

Extended Scoping Comments (Individual)

McGee, Lauren - Washington, DC

From: jamorse tds.net [jamorse@tds.net]
Sent: Sunday, December 19, 2010 9:00 PM
To: McGee, Lauren - Washington, DC
Subject: Late notification of public hearing on, McClellanville, S.C>Transmission Line

Dear Ms. McGee, I was not aware that a public hearing was held, September 29, at St.James Santee School-nor was I aware that this subject of the Transmission line was being discussed. In your mail out you say-an error in mailing distribution list may have caused a large number of property in Charleston County to not receive the first edition of this news letter. That means that me and my wife have sitting in the dark for over 3 months! I read 3 news papers every day,watch the local ,and stay pretty much enformed on most of the issues we face in our community. But to be perfectly honest Ms. McGee, this does not surprise me if Central Electric is involved. Back in approx. 2005, central electric after being told repeatedly-that there was a better way to get to their sub station than cross our land --went and got a court order to let them survey and establish the transmission line if they deemed it feasible to their calculation. Also they told the Judge issueing the order that they had discussed the enviromental inpact study with us-----at that time the enviromental impact study had not been completed-and they certainly could not have discussed with me! But they steam rolled right over us with their court order.----and now we find out on December 18, 2010, during the Christmas Holidays that we have until January 14,2011 to voice our comments and concerns---does that seem fear to you Ms. McGee? It does not seem fear to me by any stretch ! I feel that because of the above mentioned situation that the January date should be re-set with a new hearing being set where all the people have an equal oppertunity. I appreciate you hearing me out-my email jamorse@tds.net Phone 843-887-3164 cell 843=412-3411 Sincerely yours, Julian N. Morse

Dec 2010, McCallville SC Newsletter
Kinda Too Much Info 1/8/11

- The map is Too Busy -
 - Colors are similar
 - Too much other detail on the map

- What's purpose of map?
manly? are people supposed to "know the routes scores" and "vate"

Ed Hardwiche
607 E Hobcaw Dr
MT Pleas
SC 29464

McGee, Lauren - Washington, DC

From: Nancy Marshall [nancymarshall8@gmail.com]
Sent: Friday, January 14, 2011 3:24 PM
To: McGee, Lauren - Washington, DC
Cc: John McWilliams
Subject: comments and postcard address error alert

Dear Ms. McGee,

I wish to go on record favoring the "Commonwealth" plan. I am a long time property owner and resident of McClellanville.

It is distressing that your email address on the post card recently sent out is in error. I am wondering how many people sent you comments and will not learn that the email bounced back. The address on the card and the brochure have a typo for usda.gov

Please put me on your email list for this project. Nancy M. McWilliams

--
Nancy Marshall

<http://www.southernspaces.org/2010/low-country-travelers-african-american-car-club-charleston-county-south-carolina>

<http://www.southernspaces.org/2008/andalusia-photographs-flannery-oconnors-farm>

January 9, 2010

Ms. Lauren McGee, Environmental Scientist
USDA Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Avenue, S.W. Stop 1571
Washington, D.C. 20250

Re: Mclellanville 115-KV Transmission Line Project

Dear Ms. McGee,

I would like to go on record as opposing the above mentioned project, if it goes across our property - which is located approx. 1 1/2 miles N.W. of Mclellanville S.C. on Hwy #45. We are in the Honey Hill and Jamestown combined corridor.

It would make more sense to use the common wealth corridor. You could let the line run right down the same route as the lines that parallel Hwy 17. Just look at the power lines that leave Georgetown, S.C. and run to the beach communities of Pawley's Island and Hitchfield Beach. They run parallel to U.S. 17. The poles or tower are made of steel, and painted green - you don't even hardly notice them. This could be the same approach, that the common wealth alternative could provide. Why cut through the Francis Marion National Forest and make more corridors, when you can go where a corridor, already exist?

I am enclosing a map, that I have diagrammed, the best route (Jamestown and Honey Hill corridors) once the power line gets in the vicinity of Mclellanville, if these corridors are deemed to be the best route to the proposed sub-station at Mclellanville.

Previously Central Electric wanted to come across our property, and give us \$2500 per acre for 3 acres — at that time, property comparable to ours was selling for \$30,000 — \$60,000 per acre. Ms McGee, in all honesty, money was not the only reason, we said no to Central Electric. Another factor was, that at that time it may have appeared to be just another piece of rural property — but it was more than that — it was the future of our community and our home town. Why would you want to bring a high voltage power line right through the prettiest land around, where future homes would be built and have been built, within the last 2 yrs. As well as passing within 500 feet of an American Native Indian Camp site — that according to the U.S. Forest Service Archeologist, say that is 1500 yrs. old.

My proposal to Central Electric, was once they got 2 1/2 or 3 miles away from McCellanville, was to turn NWE and cross Hwy #45, go about 5/8 +/- mile, then turn S.E. and take a straight shot right into the sub-station. The benefit of this alternative route on the final leg of this run, is that you would not impact families as far as passing right through their property — which now numbers at least 4 families. 2 families have in the last 2 or 3 yrs. have built homes that would impacted significantly.

I personally think building a substation before you run the power lines, is a bad business decision — it seems that (sub station built first) dictates, where the line has got to go, more or less — no matter what — instead of locating the sub station where the best

corridor is. But, Central Electric possesses one tool² that makes up for any adjustments, they need to make in the form of "eminent domain". They have already demonstrated to me and my wife personally, that they will use this route!

When we refused them access, the first time, they went and got a court order— In testimony, to the judge, to get the court order— they said, they had discussed the environmental impact statement in detail with me and my wife Charlotte — but the fact of the matter is, the E.I.S. had not been completed, and possibly even started — and certainly they never discussed E.I.S. with us!

Ms. McGee, needless to say, this has been rough on me and Charlotte. We have been run over by Central Electric — steam rolled is the term, that best describes it. Just look at us, not being notified about the so called public hearing, at St. James Santee Elementary School on Sept. 10th 2010. Who was responsible for providing our address? I read 2 newspapers every day, I watch the local News cast on all 3 local T.V. stations, and I am fairly active in many events that go on in our community and yet, I did not know of the hearing. Does it make any sense that Central Electric did not want me speaking or participating in the Sept. 10th 2010 meeting? It does to me!

Eventually, Mr. William Rodgers with Central Electric, came down from Columbia, S.C. to discuss our situation and the corridor through our property and any proposal for an alternative route. Mr. Rodgers brought a aereit. map — and asked us to locate our proposal on the

Chart (map). He indicated to us that the proposal looked "good to him" — and that he would send the map off to the environmental people and engineers.

Also Mr. Rodgers indicated to us, that they were removing the court orders against our property. But when we received official notice, they reserved the right to re-instate it — if they deemed it necessary.

Ms. McGee all we want is a fair shake in regards to the impacts, such as your news letter mentions: visual, environmental justice, Socioeconomics, cultural resources and basic fairness.

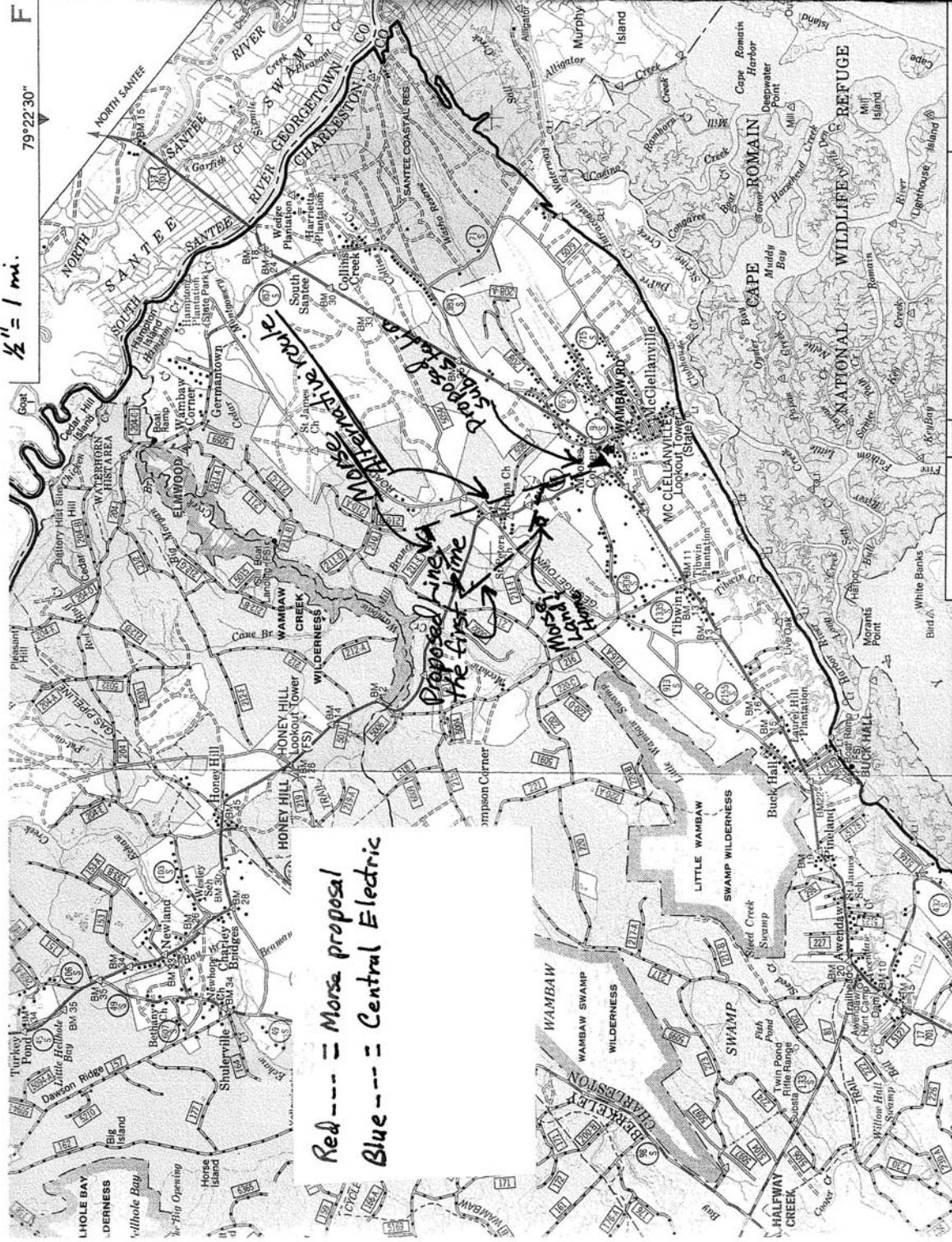
I appreciate you hearing us out and I swear that every thing I've said in this letter is 100% true.

Sincerely yours
Julian N. Morse
P.O. Box 505-1597 Hwy #45
McClellanville, S.C. 29458

JA Morse @TDS.NET
843-887-3164
✓ 412-3411

79°22'30" F

1/2" = 1 mi.



Red --- = Morse proposal
 Blue --- = Central Electric

FACILITIES

ACTIVITIES

McGee, Lauren - Washington, DC

From: wetwo tds.net [wetwo@tds.net]
Sent: Thursday, January 13, 2011 4:33 PM
To: McGee, Lauren - Washington, DC
Subject: McClellanville Transmission line

Hi Lauren, time has flown by and I suddenly realized tomorrow is the 14th. So wanted to take a moment to let you know that the proposed route change.. that is the one elaving the Commonwealth substation and then joining the southern most Charity corridor looks like a good solution to a number of my previousy expressed concerns. Thanks you all for your efforts to make this project more acceptable to those of us it is designed to serve.

I am still very concerened about the lack of participation by/inclusion in the planning process of SCEG as they actually serve McClellanville.

At any rate, the adjustments ion alignment looks much better. Thank you.
Virginia Prevost

McGee, Lauren - Washington, DC

From: Sisson, Regana Contini [contini@musc.edu]
Sent: Friday, January 14, 2011 3:24 PM
To: McGee, Lauren - Washington, DC
Subject: Comment on Transmission Line Proposal

Dear Ms. McGee,
I am in favor of the Commonwealth Alternative.
Sincerely,
Regana C. Sisson
971 Pinckney St.
McClellanville, SC 29458
phone: 843-887-3864

January 14, 2011

Dear Ms. McGee,

I tried to send you an email with my comment re: the transmission line in SC., but it was returned.

I am writing to you to express my support for the "Commonwealth Alternative" since it will use + extend an already existing line.

Thank you for your consideration.

Sincerely,

Regene C. Simon

971 Pinckney St.

McClellenville, SC. 29458

tel: 843-887-3864

Non Governmental Organizations (N)

From: [McGee, Lauren - Washington, DC](#)
To: [Ted Rosengarten](#)
Cc: [Orler, Emily - Washington, DC](#); [Bill Rogers](#); [Leon Kolankiewicz](#); [Nathalie Jacque](#)
Subject: RE: McClellanville Transmission Line Proposal
Date: Friday, October 29, 2010 5:15:40 PM

Thank for your comments. I have copied Ms. Emily Orler of RUS, Mr. Bill Rogers of Central Electric, and Mr. Leon Kolankiewicz & Ms. Nathalie Jacque of Mangi Environmental, who are tracking comments for this project. This email is now part of the official record and will be considered as the project team makes its decision. Again thank you and have a nice weekend –

Lauren McGee | Environmental Scientist
Rural Development | Rural Utilities Service (RUS)
U.S. Department of Agriculture
Mail Stop 1571 | Rm 2244-S
1400 Independence Ave, SW | Washington, DC 20250
Phone: 202-720-1482 | Fax: 202-690-0649
Email: lauren.mcgee@wdc.usda.gov
<http://www.usda.gov/rus/water/ees/envIRON.htm>

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From: Ted Rosengarten [mailto:tedrsc@gmail.com]
Sent: Friday, October 29, 2010 4:32 PM
To: McGee, Lauren - Washington, DC
Subject: McClellanville Transmission Line Proposal

Lauren McGee
USDA Rural Utilities Service
Washington, DC

Dear Ms. McGee,

We are grateful for the opportunity to comment on the alternatives described by the Central Electric Power Cooperative for a new 115kv transmission line to a proposed Berkeley Electric substation in McClellanville, South Carolina. As homeowners in the unincorporated area bounded by the Francis Marion National Forest and Cape Romain National Wildlife Refuge, and as customers of Berkeley Electric and users of rural electrification, we would be personally affected by an expansion of BEC's facilities. Furthermore, as co-chairs of the Santee Preservation Society, a non-profit organization advocating the conservation of our state's precious wetlands and coastal forests, we favor the course of action that most effectively safeguards natural habitats and the wildlife that depends on them.

The Revised Macro-Corridor Study Report is thorough, thoughtful, and clearly written. We share the authors' goal of wanting to "avoid and minimize environmental, social, cultural and [adverse] economic effect." Regrettably, the report fails to indicate how these impacts factor

in the cost equation that concludes the study. How do you attach a dollar value, for example, to the permanent degradation of scenic views that would result from stringing an overhead transmission line across the marvelous expanse of the Santee River Delta?

In our view, the most sensible course of action is to take “No Action,” a choice that does not appear in the list of alternatives. We don’t say this facetiously or in the spirit of wanting to impede progress. Rather than spend millions of dollars to bring an expensive new transmission line to McClellanville at an unacceptably high environmental cost, the existing line should be upgraded. The fact is, the population of McClellanville is in decline. All schools, public and private, in and around the town, are experiencing sharp drops in enrollment. There is no new residential or commercial development within twenty miles of the village, and none on the horizon.

But if a new transmission line must be built and Rural Utilities Service decides to fund one of the ten proposals outlined in the Report, we are adamant that no line be permitted to cross the Santee overhead. The Santee estuary is the largest river Delta on the Atlantic coast, and its future is not merely a local or state issue. It is one of the best locations in the southeast United States to reliably see large numbers of Swallow-tailed Kites and other species of soaring birds, including Mississippi Kites, Bald Eagles, and Harriers. The Report alludes to potential risks from transmission line construction to migratory birds and waterfowl, but says nothing about the long-term risks to bird populations from standing poles and lines.

We could favor the Belle Isle 2 route, *if* the line running under the surface substrate of the Delta were to continue underground parallel to Highway 17 to the proposed McClellanville substation. This plan would protect the additional miles of flyway that link the Delta, the Francis Marion National Forest, and the Santee Coastal Reserve. Though more costly than running the line overhead, the expense would be mitigated by reduced right-of-way acquisition costs, while the savings to bird life would be priceless. An underground line is also safer to human beings and less liable to damage in storm winds that are not strangers to the coast.

Proposals to run lines from Honey Hill or Jamestown to McClellanville appear to make a highway out of wetlands—indeed an astounding 96 percent of the Honey Hill plan goes over and through wetlands, including the Wambaw Creek Wilderness Area, which ought to rule it out *prima facie*. Any proposal that can be modified to make use of existing roads and transmission corridors is preferable to ones that require disturbing and forever altering these sensitive environments.

Proposals commencing in Charity and eventually running north to McClellanville parallel to Highway 17 have the advantage of avoiding red-cockaded woodpecker cavity tree clusters and following, and perhaps leading, the route that development may eventually take. Charity 2 and 4 have an advantage over Charity 1 and 3, because they apparently spare the coastline and sight lines from Bulls Bay.

Thirty years ago, we went to Washington to push for wilderness status for Wambaw Creek and Wambaw Swamp. We met with representatives from the Departments of Agriculture and Interior, and our conversations bore fruit. We are ready to make another trip to the nation’s capitol if appearing in person would help protect the Santee region so central to our way of life. Please do not hesitate to contact us if you have any questions about our position, or if you need additional information.

Sincerely,

Dr. Theodore Rosengarten

James E. Fulcher, MD

--for the Santee Preservation Society
PO Box 8
McClellanville, SC 29458

843.887.3352
tedrsc@gmail.com



October 25, 2010

USDA – Rural Development
Attn: Lauren McGee
1400 Independence Ave, SW
Mail Stop 1571
Washington, DC 20250-1571

Re: McClellanville 115kv Transmission Line – Public Scoping Comments

Ms. Lauren McGee,

The Rural Utilities Services held a public scoping meeting to address potential impacts of a proposal by Central Electric Power Cooperative, Inc to construct a 115-kilovolt transmission line to a proposed Berkeley Electric Substation in McClellanville, SC. Thank you for the opportunity to submit comments and for conducting a thorough public scoping comment period. We believe the first choice, or default option, given the unique environmental features of the area, should be to rebuild or repair the existing distribution line. The option should be further evaluated in the Environmental Impact Statement process and other routes and corridors should be compared to this option throughout the process.

A distribution line currently runs from Mount Pleasant, South Carolina through Awendaw to McClellanville with access points for South Carolina Electric and Gas utility and Berkeley Electric Cooperative. We believe the option to rebuild, repair and maintain the existing distribution line has not been fully vetted. This option makes best use of existing infrastructure and repair to the existing line would be the least damaging to the natural environment and the nearby landowners because the right of way and easements are already in place and no new clearings would be needed. The Alternatives Evaluation Study (AES) did not fully vet this option and it should therefore be included in the Environmental Impact Statement for further evaluation and possible implementation. The costs of each – both repair to the distribution line and construction of a new transmission line plus the proposed substation – should be evaluated in the same manner.

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Additionally, two power providers service the McClellanville area. South Carolina Electric and Gas (SCE&G) services the Town of McClellanville and Berkeley Electric Cooperative (BEC) services the area outside of the Town. An improvement to one system does not guarantee an improvement for the entire area. It should be noted in any cost-benefit analysis that there is no planned interconnection between the proposed BEC transmission line and substation and SCE&G or their customers. Without such, power distribution by SCE&G to the Town of McClellanville will not be improved. The Environmental Impact Statement must therefore clearly show how the benefit to only BEC customers justifies the high financial and environmental costs or should require a connection between the two power providers to expand the possible benefit.

Lastly, Central Electric Cooperatives has been a statewide leader in energy efficiency programs and promotion of energy efficiency and load reduction strategies among their customers. Load reduction home retrofits in the McClellanville may also be an innovative option to reduce demand and improve power distribution in the area and should be further evaluated in the EIS.

The corridors traverse an ecologically important landscape. Thank you for including Red Cockaded Woodpecker nesting clusters as exclusionary areas and working to protect the habitat of these species. Swallowtail kites and other species, as suggested by our resource agencies, should be treated in the same manner. Additionally, updating the easement and protected land files with the most recent acquisitions and land holdings should be completed before any work is continued to ensure these lands are included in the analysis. (The South Carolina Chapter of the Nature Conservancy has this information).

While protecting specific areas, such as nesting sites, is important, the habitat fragmentation caused by this project is threatening to the overall ecosystem. During the 2005 public comment period the South Carolina Department of Natural Resources requested that the Santee Delta Wildlife Management Area and private properties under conservation easement be rated as exclusionary areas in the 'suitability index'. We agree and believe these areas and others should be assigned the highest possible risk factor. These recommendations were not taken into account in the 2010 Macro-Corridor Study and both the Santee Delta Wildlife Management Area and private conservation easements were valued at 25 risk points. Given the pristine habitat and the commitment to conservation attributed to both the Santee Delta and the nearby properties under easement, we believe these areas should be assessed higher and avoided in any corridor analysis and selection.

For these reasons, we do not support the Britton Neck and Belle Isle corridors: traversing the Santee Delta and private lands under easement pose a threat to the surrounding habitat, endangered and migratory bird species, the lowcountry views and vistas that are a part of the public's shared heritage and private enjoyment of the land.

Much like the state investment in the Santee Delta Wildlife Management Area, there is a national investment in the Francis Marion and its long-leaf pine ecosystem. This resource should be similarly assessed with a higher risk rating or exclusionary status in some cases.

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New cuts through the forest result in habitat fragmentation, may disrupt essential forest management strategies including prescribed fire, and introduce new species to the area. The required 70-foot right of way for this project poses a threat to the integrity of the National Forest; use of herbicides and removal of the forest understory is a disruptive common practice along other previous local road rights of way and power line easements. In addition, clearing near the forest can disrupt the forest canopy and be a vector for new species (e.g. fire ants) to enter and disrupt forest conditions. For these reasons, we also do not support the corridors from Jamestown and from Honey Hill as the majority of land within these corridors is part of the Francis Marion National Forest.

The four possible transmission line corridors from the Charity sub-station cross less forest land and state owned property and could make the best use of the existing right of way along Highway 17. Minimizing the right of way required by using adjacent road right of way or distribution line right of way would be the best way to mitigate impacts to landowners and adjacent property, aside from the first preferred option of repairing the existing distribution line. The corridor known as 'Charity 4' appears to follow Highway 17 and should be evaluated further to determine if more existing right of way along the Highway could be used for the proposed transmission line as well.

The array of options presented in all the corridors, including the choice between directional boring and overhead lines, the width and variation of each path, make it difficult to comment on the routes in their entirety at this time. Our future support for any route, would be contingent on the treatment to the sensitive areas, loss of quality habitat, adherence to the existing right of way and future specifics provided.

The McClellanville area is unique and is surrounded by incredible natural resources that our local, state and federal governments, as well as private citizens, have taken great interest in and worked hard to protect in that past 100 years. A one-size-fits-all approach will not work for McClellanville because its position among these valued lands. Creative solutions within the proposed corridors are imperative to avoid fragmenting and disrupting vital lowcountry habitat. Minimizing disruption by rebuilding and repairing the existing distribution line is the best option although routes that best use existing right of way should also be considered. Measuring all against a no build option will ensure a verifiable and trustworthy environmental impact statement. We look forward to continuing the discussion.

Respectfully submitted,

Kate Parks
Project Manager
Coastal Conservation League

katep@sccl.org
Phone: 843.723.8035 ex 1026

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Extended Scoping Comments (N)

The South Carolina Native Plant Society
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Awendaw, SC 29429
(843) 928-4001
brubakerj@tds.net



December 10, 2011

Ms. Lauren McGee, Environmental Scientist
USDA/RUS
1400 Independence Ave. SW, Stop 1571
Washington, DC 20250-1571
lauren.mcgee@wdc.usda.gov

RE: Public Scoping Comment, McClellanville 115kV Transmission Line Project

Dear Ms. McGee:

On behalf of the South Carolina Native Plant Society (SCNPS), I submit the following comment on the USDA Rural Utilities Service (RUS) consideration of financial assistance to Central Electric Power Cooperative Inc. (CEPCI) to construct a 115-kV transmission line from one of several possible power sources to Berkeley Electric Cooperative's (BEC) proposed new McClellanville substation.

We respectfully request that RUS not provide financial assistance to CEPCI for construction of this new 115-kV power line.

None of the Alternative Transmission Line Route Corridors under consideration are acceptable, although, the new Commonwealth route is less objectionable than any of the alternatives originally offered by CEPCI. We consider a new on-site generating plant to be the only justifiable option whereby Berkeley Electric might provide more reliable electrical service to a few hundred residents of the small rural community of McClellanville. We do not agree that the on-site alternative is too costly as suggested in the Purpose and Need. While the onsite option may not presently be estimated as the lowest cost alternative in dollars, when values are attached to specific components of the area's natural and historical heritage the cost of the proposed corridors skyrocket far beyond the costs presently assigned to them.

Although much of their data is dated, Mangi Environmental Group, Inc. appropriately describes the area's natural and historical heritage in their "Macro-Corridor Study Report" and "2007 Summary Report/Environmental Decision" prepared for Central Electric Power Cooperative (CEPCI) and USDA Rural Development – Utilities Programs (RUS). It is appreciated that RUS confirms the sensitive nature of the area and has elevated the required study from an EA to an EIS. It is inconsistent, however, that the study weights important environmental and cultural elements, i.e. Endangered Species, in considering corridor alternatives, however, no dollar value is assigned the demise of those elements in the cost analysis. In fact the richest wetlands are assigned the lowest property value. Failing to appropriately assign values to and include those

South Carolina Native Plant Society
WWW.SCNPS.ORG

values in the tally are the fatal flaw of the documents noted above. This is the Seewee to Santee Corridor. This is a Class I air and water quality environ surrounded by the Francis Marion National Forest, Cape Romain National Wildlife Refuge, Santee Coastal Reserve, and the Santee River and its delta. The values of the corridor are in its natural and cultural heritage, not the reliability of common amenities like electricity.

CEPCI has existing power line corridors through the Francis Marion National Forest (FMNF). These corridors already give CEPCI license to significant acreage in the FMNF which, unfortunately, are generally degraded in comparison to adjacent systems. They constitute attractive nuisances illegally frequented by ATV riders who seem to delight in turning important wetlands that occur throughout into mud holes. Please see the attached recent photo of one of those wetlands near Florida Bay just east of Halfway Creek Road. This was a breeding site for Gopher Frogs (*Rana areolata*), a species of federal concern, and considered by many to be the most magnificent pitcher plant bog in the FMNF. As the photograph shows, it's been destroyed, and could likely not be restored even if the ATV menace that did the damage could be abated. The USDA Forest Service does not have a law enforcement staff to police these corridors, and CEPCI has shown no interest in fencing, gating, or otherwise securing and patrolling those existing corridors through this rare and important ecosystem. USDA Forest Service maintenance is compromised by CEPCI in other ways. The FMNF is a fire dependant ecosystem. If necessary prescribed fires managed by the Forest Service inadvertently damage a CEPCI power pole, the Forest Service is obliged to pay many thousands of dollars in restitution. Clearly, CEPCI corridors have proved to be incompatible with this important natural resource. Existing corridors might be reassessed. No additional corridors should be considered.

Thank you for taking the time to consider our concerns.

Sincerely,



John A. Brubaker, Chairman
Issues Committee

attachment





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www.palmettoconservation.org

January 14, 2011

Ms. Lauren McGee
Environmental Scientist
USDA/RUS
1400 Independence Avenue SW
Stop 1571
Room 2244-S
Washington, DC 20250

Ms. McGee:

The Palmetto Trail is a state-wide, hiking and biking trail that crosses the Francis Marion National Forest from Buck Hall Recreation Area on US 17 to Canal Recreation Area on US 52. The McClellanville 115kV transmission line proposal would negatively impact the Palmetto Trail, as well as the surrounding area. The proposed Charity Corridor 1-4 would intersect the trail near Little Wambaw Swamp in close proximity to an existing utility line that runs parallel to US 17. The trail currently crosses under this existing line, and the best scenario for trail use is to make improvements on this existing structure rather than constructing new right of ways.

While the trail currently crosses under other utility lines, such a new construction project would still hurt the trail aesthetically, causing another break in the forest foliage for an unsightly power line right of way. The opening in the canopy will also allow grasses and weeds to grow more abundantly, requiring more maintenance to keep the trail desirable. During construction, the trail would have to be closed to public use. These issues are not conducive to promoting outdoor recreation and natural resource conservation for trail users across the state. If the existing utility could be updated, allowing for a more reliable and consistent power source, the trail could remain intact in this area.

The delicate and unique ecosystems in this area are one of the biggest assets to the Palmetto Trail in this region. Construction and alterations to the area, other than prescribed management practices, are harmful to the vast diversity of the local flora and fauna. This also diminishes the value of this area for hikers and bikers. This seems extreme at a place where an existing utility and right of way are already established.

It is the opinion of the staff at Palmetto Conservation Foundation, and users of the Palmetto Trail, that the Rural Utilities Service should assist Central Electric Power Cooperative, Inc. with financial assistance for alternate power transmission improvements, without the construction of a new transmission line.

Sincerely,

Dane Hanna
Lowcountry Trail Coordinator
Palmetto Trail

Conservation • Preservation • Recreation



January 13, 2011

USDA – Rural Development
Attn: Lauren McGee
1400 Independence Ave, SW
Mail Stop 1571
Washington, DC 20250-1571

Re: McClellanville 115kv Transmission Line – Public Scoping Comments (2)

Ms. Lauren McGee,

We were informed that a new corridor, not previously evaluated in the Macro-Corridor study, has been introduced since our comments were submitted. Known as the *Commonwealth* alternative, this alternative extends from the Hamlin substation in Mount Pleasant, along and parallel to Highway 17, ending at the proposed McClellanville substation.

In addition to our previous comments (enclosed) we offer the following comments on the proposed *Commonwealth* alternative. We appreciate that the *Commonwealth* alternative appears to utilize existing infrastructure and minimizes the right of needed by paralleling Highway 17. Whereas other alternatives cut through DNR and FMNF properties, properties under conservation easement, near and around red-cockated woodpecker habitat and others, this alternative rightly parallels the highway and minimizes its impact on this environmentally significant area. We believe this alternative, assuming it continues to parallel the Highway and minimize its impact to the surrounding land and nearby residents, should be fully evaluated and strongly considered in the review process.

As expressed in our previous comments, we recommended that “The corridor known as ‘Charity 4’ appears to follow Highway 17 and should be evaluated further to determine if more existing right of way along the Highway could be used for the proposed transmission line as well.” The *Commonwealth* alternative builds upon the benefits of the Charity 4 route with a more logical connection to Mount Pleasant’s Hamlin Station.

Thank you for introducing and considering this new route.

Respectfully submitted,

Kate Parks
Program Director, Land Use
Coastal Conservation League

katep@ccccl.org
Phone: 843.723.8035 ex 1026

McGee, Lauren - Washington, DC

From: Reeves, Grant [reevesg@intertechsc.com]
Sent: Friday, January 14, 2011 2:00 PM
To: McGee, Lauren - Washington, DC
Subject: McClellanville 115 kV Transmission Line Project
Attachments: USDA letter re McClellanville.pdf

Dear Ms McGee,

Attached is letter from Bulls Bay Overlook Community Association, Inc. commenting on the proposed corridors.

I am a Director of the Association and also the contact person if you have any questions regarding our comments.

Please use the phone numbers and email address below if you need to contact me.

With warm regards,

Grant

Grant Reeves
Director
Bulls Bay Overlook Community Association, Inc.
PO Box 445
Awendaw, SC 29429
843-744-5174 Main Office
843-202-4349 Direct
704-421-4344 Mobile
grant.reeves@pbiproducts.com

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BULLS BAY OVERLOOK COMMUNITY ASSOCIATION, INC
PO BOX 445, AWENDAW, SC 29429

January 14, 2011

Ms. Lauren McGee
USDA Rural Utilities Service
USDA, Rural Development, Utilities Programs
Mail Stop 1571, Room 2244-S
1400 Independence Avenue, SW
Washington, DC 20250-1571

Re: McClellanville, SC 115kV Transmission Line Project

Dear Ms. McGee,

This letter is in response to the McClellanville, SC 115kV Transmission Line Project and the proposed Macro-Corridor Study Report prepared for the Central Electric Power Cooperative, Inc. by Mangi Environmental Group, Inc. We represent the Bull's Bay Overlook Community Association which is a neighborhood consisting of 38 lot owners located on Doar Road north of the town hall of Awendaw. We were first notified of plans to construct an electrical transmission line that may cross or border the property owned by members of our Association in 2005. We weighed-in at the time with a number of objections related to the Charity corridor. We understand there are multiple options under consideration and that a final decision on the best corridor is pending. Our members are most concerned with the Charity to McClellanville corridor as this route would negatively impact the interests of our members.

The Macro-Corridor Study Report suggests there are superior corridors for the proposed transmission lines that have less impact on the environment, are of shorter distance and are less expensive. **For the record we want to state that the residents of Bull's Bay Overlook Community are opposed to the Charity to McClellanville corridor if it uses the existing utility easement on Doar Road.**

Bull's Bay Overlook Community is located between the Atlantic Inter-Coastal Waterway, the Cape Romaine National Wildlife Refuge and the Francis Marion National Forrest. This unique location is home to various protected species including the red cockaded woodpecker (*Picoides borealis*), which have a nesting tree within several hundred yards of our community's entrance. This protected area is within the inclusion zone contemplated by the corridor plan although the 200 foot buffer does not seem to be given its required exclusionary status. We would be prepared to challenge any plan that encroaches on these sensitive areas.

The close proximity to the Inter Coastal Waterway, salt water marshes and Bulls Bay make the area surrounding our community highly prone to hurricane induced flooding and high winds. As a result any transmission lines located in our area would be subject to higher construction standards (and higher cost) to withstand the additional risk of high winds and flooding. During Hurricane Hugo in 1989 this area was under 19 feet of water

BULLS BAY OVERLOOK COMMUNITY ASSOCIATION, INC
PO BOX 445, AWENDAW, SC 29429

and every tree, power line and structure was leveled. Transmission lines should be located further inland to protect them from the direct force of a potential hurricane.

The proposals under consideration are exclusively transmission line options despite the national and international development of alternative energy sources, including low impact stationary hydrogen fuel cells such as the power plants designed and built by Bloom Energy. This approach is also known as Distributed Generation (DG) which refers to power generation at the point of consumption. Generating power on-site, rather than centrally, eliminates the cost, complexity, interdependencies, and inefficiencies associated with transmission and distribution. Like distributed computing (i.e. the PC) and distributed telephony (i.e. the mobile phone), distributed generation shifts control to the community. Recently, solar and wind have become popular distributed generation options and although the output is clean; it is also intermittent, making it an incomplete solution in this case

Bloom Energy's commercial power plants are rated at 100kV and are used as base load for companies including E-Bay, Wal-Mart and Google. A fuel cell power plant located in McClellanville could provide the base load while the existing transmission lines would provide peak load. Since the energy source would be located in McClellanville it would eliminate environmental impacts to the sensitive areas. While operating cost would be higher due to the natural gas fuel source, there would be significant capital cost savings that would serve to offset the operating cost premium. It appears to be an oversight that distributed generation solutions are not included in the proposed alternatives given the expensive cost of constructing transmission lines in environmental and culturally sensitive areas. More information on Bloom Energy can be found at:
<http://www.bloomenergy.com>

In conclusion, the proposed Charity corridor would impact sensitive habitat and destroy pristine forest and wetlands which will lead to higher than normal construction costs. Locating the transmission lines on Doar Road will have a direct adverse effect on property values and quality of life. The property tax base for the 38 lots located in our community is \$13 million. If the transmission line was built it could conservatively depress property values by 10-15% resulting in over \$1.3-2 million of devaluation. This would certainly mobilize the community to use its significant resources to challenge permits and construction.

For the reasons stated above we are strongly opposed to the Charity to McClellanville corridor along Doar Road and request that this corridor be eliminated as a possible route for the transmission line.

Sincerely,

Bulls Bay Overlook

The Board of Directors
Bull's Bay Overlook Community Association

Federal (F), State (S), and Local (L) Agencies



United States Department of the Interior



FISH AND WILDLIFE SERVICE

176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407

October 28, 2010

Ms. Lauren McGee
Environmental Scientist
Rural Utilities Service, USDA
1400 Independence Avenue, SW
Stop 1571, Room 2244-S
Washington, DC 20250-1571

Re: Central Electric Cooperative, Inc.: Notice of Intent to Hold a Public Scoping Meeting and Prepare an Environmental Impact Statement
Rural Utilities Service, USDA
Berkeley, Charleston, and Georgetown Counties, South Carolina
FWS Log No. 2010-I-0305

Dear Ms. McGee:

The U.S. Fish and Wildlife Service (Service) has reviewed the Notice of Intent (NOI) to Hold a Public Scoping Meeting and to Prepare an Environmental Impact Statement (EIS) for the proposed construction of a 115 kilovolt (kV) transmission line through portions of Berkeley, Charleston, and Georgetown Counties (project). The NOI was published on September 17, 2010, in the Federal Register by Rural Utilities Service (RUS) for Central Electric Power Cooperative, Inc (Central Electric). Central Electric is requesting that RUS provide financial assistance for the proposal and may require a special permit from the U.S. Forest Service. The Service offers the following comments:

The geographic study area of the proposed project spans from Charleston, South Carolina, north to Georgetown, South Carolina and includes much of the Francis Marion National Forest (FMNF). The unique coastal area of central South Carolina is dominated by sensitive and protected habitats including the Cape Romain National Wildlife Refuge, the FMNF, the Santee River Delta Wildlife Management Area, and the Santee Coastal Reserve Wildlife Management Area. These areas are dominated by wetlands, tidal marsh, longleaf pine forest, and mixed pine hardwood forests. The FMNF hosts a variety of federally protected species and the Santee River Delta is extremely important to migratory birds.

Federally Protected Species

We are providing you a list of federally protected species and species of concern that have the potential to occur in Berkeley, Charleston, and Georgetown Counties to aid you in determining the potential impacts that your proposed project may have on protected species. This list includes species known and likely to occur in the affected county. Please note that species occurrence records are updated continually and may differ in the future. Therefore, this list should be used only as a guideline and not as the final authority.

County	Common Name	Scientific Name	Status
Berkeley	American chaffseed	<i>Schwalbea americana</i>	E
	Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA
	Canby's dropwort	<i>Oxypolis canbyi</i>	E
	Frosted flatwoods salamander	<i>Ambystoma cingulatum</i>	T, CH
	Pondberry	<i>Lindera melissifolia</i>	E
	Red-cockaded woodpecker	<i>Picoides borealis</i>	E
	Shortnose sturgeon	<i>Acipenser brevirostrum*</i>	E
	West Indian manatee	<i>Trichechus manatus</i>	E
	Wood stork	<i>Mycteria americana</i>	E
	Charleston	American chaffseed	<i>Schwalbea americana</i>
Bald eagle		<i>Haliaeetus leucocephalus</i>	BGEPA
Bachman's warbler		<i>Vermivora bachmanii</i>	E
Canby's dropwort		<i>Oxypolis canbyi</i>	E
Finback whale		<i>Balaenoptera physalus*</i>	E
Frosted flatwoods salamander		<i>Ambystoma cingulatum</i>	T, CH
Green sea turtle		<i>Chelonia mydas**</i>	E
Humpback whale		<i>Megaptera novaengliae*</i>	E
Kemp's ridley sea turtle		<i>Lepidochelys kempii**</i>	E
Leatherback sea turtle		<i>Dermochelys coriacea**</i>	E
Loggerhead sea turtle		<i>Caretta caretta**</i>	T
Piping plover		<i>Charadrius melodus</i>	T, CH
Pondberry		<i>Lindera melissifolia</i>	E
Red-cockaded woodpecker		<i>Picoides borealis</i>	E
Red knot		<i>Calidris canutus rufa</i>	C
Right whale		<i>Balaena glacialis*</i>	E
Seabeach amaranth		<i>Amaranthus pumilus</i>	T

	Shortnose sturgeon	<i>Acipenser brevirostrum*</i>	E
	West Indian manatee	<i>Trichechus manatus</i>	E
Georgetown	American chaffseed	<i>Schwalbea americana</i>	E
	Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA
	Canby's dropwort	<i>Oxypolis canbyi</i>	E
	Finback whale	<i>Balaenoptera physalus*</i>	E
	Green sea turtle**	<i>Chelonia mydas**</i>	T
	Humpback whale	<i>Megaptera novaengliae*</i>	E
	Kemp's ridley sea turtle**	<i>Lepidochelys kempii**</i>	E
	Leatherback sea turtle**	<i>Dermochelys coriacea**</i>	E
	Loggerhead sea turtle**	<i>Caretta caretta**</i>	T
	Piping plover	<i>Charadrius melodus</i>	T, CH
	Pondberry	<i>Lindera melissifolia</i>	E
	Red-cockaded woodpecker	<i>Picoides borealis</i>	E
	Seabeach amaranth	<i>Amaranthus pumilus</i>	T
	Right whale	<i>Balaena glacialis*</i>	E
	Shortnose sturgeon	<i>Acipenser brevirostrum*</i>	E
	West Indian manatee	<i>Trichechus manatus</i>	E
	Wood stork	<i>Mycteria americana</i>	E

T - Federally Threatened,

E - Federally Endangered,

CH - Critical Habitat

C - The U.S. Fish and Wildlife Service has on file sufficient information on biological vulnerability and threat to support proposals to list the species

BGEPA – federally protected under Bald and Golden Eagle Protection Act

*Contact the National Marine Fisheries Service for more information on this species.

Migratory Birds

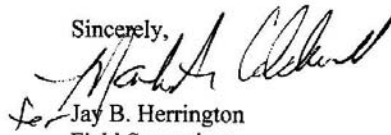
The Service is concerned with the potential effects of the installation of a transmission line within the study area. The longleaf pine stands of the FMNF are habitat for the endangered red-cockaded woodpecker and a variety of neo-tropical migrants, amphibians and reptiles. The Santee River Delta is also an important wintering area for waterfowl and shorebirds. The potential effects (i.e. collisions) of a large transmission line could be substantial.

Cumulative Impacts

A cumulative impacts study should be conducted that addresses past, present, and reasonably foreseeable future effects to the study area ecosystem. Loss of potential forest and of protected species nesting and foraging habitat should be analyzed. The sensitivity of the surrounding

ecosystem including the vast amount of federal and state protected lands should receive full consideration when making any determination. Additionally, the potential for the proposed project to encourage installation of more substations and development within the study area while encroaching on these important habitats should be addressed.

We appreciate the opportunity to provide comments on the Scoping Process for the proposed project. If you require additional assistance, please contact Paula Sisson at (843) 727-4707 ext. 226.

Sincerely,

For Jay B. Herrington
Field Supervisor

JBH/PTS



United States
Department of
Agriculture

Forest
Service

Francis Marion and
Sumter National Forests

4931 Broad River Road
Columbia, SC 29212
803-561-4000

File Code: 1580/2700

Date: October 14, 2010

Lauren McGee
Environmental Coordinator
USDA Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Avenue, SW, Mail Stop 1571
Washington, DC 20250-1571

Dear Ms. McGee:

Thank you for your efforts in managing the Agency Meeting for the McClellanville Transmission Line proposal held on Wednesday September 29, 2010. You did an excellent job informing agencies and the public of actions to date and what to expect in the future. Based on the roll-out of proposed corridors, we would like to request a meeting between Forest Service and RUS staff to discuss some of our comments and concerns. We would like to schedule this meeting prior to the end of your comment analysis period. We would be happy to meet with your local RUS contact here in Columbia and have you participate via VTC or teleconference if travel is an issue.

Some of the points we wish to discuss include:

- Risk/opportunity ratings do not adequately represent the importance of the National Forest (NF) in comparison to the Santee Coastal Reserve, Cape Romain Wildlife Refuge and Bonneau Ferry (current rating is 25 for NF lands).
- The 300 foot buffer for private parcels with structures 6 acres and smaller is of concern.
- Include Mt. Pleasant transmission/distribution line corridor from Mt. Pleasant to McClellanville concurrent with SCE&G.
- Show all other existing utility company transmission line routes on project area map with proposed corridors.
- Hanging distribution lines under transmission lines on existing routes needs to be considered to minimize resource impacts.
- Any portion of the selected alternative on NF land must have site specific analysis in order for the Forest Service to make a final decision and issue a special use authorization. We need to determine how we might accomplish this when our ROD is issued.

Once we have had an opportunity to discuss these and other topics with you, we would request a follow-up meeting that would include personnel from Mangi and Central Electric.



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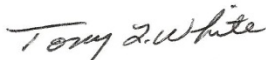
Ms. Lauren McGee

Page 2

It is likely that we will need Mangi to illustrate some of the additional values yielded from our meeting. We feel that our continued dialogue will provide all parties and the public with a product representative of the cooperative spirit we have enjoyed throughout the project.

Please contact Amy Fore at 843-887-3257 or afore@fs.fed.us to provide dates we can consider for our post scoping meeting. We look forward to our continued cooperation on this project.

Sincerely,


for PAUL L. BRADLEY
Forest Supervisor

cc: Amy Fore
Orlando Sutton
Stephen E Wells



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
CHARLESTON DISTRICT, CORPS OF ENGINEERS
69A HAGOOD AVENUE
CHARLESTON, SOUTH CAROLINA 29403-5107

October 27, 2010

Regulatory Division

Lauren Mcgee
USDA RUS/WEP
1400 Independence Ave, SW
Mail Stop 1571
Washington, DC 20250

Dear Ms. Mcgee:

This is in response to your letter of September 16, 2010, wherein you provided information regarding a project proposal consisting of the construction of a 115 kv transmission line and associated facilities, located in a linear project area in Berkeley, Charleston and/or Georgetown Counties, South Carolina. Based on the information you supplied, it is our opinion that jurisdictional wetlands or other Waters of the United States may be impacted by a project of this nature, and a Department of the Army permit may be required. For this reason, it is strongly suggested that you first obtain a jurisdictional determination of the project area. Once any project area wetlands have been identified, and project plans and associated impacts have been reviewed, the permitting process can ensue.

Should this project be in a position to move forward, please have the involved environmental consultant provide this office with the "Request for Jurisdictional Determination" form along with the required supporting information for review and verification.

Enclosed please find:

- ✓ a "Request for Jurisdictional Determination" form (to determine location and size of wetlands and other jurisdictional waters)
- ✓ a Corps permit application (including detailed instructions for filling out permit applications)

In future correspondence, please refer to this file as SAC 2010-01222-2JH. If you have any questions concerning your permit application, please call me at 843-329-8044.

Respectfully,

Holland Youngman
Project Manager

Enclosures:
"Request for Jurisdictional Determination" form
Army Corps permit application form

U.S. Army Corps of Engineers – Charleston District - Regulatory Division

JURISDICTIONAL DETERMINATION REQUEST

For Identifying Waters of the U.S., Including Wetlands and Tributaries

Project Name: _____ Date: _____

County: _____

Total Acreage of Tract: _____

Property Owner : _____ Address: _____ Address: _____ Phone: _____ Email: _____
--

Agent: _____ Address: _____ Address: _____ Phone: _____ Email: _____
--

Information Required to Accompany Request - Check the items submitted - forward as much information as is available. At a minimum, the first two items must be forwarded:

- Accurate Location Maps (from County Map, USGS Quad Sheet, etc.)
- Survey Plat or Tax Map of the Property in Question
- Soil Survey Sheet (from USDA-NRCS) or Aerial Photo (from County Assessor's Office or other source).
Property boundaries should be shown on the soil survey / photo.
- Topographic Survey
- Conceptual Site Plan for the Overall Development
- Description of the proposed use of the property (residential, commercial, industrial, silvicultural, agricultural, etc.)
- Status of the project (on-going site work for development, development in planning stages, no plans at this time, etc.)

Type of Determination Requested - Choose one:

- Preliminary – Preliminary determinations will identify whether wetlands or other waters are present on the site and will presume that they are jurisdictional. This type of determination is likely to be made more quickly and require less information be submitted.
- Approved – Approved determinations will identify whether wetlands or other waters are present on the site and will include a determination of their jurisdictional status. This type of determination is likely to take longer and require more detailed information be submitted.

IMPORTANT NOTE: Legible printed name and signature required. The person signing this form must be the present property owner or have the specific authority of the property owner to authorize Corps of Engineers employees or their agents to enter onto the property for on-site investigations if such is deemed necessary. Do not sign this form unless you are the owner, or have the specific authority of the property owner.

PRINTED NAME of person signing this form, below: _____

Signature of Property Owner or Authorized Agent: _____

HQ and South Branch
69-A Hagoood Avenue
Charleston, SC 29403
843-329-8044

Northeast Branch
1949 Industrial Park Rd, Room 140
Conway, SC 29526
843-365-4239

Northwest Branch
1835 Assembly St., Room 865-B1
Columbia, SC 29201
803-253-3444

Copies of this form may be obtained at: http://www.sac.usace.army.mil/assets/pdf/regulatory/permits/request_jurisdictional_determination_form.pdf

Joint Federal and State Application Form For Activities Affecting Waters of the United States Or Critical Areas of the State of South Carolina		This Space for Official Use Only Application No. _____ Date Received _____ Project Manager _____ Watershed # _____	
<p><i>Authorities:</i> 33 USC 401, 33 USC 403, 33 USC 407, 33 USC 408, 33 USC 1341, 33 USC 1344, 33 USC 1413 and Section 48-39-10 et. Seq of the South Carolina Code of Laws. These laws require permits for activities in, or affecting, navigable waters of the United States, the discharge of dredged or fill material into waters of the United States, and the transportation of dredged material for the purpose of dumping it into ocean waters. The Corps of Engineers and the State of South Carolina have established a joint application process for activities requiring both Federal and State review or approval. Under this joint process, you may use this form, together with the required drawings and supporting information, to apply for both the Federal and/or State permit(s).</p> <p><i>Drawings and Supplemental Information Requirements:</i> In addition to the information on this form, you must submit a set of drawings and, in some cases, additional information. A completed application form together with all required drawings and supplemental information is required before an application can be considered complete. See the attached instruction sheets for details regarding these requirements. You may attach additional sheets if necessary to provide complete information.</p>			
1. Applicant Last Name:		11. Agent Last Name (agent is not required):	
2. Applicant First Name:		12. Agent First Name:	
3. Applicant Company Name:		13. Agent Company Name:	
4. Applicant Mailing Address:		14. Agent Mailing Address:	
5. Applicant City:		15. Agent City:	
6. Applicant State:	7. Applicant Zip:	16. Agent State:	17. Agent Zip:
8. Applicant Area Code and Phone No.:		18. Agent Area Code and Phone No.:	
9. Applicant Fax No.:		19. Agent Fax No.:	
10. Applicant E-mail:		20. Agent E-mail:	
21. Project Name:		22. Project Street Address:	
23. Project City:	24. Project County:	25. Project Zip Code:	25. Nearest Waterbody:
26. Tax Parcel ID:	27. Property Size (acres):	28. Latitude:	29. Longitude:
30. Directions to Project Site (Include Street Numbers, Street Names, and Landmarks and attach additional sheet if necessary):			
31. Description of the Overall Project and of Each Activity in or Affecting U.S. Waters or State Critical Areas (attach additional sheets if needed)			
32. Overall Project Purpose and the Basic Purpose of Each Activity In or Affecting U.S. Waters (attach additional sheets if needed):			
33. Type and quantity of Materials to Be Discharged Dirt or Topsoil: _____ <input type="checkbox"/> cubic yards Clean Sand: _____ <input type="checkbox"/> cubic yards Mud: _____ <input type="checkbox"/> cubic yards Clay: _____ <input type="checkbox"/> cubic yards Gravel, Rock, or Stone: _____ <input type="checkbox"/> cubic yards Concrete: _____ <input type="checkbox"/> cubic yards Other (describe): _____ <input type="checkbox"/> cubic yards TOTAL: _____ cubic yards		34. Type and Quantity of Impacts to U.S. Waters (including wetlands). Filling: _____ <input type="checkbox"/> acres <input type="checkbox"/> sq.ft. <input type="checkbox"/> cubic yards Backfill & Bedding: _____ <input type="checkbox"/> acres <input type="checkbox"/> sq.ft. <input type="checkbox"/> cubic yards Landclearing: _____ <input type="checkbox"/> acres <input type="checkbox"/> sq.ft. <input type="checkbox"/> cubic yards Dredging: _____ <input type="checkbox"/> acres <input type="checkbox"/> sq.ft. <input type="checkbox"/> cubic yards Flooding: _____ <input type="checkbox"/> acres <input type="checkbox"/> sq.ft. <input type="checkbox"/> cubic yards Draining/Excavation: _____ <input type="checkbox"/> acres <input type="checkbox"/> sq.ft. <input type="checkbox"/> cubic yards Shading: _____ <input type="checkbox"/> acres <input type="checkbox"/> sq.ft. <input type="checkbox"/> cubic yards TOTALS: _____ acres _____ sq.ft. _____ cubic yards	

35. Individually list wetland impacts including mechanized clearing, fill, excavation, flooding, draining, shading, etc. and attach a site map with location of each impact (attach additional sheets if needed).

Impact No.	Wetland Type	Distance to Receiving Water body (LF)	Purpose of Impact (road crossing, impoundment, flooding, etc)	Impact Size (acres)
Total Wetland Impacts (acres)				

36. Individually list all seasonal and perennial stream impacts and attach a site map with location of each impact (attach additional)

Impact No.	Seasonal or Perennial Flow	Average Stream Width (LF)	Impact Type (road crossing, impoundment, flooding, etc)	Impact Length (LF)
Total Stream Impacts (Linear Feet)				

37. Have you commenced work on the project site? YES NO If yes, describe all work that has occurred and provide dates.

38. Describe measures taken to avoid and minimize impacts to Waters of the United States:

39. Provide a brief description of the proposed mitigation plan to compensate for impacts to aquatic resources or provide justification as to why mitigation should not be required (Attach a copy of the proposed mitigation plan for review).

40. See the attached sheet to list the names and addresses of adjacent property owners.

41. List all Corps Permit Authorizations and other Federal, State, or Local Certifications, Approvals, Denials received for work described in this application.

42. Authorization of Agent. I hereby authorize the agent whose name is given on page one of this application to act in my behalf in the processing of this application and to furnish supplemental information in support of this application. ¹

 Applicant's Signature Date

43. Certification. Application is hereby made for a permit or permits to authorize the work and uses of the work as described in this application. I certify that the information in this application is complete and accurate. I further certify that I possess the authority to undertake the work described herein or am acting as the duly authorized agent for the applicant. ¹

 Applicant's Signature Date

 Agent's Signature Date

¹The application must be signed by the person who desires to undertake the proposed activity or it may be signed by a duly authorized agent if the authorization statement in blocks 11 and 42 have been completed and signed. 18 U.S.C. Section 1001 provides that: Whoever, in any manner within the jurisdiction of any department of the United States knowingly and willfully falsifies, conceals, or covers up any trick, scheme, or disguises a material fact or makes any false, fictitious or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statements or entry, shall be fined not more than \$10,000 or imprisoned not more than five years or both.

South Carolina Department of Natural Resources

PO Box 12559
Charleston, SC 29422
843.953.9003 Office
843.953.9399 Fax
Daviss@dnr.sc.gov



John E. Frampton
Director
Robert D. Perry
Director, Office of
Environmental Programs

October 27, 2010

Mr. Mark S. Plank
Director, Engineering & Environmental Staff
USDA Rural Utilities Service
1400 Independence Ave, Mail Stop 1571
Washington, DC 20250-1571

Re: Scoping Comments for the McClellanville 115 kilovolt Transmission Line Proposal,
Berkeley, Charleston and Georgetown Counties, SC.

Dear Mr. Plank:

As an agency mandated to protect and conserve the natural resources of this state, we have a strong interest in the proposed Central Electric Cooperative initiative to improve power supply to the McClellanville area by constructing a 115 kilovolt transmission line. The proposed project area encompasses an enormous amount of sensitive habitat considered of high value in the conservation community, including private lands under very restrictive conservation easement, scenic National Forest Service land (Francis Marion National Forest (FMNF)), and several properties owned and managed by the DNR for resource protection and public benefit. One of the transmission line corridors under consideration crosses one of our state's natural treasures, the Santee Delta. The Santee Delta is home to thousands of resident and migratory birds, including many rare or endangered species. State and federal agencies and private landowners cooperatively manage thousands of acres of wetlands to improve wildlife habitat in the Delta. The success of these efforts is clearly evident in the pristine character and abundant wildlife in the area. Construction of a transmission line through these sensitive habitats would result in a number of adverse impacts, including habitat alteration, bird mortality, aesthetic degradation and impairment of the public use and enjoyment of these resources.

We understand your agency will be preparing an Environmental Impact Statement (EIS) as part of the environmental review for this project and to comply with the National Environmental Policy Act (NEPA). We stress the importance of selecting alternatives to be considered in the NEPA review of this project based on a clear and justifiable project purpose and need, with careful consideration given to avoiding and minimizing impacts to important natural resources such as those outlined above. Both the direct and indirect impacts of each alternative should be fully evaluated. In most cases, transmission line construction on new alignment represents the most environmentally damaging alternative in meeting project objectives and we ask that it be considered only after all other options are exhausted. Alternatives that involve improvements to

existing infrastructure (i.e. rebuilding existing distribution system) should be given full consideration in the NEPA review of this project.

DNR staff has reviewed both the Revised Macro-Corridor Study Report for the McClellanville 115 kV Transmission Line Project as well as the McClellanville Power Supply Alternatives Evaluation compiled by Central Electric Cooperative. The Study Report and Alternative Analysis address potential improvements and/or construction of rights-of-ways and infrastructure allowing greater and more reliable electric power transmission to the McClellanville area in northern Charleston County. Our department previously commented on earlier versions of these documents in January of 2006 and provided several recommendations. DNR continues to have concerns regarding a number of aspects presented either in the Study Report or Alternative Analysis and are as follows:

McClellanville Power Supply Alternative Evaluation (PSAE)

The Power Supply Alternative Evaluation provides projected construction and operational cost figures for several potential options allowing power to be more effectively provided to the McClellanville area. Several options were considered, including rebuilding the existing power supply system and the construction of a new transmission line along one of several proposed new alignments. Transmission line construction on new alignment represents the most environmentally damaging alternative. Conversely, the option to rebuild, repair and maintain the existing distribution line utilizes existing infrastructure and right-of-way, requiring minimal new encroachment on the natural environment and represents the least damaging alternative. From the information provided in the PSAE, it is difficult to understand why rebuilding the existing power supply system would be significantly less cost effective than clearing and constructing new rights-of-ways and constructing a new 115 kV segment and distribution system in any one of several alternative routes being considered. We do not believe the PSAE provides a clear and comprehensive evaluation of this option and we recommend that it be further evaluated in the NEPA review of this project. We also recommend the EIS prepared for this project include a cumulative impacts cost analysis for each alternative considered such that all potential ecological impacts, including mitigation, are addressed.

There is also questions regarding the overall need for the project and the effectiveness of the project as proposed in providing improved power service to the entire McClellanville area. Given growth restrictions imposed on the McClellanville area (e.g., so much state, Federal and conservation easement properties), the overwhelming need for the project is unclear. The projected growth and power demands for this area do not clearly support the need for a project of this scope.

There are currently two power providers that service the McClellanville area, South Carolina Electric and Gas (SCE&G) and Berkeley Electric Cooperative (BEC). The proposed project involves improvements to the BEC system only, limiting the benefits of the project to those customers living outside the Town of McClellanville. Without a planned interconnection between the proposed BEC transmission line and substation and the SCE&G system, the benefits of the project are limited and may not justify the significant financial and environmental costs associated with new line construction. We recommend the overall need for the project and a cost-benefit analysis for each alternative be fully evaluated in the EIS.

Revised Macro-Corridor Study Report

In accordance with our earlier comments, the data presented in the Revised Macro-Corridor Study Report has been updated to include additional threatened, endangered and sensitive species occurrences and habitats, additional conservation easement properties, additional DNR owned properties and revised FMNF boundaries. The Suitability Ratings for the data layers used in the Suitability Analysis have also been revised. In several instances, less weight (less risk) has been assigned to resource suitability layers for areas of high conservation value and sensitivity. Examination of several route alternatives clearly will impact private lands under very restrictive conservation easement and/or DNR Wildlife Management Areas (WMA). As stated in our previous comments, we believe conservation easement properties and DNR properties require exclusionary ranking status. The revised report assigns a reduced value of +25 for these layers.

DNR is a long-time advocate and supporter of appropriate and traditional uses within the FMNF. Written cooperative agreements between DNR and the US Forest Service relating to FMNF may be of the oldest and most sacred of such agreements between any state natural resource agency in the Nation and the Forest Service. Not unexpectedly, DNR will voice concern regarding any proposal resulting in adverse impacts on FMNF and sensitive habitats and species therein including creation of any new rights-of-ways. We continue to insist upon recognition that the FMNF and these habitats and species are very important to the people of SC and the Nation as well as to the local and state economy. Accordingly, we recommend a suitability rating greater than +25 be assigned to FMNF lands.

In the NEPA review of this project, we continue to recommend that more consideration and weight be given to route alternatives and opportunities minimizing or eliminating potential impacts to FMNF lands, conservation easement properties, DNR properties, sensitive species and/or habitats, and unaddressed cultural and/or historic resources. We also recommend that less risk be assigned to those alternatives and opportunities adjoining existing utility or highway rights-of-ways. We submit an approach will be more in keeping with least risk analysis even if some mitigation ultimately will be required.

The project area under consideration in the NEPA review of this project is one of the most ecologically complex and significant along the coast of SC. While we recognize the importance of providing dependable, cost effective electric power to the citizens of the McClellanville area, we consider the proposed study area worthy of the highest degree of environmental protection possible. DNR appreciates the opportunity to provide input in the early stages of this project, and DNR staff will be available for future consultation. I will be the DNR project manager for this project. My contact information is as follows:

Mailing Address: 217 Fort Johnson Road
Charleston, SC 29412

E-Mail Address: Daviss@dnr.sc.gov

Phone: (843) 953-9003 Fax: (843) 953-9399

Please do not hesitate to contact me if I can be of any additional assistance on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan F. Davis". The signature is fluid and cursive, with the first name "Susan" being the most prominent part.

Susan F. Davis
Coastal Environmental Coordinator

Extended Scoping Comments (F, S, L)



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Cape Romain National Wildlife Refuge
5801 Highway 17 North
Awendaw, South Carolina 29429-5908
Phone (843) 928-3264 Fax (843) 928-3803



January 3, 2011

Ms. Lauren McGee, Environmental Scientist
USDA Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Ave., S.W., Stop 1571
Washington, DC 20250-1571

RE: McClellanville 115 kilovolt Transmission Line Proposal

Dear Ms. McGee,

I have reviewed the above-referenced proposal for the construction of a 115 kilovolt transmission line to provide McClellanville with reliable power. I have several concerns regarding this project and the effects on the Cape Romain National Wildlife Refuge (NWR). Cape Romain NWR was established in 1932 as a migratory bird Refuge and encompasses a 22-mile segment of the southeast Atlantic coast, east of the Atlantic Intra-coastal Waterway (ICW).

In 2009, Cape Romain NWR completed a Comprehensive Conservation Plan (CCP) outlining the programs and corresponding resource needs for the next 15 years, as mandated by the National Wildlife Refuge System Improvement Act of 1997. As part of the CCP goals to "protect refuge resources through adaptive management, land acquisition, land protection and limiting impacts of human activities and invasive species on and around the refuge", Cape Romain NWR was approved for a minor expansion of the historic boundary to encompass lands west of the ICW in the Awendaw area. In addition, a major expansion plan is currently being evaluated to encompass land west of the ICW along the entire corresponding Refuge boundary. Our efforts to expand our boundaries have involved partnership with the Francis Marion National Forest to create uninterrupted wildlife corridors from the forest to the sea as well as preserving future habitat for coastal species as climate change and sea level rise erode existing habitat.

The Refuge is designated as a Western Hemisphere Shorebird Reserve Network of International Importance due to the large number of shorebirds that utilize the Refuge throughout the year. Criteria for the network of international importance are at least 100,000 shorebirds annually, or at least 10 percent of the bio-geographic population for a shorebird species. Only three other sites have this designation on the Atlantic Coast. In addition, Cape Romain NWR supports large numbers of nesting seabirds and is one of only 5 seabird nesting islands in the state. Raptors are prevalent on the Refuge as well as neotropical migrants, waterbird and waterfowl. In all, 277 species of birds have been recorded on the Refuge.

The National Wildlife Refuge System Improvement Act of 1997 defines six wildlife-dependent recreational uses on Refuge lands; hunting, fishing, wildlife observation and photography, and environmental education and interpretation if compatible with the mission of the Refuge. If an activity falls outside of these approved uses, then a special use permit or easement is required. Special use permits require a compatibility determination and are decided on a case by case basis. It is the policy of the Service to discourage the types of uses embodied in right-of-way requests. According to policy, on areas in the National Wildlife Refuge System, if a right-of-way cannot be certified as compatible with the purposes for which a unit was established, it cannot be granted without authorization by Congress.

Although none of the corridors currently proposed occur on Refuge lands, five of the proposed corridors come in close proximity to our border. These are the Charity Corridors 1 – 4 and the Commonwealth Corridor. Due to the importance of Cape Romain NWR to many different species of birds utilizing the Atlantic Flyway and the documented bird mortalities associated with transmission lines, we cannot support any alignment that would result in the construction of transmission lines immediately adjacent to Cape Romain National Wildlife Refuge. In addition, a transmission line corridor through the above referenced areas which border the Refuge will negatively impact the efforts of the U.S. Fish and Wildlife Service and the U.S. Forest Service to create uninterrupted wildlife corridors.

If the location of the transmission line corridor is immediately adjacent to or within the boundary of Cape Romain National Wildlife Refuge, please contact me to obtain more precise information on the wildlife and habitat resources that would likely be affected by this action.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sarah Dawsey".

Sarah Dawsey
Refuge Manager



Daniel C. Pennick, AICP
Zoning/Planning Director

843.202.7200
Fax: 843.202.7218
Lonnie Hamilton III Public Services Building
4045 Bridge View Drive
North Charleston, SC 29405

January 4, 2011

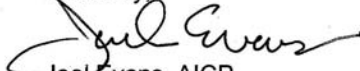
Lauren McGee, Environmental Specialist
USDA Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Ave., S.W., Stop 1571
Washington DC, 20250-1571

Re: McClellanville 115 kilovolt Transmission Line Proposal
Berkeley, Charleston, and Georgetown Counties, SC

Dear Ms. McGee:

Charleston County has received the notice of extension of scoping period and addition of an alternative route corridor for McClellanville 115 kilovolt transmission line proposal dated December 10, 2010. Please be aware that portions of the study area located in unincorporated Charleston County are under the jurisdiction of Charleston County Government and will require permits from this agency prior to construction. We would like to meet with you to discuss the project in more detail and the permitting requirements of the Charleston County Zoning and Land Development Regulations Ordinance that will apply to your project. Please contact me at (843) 202-7202 at your earliest convenience to schedule a meeting.

Sincerely,


Joel Evans, AICP
Planner IV

cc: Mark Plank, Director, USDA Engineering and Environmental Staff
Walt Smalls, Assistant Administrator for General Services
Dan Pennick, AICP, Director, Zoning/Planning Department
File



113 Forestry Commission Drive
Florence, SC 29501
(p) (843) 662-5571
(f) (843) 662-2627
www.trees.sc.gov

Henry E. (Gene) Kodama, State Forester

January 6, 2011

Ms. Lauren McGee, Environmental Scientist
USDA Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Ave., S.W., Stop 1571
Washington, DC 20250-1571

Ms. McGee,

This letter is in response to the Georgetown County portion of the McClellanville 115 kv Transmission Line Proposal. The project area does not appear to include the Wee Tee State Forest. If at any point that it may in the future, the Forest Director, Harvey Belser, should be contacted at 803-494-8196.

Regarding the overall proposed project area, the SC Forestry Commission's mission is to protect, promote, and enhance the forestry resource. The agency always encourages the proper management and protection of the forestry resource by/for private and public entities. We encourage the minimizing of any possible pollution to the water system that may derive from such a disturbance. The project leaders should take all precautions to ensure that all measures are in place to protect the local natural resources such as taking precautions to avoid soil compaction in sensitive wetland areas that may occur due to heavy equipment. As you can imagine, heavy soil compaction can have a lasting effect on the forest by inhibiting such factors as water drainage, nutrient intake, and plant growth. It is also recommended that special attention is given to any possible endangered or protected species in the project area.

If the SC Forestry Commission can be of any assistance to you, please do not hesitate to call and we will be happy to assist you in any way possible.

Sincerely,

Ron Holt
Black River Unit Forester
SC Forestry Commission

Our mission is to protect and develop the forest resources of South Carolina.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407



January 10, 2010

Ms. Lauren McGee
Environmental Scientist
Rural Utilities Service, USDA
1400 Independence Avenue, SW
Stop 1571, Room 2244-S
Washington, DC 20250-1571

Re: McClellanville 115 kilovolt Transmission Line Proposal
Berkeley, Charleston, and Georgetown Counties, South Carolina
Notice of Extension of Scoping Period and Addition of an Alternative Route Corridor
FWS Log No. 2010-I-0305

Dear Ms. McGee:

The U.S. Fish and Wildlife Service (Service) has received the Notice of Extension of Scoping Period and Addition of an Alternative Route Corridor for the proposed construction of a 115 kilovolt (kV) transmission line through portions of Berkeley, Charleston, and Georgetown Counties (project). The Notice of Intent to Prepare an Environmental Assessment was published on September 17, 2010, in the Federal Register by Rural Utilities Service (RUS) for Central Electric Power Cooperative, Inc (CEPCI). CEPCI is requesting that RUS provide financial assistance for the proposal and may require a special permit from the U.S. Forest Service. We provide the following comments in accordance the Fish and Wildlife Coordination Act, as amended (16 U.S.C. §§ 661-667e); Section 7 of the Endangered Species Act of 1973, as amended (Act)(16 U.S.C. §§1531-1543); the Migratory Bird Treaty Act (16 U.S.C. §§1536, 1538); the Bald Eagle Protection Act of 1940 (16 U.S.C. 668-668d); the National Environmental Policy Act (42 U.S.C. § 4321 et seq.); and the Clean Water Act (33 U.S.C. §1251 et seq).

The Service attended a Scoping Meeting held on December 14, 2005, for the proposed project and has reviewed the Electric Alternative Evaluation Report and the Macro-Corridor Study Report prepared by CEPCI and provided comments on January 12, 2006. On September 29, 2010, the Service attended an additional Public Scoping meeting and provided additional comments on October 28, 2010.

The Service is very concerned with the potential affects this proposed project may have on rare and protected species, uncommon habitats, and unique ecosystems. We recommend the following topics are thoroughly evaluated in an Environmental Assessment as prepared for the proposed project.

Purpose and Need

South Carolina Electric & Gas (SCE&G) is the utility that currently provides power to the McClellanville community. We have not been provided any documentation, and are unaware of any action by SCE&G to cease providing service to their existing customers. We are unclear why Berkeley Electric is pursuing the construction of a 115 kV transmission line without the guarantee of customers. The McClellanville area is surrounded by a National Forest, a National Wildlife Refuge, Wildlife Management Areas, and historic plantations. It is unlikely that the customer base will significantly increase in the future. We are, thus far, unconvinced of any overwhelming need or purpose for the proposed project, particularly, with the myriad of potential adverse environmental effects that may occur. We recommend a thorough evaluation of the existing circumstances surrounding the proposed project, and a justification and explanation for its purpose and need.

General Comments

The geographic study area of the proposed project spans from Charleston, South Carolina, north to Georgetown, South Carolina and includes much of the Francis Marion National Forest (NF) which is comprised of 645,120 acres. The unique coastal area of central South Carolina is dominated by protected conservation lands including the Cape Romain National Wildlife Refuge (NWR), the Francis Marion NF, the Santee River Delta Wildlife Management Area (WMA), and the Santee Coastal Reserve (WMA). These areas are bound by open water, Carolina Bays, wetlands, tidal marsh, longleaf pine forest, and mixed pine hardwood forests. Cape Romain NWR and the Francis Marion NF host a variety of federally protected species and the Santee River Delta WMA and Santee Coastal Reserve WMA are extremely important areas for migratory birds and other forms of wildlife.

Federally Protected Species

In 1973, Congress recognized threatened and endangered species of wildlife and plants as "esthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people." Congress further stated that the Act should conserve the ecosystems upon which endangered and threatened species depend. Cape Romain NWR, the Francis Marion NF, the Santee River Delta WMA and the Santee Coastal Reserve WMA all support protected species and their habitats which provide for feeding, breeding, sheltering, and migration. These interconnected conservation lands are substantial in their diversity of habitats and make available natural corridors for these protected species.

Therefore, we are providing you a list of federally protected species that have the potential to occur in Berkeley, Charleston, and Georgetown Counties to aid you in determining the potential impacts that your proposed project may have on protected species. This list includes species

known and likely to occur in the affected county. Please note that species occurrence records are updated continually and may differ in the future. Therefore, this list should be used only as a guideline and not as the final authority.

County	Common Name	Scientific Name	Status	
Berkeley	American chaffseed	<i>Schwalbea americana</i>	E	
	Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA	
	Canby's dropwort	<i>Oxypolis canbyi</i>	E	
	Frosted flatwoods salamander	<i>Ambystoma cingulatum</i>	T, CH	
	Pondberry	<i>Lindera melissifolia</i>	E	
	Red-cockaded woodpecker	<i>Picoides borealis</i>	E	
	Shortnose sturgeon	<i>Acipenser brevirostrum*</i>	E	
	West Indian manatee	<i>Trichechus manatus</i>	E	
	Wood stork	<i>Mycteria americana</i>	E	
	Charleston	American chaffseed	<i>Schwalbea americana</i>	E
		Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA
Bachman's warbler		<i>Vermivora bachmanii</i>	E	
Canby's dropwort		<i>Oxypolis canbyi</i>	E	
Finback whale		<i>Balaenoptera physalus*</i>	E	
Frosted flatwoods salamander		<i>Ambystoma cingulatum</i>	T, CH	
Green sea turtle		<i>Chelonia mydas**</i>	E	
Humpback whale		<i>Megaptera novaengliae*</i>	E	
Kemp's ridley sea turtle		<i>Lepidochelys kempii**</i>	E	
Leatherback sea turtle		<i>Dermochelys coriacea**</i>	E	
Loggerhead sea turtle		<i>Caretta caretta**</i>	T	
Piping plover		<i>Charadrius melodus</i>	T, CH	
Pondberry		<i>Lindera melissifolia</i>	E	
Red-cockaded woodpecker		<i>Picoides borealis</i>	E	
Red knot		<i>Calidris canutus rufa</i>	C	
Right whale		<i>Balaena glacialis*</i>	E	
Seabeach amaranth		<i>Amaranthus pumilus</i>	T	
Shortnose sturgeon		<i>Acipenser brevirostrum*</i>	E	
West Indian manatee		<i>Trichechus manatus</i>	E	

Georgetown	American chaffseed	<i>Schwalbea americana</i>	E
	Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA
	Canby's dropwort	<i>Oxypolis canbyi</i>	E
	Finback whale	<i>Balaenoptera physalus*</i>	E
	Green sea turtle**	<i>Chelonia mydas**</i>	T
	Humpback whale	<i>Megaptera novaengliae*</i>	E
	Kemp's ridley sea turtle**	<i>Lepidochelys kempii**</i>	E
	Leatherback sea turtle**	<i>Dermodochelys coriacea**</i>	E
	Loggerhead sea turtle**	<i>Caretta caretta**</i>	T
	Piping plover	<i>Charadrius melodus</i>	T, CH
	Pondberry	<i>Lindera melissifolia</i>	E
	Red-cockaded woodpecker	<i>Picoides borealis</i>	E
	Seabeach amaranth	<i>Amaranthus pumilus</i>	T
	Right whale	<i>Balaena glacialis*</i>	E
	Shortnose sturgeon	<i>Acipenser brevirostrum*</i>	E
	West Indian manatee	<i>Trichechus manatus</i>	E
	Wood stork	<i>Mycteria americana</i>	E

T - Federally Threatened,
E - Federally Endangered,
CH - Critical Habitat

C - The U.S. Fish and Wildlife Service has on file sufficient information on biological vulnerability and threat to support proposals to list the species

BGEPA – federally protected under Bald and Golden Eagle Protection Act

*Contact the National Marine Fisheries Service for more information on this species.

Migratory Birds

The Service is concerned with the potential effects of the installation of a transmission line within the study area. Cape Romain NWR is designated as a Western Hemisphere Shorebird Reserve Network of International Importance due to the large number of shorebirds that utilize the Refuge throughout the year. The longleaf pine stands of the Francis Marion NF support one of the most vigorous populations of red-cockaded woodpeckers (*Picoides borealis*) in the United States as well as habitat for a variety of neo-tropical migrants. The Santee River has the largest delta on the east coast and provides an important wintering area for waterfowl, and birds of prey such as the bald eagle and the swallow tail kite. A large transmission line in this sensitive area could subdivide and fragment the habitat. The effects to natural resources may be considerable.

Cumulative Impacts

A cumulative impacts study should be conducted that addresses past, present, and reasonably foreseeable future effects to the study area ecosystem. Loss of potential forest and of protected species nesting and foraging habitat should be analyzed. The sensitivity of the surrounding ecosystem including the vast amount of federal and state protected lands should receive full consideration when making any determination. Additionally, the potential for the proposed project to encourage installation of more substations and development within the study area while encroaching on these important habitats should be addressed.

We appreciate the opportunity to provide comments on the Scoping Process for the proposed project. If you require additional assistance, please contact Paula Sisson at (843) 727-4707 ext. 226.

Sincerely,



*Acting
for*

Jay B. Herrington
Field Supervisor

JBH/PTS

South Carolina Department of Natural Resources

PO Box 12559
Charleston, SC 29422
843.953.9003 Office
843.953.9399 Fax
Daviss@dnr.sc.gov



John E. Frampton
Director
Robert D. Perry
Director, Office of
Environmental Programs

January 13, 2011

Ms. Lauren McGee
Environmental Scientist
USDA Rural Utilities Service
1400 Independence Ave, S.W., Mail Stop 1571
Washington, DC 20250-1571

Re: Scoping Comments for the McClellanville 115 kilovolt Transmission Line Proposal,
Berkeley, Charleston and Georgetown Counties, SC.

Dear Ms. McGee:

We understand that a new alternative corridor that was not evaluated in the Macro-Corridor Study has been identified during the current scoping period. The new corridor, identified as the Commonwealth Alternative, involves a recently constructed 115-kV transmission line between Hamlin and the Commonwealth substation located in Mt. Pleasant. The new alternative extends the transmission line northeast from the substation parallel to US Highway 17, uses the portion of the Charity route corridors that parallels SC Highway 17, and ends at the McClellanville substation.

As outlined in our previous scoping comments in correspondence dated October 27, 2010, we consider the project area under consideration in the NEPA review of this project as being one of the most ecologically complex and significant along the coast of SC. We continue to stress the importance of considering route alternatives that minimize or eliminate potential impacts to FMNF lands, conservation easement properties, DNR properties, sensitive species and/or habitats, and cultural and/or historic resources. The new Commonwealth Alternative utilizes existing infrastructure and parallels an existing roadway for the majority of its length. As a result, this alternative greatly minimizes encroachment on sensitive natural and cultural resources and in our opinion represents the least environmentally damaging alternative being considered. We ask that this alternative be given full consideration in the NEPA review of this project.

DNR appreciates the opportunity to provide input in the early stages of this project, and DNR staff will be available for future consultation. I will be the DNR project manager for this project. My contact information is as follows:

Mailing Address: 217 Fort Johnson Road
Charleston, SC 29412

E-Mail Address: Daviss@dnr.sc.gov

Phone: (843) 953-9003 Fax: (843) 953-9399

Please do not hesitate to contact me if I can be of any additional assistance on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan F. Davis". The signature is fluid and cursive, with a large initial "S" and "D".

Susan F. Davis
Coastal Environmental Coordinator

January 12, 2011

Mr. Mark S. Plank
Water and Environmental Programs
USDA Rural Utilities Service
1400 Independence Ave, SW
Mail Stop 1571
Washington, DC 20250



Re: McClellanville 115 Kilovolt Transmission Line Proposal
Berkeley, Charleston, and Georgetown Counties, South Carolina
SHPO No. 10JB0020

Dear Mr. Plank:

Thank you for your letter of December 10, which we received on December 16, regarding the above-named project. The State Historic Preservation Office is providing comments to USDA Rural Utilities Service pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR 800. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public.

In 2005, our office provided comments on the overall project:

Based on the information provided, it does not appear that cultural resources surveys have been conducted on the proposed transmission line corridors. We understand that these surveys will be conducted in the future, and we look forward to reviewing the information provided.

The Belle Isle to McClellanville #1 route has the potential to affect Hopsewee Plantation, a historic property designated a National Historic Landmark. If this location is ultimately chosen, consultation with the National Park Service and the owners of Hopsewee will be requested.

We continue to support the directional bore option for the Belle Isle to McClellanville #2 route. The overhead line option for this route also has the potential to affect Hopsewee Plantation.

At this point we have not received any information about the cultural resources surveys or the potential affects to Hopsewee Plantation. We thank you for the opportunity to comment on project and look forward to continuing our consultation. If you have any questions, please contact me at (803) 896-6181 or jbarnes@scdah.state.sc.us.

Sincerely,

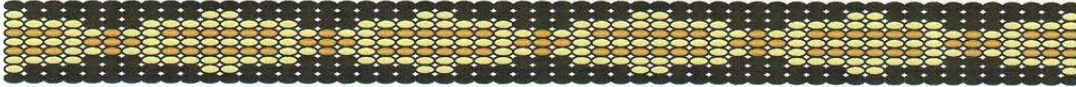
Jodi Barnes, PhD
Staff Archaeologist/GIS Coordinator
State Historic Preservation Office

Appendix K:

Consultation Letters

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427
Fax 803-328-5791



October 7, 2010

Attention: Mark S. Plank
USDA Rural Development
1400 Independence Ave, S.W.
Washington, DC 20250-0700

Re. THPO #	TCNS #	Project Description
2010-175-61		McClellanville 115 kilovolt Transmission Line Proposal Berkeley, Charleston and Georgetown

Dear Mr. Plank,

We expect to be a consulting party but we will have to do it via mail. We have concerns and wish to be a part of this process.

If you have questions please contact Caitlin Totherow at 803-328-2427 ext. 226, or e-mail caitlinh@ccppcrafts.com.

Sincerely,

Handwritten signature of Caitlin Totherow for Wenonah G. Haire.

Wenonah G. Haire
Tribal Historic Preservation Officer



Eastern Shawnee Tribe

Cultural Preservation Department

P.O. Box 350, Seneca, MO 64865

918 666 2435 ext 247

culturalpreservation@estoo.net

September 27, 2010

Ms. Lauren McGee, RUS environmental coordinator
United States Dept. of Agriculture and Rural Development
1400 Independence Ave. S.W.
Washington D. C. 20250-0700

Re: McClellanville 115 kilovolt Transmission Line Proposal
Berkeley, Charleston and Georgetown Counties, SC
Initiation of Government to Government consultation and Invitation to Agency Scoping Meeting

Ms. Lauren McGee;

The Eastern Shawnee Tribe of Oklahoma would like to thank you for allowing us to comment on the proposed McClellanville 115 kilovolt Transmission Line Proposal. We regret to inform you that we will not be able to attend the Scoping meetings at this time.

The Cultural Preservation Office has reviewed the undertaking referenced in your correspondence as to its effect regarding religious and cultural significance to historic properties. We are aware of Shawnee occupation in the area of the three mentioned counties near the waterways. The area near Berkeley and Charleston primarily are of interest to us. As the project progresses we would appreciate results of the EIS analysis and any other pertinent information as it becomes available. If cultural resources including human remains are inadvertently discovered during the construction phase of this project or at any time, we require our tribe to be contacted immediately.

If I may be of further assistance please do not hesitate to contact me. Thank you for your notification regarding this important project.

Best Regards,

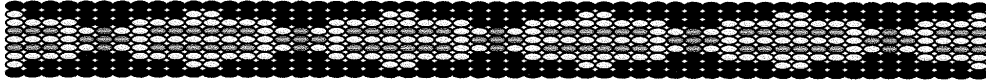
Robin Dushane
Cultural Preservation Department Director
Eastern Shawnee Tribe

Cc/jh

attempted email - undeliverable

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427
Fax 803-328-5791



January 17, 2011

Attention: Lauren McGee
USDA Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Ave., S.W., Stop 1571
Washington, D.C. 20250-1571

Re. THPO #	TCNS #	Project Description
2011-175-4		McClellanville 115 kilovolt Transmission Line Proposal Berkeley, Charleston, and Georgetown Counties, SC

Dear Ms. McGee,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Totherow at 803-328-2427 ext. 226, or e-mail caitlinh@ccppcrafts.com.

Sincerely,


Wenonah G. Haire
Tribal Historic Preservation Officer