Purpose and Need	The purpose and need for the Project is to address system capacity, system reliability, and power quality issues resulting from the current use of the aging distribution line. The N-1 contingency criterion is the threshold industry standard for acceptable power system reliability and is therefore an effective metric to use for evaluating the alternatives considered.
NGO-007	NGO-003-005	South Carolina Coastal Conservation League, Historic Charleston Foundation (submitted by Southern Environmental Law Center)			<p>SDEIS does not fully and fairly consider viable alternatives. The SDEIS makes it impossible to compare project alternatives due to outdated cost projections. It appears that CE last updated its cost projections in 2010 and did not include costs for operations and maintenance. The SDEIS dismisses energy storage as a possible alternative. Instead, the SDEIS should carefully and transparently calculate the costs and benefits associated with a range of battery storage solutions, combined with an optimal mix of other distributed energy resources. SDEIS provides no citations on why on-site solar was dismissed. SDEIS fails to consider demand-side management measures.</p> <p>Because the proposed transmission line alternatives would each require a Section 404 permit, RUS should align its alternatives analysis with the Section 404(b)(1) guidelines to avoid duplicative or wasteful review. However, as presented in the SDEIS, the current transmission</p>	Cost projections are outdated Energy storage not evaluated as an option; Implications of CWA; Use cost-benefit analysis	Project economics	Section 2.2.1 describes the evaluation of alternative technologies, based on data and studies that include an Independent Engineering Study (McGavran 2017) and a Battery Energy Storage Study (Burns & McDonnell 2020).

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					line is not a water-dependent activity, so the Project proponents will ultimately need to prove that no other practicable alternative exists.			
NGO-008	NGO-003-006	South Carolina Coastal Conservation League, Historic Charleston Foundation (submitted by Southern Environmental Law Center)			SDEIS fails to adequately disclose and consider environmental impacts including transmission line collisions. All corridor alternatives evaluated in the SDEIS would pass through globally significant bird habitat, such as the Santee Coastal Reserve Important Bird Area and the Francis Marion Important Bird Area. The SDEIS acknowledges that avian collisions could occur under certain conditions, but then provides no further analysis. The SDEIS dismisses collision concerns by assuring that the Project would comply with Avian Power Line Interaction Committee guidelines for reducing collisions. The SDEIS does not, however, explain what precise design measures would apply to the project; how successful those measures are at reducing collisions, or whether certain collision risks would nonetheless persist.	Weak analysis concerning avian collisions	Avian and ecological impacts	Comment noted.
NGO-009	NGO-003-007	South Carolina Coastal Conservation League, Historic Charleston Foundation (submitted by Southern Environmental Law Center)			SDEIS fails to adequately disclose and consider environmental impacts including prescribed burning. Although the SDEIS repeatedly references the importance of prescribed burns to the FMNF, there is practically no discussion about how a new transmission line would affect the Forest Service's ability to conduct prescribed burns. Further, the SDEIS does not explain how the project would align or conflict with prescribed fire strategies outlined in the FMNF Forest Plan. For instance, it appears that the Jamestown and Charity corridors would traverse large portions of Management Area 1 and thus have an especially adverse impact on prescribed burns. Additionally, the SDEIS does not describe how a reduction in prescribed burns would affect fire-dependent ecosystems and species.	Fire management; Lacks analysis on fire reduction impacts to fire dependent species	Ecological Resources	Text revised to indicate that the proposed transmission line would follow alongside existing ROWs that would already serve as fire breaks and would not limit the FMNF's ability to implement prescribed fire
NGO-010	NGO-003-008	South Carolina Coastal Conservation League, Historic Charleston Foundation (submitted by Southern Environmental Law Center)			SDEIS fails to adequately disclose and consider environmental impacts including impacts related to non-native invasive species and herbicides. SDEIS hardly addresses the potential for a new transmission line to exacerbate the introduction of invasive species. Relatedly, the SDEIS downplays the impacts from the project maintenance by assuring that Central Electric would use no herbicides to control vegetation on Forest Service lands and only EPA-approved herbicides on other lands. The SDEIS should have more fully explored herbicide use and the potential effects on plants, animals, waterbodies, and humans.	Invasive species and herbicides	Ecological resources	See response above to comment number P-063.

Committer Number	Internal Comment Number	Organization	First Name	Last Name	Public Comment on DEIS	Concern, Issue, and/or Resource Topic(s)	EIS Resource	Response to Comment
NGO-011	NGO-003-009	South Carolina Coastal Conservation League, Historic Charleston Foundation (submitted by Southern Environmental Law Center)			SDEIS fails to adequately disclose and consider environmental impacts including impacts related to habitat fragmentation. SDEIS predicts all four proposed corridors would have long-term, moderate impacts on wildlife due to habitat fragmentation, while the proposed Jamestown and Charity corridors would result in habitat fragmentation just as great. Beyond making this conclusion, the SDEIS offers no further analysis on habitat fragmentation. SDEIS never addresses potential species-specific impacts. The document also does not examine whether Central Electric could orient transmission ROWs to avoid important ecosystem features and thus limit the effects of habitat destruction and fragmentation.	Habitat fragmentation; Lacks analysis on species specific related impacts	Ecological resources	The Applicant has performed 13 field surveys for wildlife on National Forest System lands within the proposed corridors, focused on bats, red-cockaded woodpeckers, large birds (kites, eagles, wood storks, etc.), fish, reptiles and amphibians, lepidoptera, and flora). The Applicant would perform additional pre-construction biological surveys, including wetland delineations. These surveys will serve to identify sensitive habitats and inform the siting of the final ROW within the proposed corridor.
NGO-012	NGO-003-010	South Carolina Coastal Conservation League, Historic Charleston Foundation (submitted by Southern Environmental Law Center)			SDEIS fails to adequately disclose and consider environmental impacts including impacts related to cumulative impacts including the Cainhoy Plantation Development and Climate Change. The Cainhoy property contains extensive mature loblolly and longleaf pine forest areas providing habitat for red-cockaded woodpecker, flatwoods salamander, pondberry, and other T&E species. RUS should acknowledge and examine this issue. The FMNF Forest Plan discusses the effects of climate change and the need to combat them through active management. The SDEIS never addresses climate change or extreme weather events as cumulative impacts on the project area. RUS needs to devote appropriate attention to climate change and explain how a new transmission line would affect ecosystem resilience to extreme storms and weather patterns.	Cumulative impacts; T&E species; Climate change	General recommendation	The proposed Cainhoy development is described as part of the cumulative impact scenario in Section 4.2.2. The analysis in section 4.3.2 acknowledges that there would be adverse cumulative impacts to biological resources, but the Cainhoy development is not specifically analyzed because, although a USACE permit for the project was issued, a lawsuit challenging the development has been filed by environmental groups.
NGO-013	NGO-003-011	South Carolina Coastal Conservation League, Historic Charleston Foundation (submitted by Southern Environmental Law Center)			SDEIS fails to adequately disclose and consider historic and cultural impacts. It appears in the SDIES that RUS has not yet initiated consultations for the project and neither the agency nor Central Electric has commissioned any cultural resources surveys in the project area. SDEIS fails to adequately identify at-risk historic and cultural sites and relies on just one 40-year-old survey to identify historic properties along the Belle Isle corridors. SDEIS also neglects to fill gaps in the cultural resource data from the Jamestown and Charity corridors. SDEIS never discusses the potential for the project to impact NHLs near the project area (Hopsewee and Hampton Plantations and St. James-Santee Parish Episcopal Church) and trigger 110(f) of the NHPA.	SDEIS fails to address impacts to cultural resources	Cultural Resources	Section 3.6 evaluates the Project's potential impacts to cultural resources. The Belle Isle corridors have been eliminated from further consideration in the final EIS (see response above to comment number P-001). More detailed and extensive cultural studies would be performed after the final 75-foot ROW is identified within the selected corridor. The procedures for completion of the final identification and evaluation; assessment of effects; and, as appropriate, mitigation would be agreed to through the ongoing Section 106 process being addressed through preparation of a Programmatic Agreement.
NGO-014	NGO-014-001	Low Country Land Trust			Not all of the protected properties in the proposed work area are represented. SDEIS should be updated to accurately reflect the lands	Need updated property list for	Cultural Resources	The EIS provides an analysis of potential impacts to the biologically rich FMNF. The

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					protected near the proposed routes. LLT requests that any preferred alternative route avoid protected lands, and eliminate potential impacts to sensitive species/habitats, and cultural and historic resources.	full historic property evaluation		Applicant would perform pre-construction biological surveys, including wetland delineations and surveys for special-status species. These surveys would serve to identify sensitive habitats and inform the siting of the final ROW within the proposed corridor. Section 3.7 discusses private lands protected for conservation purposes and conservation easements are shown on the revised Figures 3.7-1 and 3.7-2.
NGO-015	NGO-015-001	The Village Museum			The Santee Delta and its adjoining region is sacred ground of national significance and must not be marred visually and physically with the proposed transmission line. Accordingly, we strongly oppose the multiple adverse impacts, both visual and physical, of the Belle Isle Corridor Alternatives (Routes B & C), to Old Georgetown Road, Peachtree Plantation, and the Georgetown County Tidal Ricefield Cultural Project sites.	Opposed to the Belle Isle Corridor for cultural impacts and recommend it be eliminated from consideration	Cultural Resources	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002).
NGO-016	NGO-016-001	Santee Preservation Society			We oppose Central Electric's proposal to install high power lines across the Santee Delta as part of its McClellanville Area 115-kV Transmission Project. Central Electric has not followed up the discussions Berkeley Electric had been having with SCE&G and then with Dominion to purchase more power using existing lines to McClellanville. Solar options should be discussed. No proposed benefits of this massive construction project would mitigate the tangible and aesthetic harm inflicted for hypothetical gains.	Opposed to the Belle Isle Corridor; Need to evaluate solar; Aesthetic impacts from project	Solar and aesthetics	Alternatives crossing the Santee Delta have been eliminated from further consideration in the final EIS (see response above to comment numbers P-001 and P-002). Section 2.2.1 describes the alternative technologies considered, including solar power.