Plains & Eastern Clean Line Transmission Project
Final Environmental Impact Statement

DOE/EIS-0486

Errata Sheet
February 26, 2016

Since release of the Plains & Eastern Final EIS on November 13, 2015, the Department of Energy (DOE) has identified errors and inconsistencies in the Final EIS that are detailed below. In the Final EIS, vertical bars in the margins of the pages indicate where revisions, including deletions, were made to the Draft EIS. In this Errata Sheet, the same approach is used to indicate changes to the Final EIS. Gray shading in the Errata Sheet shows revisions and newly inserted text that was not in the Final EIS.

DOE has considered each of these errata individually and collectively and has determined that they do not represent significant new information relevant to environmental concerns and do not change the conclusions in the Final EIS. This Errata Sheet has been prepared to disclose known errors to interested government and tribal agencies and the general public.

This Errata Sheet is available on the Project website: http://www.plainsandeasterneis.com/ and on the DOE NEPA website: http://energy.gov/nepa/.

Item 1. DOE noted inconsistencies in the information presented in Table S-3, Counties Potentially Affected by the Applicant Proposed Route, and Table 2.4-1, Counties Potentially Affected by DOE Alternatives, in the Summary and Chapter 2 of the Final EIS, respectively. The revised tables below show the correct lengths in miles for each feature. Five corrections were made to Table S-3, and three were made to Table 2.4-1. Seven of the eight changes between the Final EIS and this Errata Sheet reflect less than 1 mile difference in length. The largest difference in length between the Final EIS and this Errata Sheet is 1.5 miles.

Table S-3:
Counties Potentially Affected by HVDC Alternative Routes

Feature	Length (Miles)	State	Counties
Region 1 (Oklahoma Panhandle)			
Link 1 of the Applicant Proposed Route (no corresponding HVDC alternative route)	1.91	Oklahoma	Texas
HVDC Alternative Route 1-A	123.3	Oklahoma	Texas, Beaver, Harper, and Woodward
Corresponding Links (2, 3, 4, 5) of the Applicant Proposed Route	114.0	Oklahoma	Texas, Beaver, Harper, and Woodward
HVDC Alternative Route 1-B	52.1	Oklahoma	Texas and Beaver
Corresponding Links (2, 3) of the Applicant Proposed Route	54.0	Oklahoma	Texas and Beaver
HVDC Alternative Route 1-C	52.2	Oklahoma	Texas and Beaver
Corresponding Links (3) of the Applicant Proposed Route	54.0	Oklahoma	Texas and Beaver
HVDC Alternative Route 1-D	33.6	Oklahoma	Beaver and Harper
Corresponding Links (3, 4) of the Applicant Proposed Route	33.7	Oklahoma	Beaver and Harper
Region 2 (Oklahoma Central Great Plains)			
Link 1 of the Applicant Proposed Route (no corresponding HVDC alternative route)	20.32	Oklahoma	Woodward
HVDC Alternative Route 2-A	57.3	Oklahoma	Woodward and Major
Corresponding Link (2) of the Applicant Proposed Route	54.5	Oklahoma	Woodward and Major
HVDC Alternative Route 2-B	29.9	Oklahoma	Major and Garfield
Corresponding Link (3) of the Applicant Proposed Route	31.3	Oklahoma	Major and Garfield
Region 3 (Oklahoma Cross Timbers)			
HVDC Alternative Route 3-A	37.5	Oklahoma	Garfield, Logan, and Payne
Corresponding Link (1) of the Applicant Proposed Route	40.1	Oklahoma	Garfield, Kingfisher, Logan, and Payne
HVDC Alternative Route 3-B	47.9	Oklahoma	Garfield, Logan, and Payne
Corresponding Links (1, 2, 3) of the Applicant Proposed Route	50.1	Oklahoma	Garfield, Kingfisher, Logan, and Payne
HVDC Alternative Route 3-C	121.9	Oklahoma	Payne, Lincoln, Creek, Okmulgee, and Muskogee

Table S-3:
Counties Potentially Affected by HVDC Alternative Routes

Feature	Length (Miles)	State	Counties
Corresponding Links (3, 4, 5, 6) of the Applicant Proposed Route	118.7	Oklahoma	Payne, Lincoln, Creek, Okmulgee, and Muskogee
HVDC Alternative Route 3-D	39.4	Oklahoma	Muskogee
Corresponding Links (5, 6) of the Applicant Proposed Route	35.2	Oklahoma	Muskogee
HVDC Alternative Route 3-E	8.5	Oklahoma	Muskogee
Corresponding Links (6) of the Applicant Proposed Route	7.8	Oklahoma	Muskogee
Region 4 (Arkansas River Valley)			
Link 1 of the Applicant Proposed Route (no corresponding HVDC alternative route)	8.31	Oklahoma	Muskogee
HVDC Alternative Route 4-A	58.6	Oklahoma and Arkansas	Sequoyah County, Oklahoma, and Crawford and Franklin counties, Arkansas
Corresponding Links (3, 4, 5, 6) of the Applicant Proposed Route	60.6	Oklahoma and Arkansas	Sequoyah County, Oklahoma, and Crawford and Franklin counties, Arkansas
HVDC Alternative Route 4-B	78.9	Oklahoma and Arkansas	Sequoyah County, Oklahoma, and Crawford and Franklin counties, Arkansas
Corresponding Links (2, 3, 4, 5, 6, 7, 8) of the Applicant Proposed Route	80.0	Oklahoma and Arkansas	Sequoyah County, Oklahoma, and Crawford and Franklin counties, Arkansas
HVDC Alternative Route 4-C	3.4	Arkansas	Crawford
Corresponding Link (5) of the Applicant Proposed Route	2.2	Arkansas	Crawford
HVDC Alternative Route 4-D	25.4	Arkansas	Crawford and Franklin
Corresponding Links (4, 5, 6) of the Applicant Proposed Route	25.3	Arkansas	Crawford and Franklin
HVDC Alternative Route 4-E	36.9	Arkansas	Franklin, Johnson, and Pope
Corresponding Links (8, 9) of the Applicant Proposed Route	38.9	Arkansas	Franklin, Johnson, and Pope
Region 5 (Central Arkansas)			
HVDC Alternative Route 5-A	12.7	Arkansas	Pope
Corresponding Link (1) of the Applicant Proposed Route	12.3	Arkansas	Pope
Link 2 of the Applicant Proposed Route (no corresponding HVDC alternative route)	6.45	Arkansas	Pope
HVDC Alternative Route 5-B	71.1	Arkansas	Pope, Conway, Faulkner, White
Corresponding Links (3, 4, 5, 6) of the Applicant Proposed Route	67.4	Arkansas	Pope, Conway, Van Buren, Cleburne and White
HVDC Alternative Route 5-C	9.2	Arkansas	White
Corresponding Links (6, 7) of the Applicant Proposed Route	9.6	Arkansas	White
HVDC Alternative Route 5-D	21.7	Arkansas	White and Jackson
Corresponding Link (9) of the Applicant Proposed Route	20.5	Arkansas	White and Jackson

Table S-3:
Counties Potentially Affected by HVDC Alternative Routes

Feature	Length (Miles)	State	Counties
Link 8 of the Applicant Proposed Route (no corresponding HVDC alternative route)	1.61	Arkansas	White
HVDC Alternative Route 5-E	36.4	Arkansas	Van Buren, Faulkner, and White
Corresponding Links (4, 5, 6) of the Applicant Proposed Route	33.3	Arkansas	Van Buren, Cleburne, and White
HVDC Alternative Route 5-F	22.4	Arkansas	Cleburne and White
Corresponding Links (5, 6) of the Applicant Proposed Route	18.8	Arkansas	Cleburne and White
Region 6 (Cache River, Crowley's Ridge Area, and St. Francis Channel)			
Link 1 of the Applicant Proposed Route (no corresponding HVDC alternative route)	6.12	Arkansas	Jackson
HVDC Alternative Route 6-A	15.6	Arkansas	Jackson and Poinsett
Corresponding Links (2, 3, 4) of the Applicant Proposed Route	17.7	Arkansas	Jackson and Poinsett
HVDC Alternative Route 6-B	14.1	Arkansas	Jackson and Poinsett
Corresponding Link (3) of the Applicant Proposed Route	9.7	Arkansas	Jackson and Poinsett
Link 5 of the Applicant Proposed Route (no corresponding HVDC alternative route)	1.87	Arkansas	Poinsett
HVDC Alternative Route 6-C	23.2	Arkansas	Poinsett
Corresponding Links (6, 7) of the Applicant Proposed Route	24.9	Arkansas	Poinsett and Cross
HVDC Alternative Route 6-D	9.2	Arkansas	Cross and Poinsett
Corresponding Link (7) of the Applicant Proposed Route	8.6	Arkansas	Cross and Poinsett
Link 8 of the Applicant Proposed Route (no corresponding HVDC alternative route)	3.91	Arkansas	Poinsett
Region 7 (Arkansas Mississippi River Delta and Tennessee)			
HVDC Alternative Route 7-A	43.2	Arkansas and Tennessee	Poinsett and Mississippi counties, Arkansas, and Tipton County, Tennessee
Corresponding Link (1) of the Proposed Route	28.7	Arkansas and Tennessee	Poinsett and Mississippi counties, Arkansas, and Tipton County, Tennessee
Link 2 of the Applicant Proposed Route (no corresponding HVDC alternative route)	1.08	Tennessee	Tipton
HVDC Alternative Route 7-B	8.6	Tennessee	Tipton and Shelby
Corresponding Links (3, 4) of the Applicant Proposed Route	8.3	Tennessee	Tipton and Shelby
HVDC Alternative Route 7-C	23.8	Tennessee	Tipton and Shelby
Corresponding Links (3, 4, 5) of the Applicant Proposed Route	13.2	Tennessee	Tipton and Shelby
HVDC Alternative Route 7-D	6.2	Tennessee	Tipton and Shelby
Corresponding Links (4, 5) of the Applicant Proposed Route	6.6	Tennessee	Tipton and Shelby

Table 2.4-1:
Counties Potentially Affected by DOE Alternatives

Feature	Length (Miles)	State	Counties
Converter Station			
Arkansas Converter Station Alternative	N/A	Arkansas	Pope
Arkansas AC Interconnection	6.0	Arkansas	Pope
HVDC Alternative Routes			
Region 1 (Oklahoma Panhandle)			
Link 1 of the Applicant Proposed Route (no corresponding Alternative Route)	1.91	Oklahoma	Texas
Alternative Route 1-A	123.3	Oklahoma	Texas, Beaver, Harper, and Woodward
Corresponding Links (2, 3, 4, 5) of the Applicant Proposed Route	114.0	Oklahoma	Texas, Beaver, Harper, and Woodward
Alternative Route 1-B	52.1	Oklahoma	Texas and Beaver
Corresponding Links (2, 3) of the Applicant Proposed Route	54.0	Oklahoma	Texas and Beaver
Alternative Route 1-C	52.2	Oklahoma	Texas and Beaver
Corresponding Links (2, 3) of the Applicant Proposed Route	54.0	Oklahoma	Texas and Beaver
Alternative Route 1-D	33.6	Oklahoma	Beaver and Harper
Corresponding Links (3, 4) of the Applicant Proposed Route	33.7	Oklahoma	Beaver and Harper
Region 2 (Oklahoma Central Great Plains)			
Link 1 of the Applicant Proposed Route (no corresponding Alternative Route)	20.32	Oklahoma	Woodward
Alternative Route 2-A	57.3	Oklahoma	Woodward and Major
Corresponding Link (2) of the Applicant Proposed Route	54.5	Oklahoma	Woodward and Major
Alternative Route 2-B	29.9	Oklahoma	Major and Garfield
Corresponding Link (3) of the Applicant Proposed Route	31.3	Oklahoma	Major and Garfield
Region 3 (Oklahoma Cross Timbers)			
Alternative Route 3-A	37.5	Oklahoma	Garfield, Logan, and Payne
Corresponding Link (1) of the Applicant Proposed Route	40.1	Oklahoma	Garfield, Kingfisher, Logan, and Payne
Alternative Route 3-B	47.9	Oklahoma	Garfield, Logan, and Payne
Corresponding Links (1, 2, 3) of the Applicant Proposed Route	50.1	Oklahoma	Garfield, Kingfisher, Logan, and Payne
Alternative Route 3-C	121.9	Oklahoma	Payne, Lincoln, Creek, Okmulgee, and Muskogee
Corresponding Links (3, 4, 5, 6) of the Applicant Proposed Route	118.7	Oklahoma	Payne, Lincoln, Creek, Okmulgee, and Muskogee
Alternative Route 3-D	39.4	Oklahoma	Muskogee
Corresponding Links (5, 6) of the Applicant Proposed Route	35.2	Oklahoma	Muskogee

Table 2.4-1:
Counties Potentially Affected by DOE Alternatives

Feature	Length (Miles)	State	Counties
Alternative Route 3-E	8.5	Oklahoma	Muskogee
Corresponding Link (6) of the Applicant Proposed Route	7.8	Oklahoma	Muskogee
Region 4 (Arkansas River Valley)			
Link 1 of the Applicant Proposed Route (no corresponding Alternative Route)	8.31	Oklahoma	Muskogee
Alternative Route 4-A	58.6	Oklahoma and Arkansas	Sequoyah County, Oklahoma, and Crawford and Franklin counties, Arkansas
Corresponding Links (3, 4, 5, 6) of the Applicant Proposed Route	60.6	Oklahoma and Arkansas	Sequoyah County, Oklahoma, and Crawford and Franklin counties, Arkansas
Alternative Route 4-B	78.9	Oklahoma and Arkansas	Sequoyah County, Oklahoma, and Crawford and Franklin counties, Arkansas
Corresponding Links (2, 3, 4, 5, 6, 7, 8) of the Applicant Proposed Route	80.0	Oklahoma and Arkansas	Sequoyah County, Oklahoma, and Crawford and Franklin counties, Arkansas
Alternative Route 4-C	3.4	Arkansas	Crawford
Corresponding Link (5) of the Applicant Proposed Route	2.2	Arkansas	Crawford
Alternative Route 4-D	25.4	Arkansas	Crawford and Franklin
Corresponding Links (4, 5, 6) of the Applicant Proposed Route	25.3	Arkansas	Crawford and Franklin
Alternative Route 4-E	36.9	Arkansas	Franklin, Johnson, and Pope
Corresponding Links (8, 9) of the Applicant Proposed Route	38.9	Arkansas	Franklin, Johnson, and Pope
Region 5 (Central Arkansas)			
Alternative Route 5-A	12.7	Arkansas	Pope
Corresponding Link (1) of the Applicant Proposed Route	12.3	Arkansas	Pope
Link 2 of the Applicant Proposed Route (no corresponding Alternative Route)	6.45	Arkansas	Pope
Alternative Route 5-B	71.1	Arkansas	Pope, Conway, Faulkner, White
Corresponding Links (3, 4, 5, 6) of the Applicant Proposed Route	67.4	Arkansas	Pope, Conway, Van Buren, Cleburne and White
Alternative Route 5-C	9.2	Arkansas	White
Corresponding Links (6, 7) of the Applicant Proposed Route	9.6	Arkansas	White
Alternative Route 5-D	21.7	Arkansas	White and Jackson
Corresponding Link (9) of the Applicant Proposed Route	20.5	Arkansas	White and Jackson
Link 8 of the Applicant Proposed Route (no corresponding Alternative Route)	1.61	Arkansas	White
Alternative Route 5-E	36.4	Arkansas	Van Buren, Faulkner, and White

Table 2.4-1:
Counties Potentially Affected by DOE Alternatives

Feature	Length (Miles)	State	Counties
Corresponding Links (4, 5, 6) of the Applicant Proposed Route	33.3	Arkansas	Van Buren, Cleburne, and White
Alternative Route 5-F	22.4	Arkansas	Cleburne and White
Corresponding Links (5, 6) of the Applicant Proposed Route	18.8	Arkansas	Cleburne and White
Region 6 (Cache River, Crowley's Ridge Area, and St. Francis Channel)			
Link 1 of the Applicant Proposed Route (no corresponding Alternative Route)	6.12	Arkansas	Jackson
Alternative Route 6-A	15.6	Arkansas	Jackson and Poinsett
Corresponding Links (2, 3, 4) of the Applicant Proposed Route	17.7	Arkansas	Jackson and Poinsett
Alternative Route 6-B	14.1	Arkansas	Jackson and Poinsett
Corresponding Link (3) of the Applicant Proposed Route	9.7	Arkansas	Jackson and Poinsett
Link 5 of the Applicant Proposed Route (no corresponding Alternative Route)	1.87	Arkansas	Poinsett
Alternative Route 6-C	23.2	Arkansas	Poinsett
Corresponding Links (6, 7) of the Applicant Proposed Route	24.9	Arkansas	Poinsett and Cross
Alternative Route 6-D	9.2	Arkansas	Cross and Poinsett
Corresponding Link (7) of the Applicant Proposed Route	8.6	Arkansas	Cross and Poinsett
Link 8 of the Applicant Proposed Route (no corresponding Alternative Route)	3.91	Arkansas	Poinsett
Region 7 (Arkansas Mississippi River Delta and Tennessee)			
Alternative Route 7-A	43.2	Arkansas and Tennessee	Poinsett and Mississippi counties, Arkansas, and Tipton County, Tennessee
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Corresponding Links (3, 4, 5) of the Applicant Proposed Route	13.2	Tennessee	Tipton and Shelby
Alternative Route 7-D	6.2	Tennessee	Tipton and Shelby
Corresponding Links (4, 5) of the Applicant Proposed Route	6.6	Tennessee	Tipton and Shelby

Item 2. Minor clarifications have been made to Sections 2.1.2.2.1 and 2.1.2.3.1 of Final EIS. These are shown below.

2.1 Project Overview

2.1.2 Applicant Proposed Project Description

2.1.2.2 HVDC Transmission Line

2.1.2.2.1 Right-of-Way

Construction and operations of the HVDC transmission line would require ROW easements, which would typically be 150 to 200 feet wide. The analyses of impacts in Chapter 3 are based on a representative 200-foot-wide ROW within a 1,000-foot-wide corridor. The final transmission line ROW could be located anywhere within the 1,000-foot-wide corridor identified in this Final EIS. The final location would be determined pursuant to NEPA, engineering design, and ROW acquisition activities. Determination of this final location is referred to as micrositing. The easement acquisition process is described in Section 2.1.3. Figure 2.1-18 (located in Appendix A) depicts the ROW requirements for the HVDC transmission line.

2.1.2.3 AC Collection System

2.1.2.3.1 Right-of-Way

ROW easements for the AC transmission lines, with a typical width of approximately 150 to 200 feet, would be required. The final AC collection line ROWs could be located anywhere within the 2-mile-wide corridors identified in this Final EIS. The final location would be determined pursuant to NEPA, engineering design, and ROW acquisition activities. The ROW requirements for the AC transmission line are depicted on Figure 2.1-27 (located in Appendix A). Restrictions on other uses within the ROW during operations and maintenance are described in Section 2.1.5.1. Section 2.1.3 provides information relating to the acquisition of ROW easements.

Item 3. The analysis of air quality impacts associated with wind generation (Section 3.3.6.8.1.2 of the Draft and Final EIS) used the results of simulation model PROMOD version 10.1 to estimate which power sources would be displaced and what the corresponding emissions reduction would be if the Project and connected wind farms were in operation. In this Errata Sheet, revised displaced emission rates are presented based on an updated version of the simulation model (PROMOD version 11.1). The updated model results were lower than the original model results presented in the Draft and Final EIS, indicating a smaller benefit of greenhouse gas emission (GHG) reductions associated with the operation of wind farms than was presented in the Draft and Final EIS. Calculations of displaced emissions from wind energy generation during operations and maintenance of the Project, which were presented in a bulleted list in Volume I, Chapter 3, Section 3.3.6.8.1.2 of the Final EIS, have been updated below.

DOE has reviewed the differences in results between the original and updated models and has concluded that the original model's estimated benefits from GHG reductions that were presented in the Final EIS do not change the underlying analysis of operational impacts to air quality associated with the wind farms.

3.3 Air Quality and Climate Change

3.3.6 Impacts to Air Quality and Climate Change

3.3.6.8 Impacts from Connected Actions

3.3.6.8.1 Wind Energy Generation

3.3.6.8.1.2 Operations and Maintenance Impacts

Operational impacts to air quality associated with the wind farms are expected to be beneficial, because operations and maintenance of wind farms would result in negligible emissions (Clean Line 2014), whereas much of the electricity generated today is produced with fossil fuels such as coal or natural gas. The Applicant used a commercially available simulation model (PROMOD version 11.1) to determine a best estimate of which power sources would be displaced and what the corresponding emissions reduction would be. The Applicant used the latest Ventyx East NERC root database and updated the database to reflect expected 2018 market conditions as of December 2014. The model updates included but were not limited to transmission upgrades to reflect ISO transmission plans, market membership changes (e.g., Entergy joining MISO), then-current natural gas forecast, and recently announced coal plant retirements. The model provided a best estimate of displaced emissions as follows: approximately 0.00027 tons NO_x/megawatt hours (MWh), 0.00055 tons SO_x/MWh, 0.667 tons CO_2/MWh, and 0.0000097 pounds mercury/MWh. Using these displaced emissions rates with the range of megawatts of anticipated power production from wind energy as identified in Section 2.5.1 (4,000MW from the wind farm build-out and 4,550MW with the addition of the Arkansas converter station alternative), calculations of displaced emissions were calculated as follows:

- NO_x, 4,600 to 5,300 TPY
- SO_x 9,300 to 10,600 TPY
- CO_2e 11 to 13 million TPY
- Mercury 0.1 TPY (approximate)

These reductions in emissions occur each year, and even 1 year of emissions reduction far exceeds the combined emissions increases associated with the construction of the Project and the wind farms. Although the emissions reduction from this single project is small relative to the 7,249 million tons CO_2e (6,576 million metric tonnes) emitted by anthropogenic sources in the United States in 2009, the electric power generation sector contributes approximately 40 percent of those emissions (EIA 2011) and the implementation of lower-GHG electricity generation is therefore an important component of achieving significant GHG emissions reductions both nationally and globally. Currently, there is no methodology that would allow DOE to estimate the specific impacts (if any) this increment of climate change would produce in the vicinity of the facility or elsewhere.

Item 4. Language has been revised to replace four instances of "the Project" with "the representative ROW" in content related to tribal lands for accuracy. The revised text from Section 3.9.1.1.3 and Appendix Q of the Final EIS are included below.

3.9 Historic and Cultural Resources

3.9.1 Regulatory Background

3.9.1.1 Federal Requirements

3.9.1.1.3 Other Federal and State Laws

Other federal laws that concern the evaluation and management of historic and cultural resources within the Project ROI include Archaeological Resources Protection Act (ARPA), Native American Graves Protection and Repatriation Act (NAGPRA), American Indian Religious Freedom Act (AIRFA), and Cultural and Heritage Cooperation Authority, which only applies to National Forest lands (Table 3.9-1). Very little of the Applicant Proposed Route and only one alternative route, HVDC Alternative Route 4-B, crosses National Forest land. ARPA (16 USC §§ 470 aa–470mm) protects archaeological sites and resources on federal and tribal lands from unauthorized damage or impacts, establishes procedures for obtaining permits for archaeological excavation on federal and tribal lands by qualified individuals, and sets criminal and civil penalties for violations of the law. NAGPRA (25 USC §§ 3001–3013) protects Native American human remains, funerary objects, and other items of cultural patrimony found on federal and tribal lands and requires that such materials are treated respectfully if encountered on federal or tribal lands during Project development, construction, operation, or decommissioning. AIRFA (42 USC § 1996 et seq.) protects and preserves for American Indians their inherent right of freedom to believe, express, and exercise their traditional religions, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites. No tribal lands, as defined by 25 CFR 169.1(d) or 36 CFR 800.16(x), outside of the Arkansas River , are crossed by the representative ROW. The only location along the representative ROW involving tribal lands is in the vicinity of a crossing of the Arkansas River south of Webbers Falls Lock and Dam 16. Tribal interests here are managed by the Arkansas Riverbed Authority, an entity created jointly by the Chickasaw, Choctaw and Cherokee Nations (Title 25 USC §§ 1779-1779f) to administer tribal interests in this section of the river.

State laws and regulations complement federal law on historic and cultural resources. These laws and regulations vary by state (Table 3.9-1). In general, however, all four states in which the Project would be located have laws protecting marked and unmarked graves and cemeteries, and all four states assert control over archaeological and historic resources on state and local public lands. Administrative rules or other standards issued by the respective SHPOs provide specifications and guidance for archaeological and historic architectural surveys, particularly when such studies are completed as part of Section 106 consultation.

2G Cooperating Agencies

[From page 3-69 of Appendix Q of the Final EIS]

- Commenter notes that the Draft EIS Summary states that the Bureau of Indian Affairs has jurisdiction by law and/or has special expertise. Commenter feels that it is important to honor the wishes of the Tribes and Sovereign Nations. If the Bureau of Indian Affairs' expertise conflicts with the Tribes/Sovereign Nations wishes, then the Tribes/Sovereign Nations should have final say over their lands.

Response:

BIA is a cooperating agency for the EIS under NEPA; BIA is also a consulting party under Section 106 of the NHPA. In accordance with NHPA Section 106, DOE is involved in consultations with SHPOs, certain Indian Tribes and Nations on whose tribal lands the undertaking may occur or that attach religious and cultural significance to historic properties that may be affected by the undertaking; THPOs; local, state, and federal agencies; and others to develop a draft Programmatic Agreement (Appendix P of the Final EIS) that will provide a process for addressing the Project's potential effects on historic properties, including archeological sites, historic buildings and structures, and TCPs. See Section 3.9.1.1.2 of the EIS. The only location along the representative ROW involving tribal lands is in the vicinity of a crossing of the Arkansas River south of Webbers Falls Lock and Dam 16. Tribal interests here are managed by the Arkansas Riverbed Authority, an entity created jointly by the Chickasaw, Choctaw, and Cherokee Nations (Title 25 USC §§ 1779-1779f) to administer tribal interests in this section of the river. In addition, the BIA has legal jurisdiction with regard to ROWs over land held in trust for American Indians (Final EIS Section 1.2.1). DOE intends to execute the Programmatic Agreement prior to issuance of the ROD or otherwise comply with procedures set forth in 36 CFR Part 800.

20 Historic and Cultural Resources

[From pages 3-331 to 3-332 of Appendix Q of the Final EIS]

- Commenter states that several Indian Tribes have opposed the Project including Choctaw Nation, Creek Nation and from her understanding the Cherokee Nation and believes that between all of the Indian Tribal agencies, no one should be gaining access to tribal lands.

Response:

The only location along the representative ROW involving tribal lands is in the vicinity of a crossing of the Arkansas River south of Webbers Falls Lock and Dam 16. Tribal interests here are managed by the Arkansas Riverbed Authority, an entity created jointly by the Chickasaw, Choctaw and Cherokee Nations (Title 25 USC §§ 1779-1779f) to administer tribal interests in this section of the river. In addition, the BIA has legal jurisdiction with regard to ROWs over land held in trust for American Indians (Final EIS Section 1.2.1).

Item 5. Section 3.13.6.8 of the Final EIS refers to the potential socioeconomic impacts of the development of "approximately 4,000MW of wind generating capacity." With the potential addition of the Arkansas converter station alternative, the Applicant anticipates the delivery capacity of the Project would increase by 500MW (from 3,500MW to 4,000MW), and associated wind farm build-out would increase to approximately 4,550MW (Clean Line 2014b). DOE has corrected this section below to reflect the potential impacts of approximately 4,000MW–4,550MW of generating capacity.

3.13 Socioeconomics

3.13.6 Socioeconomic Impacts

3.13.6.8 Impacts from Connected Actions

3.13.6.8.1 Wind Energy Generation

For the purposes of analysis, the Applicant assumed that 90 percent of this capacity would be constructed over a 2-year timeframe leading up to the commercial operation date of the Project, with the remaining 10 percent expected to be built within a year following this date (Clean Line 2014b). Individual wind farms could range in capacity from approximately 50MW to 1,125MW in a single phase; multiple-phased projects are possible and could be larger than 1,125MW. Future nameplate capacities for a single turbine are assumed to range from 1.5MW to 3.5MW (Clean Line 2014b).

The potential socioeconomic impacts of the development of approximately 4,000MW–4,550MW of wind generating capacity in the 12 identified WDZs (Table 3.13-21) are assessed using data derived from the DOE National Renewable Energy Laboratory's Jobs and Economic Development Impacts (JEDI) Wind model (NREL 2014). The JEDI Wind model allows the user to identify potential impacts assuming general wind industry averages.

The following analysis assesses two potential scenarios based on the range of potential capacity for individual wind farms (50MW to 1,125MW per facility). These scenarios recognize that there are labor-related economies of scale associated with larger facilities, during both construction and operation. The two scenarios are as follows: (1) 84 facilities with a nameplate capacity of 53MW, for a total capacity of 4,452MW; and (2) four facilities with a nameplate capacity of 1,125MW, for a total capacity of 4,500MW. The first scenario assumes an average facility (wind farm) consists of sixteen 3.5MW turbines. The second scenario assumes an average facility (wind farm) consists of seven hundred fifty 1.5MW turbines. In both scenarios, the proposed generating capacity is assumed to be divided equally between Oklahoma and Texas, with the same total capacity and number of facilities located in the WDZs in each state. Construction is also assumed to spread evenly over the 2 years prior to the transmission line Project's commercial operation date.

3.13.6.8.1.1 Population

3.13.6.8.1.1.1 Construction Impacts

Total annual employment estimates are presented by wind development scenario and stated in Table 3.13-51. Viewed in FTEs, total direct employment under Scenario 1 would be equivalent to 2,362 FTEs. Total direct employment under Scenario 2 would be less than half this total (1,169 FTEs), reflecting the labor economies of scale

involved in constructing four 1,125MW facilities (Scenario 2) versus eighty-four 53MW facilities (Scenario 1). FTEs are employment estimates based on 12 months (2,080 hours) employment. These numbers do not translate into individual workers who may be employed for shorter periods.

Table 3.13-51:
Estimated Annual Change in Population During Construction by Potential Wind Development Scenario

Workers/Population[1]	Scenario 1[2]			Scenario 2[2]		
	Oklahoma	Texas	Region 1 Total	Oklahoma	Texas	Region 1 Total
Workers[3]						
Commute to Job Site Daily[4]	669	669	1,338	319	312	631
Move to the Affected Region alone[5]	470	451	921	248	235	484
Move to the Affected Region with family[5]	52	50	102	28	26	54
Total	1,191	1,170	2,362	595	574	1,169
Population						
2012 Population[6]	28,658	19,322	51,652	28,658	19,322	51,652
Number of People Temporarily Relocating[7]	627	602	1,228	331	314	645
Percent of 2012 Population	2.2%	3.1%	2.4%	1.2%	1.6%	1.2%

1 Data are annual estimates and assume that construction would be spread evenly over 2 years.

2 Scenario 1 consists of 84 wind generation facilities with a nameplate capacity of 53MW, for a total capacity of 4,452MW; Scenario 2 consists of four facilities with a nameplate capacity of 1,125MW, for a total capacity of 4,500MW.

3 The JEDI Wind model was used to estimate construction workforce requirements by scenario and state. Jobs are FTEs for a period of one year (1 FTE = 2,080 hours).

4 The share of the annual construction workforce expected to be hired locally was estimated using the JEDI Wind model and varies slightly by state and scenario.

5 An estimated 90 percent of workers temporarily relocating to the region are assumed to do so alone. The remaining 10 percent are assumed to be accompanied by their families for the purposes of analysis.

6 2012 population totals are as follows:
Oklahoma = Cimarron, Texas, and Beaver counties
Texas = Hansford, Ochiltree, and Sherman counties
Region 1 Total = The above six counties plus Harper County, Oklahoma (see Table 3.13-4).

7 Number of people temporarily relocating assumes an average family size of 3 (two adults and one school-age child).

The share of the annual construction workforce expected to be hired or contracted locally was estimated using the JEDI Wind model and varies slightly by state and scenario. According to the JEDI Wind model, an estimated 56 percent (Oklahoma) and 57 percent (Texas) of workers under Scenario 1 would be hired locally; 54 percent (Oklahoma and Texas) of the annual construction workforce would be expected to be hired locally under Scenario 2. The remaining workforce would be expected to temporarily relocate to Region 1 for the duration of their employment, possibly commuting home on weekends, depending on the location of their primary residence.

Very few, if any, of the non-local workers employed during the construction phase of the potential wind facilities would be expected to permanently relocate to the affected areas. For the purposes of analysis, 10 percent of non-local workers temporarily relocating to the area are assumed to be accompanied by family members; the average size of a family that is relocating is assumed to be three, two adults and one school-age child (Clean Line 2013). The estimated annual change in population would be equivalent to approximately 2.4 percent of the total Region 1 population in 2012 under Scenario 1 and approximately 1.2 percent under Scenario 2 (Table 3.13-51).

3.13.6.8.1.1.2 Operations and Maintenance Impacts

Operations and maintenance of the potential wind facilities would employ an estimated total of 159 full-time employees in each state under Scenario 1 and 102 full-time employees in each state under Scenario 2, reflecting the labor economies of scale associated with operating a substantially smaller number (4 versus 84) of much larger (1,125MW versus 53MW) facilities (Table 3.13-52). These estimates were developed using the JEDI Wind model and general wind industry averages. Assuming these employees would all permanently relocate to the area from elsewhere with an average family size of three (two adults and one school-age child), estimated total population increases in Region 1 would be 954 and 613 under Scenarios 1 and 2, respectively, which would be equivalent to 1.8 percent and 1.2 percent of the total population in Region 1 in 2012 (Table 3.13-52).

Table 3.13-52:
Estimated Annual Change in Population During Operations and Maintenance by Potential Wind Development Scenario

Workers/Population[1]	Scenario 1[2]			Scenario 2[2]		
	Oklahoma	Texas	Region 1 Total	Oklahoma	Texas	Region 1 Total
2012 Population[3]	28,658	19,322	51,652	28,658	19,322	51,652
Number of Workers[4]	159	159	318	102	102	204
Number of People Permanently Relocating[5]	477	477	954	306	306	613
Percent of 2012 Population	1.7%	2.5%	1.8%	1.1%	1.6%	1.2%

1 Data are annual estimates and assumed to continue for the operating lives of the potential facilities.

2 Scenario 1 consists of 84 wind generation facilities with a nameplate capacity of 53MW, for a total capacity of 4,452MW; Scenario 2 consists of four facilities with a nameplate capacity of 1,125MW, for a total capacity of 4,500MW.

3 2012 population totals are as follows:
Oklahoma = Cimarron, Texas, and Beaver counties
Texas = Hansford, Ochiltree, and Sherman counties
Region 1 Total = The above six counties plus Harper County, Oklahoma (see Table 3.13-4).

4 The JEDI Wind model was used to estimate annual operations and maintenance workforce requirements by scenario and state. Jobs are FTEs for a period of one year (1 FTE = 2,080 hours).

5 Number of people permanently relocating assumes that all the onsite workers would relocate from elsewhere and represent an average family size of three (two adults and one school-age child).

3.13.6.8.1.1.3 Decommissioning Impacts

Decommissioning of the potential wind generation facilities would require a labor force approximately equal to that needed for their construction. Impacts to population from decommissioning are, therefore, expected to be similar to those from construction.

3.13.6.8.1.2 Economic Conditions

3.13.6.8.1.2.1 Construction Impacts

Construction of the two potential wind development scenarios would result in a temporary increase in employment and earnings in the surrounding area. Annual estimates are presented by scenario and state in Table 3.13-53. Construction would support an estimated total (direct, indirect, and induced) of 11,249 jobs in Region 1 under Scenario 1 and 10,111 jobs under Scenario 2. Construction would also support estimated total (direct, indirect, and induced) earnings of $561 million and $502 million under Scenarios 1 and 2, respectively (Table 3.13-53). These annual impacts would occur each year for 2 years leading up to the commercial operation date of the Project.

Table 3.13-53:
Total Annual Economic Impacts During Construction by Potential Wind Development Scenario

Impacts[1]	Scenario 1[2]			Scenario 2[2]		
	Oklahoma	Texas	Region 1 Total	Oklahoma	Texas	Region 1 Total
Employment (Jobs)[3]						
Direct Impact	1,191	1,170	2,362	595	573	1,168
Indirect and Induced Impacts	4,525	4,363	8,888	4,571	4,372	8,943
Total Impacts	5,716	5,533	11,249	5,166	4,945	10,111
Annual Earnings ($ million)[4]						
Direct Impact	$54.87	$71.78	$126.65	$28.65	$36.58	$65.23
Indirect and Induced Impacts	$193.79	$240.21	$433.99	$195.69	$240.70	$436.39
Total Impacts	$248.65	$311.99	$560.65	$224.34	$277.28	$501.62

1 The JEDI Wind model was used to estimate direct, indirect, and induced impacts. Indirect impacts during construction are identified in the model as turbine and supply chain impacts. Data are annual estimates and assume that construction would be spread evenly over 2 years. Indirect and induced impacts are estimated at the state level.

2 Scenario 1 consists of 84 wind generation facilities with a nameplate capacity of 53MW, for a total capacity of 4,452MW; Scenario 2 consists of four facilities with a nameplate capacity of 1,125MW, for a total capacity of 4,500MW.

3 Jobs are FTEs for a period of one year (1 FTE = 2,080 hours).

4 Annual earnings are expressed in millions of dollars in year 2014 dollars.

3.13.6.8.1.2.2 Operations and Maintenance Impacts

Operations and maintenance of the potential wind facilities would employ an estimated total of 159 full-time employees in each state under Scenario 1 and 102 full-time employees in each state under Scenario 2 (Table 3.13-54).

Operations and maintenance would support an estimated total (direct, indirect, and induced) of 906 jobs under Scenario 1 and 768 jobs under Scenario 2. Operations and maintenance would also support estimated total (direct, indirect, and induced) earnings of $46.8 million and $38.0 million under Scenarios 1 and 2, respectively (Table 3.13-54). These annual impacts would occur each year for the operating life of the potential facilities.

Table 3.13-54:
Total Annual Economic Impacts During Operations and Maintenance by Potential Wind Development Scenario

Impacts[1]	Scenario 1[2]			Scenario 2[2]		
	Oklahoma	Texas	Region 1 Total	Oklahoma	Texas	Region 1 Total
Employment (Jobs)[3]						
Direct Impact	159	159	318	102	102	204
Indirect and Induced Impacts	269	319	588	259	305	563
Total Impacts	428	478	906	361	407	768
Annual Earnings ($ million)[4]						
Direct Impact	$8.09	$10.85	$18.94	$4.82	$6.47	$11.29
Indirect and Induced Impacts	$11.21	$16.63	$27.83	$10.87	$15.84	$26.71
Total Impacts	$19.29	$27.48	$46.77	$15.69	$22.31	$38.00

1 The JEDI Wind model was used to estimate direct, indirect, and induced impacts. Indirect impacts during construction are identified in the model as local revenue and supply chain impacts. Data are annual estimates and assumed to continue for the operating lives of the potential facilities. Indirect and induced impacts are estimated at the state level.
2 Scenario 1 consists of 84 wind generation facilities with a nameplate capacity of 53MW, for a total capacity of 4,452MW; Scenario 2 consists of four facilities with a nameplate capacity of 1,125MW, for a total capacity of 4,500MW.
3 Jobs are FTEs for a period of one year (1 FTE = 2,080 hours).
4 Annual earnings are expressed in millions of dollars in year 2014 dollars.

3.13.6.8.1.2.3 Decommissioning Impacts

Decommissioning of the HVDC transmission line would require a labor force approximately equal to that needed for its construction. Local expenditures on materials and supplies and payments to workers would likely be similar, resulting in broadly similar economic impacts to those from construction.

3.13.6.8.1.3 Agriculture

Agriculture is the primary existing land use in the 12 WDZs. An estimated 3 to 5 percent of the land within the boundaries of each potential wind energy facility is expected to be affected during construction, with 1 percent or less expected to be affected during the operations and maintenance phase of each facility. Assuming full build-out, 20 to 30 percent of the area within the WDZs would involve an estimated total of 6,492 to 16,230 acres of primarily agricultural land would be affected during construction, with 2,164 to 3,246 acres affected during operations and maintenance (see Section 3.2). This potential disturbance represents a very small share of the 5.9 million acres of land in farms in Region 1 (Table 3.13-9) and is unlikely to noticeably affect overall agricultural production and employment in the affected counties.

In cases where turbines are located on agricultural land, land owners typically receive lease payments. Wind lease agreements usually include provisions to minimize construction-related losses, including minimizing soil compaction and revegetating temporary work areas. In addition, these types of agreement typically stipulate compensation for landowners for other potential losses, such as damage to or loss of crops, gates, fences, landscaping and trees, irrigation, and livestock.

3.13.6.8.1.4 Housing

3.13.6.8.1.4.1 Construction Impacts

Using the same assumptions employed in the above transmission line Project analysis, an estimated 45 percent of the workers temporarily relocating during construction are expected to require motel or hotel rooms, with the remaining non-local workers expected to require rental housing (apartments, houses, or mobile homes) (20 percent), or provide their own housing in the form of RVs or pop-up trailers (35 percent). Projected average annual housing demand based on the number of FTE workers for the anticipated 2-year construction period is compared with estimated supply in Table 3.13-55.

Table 3.13-55:
Estimated Construction-Related Housing Demand by Potential Wind Development Scenario

Housing/Geographic Area	Scenario 1[1]			Scenario 2[1]		
	Oklahoma	Texas	Region 1 Total	Oklahoma	Texas	Region 1 Total
Projected Non-Local Employment[2]	522	501	1,024	276	261	537
Projected Peak Housing Demand						
Rental Housing	104	100	205	55	52	107
Hotel and Motel Rooms	235	226	461	124	118	242
RV Spaces	183	175	358	97	91	188
Estimated Available Housing Units[3]						
Rental Housing	279	38	370	279	38	370
Hotel and Motel Rooms[4]	194	76	273	194	76	273
RV Spaces	48	161	235	48	161	235
Projected Demand as a Share of Existing Resources						
Rental Housing	37%	264%	55%	20%	138%	29%
Hotel and Motel Rooms	121%	298%	169%	64%	155%	89%
RV Spaces	381%	109%	152%	201%	57%	80%

1 Scenario 1 consists of 84 wind generation facilities with a nameplate capacity of 53MW, for a total capacity of 4,452MW; Scenario 2 consists of four facilities with a nameplate capacity of 1,125MW, for a total capacity of 4,500MW.

2 The JEDI Wind model was used to estimate construction workforce requirements by scenario and state. Jobs are FTEs for a period of one year (1 FTE = 2,080 hours). According to the JEDI Wind model analysis, an estimated 44 percent (Oklahoma) and 43 percent (Texas) of workers under Scenario 1 would be hired locally, with 46 percent (Oklahoma and Texas) of the annual construction workforce expected to be hired locally under Scenario 2.

3 Estimated housing unit totals are for the following counties:
Oklahoma = Cimarron, Texas, and Beaver counties
Texas = Hansford, Ochiltree, and Sherman counties
Region 1 Total = The above six counties plus Harper County, Oklahoma (see Table 3.13-10).

4 Assumes an average occupancy rate of 75 percent for the purposes of analysis, with 25 percent of total units assumed to be available.

This comparison indicates that temporary housing demand under Scenario 1 (84, 53MW facilities built over 2 years) would be more than double (264 percent) of the supply of rental housing in the three Texas counties. Demand under Scenario 1 would also exceed the estimated supply of available hotel and motel rooms in the counties in both states and Region 1 as a whole. Demand for RV spaces would also exceed the total identified spaces in the affected counties in both states and Region 1 as a whole (Table 3.13-55).

Projected housing demand would be lower under Scenario 2 (four 1,125MW facilities) due to labor economies of scale. This scenario represents the low end of the range of potential effects on housing; Scenario 1 represents the high end of this range. Under this scenario, demand would exceed supply for rental housing in the three Texas counties. Demand would also exceed the estimated supply of available hotel and motel rooms in the three Texas counties, as well as the total number of identified RV spaces in the three Oklahoma counties (Table 3.13-55).

3.13.6.8.1.4.2 Operations and Maintenance Impacts

Operations and maintenance of the potential wind facilities would employ an estimated total of 159 full-time employees in each state under Scenario 1, and 102 full-time employees in each state under Scenario 2. If all these employees permanently relocated to the area, a corresponding demand for permanent housing would be created. This potential demand is compared with housing data in Table 3.13-56. In the short-term, workers relocating would likely stay in hotels or motels while looking for a more permanent residence to rent or purchase.

Table 3.13-56:
Estimated Housing Demand by Potential Wind Development Scenario under Operations and Maintenance

Housing/Geographic Area[2]	Scenario 1[1]			Scenario 2[1]		
	Oklahoma	Texas	Region 1 Total	Oklahoma	Texas	Region 1 Total
Number of Households Permanently Relocating[3]	159	159	318	102	102	204
Vacant Housing Units						
For Rent or Sale	450	79	597	450	79	597
Rented or Sold, Not Occupied	242	113	365	242	113	365
Seasonal, Recreational, or Occasional use	158	192	409	158	192	409
Other Vacant4	1,349	544	2,153	1,349	544	2,153
Total	2,199	928	3,524	2,199	928	3,524

1 Scenario 1 consists of 84 wind generation facilities with a nameplate capacity of 53MW, for a total capacity of 4,452MW; Scenario 2 consists of four facilities with a nameplate capacity of 1,125MW, for a total capacity of 4,500MW.

2 Estimated housing unit totals are for the following counties:
Oklahoma = Cimarron, Texas, and Beaver counties
Texas = Hansford, Ochiltree, and Sherman counties
Region 1 Total = The above six counties plus Harper County, Oklahoma

3 Number of households relocating is based on estimated total annual employment and assumes that all workers would permanently relocate to the area from elsewhere.

4 According to the U.S. Census Bureau, a housing unit is classified as "other vacant" when it is unoccupied and does not fit into one of the other categories identified in the above table. Common reasons a housing unit is labeled as "other vacant" are that nobody lives in the unit and the owner is making repairs or renovating, does not want to rent or sell, or the unit is being held for settlement of an estate or in foreclosure (Kresin 2013).

Economic development organizations in the Oklahoma Panhandle region have identified a potential shortage in permanent housing in and around the city of Guymon in Texas County, with these problems expected to be further exacerbated by this type of wind energy development (Fleming 2013). Estimated demand under Scenario 1 in the three Oklahoma counties would be equivalent to 35 percent of the housing units available for rent or sale in 2012 (159 versus 450). Demand in the three Texas counties would be about twice the number of housing units available for rent or sale under Scenario 1 (159 versus 79), and 1.3 times under Scenario 2 (102 versus 79) (Table 3.13-56). This imbalance may be partially offset by some of the housing units currently identified as "other vacant" coming on the market for rent or sale. "Other vacant" housing units comprised 59 percent of the vacant housing in the three Texas counties in 2012.

3.13.6.8.1.4.3 Decommissioning Impacts

Decommissioning of the wind facilities would require a labor force approximately equal to that needed for their construction. Impacts to housing from decommissioning are, therefore, expected to be similar to those from construction.

3.13.6.8.1.5 Community Services

3.13.6.8.1.5.1 Construction Impacts

Increased demands for local services that would likely occur from wind facility construction workers and family members temporarily relocating to the affected areas would be short term. The estimated number of workers and family members expected to temporarily relocate to Region 1 during construction ranges from 645 (Scenario 2) to 1,228 (Scenario 1) (Table 3.13-51). This estimated increase in population would be equivalent to approximately 1.2 percent (Scenario 2) to 2.4 percent (Scenario 1) of total Region 1 population in 2012 (Table 3.13-51). The temporary addition of these workers and family members to local communities is not expected to affect the levels of service provided by existing law and fire protection personnel.

Medical facilities located in Region 1 are identified in Table 3.3-12 and discussed with respect to the AC collection system routes in Section 3.13.2.4.2. The temporary relocation of workers and family members to the counties in the region is not expected to affect existing levels of health care and medical services.

The estimated number of children expected to temporarily relocate to Region 1 during peak construction ranges from about 54 (Scenario 2) to 102 (Scenario 1) (Table 3.13-51). These children would likely be located in a number of different school districts throughout Region 1 and would not be expected to affect existing average student/teacher ratios (Table 3.13-13).

Spending by relocating workers and their families would likely generate economic benefits for community commercial and retail services, as would be the case with other local construction-related expenditures.

3.13.6.8.1.5.2 Operations and Maintenance Impacts

Operations and maintenance of the potential wind facilities would employ between 204 (Scenario 2) and 318 (Scenario 1) workers. If these workers and their families were all to relocate from elsewhere, the estimated increase in population would be equivalent to approximately 1.2 percent (Scenario 2) to 1.8 percent (Scenario 1) of total Region 1 population in 2012 (Table 3.13-52). The permanent addition of these workers and family members would not be expected to affect the provision of community services in the affected areas.

3.13.6.8.1.5.3 Decommissioning Impacts

Decommissioning of the transmission lines would require a labor force approximately equal to that needed for their construction. Impacts to community services from decommissioning are, therefore, expected to be similar to those from construction.

3.13.6.8.1.6 Tax Revenues

3.13.6.8.1.6.1 Construction Impacts

Construction of the potential wind facilities would generate sales, use, and lodging tax during the construction period. All equipment and material costs are assumed for the purposes of analysis to be subject to sales and use tax. Wind facility equipment would include turbines, blades, and towers. Materials would include transformers, electrical equipment, and construction materials (concrete, rebar, and construction equipment). Estimated equipment and material costs are approximately $104 million for a single 53MW wind facility and $2.3 billion for a single 1,125MW facility. These costs were estimated using the JEDI Wind model and general wind energy averages. The use of these averages results in total estimated equipment and material costs of $8,717 million and $9,096 million for Scenarios 1 and 2, respectively.

State sales and use tax rates are 4.5 percent in Oklahoma and 6.25 percent in Texas (Tables 3.13-15 and 3.13-14, respectively). Estimated state sales and use tax revenues would range from $197 million to $205 million in Oklahoma and from $271 million to $284 million in Texas, with the higher end of the range in each case estimated for Scenario 2.

None of the potentially affected Texas counties levy local sales and use tax. In the three Oklahoma counties, local county sales and use tax rates are either 1 percent (Texas County) or 2 percent (Cimarron and Beaver counties) (Table 3.13-15). Based on these rates, estimated county sales and use tax revenues per facility would range from $0.9 million to $1.9 million for a 53MW facility and from $20.7 million to $41.2 million for a 1,125MW facility.

3.13.6.8.1.6.2 Operations and Maintenance Impacts

Operations and maintenance of the potential wind facilities would generate annual property or ad valorem tax revenues in the counties where they would be located. Estimated installed costs are approximately $116 million for a single 53MW wind facility and $2.1 billion for a single 1,125MW facility. These costs were estimated using the JEDI Wind model and general wind energy averages. The use of these averages results in total estimated installed costs of $8,717 million and $9,096 million for Scenarios 1 and 2, respectively.

Millage rates for the potentially affected Oklahoma counties range from 52.19 to 80.73 (Table 3.13-19). Adjusting the range of estimated installed costs for a single wind facility by the state assessment ratio (the state share of assessed value subject to taxation) of 22.85, the application of these millage rates would result in ad valorem tax revenues ranging from $1.9 million (for a 53MW facility in Beaver County) to $41.5 million (for a 1,125MW facility in Texas County).

Average millage rates (expressed per $1,000 of assessed value) in the three potentially affected Texas counties range from 4.131 (Hansford County) to 4.392 (Sherman County) (Table 3.13-18). Using a simplified cost approach, property tax revenues for a single wind facility could range from $4.3 million (for a 53MW facility in Hansford County) to $98.8 million (for a 1,125MW facility in Sherman County).

3.13.6.8.1.6.3 Decommissioning Impacts

The general tax implications of decommissioning the potential wind generation facilities would be similar to those discussed with respect to the converter stations, above (see Section 3.13.5.2.7.1).

Item 6. Section 3.16.6.8 of the Final EIS cross-references to Section 3.13.6.8, which refers to the potential socioeconomic impacts of the development of "approximately 4,000MW of wind generating capacity." With the potential addition of the Arkansas converter station alternative, the Applicant anticipates the delivery capacity of the Project would increase by 500MW (from 3,500MW to 4,000MW), and associated wind farm build-out would increase to approximately 4,550MW (Clean Line 2014b). DOE has corrected this section below to reflect the potential impacts of approximately 4,000MW–4,550MW of generating capacity.

3.16 Transportation

3.16.6 Impacts to Transportation

3.16.6.8 Impacts from Connected Actions

3.16.6.8.1 Wind Energy Generation

3.16.6.8.1.2 Operation and Maintenance

As discussed in Section 3.13.6.8.1, operations and maintenance of approximately 4,000MW–4,550MW of wind generating capacity build-out would require 204 to 318 operations workers. Assuming an average family size of 3, the full build-out scenario is expected to result in a population increase of from 613 to 954. The population is anticipated to be spread among Sherman, Hansford, and Ochiltree counties in Texas; and Cimarron, Texas, and Beaver counties in Oklahoma; as well as surrounding counties in Texas, Oklahoma, and Kansas. If these people were spread evenly across the six-county area where the wind farms would be located, 102 to 159 people could potentially reside in each county. If these 102 to 159 people generated 307 to 477 additional round trips per day (a conservative estimate of three round trips per person), based on previous construction traffic analysis results, no roadway segments would incur a LOS decrease below LOS-C. Under LOS-B and LOS-C, impacts to traffic would be minimally noticeable to motorists. In addition, such trips would occur during limited times associated with peak daily commutes to and from the wind farms by workers from their homes; sporadic equipment and material deliveries, and localized maintenance activities at each wind farm. Indirect impacts to roadways would occur with typical local residential trips and family member commuting not directly associated with the wind farm operation.

Item 7. Table 1.3-6, Campaign Comment Documents, in Appendix Q of the Final EIS listed incorrect page numbers. The revised Table 1.3-6 below shows the correct page numbers.

Table 1.3-6—Campaign Comment Documents

Commenter Information	Document Page Number
Campaign 1	2-965
Campaign 2	2-972
Campaign 3	2-979
Campaign 4	2-985
Campaign 5	2-990
Campaign 6	2-992
Campaign 7	2-993
Campaign 8	2-994
Campaign 9	2-994
Campaign 10	2-966
Campaign 11	2-966
Campaign 12	2-967
Campaign 13	2-968
Campaign 14	2-969
Campaign 15	2-969
Campaign 16	2-970
Campaign 17	2-971
Campaign 18	2-971
Campaign 19	2-972
Campaign 20	2-973
Campaign 21	2-973
Campaign 22	2-974
Campaign 23	2-975
Campaign 24	2-976
Campaign 25	2-976
Campaign 26	2-977
Campaign 27	2-977
Campaign 28	2-978
Campaign 29	2-978
Campaign 30	2-980
Campaign 31	2-980
Campaign 32	2-981
Campaign 33	2-981
Campaign 34	2-982
Campaign 35	2-982
Campaign 36	2-983
Campaign 37	2-983
Campaign 38	2-984
Campaign 39	2-984
Campaign 40	2-985

Table 1.3-6—Campaign Comment Documents

Commenter Information	Document Page Number
Campaign 41	2-986
Campaign 42	2-986
Petition 43	2-995
Campaign 44	2-987
Campaign 45	2-987
Campaign 46	2-988
Campaign 47	2-988
Campaign 48	2-989
Campaign 49	2-990
Campaign 50	2-991
Campaign 51	2-992
Petition 52	2-995
Petition 53	2-996
Petition 54	2-996
Petition 55	2-997

Item 8.	Chapter 2 of Appendix Q of the Final EIS contains a copy of the comment documents that DOE received on the Draft EIS. Comment documents that were determined to be duplicates or that did not contain substantive comments were not reproduced in Appendix Q. Twenty-six comment documents were inadvertently excluded from Appendix Q of the Final EIS and are provided in this Errata Sheet for completeness. Although they were omitted from Appendix Q of the Final EIS, DOE reviewed each of these comment documents during the preparation of the Final EIS. The 26 comment documents that follow are annotated with sidebars identifying the issue code assigned to each comment, as well as explanations (in red text) of where to find responses to comments in the Final EIS or this Errata Sheet. Where the comment summaries and responses in Chapter 3 of Appendix Q of the Final EIS did not directly address the comments in these 26 comment documents, DOE added or revised comment summaries and responses in item 9 below in this Errata Sheet. Chapter 3 of Appendix Q of the Final EIS summarizes all of the comments that DOE received on the Draft EIS and provides DOE's responses to those comments. Since the release of the Final EIS, DOE has again reviewed each of the comment documents in this Errata Sheet. With the comment responses provided in the Final EIS and item 9 of this Errata Sheet, DOE has confirmed that all comments contained in each comment document were assessed and considered both individually and collectively in accordance with CEQ's NEPA regulations (40 CFR 1503.4).

From: Plains and Eastern Website
To: CES.CommentsPlainSandEasternEIS
Subject: Plains and Eastern Website feedback
Date: Friday, March 06, 2015 3:32:40 PM

Comments Form	Responses related to eminent domain and public good are addressed in Section 4 (Section 1222 Process), pages 3-79 to 3-82, Section 4C (Public Good), pages 3-93 to 3-98, and in Section 6 (Easements and Property Rights/Value), pages 3-103 to 3-136, in Chapter 3 of Appendix Q.
Please include if your comment pertains to a specific route segment	plains&Eastern clean line
Comment	I am against Clean Line Energy Partners LLC. using the DOE in order to obtain eminent domain. This is a State right, especially when a merchant group is trying to seize land from private owners for their personal profits. This is not a public project. 1|4 2|6 3|4C
Attatchment	
*** First Name**	Verna
*** Last Name**	Auchstetter
*** Email**	vernajulene@yahoo.com
Receive Email Notifications	1
Organization	
Title	
Mailing Address 1	1609 26th st
Mailing Address 2	
City	peru
State	IL
Country	US
Contact Preference	US Mail

*** Protect Private Information?**	1

Submitted by 10.5.6.10

Plains & Eastern Draft Environmental Impact Statement (EIS)

U.S. DEPARTMENT OF ENERGY

RECEIVED APR 10 2015

Draft EIS Comment Form

Must be received on or before March 19, 2015

Note: If your comment pertains to a specific route segment (example: Region 1 HVDC, AR 1-A), or project component (example: Applicant Proposed Routes, Converter Station, AC collection system), please indicate details in the space below. If your comment pertains to a specific section of the Draft EIS, please reference the chapter, section, page, and line numbers, or the table, figure or map number related to your comments. A response to a similar comment in Section 1 (Policy/Purpose and Need/Scope) is located on pages 3-10 to 3-11 in Chapter 3 of Appendix Q.

I appreciate that a private company in Houston TX is concerned about the residents of Memphis TN. I have to think that private company would benefit more people by putting the 500 Mega Watt line from Oklahoma to the Dallas then on to Houston areas. That private company from Houston Texas needs to take care of their own neighbors and fellow Texans. 1|1

Houston is the largest city in Texas and forth largest in US.

Houston population	-	16,473,310
Dallas, Plano, Irving	"	4,617,827
Ft Worth, Arlington	"	2,353,597
Total		13,444,734

Population of Memphis Tenn. 653,450

What could their motive be for a privat company to do this. Let the Texans take other Texans land and benefit their fellow neighbors.

It is DOE's practice to make comments, including names and addresses of respondents, available for public review. Before including your address, phone number, email address, or other personal identifying information with your comments, be advised that your entire comment, including your personal identifying information, may be made publicly available at any time.

Although you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

Plains & Eastern Clean Line
216 16th Street, Suite 1500
Denver, CO 80202

TAPE HERE (DO NOT STAPLE)

Plains & Eastern Clean Line
216 16th Street, Suite 1500
Denver, CO 80202

80202512975

FOLD HERE

Written comments on the scope of the Plains & Eastern EIS and requests to be added to the EIS distribution list may be submitted by any of the following methods:

- Electronic comments via the EIS website at **http://PlainsandEasternEIS.com**
- Email to **comments@PlainsandEasternEIS.com**
- Insert in comment box at a public hearing
- U.S. Mail to: Plains & Eastern Clean Line EIS
  216 16th Street, Suite 1500
  Denver, CO 80202

FOLD HERE

Name: Karen Barnes
Representing (Optional): _____

Mailing Address: 122 Barnes Dr
Physical Address (for Final EIS delivery): _____

City: Center Ridge State: AR
City: _____ State: _____

Zip Code: 72027
Zip Code: _____

Email: karenbarnes1@sbcglobal.net
Daytime Phone: _____

I would like to receive email announcements through the project email address (circle one): (Yes) No

I would like to receive the Final EIS:

- ☐ An emailed notice of availability and directions to download the EIS on the Plains & Eastern EIS website
- ☐ A mailed notice of availability and directions to download the EIS on the Plains & Eastern EIS website
- ☐ A CD copy of the Executive Summary and EIS and appendices
- ☐ A hard copy of the Executive Summary and CD copy of EIS and appendices
- ☐ A hard copy and CD of the Executive Summary and EIS including appendices
- ☐ Please take me off the EIS distribution list

From:	Plains and Eastern Website
To:	CES.CommentsPlainSandEasternEIS
Subject:	Plains and Eastern Website feedback
Date:	Friday, February 20, 2015 7:09:30 AM

Comments Form

Responses related to the Section 1222 process and landowner rights are located in Section 4 (Section 1222 Process), pages 3-79 to 3-82, and in Section 6 (Easements and Property Rights/Value), pages 3-103 to 3-136, in Chapter 3 of Appendix Q.

DOE's potential partnership with Clean Line in terms of Section 1222 and landowner rights is also discussed in Sections 4B (Technical Viabilitily), pages 3-89 to 3-92, and 4C (Public Good), pages 3-93 to 3-98 in Chapter 3 of Appendix Q.

Please include if your comment pertains to a specific route segment	proposed route, region 4	
Comment	I am opposed to this project because I feel like it is being forced down our throat! I do not have any rights in this section 1222, I am just in the way! This law is striping us of our rights as landowners! I would like the DOE to stay out of equation to partner with Clean Line, if they want to pass through states they simply have to be approved by that state!	2|6 1|4, 4B, 4C
Attatchment		

*** First Name**	Emily
*** Last Name**	Brown
*** Email**	emilyelise03@yahoo.com
Receive Email Notifications	1
Organization	sierra club, landowner
Title	landowner
Mailing Address 1	P.O. Box 235
Mailing Address 2	
City	Van Buren
State	AR

Country	US
Contact Preference	US Mail
*** Protect Private Information?**	

Submitted by 10.5.6.10

From: Plains and Eastern Website
To: CES.CommentsPlainSandEasternEIS
Subject: Plains and Eastern Website feedback
Date: Monday, January 12, 2015 1:40:17 PM
Attachments: 20150112124003_Resolution 270 - SIGNED.pdf

Comments Form		General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476, in Chapter 3 of Appendix Q.
Please include if your comment pertains to a specific route segment	Region 4	A response related to public interest of the project and availability of information is located in Section 2F (Availability of Information), pages 3-65 to 3-68 in Chapter 3 of Appendix Q. Quorum courts are mentioned in Section 3 (Permits/Laws/Regulations) in Chapter 3 of Appendix Q, page 3-76, and in Section 36 (Outside the Scope of the EIS), page 3-481.
Comment	This is not in the best interest of the public, especially the public in the state of Arkansas. Opposition grows daily and mainly because many of the affect landowners are just now finding out about this project. Attached is a copy of the Johnson County Quorum Court Resolution passed with all JP's present and all voting For the resolution in opposition to Plains and Eastern.	1|34 2|2F 3|3, 36
Attatchment	20150112124003_Resolution 270 - SIGNED.pdf	
*** First Name**	CYNTHIA	
*** Last Name**	CALLAHAN	
*** Email**	CYNTHIA.CALLAHAN.11@GMAIL.COM	
Receive Email Notifications	1	
Organization		
Title		
Mailing Address 1	701 Hickeytown Rd	
Mailing Address 2		
City	London	

State	AR
Country	US
Contact Preference	US Mail
*** Protect Private Information?**	1

Submitted by 10.5.6.10

From:	Plains and Eastern Website
To:	CES.CommentsPlainSandEasternEIS
Subject:	Plains and Eastern Website feedback
Date:	Monday, January 12, 2015 2:00:34 PM
Attachments:	20150112130028_RESOLUTION 2015-0-1 CLEAN LINE TRANSMISSION PROJECT.pdf

Comments Form		Responses related to availability of information are located in Section 2F (Availability of Information), pages 3-65 to 3-68 in Chapter of Appendix Q.
Please include if your comment pertains to a specific route segment	Region 5	General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q. Responses related to eminent domain are addressed in Section 4 (Section 1222 Process), page 3-79 to 3-82, and in Section 6 (Easements and Property Rights/Value), page 3-103 to 3-136, in Chapter 3 of Appendix Q.
Comment	There is unresolved controversy growing every day as more and more people find out about this project. The most affected people were to last to find out, LONG after the Scoping period. Attached is a resolution passed with all JP's present unanimously in opposition to Plains and Eastern. The people of Pope Co AR do NOT want this transmission line. The people of Pope Co Ar do not want the converter station. But more than anything the people of Pope Co do NOT want a PRIVATE COMPANY GRANTED FEDERAL SITING AUTHORITY using tax dollars to take land away from tax payers. Clean Line is free to pursue their business goals but NOT WITH FEDERAL EMINENT DOMAIN AND TAX DOLLARS. DO NOT PARTICIPATE WITH PLAINS AND EASTERN.	1|2F 2|34 3|4, 6
Attatchment	20150112130028_RESOLUTION 2015-0-1 CLEAN LINE TRANSMISSION PROJECT.pdf	

*** First Name**	CYNTHIA
*** Last Name**	CALLAHAN
*** Email**	CYNTHIA.CALLAHAN.11@GMAIL.COM
Receive Email Notifications	1
Organization	
Title	

Mailing Address 1	701 Hickeytown Rd
Mailing Address 2	
City	London
State	AR
Country	US
Contact Preference	Email
*** Protect Private Information?**	1

Submitted by 10.5.6.10

From: Mark Fears
To: CES.CommentsPlainSandEasternEIS
Subject: Opposed!!!
Date: Tuesday, March 24, 2015 2:31:55 PM

My name is Mark Fears and I live in Crawford County, Arkansas.

I am opposed to the Plains and clean Line project!!! 1|34

I just received my Draft EIS, and what a joke! Overall, the draft EIS, consisting of five volumes and a "Reference CD" and including numerous appendices, figures, and maps, is voluminous, technical, and, as written, appears to be directed toward an audience other than the general public, from whom comments are solicited. For example, the use of acronyms and abbreviations, while common to preparers of such documents, presents difficulties for nontechnical readers. Nonetheless, the level of detail is appreciated, as is the candor with which the DOE admits the numerous, ongoing, and long-lasting environmental impacts that can reasonably be expected as a direct result of the proposed venture. Yet, DR. Somerson stated there were no impacts. 2|2A

Also, in regard to all of those form letters from Florida and Georgia, (which I suspect are being faked and sent by Plains and Eastern), are so excited to have this line they can put it across Florida!!

Mark Fears
Crawford County, Arkansas

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q.

General NEPA process and compliance comments and responses are located in Section 2A (General Process and Compliance), pages 3-27 to 3-34 in Chapter 3 of Appendix Q.

From: Mark Fears
To: CES.CommentsPlainSandEasternEIS
Subject: Opposed! Stop!!!
Date: Friday, March 27, 2015 9:14:47 AM

My name is Mark Fears and I live in Crawford County, Arkansas.

I am strongly opposed to the plains and eastern project.

The people from plains and clean line do not need to waste there time coming to my property to try and purchase it or to access it for a so called soft survey. My gates are locked and they will not enter on to my property. This project is about nothing but greed and the fact that the people of Arkansas are being subjected to this is appalling. Not to mention the amount of tax payer money being wasted by the DOE. This needs to be stopped now! 1|34

Mark Fears
Crawford County, Arkansas

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q.

REPRESENTATIVE
Charlene Fite
P. O. Box 7300
Van Buren, Arkansas 72956-0262

479-414-1818 Business/Residence
charlene.fite@arkansashouse.org

DISTRICT 80

Counties:
Part Crawford
Part Washington

COMMITTEES:

Public Health, Welfare and Labor

Aging, Children and Youth, Legislative and Military Affairs

STATE OF ARKANSAS

House of Representatives

January 9, 2015

Dr. Jane Summerson
NEPA Document Manager
Plains and Eastern EIS
216 16th St., Ste. 1500
Denver, CO 50202

Dear Dr. Summerson:

I am an Arkansas State Representative for District 80 (Washington and Crawford Counties). This letter is in regards to the potentional takeover of farm land that has belonged to area families for multiple generations. This project would affect numerous constituents in my House District. Our local economy and property values will be negatively impacted by this and we all believe the reaps will be negative. Additionally, permanent scars will be left across some of the most beautiful vistas in the nation if this takeover happens.

1|24, 6

2|29

I am working in solidarity with the landowners and constituents in my district to oppose this project. If you have any questions, please do not hesitate to contact me.

Sincerely,

Charlene Fite

Charlene Fite
State Representative

CF/jnm

Socioeconomics comments and responses are located in Section 24 (Socioeconomics), pages 3-359 to 3-378 in Chapter 3 of Appendix Q.

Visual resource comments and responses are located in Section 29 (Visual Resources), pages 3-417 to 3-426 in Chapter 3 of Appendix Q.

Easements and property rights/values are discussed in Section 6 (Easements and Property Rights/Value, pages 3-106 to 3-136 in Chapter 3 of Appendix Q.

RESOLUTION 2015-2

BE IT RESOLVED BY THE QUORUM COURT OF FRANKLIN COUNTY, STATE OF ARKANSAS, A RESOLUTION ENTITLED:

A Resolution Opposing the Establishment of a High Voltage Power Transmission Line Known as "Plains and Eastern Clean Line" Across Franklin County as Proposed by Clean Line Energy Partners, LLC.

WHEREAS, Clean Line Energy Partners, LLC, A for-profit private company, proposes a high voltage direct current (HVDC) power line across the state of Arkansas and Franklin County, Arkansas. This power line is proposed to transmit wind generated electrical power form the Oklahoma panhandle area to Memphis, Shelby County Tennessee. It will be one of the largest power lines ever built according to Clean Line's own description.

WHEREAS, This huge power line with its 200 foot wide, clear cut right-of-way and 120 to 200 foot lattice type towers will bisect Franklin County from west to east, generally north of Interstate 40. If this power line is built it will be an enduring eyesore to Arkansas and Franklin County, affecting the natural beauty of this area and damaging property values with little positive affect.

1|34

WHEREAS, Clean Line Energy Partners, LLC. is seeking a partnership with the Federal Government, as the Department of Energy, and if successful in obtaining this partnership will enjoy the power of eminent domain (condemnation) and be able to take property form Franklin County land owners who are unwilling to sell. If property condemned, its' value will be determined by the court having jurisdiction in the legal proceedings.

WHEREAS, Land owners whose property is directly used for the right-of-way for this proposed power line are expected to be paid for allowing the power line, including diminished value of their adjoining property. However, nearby property owners will not be paid even though their property may be devalued.

2|24

THEREFORE, Be it resolved, by the Quorum Court of Franklin County, Arkansas to hereby oppose the establishment of the Plains and Eastern Clean Line HVDC power transmission line in Franklin County

THIS RESOLUTION ADOPTED FEBRUARY 12, 2015 AT THE FRANKLIN COUNTY QUORUM COURT MEETING HELD IN OZARK, ARKANSAS

3|3, 36

APPROVED: _____
Franklin County Judge
RICKEY BOWMAN

ATTESTED: _____
Franklin County Clerk
DeAnna Schmalz

DATE: _____

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q.

Socioeconomics comments and responses are located in Section 24 (Socioeconomics), and a response to similar comments can be found in Chapter 3 of Appendix Q, page 3-372.

Quorum courts are mentioned in Section 3 (Permits/Laws/Regulations) in Chapter 3 of Appendix Q, page 3-76, and in Section 36 (Outside the Scope of the EIS), page 3-481.

From:	Plains and Eastern Website
To:	CES.CommentsPlainSandEasternEIS
Subject:	Plains and Eastern Website feedback
Date:	Friday, March 27, 2015 9:58:28 AM

Comments Form

Please include if your comment pertains to a specific route segment	near Wonderview school in Conway County
Comment	I strongley object to the Plain & Eastern CleanLine. We are already saturated with gas pipe lines
Attatchment	
*** First Name**	Regina
*** Last Name**	Gangluff
*** Email**	reginagangluf@gmail.com
Receive Email Notifications	1
Organization	
Title	
Mailing Address 1	6 Wonderview Dr
Mailing Address 2	
City	Hattieville
State	AR
Country	US
Contact Preference	US Mail
*** Protect Private Information?**	1

1|34

Submitted by 10.5.6.10

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q.

From: Bob & Julie Gillaspie
To: CES.CommentsPlainSandEasternEIS
Subject: Fw: Urgent Action is Needed before April 20
Date: Tuesday, April 07, 2015 6:37:30 PM

I am opposed to the establishment of National Interest Energy Transmission Corridors (NIETC's) for the following reasons. 1|1

1. The easements place an undo burden on landowners on and near the transmission lines. The compensation cannot begin to cover the all of the losses that landowners would suffer. Those working or living near the lines but not on the lines still suffer consequences but receive no compensation. 2|6
2. Condemning private property for transmission lines in one state to transport electricity to another is an abuse of eminent domain since it would not significantly benefit the residents of the pass-through states.
3. The eastern states want to and should develop the utility scale wind resources conveniently located just a few miles off-shore near the load centers along the eastern seaboard, thus eliminating hundreds of miles of harmful and costly transmission lines through private lands, productive farmlands, and forest.
4. Renewable energy ought to be injected into the grid and used within the regions where it is produced. The regional economies will benefit when the money is retained locally rather than exporting it to other regions, eliminating the need for transmission lines. 3|10

The NIETC's are a gross violation of state's right to regulate transmission lines.
Local production of energy would be more secure from disruption than an extension cord running cross country.
I urge you to consider these reasons and please do not establish any National Interest Energy Transmission Corridors.

Thank You Sincerely,

Robert & Julie Gillaspie
5236 Highway AA.
Moberly, Mo. 65270
660-676-4367
rjg@mcmsys.com

Easement and property rights/value comments and responses are located in Section 6 (Easements and Property Rights/Value), pages 3-103 to 3-136 in Chapter 3 of Appendix Q. A revised comment summary and response also are included in Item 9, Section 1 (Policy/ Purpose and Need/Scope) in this Errata Sheet.

Alternatives considered but eliminated comments and responses are located in Section 10 (Alterntives Considered But Eliminated), pages 3-191 to 3-194 in Chapter 3 of Appendix Q.

From:	Ron Hairston
To:	CES.CommentsPlainSandEasternEIS
Subject:	Endangered Species - Bats
Date:	Monday, March 16, 2015 10:17:56 PM
Attachments:	Ammend EIS Draft Dec 2014 - Bats 150316.pdf

Please include the attached file for consideration.

March 16, 2015

Plains & Eastern Clean Line EIS
216 16th Street, Suite 1500
Denver, CO 80202

Problem: There are many reasons that the draft EIS published in December 2014 should be rejected. One is:

Endangered species of bats are not adequately addressed in the EIS and may still be at risk.

Evidence:

1. Conversations with US Fish & Wildlife and Arkansas Game & Fish indicate that while some information regarding bats has been accumulated, bat surveys with netting and call recorders are needed in order to identify and determine if endangered species are resident. This has not been done along Region 4 APR Link 9 near Lake Ludwig and likely not along other known bat habitat areas near the path of the transmission line easement. 1|25

2. Of 16 bat species resident to Arkansas, all four endangered species (Ozark Big Eared, Indiana, Grey, and Northern Long Eared (to be listed in April)) are believed to be resident in Johnson County, AR where Link 9 crosses.

3. Since I have become a resident five years ago, bat flights of unknown species have been observed at the beginning of summer evening hours flying in a southwesterly direction on a line following a draw or cut in the bluff as shown in the attached image.

Solutions:

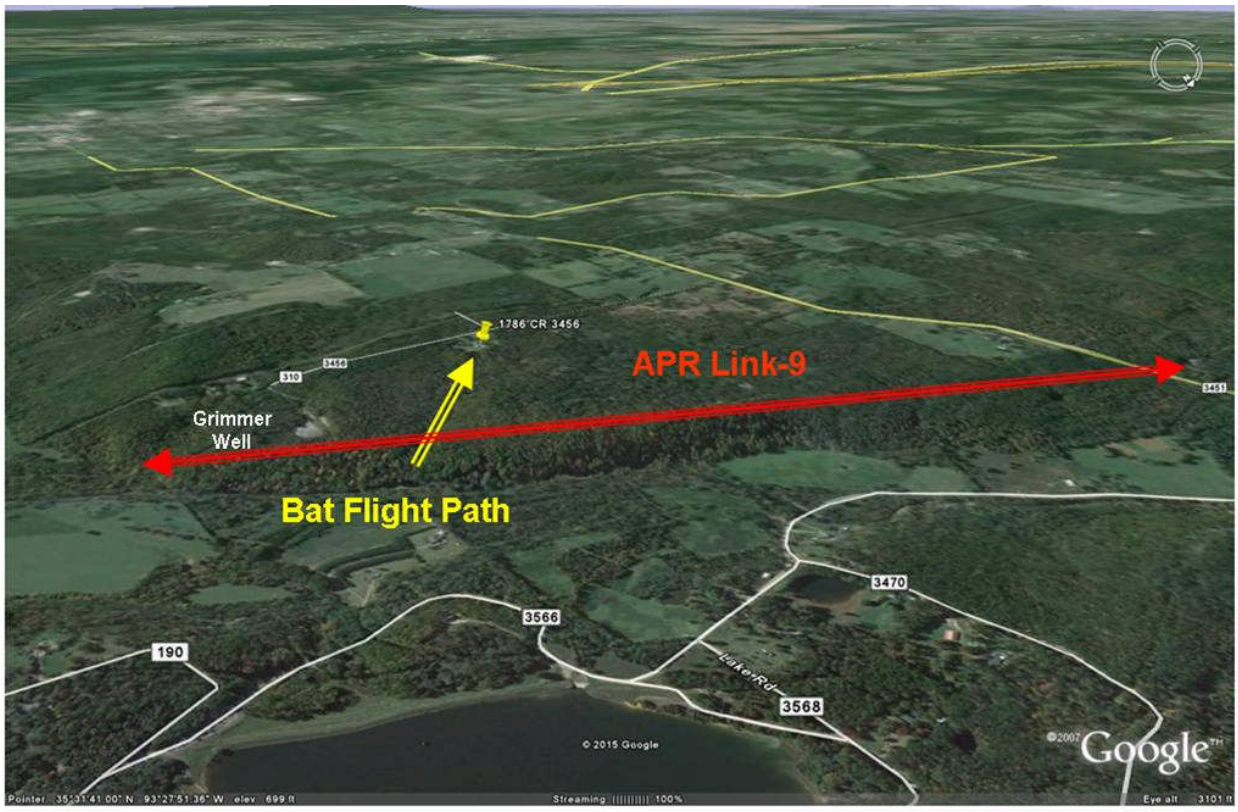
1. Complete bat surveys with netting and call recorders in the areas mentioned above to identify resident species. Update and publish the draft EIS with completed bat survey information. Allow a reasonable period for comment.

2. Withhold approvals for tree removal in and around affected Clean Line easements until habitat mitigation requirements for endangered species are agreed upon by the applicant.

Ron Hairston
1786 County Road 3456
Clarksville, AR 72830-9276

479-754-0134
ron.hairston@ph-clan.com

Special status species wildlife, fish, aquatic invertebrate, and amphibian species comments and responses are located in Section 25 (Special Status Wildlife, Fish, Aquatic Invertebrate, and Amphibian Species), pages 3-379 to 3-390 in Chapter 3 of Appendix Q. A revised comment summary also is included in Item 9, Section 25, in this Errata Sheet.



1. **Known bat flight travels SW up draw or cut in terrain (yellow arrow) crossing transmission line (Link-9) running west from vicinity of Grimmer gas well to County Road 3451.**
2. **Concern is for four (4) endangered species that may be roosting in caves and in trees (during summer months) near Link-9 and the bluff it follows.**

From: Plains and Eastern Website
To: CES.CommentsPlainSandEasternEIS
Subject: Plains and Eastern Website feedback
Date: Monday, February 16, 2015 9:39:16 AM

Comments Form

Please include if your comment pertains to a specific route segment	Purposed Route
Comment	The EIS locates the churches, cemeteries, and houses but fails to locate all Alma and Mulberry Schools. This line will be approx. 2600 ft from Alma Schools and 1300ft from Mulberry Schools. I feel this was very careless and shows the lack of importance your process has placed on the children of our community. The maps do however locate schools in other areas but not on the purposed route is this a matter of convince to not draw attention to how closely these line are to these schools?
Attatchment	

1|2

*** First Name**	Haley
*** Last Name**	Hall
*** Email**	RN.haley@gmail.com
Receive Email Notifications	1
Organization	
Title	
Mailing Address 1	2311 Hwy 348
Mailing Address 2	

NEPA process comments and responses are located in Section 2 (NEPA Process), pages 3-17 to 3-26 in Chapter 3 of Appendix Q. This comment appears on page 3-24 of the noted section of Appendix Q.

City	Rudy
State	AR
Country	US
Contact Preference	US Mail
*** Protect Private Information?**	

Submitted by 10.5.6.10

From:	Elaine Stanfield
To:	CES.CommentsPlainSandEasternEIS
Subject:	Letter and resolutions
Date:	Thursday, April 02, 2015 10:10:35 AM
Attachments:	Plains and Clean Line.pdf

Please see attached

County Judge John Hall
479-474-1511 office
479-471-3201 fax

John Hall

COUNTY JUDGE
CRAWFORD COUNTY COURTHOUSE
300 MAIN STREET • ROOM 4
VAN BUREN, ARKANSAS 72956 - 5798

April 2, 2015

Re: Plains and Eastern Clean Line

Department of Energy

Attached are the resolutions from Crawford County and the City of Mulberry opposing the Plains and Eastern Clean Line transmission project. All of the other cities in the county will be sending in their resolutions opposing project under separate cover.

As CEO of Crawford County, myself and 62,000 citizens, are adamantly OPPOSED to the federal government partnering with a Private for Profit Corporation to eminent domain property. This project will destroy our beautiful county.

Under no circumstances should the Department of Energy partner with Clean Line on this project.

Judge John Hall
Crawford County Judge

RESOLUTION NO. 2015-1

A RESOLUTION ADDRESSING EASTERN CLEAN LINE TRANSMISSION PROJECT'S REQUEST TO OPERATE AS A PUBLIC UTILITY IN ARKANSAS.

WHEREAS, Clean Line Energy Partners, LLC, has submitted to the United States Department of Energy an application for its Plains & Eastern Clean Line transmission project to construct and operate a transmission line throughout various states, including Arkansas; and

WHEREAS, the project will not provide energy to the citizens of this state or benefit consumers of energy within this state; and

WHEREAS, the proposed transmission line would pass through numerous Arkansas counties, including Crawford and will potentially have detrimental impacts on the property of landowners in these areas; and

1|34

WHEREAS, the United Stated Department of Energy should not approve the application of Clean Line Energy Partners, LLC, for its Plains & Eastern Clean Line transmission project unless it identifies clear and substantial benefits to the State of Arkansas that exceed any detrimental impacts caused by the project;

NOW THEREFORE, BE IT RESOLVED BY THE CRAWFORD COUNTY QUORUM COURT that Crawford County encourages the United States Department of Energy to carefully consider the application of Clean Line Energy Partners, LLC for its Plains & Eastern Clean Line transmission project and urges the United States Department of Energy to not approve the application unless it identifies clear and substantial benefits to the State of Arkansas that exceed any detrimental impacts caused by the project.

2|3, 36

APPROVED THIS 26th DAY OF JANUARY, 2015.

JUDGE JOHN HALL

ATTEST:

TERESA ARMER,
County Clerk

CRAWFORD COUNTY SEAL OF THE STATE OF ARKANSAS

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q.

Quorum courts are mentioned in Section 3 (Permits/Laws/ Regulations) in Chapter 3 of Appendix Q, page 3-76, and in Section 36 (Outside the Scope of the EIS), page 3-481.

RESOLUTION NO. 2015-04

A RESOLUTION ADDRESSING EASTERN CLEAN LINE TRANSMISSION PROJECT'S REQUEST TO OPERATE AS A PUBLIC UTILITY IN ARKANSAS.

WHEREAS, Clean Line Energy Partners, LLC, has submitted to the United States Department of Energy an application for its Plains & Eastern Clean Line transmission project to construct and operate a transmission line throughout various states, including Arkansas; and

WHEREAS, the project will not provide energy to the citizens of this state or benefit consumers of energy within this state; and

2|9C

WHEREAS, the proposed transmission line would pass through numerous Arkansas cities, including The City of Mulberry and will potentially have detrimental impacts on the economic development, aesthetic value, and on the property of landowners in these areas; and

WHEREAS, the United Stated Department of Energy should not approve the application of Clean Line Energy Partners, LLC, for its Plains & Eastern Clean Line transmission project unless it identifies clear and substantial benefits to the State of Arkansas that exceed any detrimental impacts caused by the project;

1|34

NOW THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF MULBERRY, ARKANSAS:

SECTION 1: That The City of Mulberry encourages the United States Department of Energy to carefully consider the application of Clean Line Energy Partners, LLC for its Plains & Eastern Clean Line transmission project and urges the United States Department of Energy to not approve the application unless it identifies clear and substantial benefits to the State of Arkansas and the City of Mulberry that exceed any detrimental impacts caused by the project.

2|9C, cont.

PASSED AND APPROVED THIS 17th DAY OF FEBRUARY, 2015.

APPROVED: _____
Gary D. Baxter, Mayor

ATTEST: _____
Jerry Dickerson, Recorder-Treasurer

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q.

Section 9C (Arkansas Converter Station) includes responses to comments requesting that a converter station be built in Arkansas to provide benefit to Arkansas (page 3-188 in Chapter 3 of Appendix Q).

From:	Plains and Eastern Website
To:	CES.CommentsPlainSandEasternEIS
Subject:	Plains and Eastern Website feedback
Date:	Monday, March 16, 2015 6:18:48 PM

Comments Form

Please include if your comment pertains to a specific route segment	
Comment	Does the Department of Energy really think it is wise to want to partner with a start-up company such as Clean Line Partners LLC and a project of this magnitude? There are 4 or 5 of these proposed projects Clean Line has grand visions of doing. They only have 3 actual engineers on staff. Something about that math just doesn't add up. And why do they have so many LLCs? They want zero responsibility for everything? I would be leery of a company wanting to construct one of the largest power lines in the country and there is no record of them having ever put so much as a utility pole in the ground. Folks at the DOE, there are a lot of red flags here. Secretary Moniz, the time is now to say "NO" to Clean Line and its 14 LLCs and end this nonsense.
Attatchment	

1|34

*** First Name**	Greg
*** Last Name**	Kremers
*** Email**	gregkremers@yahoo.com
Receive Email Notifications	1
Organization	
Title	
Mailing Address 1	

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q.

Mailing Address 2	
City	Dover
State	AR
Country	US
Contact Preference	US Mail
*** Protect Private Information?**	

Submitted by 10.5.6.10

From: Plains and Eastern Website
To: CES.CommentsPlainSandEasternEIS
Subject: Plains and Eastern Website feedback
Date: Saturday, April 11, 2015 8:55:38 AM

Comments Form

Please include if your comment pertains to a specific route segment	
Comment	To Whom It May Concern: I am opposed to the Plains and Eastern Clean Line project for the following reason: The Corporation proposes that it will "work with landowners to ensure that access is maintained as needed to existing operations (e.g. to oil/gas wells, private lands, agricultural areas, pastures, hunting leases)" (EPM LU-1). The Corporation does not specify who is the arbiter of "as needed". Can circumstances arise where landowners are denied access to their private property, where workers from oil/gas companies are denied access to their facilities, where hunters are denied access to their customary hunting areas, etc.? Given the Corporation's historical lack of communication with landowners, and indeed gas utilities, I am concerned with how the Corporation proposes to communicate and enforce whether or not it allows access. Regards, Jackie Leavell
Attatchment	

1|34

2|2

*** First Name**	Jackie
*** Last Name**	Leavell
*** Email**	mjl123@live.com
Receive Email Notifications	1
Organization	
Title	

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q.

A comment and response related to access are located in Section 2 (NEPA Process), page 3-17, in Chapter 3 of Appendix Q.

Mailing Address 1	594 Pollard Cemetery Rd
Mailing Address 2	
City	Dover
State	AR
Country	US
Contact Preference	Email
*** Protect Private Information?**	1

Submitted by 10.5.6.10

From: Plains and Eastern Website
To: CES.CommentsPlainSandEasternEIS
Subject: Plains and Eastern Website feedback
Date: Saturday, February 07, 2015 7:18:38 PM

Comments Form

Please include if your comment pertains to a specific route segment	3.3.3.5 Region 5 (Central Arkansas)
Comment	February 4, 2015 Mr. & Mrs. Truett Leavell, Jr. 594 Pollard Cemetery Rd. Dover, AR 72837 Ernest J. Moniz, Secretary U.S. Department of Energy 1000 Independence Ave, SW Washington, DC 20585 Secretary Moniz: RE: Plains and Eastern Clean Line HVDC Transmission Line (CL) We are opposed to the proposed CL project for the following reasons: 1. It would be inappropriate for the DOE to act as a land agent for any private CL program. 2. The DOE partnering with CL would raise significant issues including environmental injustice and constitutional private property rights. 3. The project will not enhance the reliability and security of the grid by adding intermittent wind supported by fossil fuels on a HVDC line that will take 3500 MW offline when there is a disruption anywhere along its 720 miles. 4. The delivery station proposed in Arkansas is just a suggested alternative as seen in the draft EIS. CL is under no obligation at this time to construct it. 5. Both the siting and the development of the route and the Draft Environmental Impact Statement were done without adequate input from the landowners as evidenced by recent quorum court resolutions against the line as well as the resolution by the Tribal Council of the Cherokee Nation. As a matter of fact, the length of time for the comment period was also recently challenged as insufficient by the entire Arkansas Delegation along with Sen. Lamar Alexander from Tennessee. 6. New investment in Arkansas is important, however it is wrong to imply that such investment is only possible at the expense of private property rights. 7. The project has already received tax abatement in two Tennessee counties for eleven years. A sister project, Grain Belt Express has also received a ten year abatement in Kansas. Furthermore two Oklahoma lawmakers filed a bill to change tax incentives for wind farms in that state due to the burgeoning burden developments have placed on the state budget. 8. C.L. was rejected as a public utility by the State of Arkansas. The proposed partnership with the Department of Energy using an untested law in defiance of that decision is federal overreach. 9. It is absolutely inappropriate for the federal

1|4
2|1
3|9C
4|2C
5|2B
6|24
7|6

government to condemn taxpayers' property on behalf of a private, merchant transmission company with no history of successful development or contractually obligated end users. 10. Forcing landowners to accept fair market payments for a perpetual easement on a risky project is unconscionable. CL should have to negotiate all easements without the advantage of eminent domain. Thank you, Truett & Jackie Leavell

7|6 cont.

Attatchment

*** First Name**	Jackie
*** Last Name**	Leavell
*** Email**	mjl123@live.com
Receive Email Notifications	1
Organization	
Title	
Mailing Address 1	
Mailing Address 2	
City	
State	
Country	US
Contact Preference	US Mail
*** Protect Private Information?**	

Submitted by 10.5.6.10

Section 1222 process comments and responses are located in Section 4 (Section 1222 Process), pages 3-79 to 3-82 in Chapter 3 of Appendix Q.

Policy/purpose and need/scope comments and responses are located in Section 1 (Policy/Purpose and Need/Scope), pages 3-5 to 3-16 in Chapter 3 of Appendix Q.

Arkansas converter station comments and responses are located in Section 9C (Arkansas Converter Station), pages 3-187 to 3-190 in Chapter 3 of Appendix Q. A new comment summary and response are included in Item 9, Section 9C, in this Errata Sheet.

Stakeholder involvement comments and responses are located in Section 2C (Stakeholder Involvement), pages 3-41 to 3-54 in Chapter 3 of Appendix Q.

Comments and responses related to the length of the comment period and number and location of public hearings are located in Section 2B (Length of Comment Period, Number and Location of Public Hearings), pages 3-35 to 3-40 in Chapter 3 of Appendix Q. The commenter's note about Lamar Alexander can be found on page 3-36 of the noted section.

Easements and property rights/value comments and responses are located in Section 6 (Easements and Property Rights/Value), pages 3-103 to 3-136 in Chapter 3 of Appendix Q.

Comments and responses related to tax credits and incentives are located in Section 24 (Socioeconomics), pages 3-367 to 3-373 in Chapter 3 of Appendix Q.

From: Samantha Lovejoy
To: CES.CommentsPlainSandEasternEIS
Subject: Plains and Eastern Clean Line project
Date: Friday, February 20, 2015 4:41:03 PM

I am writing to state my opposition to building the Plains and Eastern Clean Line project. Please let the regions of the country that need additional electrical power build their own power generation capacity. Please do not permit a huge line spanning several states to be constructed. It would be detrimental to the environment and be unsightly. Please deny the permit to build this project. 1|34

If the project is approved over my opposition, I request that the applicant PROPOSED route for the Clean Line project in Garfield County, OK be approved as the final route for this project. This route has been studied and shown by the EIS to be the most environmentally friendly and efficient route for this project. 2|8A

My family owns property on the Region 1 HVDC Alternative Route: AR 1-A in Garfield county. If this route is chosen it will cause potential ecological damage, unfavorable environmental impact and an undue hardship on our family. Trees will have to be torn out which could lead to water erosion in a low lying area of our farm. East of this low lying area but along the alternative route is where we are planning to build a new homestead including a house, barn and out buildings. This project would have to be abandoned if the alternative route for this project is approved and the line constructed. 3|8D 3|8B

Based on all available information and the least detrimental impact on the environment, please approve the proposed route in Garfield county, Oklahoma. 2|8A cont.

Best Regards,
Samantha Lovejoy
(samantha_lovejoy@yahoo.com)

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q.

Applicant Proposed Route comments and responses are located in Section 8A (Applicant Proposed Route), pages 3-151 to 3-162 in Chapter 3 of Appendix Q.

DOE alternative route comments and responses are located in Section 8B (DOE Alternative Route), pages 3-163 to 3-168 in Chapter 3 of Appendix Q. A revised response to the specific comment regarding AR 1-A is in Item 9, Section 8D (Routing Preference), in this Errata Sheet.

From: smlovejoy@yahoo.com
To: CES.CommentsPlainSandEasternEIS
Subject: Plains and Eastern EIS comments
Date: Tuesday, February 10, 2015 2:20:18 PM

I am writing to request that the applicant proposed route for the Clean Line project in Garfield County, OK be approved as the final route for this project. This route has been studied and shown by the EIS to be the most environmentally friendly and efficient route for this project.

We own property on the Region 1 HVDC Alternative Route: AR 1-A in Garfield county. If this route is chosen it will cause potential ecological damage, unfavorable environmental impact and an undue hardship on our family. Trees will have to be torn out which could lead to water erosion in a low lying area of our farm. East of this low lying area but along the alternative route is where we are planning to build a new homestead including a house, barn and out buildings. This project would have to be abandoned if the alternative route for this project is approved and the line constructed.

Based on all available information and the least detrimental impact on the environment, please approve the proposed route in Garfield county, Oklahoma.

Best Regards,
Steve Lovejoy
smlovejoy@yahoo.com

1|8D

Routing preference comments and responses are located in Section 8D (Routing Preference), pages 3-171 to 3-180 in Chapter 3 of Appendix Q. A revised response to the specific comment regarding AR 1-A is in Item 9, Section 8D (Routing Preference), in this Errata Sheet.

From: Plains and Eastern Website
To: CES.CommentsPlainSandEasternEIS
Subject: Plains and Eastern Website feedback
Date: Tuesday, February 10, 2015 4:32:01 PM

Comments Form		Comments and responses related to the length of the comment period are located in Section 2B (Length of Comment Period, Number and Location of Public Hearings), pages 3-35 to 3-40 in Chapter 3 of Appendix Q. Comments and responses regarding EIS printing delays and extending the comment period are located in Section 2F (Availability of Information), pages 3-65 to 3-66 in Chapter 3 of Appendix Q	
Please include if your comment pertains to a specific route segment	All of it		
Comment	We can't get the EIS Summary from the DoE. It's not the fault of my neighbors that you can't get them printed. Extend the comment period for more than 1 month, extend it for 3 months so we can fully understand how this will impact all of use.		1|2B, 2F
Attatchment			

*** First Name**	Steven
*** Last Name**	MacDonald
*** Email**	sdwinc@gmail.com
Receive Email Notifications	1
Organization	
Title	
Mailing Address 1	104714 S 4660 Rd
Mailing Address 2	
City	Sallisaw
State	OK
Country	US
Contact Preference	US Mail

*** Protect Private Information?**

Submitted by 10.5.6.10

From:	Plains and Eastern Website
To:	CES.CommentsPlainSandEasternEIS
Subject:	Plains and Eastern Website feedback
Date:	Sunday, March 29, 2015 9:16:57 AM

Comments Form

Please include if your comment pertains to a specific route segment	Route 4
Comment	One thing that should trouble the DoE and by extension the US Government if Clean Line is allowed to use section 1222 to acquire property for their investors in Houston, Tx. What do I mean by troubled? Clean Line Energy Partners, LLC is an LLC and therefore is not required to file financial reports to the SEC or any agency, other than the IRS. And Ziff Brother Investments is an LLC that has the same structure. Where would government oversight come from if they are allowed to using such a federal power? Profits would be reported but not required to be published to the pubic and those of us that will be impacted by their project.
Attatchment	

1|4

*** First Name**	Steven
*** Last Name**	MacDonald
*** Email**	sdwinc@gmail.com
Receive Email Notifications	1
Organization	
Title	
Mailing Address 1	104714 S 4660 Rd

Section 1222 process comments and responses are located in Section 4 (Section 1222 Process), pages 3-79 to 3-82 in Chapter 3 of Appendix Q.

United States Department of the Interior

NATIONAL PARK SERVICE
INTERMOUNTAIN REGION
12795 West Alameda Parkway
P.O. Box 25287
Denver, Colorado 80225-0287

APR 0 1 2015

IN REPLY REFER TO:
IMR/NR
MAR-03/2015

Historic and cultural resource comments and responses are located in Section 20 (Historic and Cultural Resources), pages 3-317 to 3-334 in Chapter 3 of Appendix Q. The specific comments in this letter are included on pages 3-324 to 3-327.

Jane Summerson, Ph.D.
DOE NEPA Document Manager
DOE NNSA KAFB
PO Box 5400 Bldg. 391
Albuquerque, NM 87185-5400

Dear Dr. Summerson:

The National Park Service (NPS) has reviewed the Department of Energy's (DOE) Draft Environmental Impact Statement (DEIS) on the proposed Plains & Eastern Clean Line Transmission Project. We have identified two National Historic Landmarks (NHLs) that could be impacted by the project. Moreover, numerous segments of the Trail of Tears National Historic Trail (NHT) could be crossed by the project.

We encourage DOE to assess potential impacts to the Stamper Site National Historic Landmark (Texas County, Oklahoma), which is located in the vicinity of the proposed "Region 1" Wind Development Zone and AC Collection System route. The current DEIS has not identified this National Historic Landmark in the list of historic and cultural resources. Please send the results of this assessment to the IMR National Historic Landmarks Program.

Additionally, to the maximum extent possible, efforts should be made to avoid and minimize any potential impacts to the Honey Springs Battlefield National Historic Landmark (McIntosh & Muskogee counties, Oklahoma), which is located near the proposed area of potential effect for the alternative routes 3-C and 3-D. Visual impacts are identified in the DEIS for these proposed alternate routes; however, if these routes are selected DOE should consult directly with National Park Service's Intermountain Region National Historic Landmarks Program to minimize or mitigate any potential impacts to this nationally significant site. Section 110(f) of the National Historic Preservation Act requires that "prior to the approval of any Federal undertaking, which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark." Moreover, as stated in 36 CFR Part 800.10(c), federal agencies are required to notify the Secretary of the Interior (delegated to the NPS) of any consultation involving an undertaking at a NHL and invite the Secretary to participate in the consultation where there may be an adverse effect. Adverse effects are not limited to direct impacts and include visual effects. For more information regarding NHLs, please contact Christine Whitacre at 303-969-2882 or via email at *christine_whitacre@nps.gov* if you have further questions. 1|20

The NPS's National Trails Intermountain Region (NTIR) administers the Trail of Tears NHT, which was designated by Congress in December 1987. The trail commemorates the tragic story of the forced removal of the Cherokee and other American Indian tribes from their homelands during 1838-1839, and subsequent

relocation in eastern Oklahoma. The trail consists of over 2,200 miles of overland and water routes in nine Southeastern and Midwestern States. The trail has great cultural significance to the Cherokee and other tribes.

Some of the alternative alignments in northwest Arkansas would result in the construction of a very large transmission line on top, nearby, or within view of as much as 50 miles of the congressionally designated route of the Trail of Tears NHT, and two crossings of a water route of the trail north of Memphis, Tennessee as seen in the enclosed map. It appears that the alternative alignments presented show that the NHT will be crossed by land at least ten times from central Arkansas to the Arkansas/Oklahoma border. The alternative alignments also show a crossing of the NHT near Gore, Oklahoma. If these alternatives are selected, the transmission line construction will create irreversible permanent direct, indirect, and cumulative adverse effects to the Trail of Tears NHT, associated resources, and its setting. For the past fifteen years, the Arkansas State Historic Preservation Office (AR SHPO) has conducted extensive research, documentation, and mapping of Trail of Tear alignments in Arkansas.

In addition, the AR SHPO has listed a number of trail segments to the National Register of Historic Places. It is recommended that the AR SHPO especially be consulted early on in the review process. The Cherokee Nation, one of NPS's strongest partners in the preservation, protection, and interpretation of the Trail of Tears NHT, is also very concerned about potential impacts that can be caused by the transmission line construction. 1|20 cont.

The proposed transmission line alignment also crosses historic Route 66, a cultural route that NTIR administers through Route 66 Corridor Preservation Program. The crossing is just to the northwest of Depew, Oklahoma. This area could yield segments of the historic road that are determined eligible for the National Register of Historic Places.

The NPS is requesting to be a consulting party on all phases for this project, including the National Environmental Policy Act, and for the National Historic Preservation Act Section 106 consultations. The enclosed map shows the correlation between the proposed transmission line corridors and the Trail of Tears NHT. NTIR has additional GIS detailed maps showing points at which the proposed alignments cross the NHT. NTIR will be glad to share these with the DOE. Please contact Michael Taylor at 505-988-6742 or via email at *michael_taylor@nps.gov* if you have further questions.

We appreciate you contacting us to help ensure that NPS units and related sites are identified early in the planning process. If you have any questions about our comments, please contact Sarah Quinn, External Renewable Energy Program Coordinator, at 303-969-2094 or via email at *sarah_quinn@nps.gov*.

Sincerely,

Tammy Whittington

Tammy Whittington
Associate Regional Director, Resource Stewardship & Science
Intermountain Region

Enclosures:

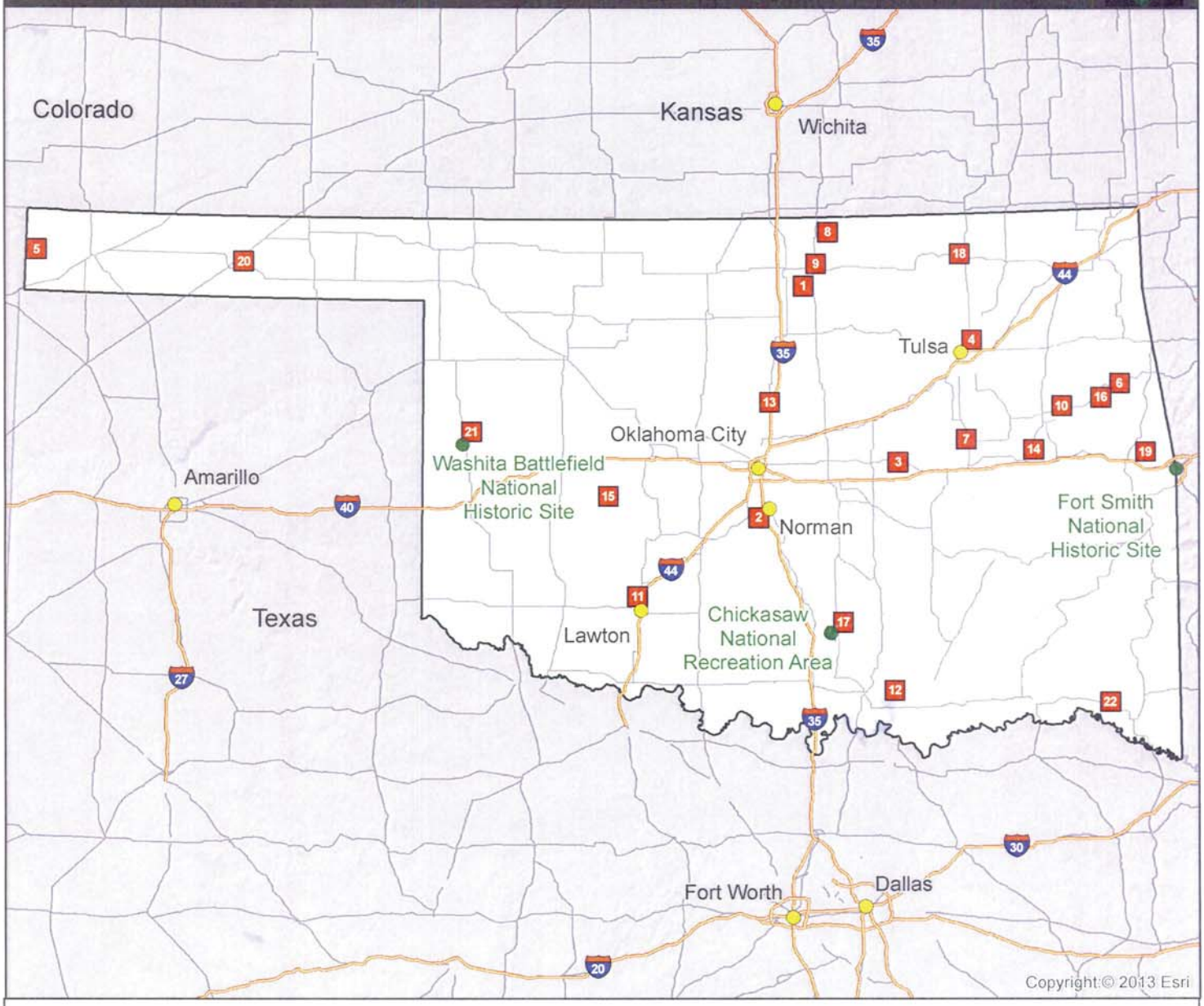
1) National Historic Landmarks Map (Oklahoma)
2) Trail of Tears Map

cc: Patrick Malone, Assistant Regional Director, Natural Resources, IMR

Vidal Davila, Acting Deputy Associate Regional Director, Resource Stewardship & Science, MWR
Ben West, Chief, Planning and Compliance Division, SER
Melissa Trenchik, Chief, Environmental Quality, IMR
Christine Whitacre, Manager, Heritage Partnerships Program, IMR
Christine Landrum, Director, Indian Affairs and American Culture, IMR
Aaron Mahr, Superintendent, National Trails Intermountain Region
Sarah Quinn, Renewable Energy Program Lead, NRSS-WASO
Andrew M. Montaño, Renewable Energy Specialist, IMR
Heidi Riddle, Renewable Energy Specialist, MWR
Bryan Faehner, Renewable Energy Specialist, SER
Truda Peters, Realty Specialist & Right-of-Way Coordinator, IMR
Michael Taylor, Cultural Resources Specialist, National Trails Program, IMR

National Historic Landmarks (NHL)
Intermountain Region
Oklahoma

National Park Service
U.S. Department of the Interior



Legend

- National Park Unit
- National Historic Landmarks
- Interstates
- Major Highways
- Cities

N

0 25 50 Miles

Landmarks

1 101 Ranch Historic District
2 Bizzell Library
3 Boley Historic District
4 Boston Avenue Methodist Episcopal Church, South
5 Camp Nichols
6 Cherokee National Capitol
7 Creek National Capitol
8 Deer Creek Site
9 Earnest Whitworth Marland Mansion
10 Fort Gibson
11 Fort Sill
12 Fort Washita
13 Guthrie Historic District
14 Honey Springs Battlefield
15 McLemore Site
16 Murrell Home
17 Platt National Park
18 Price Tower
19 Sequoyah's Cabin
20 Stamper Site
21 Washita Battlefield
22 Wheelock Academy

Data Sources: NPS Data, ESRI Basemap (Hydrography, Roads, Cities)

Plains and Eastern Transmission Line and the Trail of Tears National Historic Trail

DRAFT

Produced by National Trails Intermountain Region, Cultural Resources (MLE)

14 March 2013

FILE: TRTE Plains and Eastern transmission

Data Sources: NPS, ESRI, TetraTech

From: Retha Stephens
To: CES.CommentsPlainSandEasternEIS
Subject: Transmission Line across Eastern Arkansas
Date: Monday, March 23, 2015 4:45:21 PM

My name is Dennis Stephens. I am a farmer from Cherry Valley, Arkansas and will be impacted by the transmission line and it's proposed route through Cross County Arkansas as it is proposed to follow County Road 210 north of Cherry Valley.

I would recommend you look more closely at the alternative route known as AR 6-C which I believe was shown on map 50. The suggested route along county road 210 creates significant impact when compared to the route to the north. The areas of impact are as follows: 1|8B

Soil type: Simply pull the area soil maps for both routes and you will clearly establish as has the USDA- Natural Resources Conservation Service that you are dealing with soil types that are much more easily harmed and impacted on the CR 210 route. The soils no CR 210 are silt loam soils while those along proposed AR 6-C are more buckshot and clay based. The silt loam soils are much more impacted by erosion. In addition, the CR 210 soils have been land formed to allow for furrow irrigation to produce corn and soybeans while the AR 6-C route is still more of a rice soil. This means irrigation of rice which is flooded as opposed to furrow will be less impacted by the positioning of transmission poles as a farmer can go around those where in growing corn and soybeans under furrow irrigation the poles become an obstruction to irrigating down the furrow.
Also, the water depth on CR 210 is approximately 140' compared to 95-100' on AR 6-C, thus giving a more solid base for construction considering the soil depth and hard pan characteristics that would be provided by the alternative route of AR 6-C.

The difference in accepted agricultural practices between the two potential routes clearly favors AR 6-C as the route to provide the lesser environmental impact due to the more advanced soil erosion, the more obstruction in irrigating, the less desirable soil characteristics for construction and greater interruption to the crop rotation and practices utilized in the area of the APR along CR 210.

Thank you,
Dennis Stephens

DOE alternative route comments and responses are located in Section 8B (DOE Alternative Route), pages 3-163 to 3-168 in Chapter 3 of Appendix Q.

A new comment summary and response are included in Item 9, Section 8B, in this Errata Sheet.

Waymond Teague

Sat, Feb 21 9:37 AM

Fw: Plains & Eastern EIS

Comments on other alternatives related to Ozark National Forest Lands and the associated responses are located in Section 11 (Other Alternatives), pages 3-196 to 3-197 in Chapter 3 of Appendix Q.

Easements and property rights/value comments and responses are located in Section 6 (Easements and Property Rights/Value), pages 3-103 to 3-136 in Chapter 3 of Appendix Q.

Routing comments and responses are located in Section 8 (Routing), pages 3-139 to 3-150 in Chapter 3 of Appendix Q.

From: Waymond Teague
Sent: Saturday, February 21, 2015 9:08 AM
To: info@plainsandeasterneis.com
Cc: alex_hanson@cotton.senate.gov, Bruce.Westerman@mail.house.gov, chri_caldwell@boozman.senate.gov, http:womack@house.gov/contact/

Move the proposed transmission line in AR north onto publicly owned Ozark NF lands and you will be locating it on lands EVERYBODY owns. It could be located on publicly owned lands from the western border of AR to Scotland AR and not one acre of private land would be taken from private ownership.

How can the transmission people chose to locate the line on private property and have to deal with 500 hostile landowners when they could move the line onto public land and eliminate dealing with 300 private landowners? Why would the transmission people chose to locate the line on some of the most expensive land in the Arkansas River Valley, when they could located it on timberland in the Ozark National Forest that has a fair market value far less than the land they choose? The lands east of Scotland AR is mostly poor timberlands (non-commercial), open land or agriculture lands. The line would have much less impact on these types of lands. 1|11 2|8

Don't under estimate the emotional attachment that some of the private landowners have for their land. It is deep and abiding and nothing can replace it. It is the only thing that some of the folks have. The hostilities felt by the landowners will be deep and long lasting. Some will consider it just another reason not to like the federal government and big industry, and that is not good for the government, industry or the people. 3|6

Move the line onto public property.

Waymond Teague
9 summer hill drive
greenbrier, AR
501-733-3287
wteague1938@gmail.com

RECEIVED MAR - 5 2015

Friday, February 27, 2015

Enclosed is a copy of a memo for your consideration concerning the location of the proposed Plains and Eastern electrical transmission line across Arkansas.

I would certainly appreciate you consideration of this matter.

Waymond Teague
9 summer hill drive
Greenbrier, AR 72058
501-733-3287 anytime
Wteague1938@gmail.com

Tuesday, February 24, 2015

The following comments are for your consideration in determining the location of the proposed Plains and Eastern utility line in Arkansas. The comments are make in support of an effort to relocate the now proposed R/W as set forth in the draft EIS from private lands to public lands in the Ozark National Forest. 1|11 cont.

Locating the R/w on public lands would reduce the chance for multiple easements on a single private property. Many landowners already have utility easements on or adjacent to their property. Additional R/W's would reduce the value of their lands exponentially.

Private lands have the potential for added value in the future as residential, commercial or industrial use. National Forest lands do not have this potential. The real potential increase in worth of private lands should be a major factor in the locating of the R/W. The Arkansas River Valley is already a narrow corridor of urban and suburban, commercial and industrial development limited by the geographical locations of the Ozark and Ouachita Forests. Private lands will be needed for future development in the Arkansas River Valley. 3|6 cont.

Locating the R/W on public land would eliminate the public visibility and noise.

There would be less construction activities in the populated rural areas. Much of the future maintenance traffic and other activities associated with the line would be eliminated from the same areas.

If the line were located on National Forest lands, catastrophic events to the line would pose fewer threats to the public. Events such as earthquakes, storms, erosion, and accidental damage caused by equipment or aircraft, maintenance accidents or normal wear and age. 2|8 cont. 1|11 cont.

Locating the line of National Forest lands would increase the opportunities and the likelihood that the R/W clearings would be used as managed areas of flora and fauna by the forest service. These areas would increase wildlife and plant diversity. 2|8 cont.

Access roads to the line on private property increases trespass, unauthorized hunting, poaching, sightseeing and timber thief. Locating the line on public property would eliminate this problem from private land.

If tower locations were from mountain top to mountain top, it is assumed that the steep mountain sides and the valleys would not have to be cleared of vegetation thereby lower construction cost, reducing soil movement and provide for future timber growth.

Comments on other alternatives and the associated responses are located in Section 11 (Other Alternatives), pages 3-196 to 3-197 in Chapter 3 of Appendix Q. Easements and property rights/value comments and responses are located in Section 6 (Easements and Property Rights/Value), pages 3-103 to 3-136 in Chapter 3 of Appendix Q. Routing comments and responses are located in Section 8 (Routing), pages 3-139 to 3-150 in Chapter 3 of Appendix Q.

Locating the line on public property would leave approximately 3,400 acres of private land in private ownership. This fact should be the primary and overriding reason to locate the line on already owned public lands. The cost difference between acquiring easement on private lands and obtaining a public land permit, should be substantial. With the cost of the permit being adjusted every five (5) years, the Forest Service/taxpayers and the utility are assured of a continuing fair market value for the permit. A one time easement settlement for the acquisition of the easement may be found, in the future, to have been grossly inequitable to the private landowner.

2|8, cont.

1|11 cont.

Locating the line on the national forest would be locating it on lands already owned by the public. The lands that make up the Ozark National Forest have little intrinsic value. The timber growing capabilities are among the lowest in the Southern Pine Region. The highest and best use of the land may very well be for the locations of easements.

2|8 cont.

Locating the line on already owned rural low value publicly owned land would provide the government and big business an exceptional opportunity to demonstrate their concerns for the welfare of the general public and to promote good will among the targeted landowners.

Waymond teague
9 summer hill drive
greenbrier, AR 72058
wteague1938@gmail.com
501-733-3287 anytime

Comments on other alternatives and the associated responses are located in Section 11 (Other Alternatives), pages 3-196 to 3-197 in Chapter 3 of Appendix Q.

Routing comments and responses are located in Section 8 (Routing), pages 3-139 to 3-150 in Chapter 3 of Appendix Q.

From:	Brenda Thakkar
To:	CES.CommentsPlainSandEasternEIS
Subject:	Comments on Plains and Eastern EIS
Date:	Tuesday, April 21, 2015 7:54:08 AM
Attachments:	SCAN_20150420_110336930.pdf

To Whom it May Concern:

Please add the attached letter as a comment AGAINST the Plains and Eastern Clean Line Transmission Project that is being planned to go through my property in Shelby County in West Tennessee.

Thank you,
Pravin Thakkar

PRAVIN J. THAKKAR

PO BOX 2185

MEMPHIS, TN 38101-2185

April 20, 2015

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q. Noise comments and responses are located in Section 22 (Noise), pages 3-345 to 3-352 in Chapter 3 of Appendix Q. A revised comment summary also is included in Item 9, Section 22, in this Errata Sheet.

To Whom It May Concern:

I have been in this country for over 50 years and always cherished the freedoms that come with being an American citizen—especially the freedom and opportunity to own land in this country. My farm in Shelby County, TN is about 160 acres. I purchased this farm in 2007 in order that my family and I could enjoy the peace and quiet of acreage in the country—away from the noise of everyday life in the city. Also, we have started a wildlife refuge on this property for turkeys, deer, quail, and other species of wildlife indigenous to this area. 1|34

I strongly object to the location of the transmission lines by Plains and Eastern's Clean Line Project. After much reading and investigation into the results of such a project as this, I can see where this project does no good for this area and can only cause a serious negative effect on property values and also will contribute to excessive noise pollution for the properties affected.

The magnitude of the Corona noise and the visual pollution is unprecedented. It reaches far beyond the easement and significantly impacts property owners whose property values are taken from them without just compensation. It is my understanding that the Corona noise of 55 dBA may degrade or destroy property values 1,000 to 2,000 ft. on either side of the transmission line. The intrusive noise levels generated from line voltage that is five (5) to ten (10) times greater than typical will make the affected home impossible to sell and render building sites useless. 2|22

As regards the visual pollution, the location of the transmission line will destroy the setting of the prime area of this property—the small lake that is located on the property. Plans to eventually build a home on the lakefront are ruined by the fact that we would have to look at the towers only yards away from the planned site for the home. It is my understanding that the towers may rise as much as 150 feet over the treetops and that they can be located as little as 300 yards from residences. This visual pollution can only have disastrous effects on property values. 3|29

Also, the idea of having to listen to the constant humming, hissing, crackling and popping of the transmission lines will absolutely destroy any plans for a quiet evening communing with nature. 2|22 cont.

I have reviewed the documents provided and have realized that the scope of the damages to my property and to this area as a whole cannot be known until after the transmission was placed into operation. The documented data only shows "average" Corona noise levels—no mention of what peak level noise values may actually occur. I sense that there has been total lack of transparency as far as the potential use of public lands to the line route currently promoted by Plains & Eastern Clean Line. I ask that you make public the cost of using public lands for routing this transmission line. Also, I ask you to present to all the true costs borne by property owners who will be negatively impacted by the corona noise and visual pollution. Please see that a true and completely honest picture of costs for all routing options be presented for all to see. 2|22 cont. 4|6, 2F

I ask for help in stopping this installation of the transmission lines through my property and those properties lying in the proposed area for the transmission lines. I refuse to allow a "right of way" on my property and beseech all of the senators, representatives and other people who represent the state of Tennessee to deny Plains and Eastern Clean Lines the ability to disrupt and destroy this area. 1|34 cont.

Sincerely,

Pravin J. Thakkar

Visual resource comments and responses are located in Section 29 (Visual Resources), pages 3-417 to 3-426 in Chapter 3 of Appendix Q. Responses on page 3-417 reference locations in the Final EIS with information on structure heights. A revised comment summary and response also are included in Item 9, Section 29, in this Errata Sheet. Cost comments and responses are located in Sections 2F and 6 (Availability of Information and Easements and Property Rights/Value), pages 3-67 to 3-68 and 3-106 in Chapter 3 of Appendix Q.

RECEIVED MAR 24 2015

Town of Vian, Oklahoma

This Entity is an Equal Opportunity Employer & Provider
P.O. Box 687 Vian, Oklahoma 74962
(918) 773-8110 Fax (918) 773-4082
TDD #711

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q. Socioeconomics comments and responses are located in Section 24 (Socioeconomics), pages 3-359 to 3-378 in Chapter 3 of Appendix Q. A portion of this comment letter is presented on page 3-363 of the noted section.

March 16, 2015

Plains & Eastern Draft EIS Comments
216 16th Street, Suite 1500
Denver, CO 80202

To whom it may concern:

The Board of Trustees for the Town of Vian would like to formally express our opposition of Plains & Eastern Clean Line's proposal to run power lines through the Town of Vian. Upon further research we feel there are uncertainties regarding this project. We feel we would be simply a stepping stone given that this line does not benefit the Southwest power pool which includes our town, as well as, the state of Oklahoma.

At a time when constituents are facing severe, real and unreasonable negative impact concerning this project, we contend as the Town of Vian Board of Trustees, and representatives of our community, to support their concerns and oppose this proposal. 1|34

In conclusion, there will always be projects on the horizon and we are always willing to look at those that will improve the infrastructure for the constituents we represent. However, we do have concerns that this project will not only cost Oklahoma tax payers millions in tax credits for electric services that would benefit other states but would have a negative impact on our own City Lake and future improvements. We also do not embrace such projects that contribute to the decline of Rural Oklahoma; but rather those projects will enhance, improve and have a positive impact on the quality of life for the people of our small town, Sequoyah County and the state of Oklahoma. 2|24

Sincerely,
Town of Vian Board of Trustees

Verlita Meade, Mayor/Chairman

Dennis Fletcher, Vice-Mayor/Vice Chairman

Chad Ford, Councilman/Trustee

Ricky Peoples, Councilman/Trustee

Emanuel Drew, Councilman/Trustee

TOWN OF VIAN CLERK SEAL OKLAHOMA

From:	Plains and Eastern Website
To:	CES.CommentsPlainSandEasternEIS
Subject:	Plains and Eastern Website feedback
Date:	Sunday, April 19, 2015 5:20:30 PM
Attachments:	20150419162017_TRA Letter Combined.pdf

Comments Form

General opposition comments and responses are located in Section 34 (General Opposition Comments), pages 3-473 to 3-476 in Chapter 3 of Appendix Q.

Please include if your comment pertains to a specific route segment	
Comment	I would like to submit a letter that was signed by ~400 potentially affected landowners in Arkansas urging the Tennessee Regulatory Authority to deny Clean Line's request for CCN.
Attatchment	20150419162017_TRA Letter Combined.pdf
*** First Name**	Dave
*** Last Name**	Ulery
*** Email**	dulery70@gmail.com
Receive Email Notifications	1
Organization	Block Plains and Eastern Clean Line: Oklahoma & Arkansas
Title	
Mailing Address 1	
Mailing Address 2	
City	
State	
Country	US
Contact Preference	US Mail
*** Protect Private Information?**	

1|34

Submitted by 10.5.6.10

BLOCK Plains & Eastern Clean Line

Pope, Johnson, Newton & Conway Co.

https://www.facebook.com/groups/blockcleanlinepope/
blockcleanlinepope@gmail.com

October 5, 2014

Dear Directors:

Attached please find a letter signed by two-hundred and seventy-six Arkansans asking you not to grant public utility status or the right of eminent domain to Plains and Eastern Clean Line, LLC. It also addresses certain aspects of their August 2014 data request response.

We gathered these signatures at several public events over the course of the last month. We will send you additional signatures as we collect them.

Thank you for your time and consideration.

Sincerely,

Block Plains & Eastern Clean Line: Pope, Johnson, Newton & Conway Co.

August 28, 2014

Honorable James Allison, Chairman
Honorable Herbert Hilliard, Vice Chairman
Honorable Kenneth Hill
Honorable David Jones
Honorable Robin Bennett

Tennessee Regulatory Authority
502 Deaderick St., 4th Floor
Nashville, TN 37243

IN RE: PETITION OF PLAINS AND EASTERN CLEAN LINE LLC FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY APPROVING A PLAN TO CONSTRUCT A TRANSMISSION LINE AND TO OPERATE AS AN ELECTRIC TRANSMISSION PUBLIC UTILITY

Dear Directors,

We are writing you as concerned Arkansans opposed to the Plains and Eastern Clean Line project. The signatures at the end of this letter are from those of us living within the proposed corridor as well as others with objections to it. As you may know, the Plains and Eastern HVDC line would traverse twelve Arkansas counties, affecting hundreds of landowners along the way. Many landowners within the corridor are still unaware that the project is being planned. Many others have only recently become aware of the potential impact to their property, even after over four years of planning by Clean Line. It is our opinion that Clean Line has been very effective in lobbying various agencies regarding their project, but woefully lacking in terms of outreach to affected landowners. It is deeply important to us that the people of Tennessee understand the impact and hardship this project would place on so many people in the event it is approved, especially if eminent domain is granted.

We'd like to address and expand on a couple of the responses Clean Line submitted to you within the data response dated August 7, 2014.[i]

Firstly, while it is true that Clean Line Energy Partners was issued "public utility" status in Oklahoma on October 28, 2011, they were not given typical utility status. Instead, new regulations were proposed to ensure the project is well regulated. Additionally, the Commission explicitly excluded the use of eminent domain. A quote from Oklahoma Corporation Commission Chair Dana Murphy:

> *"It's important to note what the Commission's decision did not do," Murphy added. "It did not provide Clean Line with authority to exercise the power of eminent domain over any parcel of land. The power to decide whether Clean Line may take any real property after proper payment is in the hands of the district courts."*[ii]

It would appear as though Plains and Eastern Clean Line Oklahoma LLC does not, in fact, have the requisite authority as a traditional utility to "construct and operate the project in Oklahoma" over landowners who are opposed to this project.

Secondly, in the above referenced data response, Clean Line responded:

> *"Plains and Eastern is not pursuing a CCN from the Arkansas Public Service Commission. Instead, to obtain the requisite authority in Arkansas, Plains and Eastern has proposed, under Section 1222 of the Energy Policy Act of 2005 ("Section 1222") that the United States Department of Energy ("DOE") and Southwestern Power Administration ("Southwestern") participate in the Project."*

While it is true that Clean Line Energy Partners is not *currently* seeking a CCN in Arkansas, they filed a petition to become a public utility in Arkansas on May 13, 2010. [iii] They were subsequently denied that status in Arkansas on January 11, 2011. [iv] In addition, on October 19, 2010, Senior Assistant Attorney General M. Shawn McMurray testified to the ARPSC:

> *"What is your recommendation in this docket?*
>
> *I recommend that the Commission defer consideration of Clean Line's requested CCN until Clean Line applies for a CECPN. At that point, all issues, including the matter of public interest, can be resolved in one proceeding. Alternatively, if the Commission decides to grant a CCN, it should narrowly tailor any declarations of statutory inapplicability to limited, definite facilities and operational plans, find Ark. Code Ann. 23-4-102 applicable to Clean Line's business, and include a statement explicitly denying Clean Line a present right of eminent domain."*[v]

In summary, the authority that Clean Line is seeking in this proceeding has the potential to adversely impact hundreds of landowners within its 700 mile path. We feel as though the facts presented in this case should be clear, as it has the potential to set the dangerous precedent of granting the power of eminent domain against landowners for private gain. This could possibly open the door for further abuse. The stated goal of this project is to deliver energy to the Tennessee Valley Authority. To our knowledge, there have been no utilities, the TVA and Entergy Arkansas included, that have signed contracts to purchase electricity from Clean Line as of the date of this letter. Additionally, the generators to supply this project with electricity have yet to be built. This, coupled with the speculative nature of the project, has led us to conclude that Clean Line has not, in our opinion, demonstrated a current and urgent public need for the construction of this transmission line, much less one that justifies the hardship it will cause. As such, we respectfully urge the Directors deny Clean Line's petition for certificate of convenience and necessity. While your ultimate authority lies within the interests of the citizens of Tennessee, the potential impact upon landowners across Oklahoma and Arkansas cannot be overstated.

We thank the Directors for their thoughtful consideration.

Signed,

276 (and counting) Concerned Arkansas Landowners

References:

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i. *"The Oklahoma Corporation Commission previously designated Plains and Eastern's affiliate Plains and Eastern Clean Line Oklahoma LLC, a public utility in Oklahoma, providing the requisite authority to construct and operate the project in Oklahoma",* Responses of Plains and Eastern Clean Line LLC to July 24, 2014 Staff Data Requests: (August 7, 2014): [http://www.tn.gov/tra/orders/2014/1400036s.pdf]: Page 19, para. 3 under "Response"

ii. Skinner, Matt: (October 28, 2011): Un(land)locking Oklahoma Energy: [http://www.occeweb.com/news/2011/10-28-11CLEAN%20LINE.pdf]: Page 1, last para.

iii. In the Matter of the Application of Plains and Eastern Clean Line LLC for a Certificate of Public Convenience and Necessity to Operate as a Public Utility in the State of Arkansas: [http://www.apscservices.info/pdf/10/10-041-u_1_1.pdf]

iv. In the Matter of the Application of Plains and Eastern Clean Line LLC for a Certificate of Public Convenience and Necessity to Operate as a Public Utility in the State of Arkansas: [http://www.apscservices.info/pdf/10/10-041-u_41_1.pdf]: Page 11, para. 2

v. Testimony of M. Shawn McMurray On Behalf of the Arkansas Attorney General: ARKANSAS PUBLIC SERVICE COMMISSION DOCKET NO, 10-0414: [http://www.apscservices.info/pdf/10/10-041-u_39_3.pdf]: Page 64, lines 3-10

Item 9. Several clarifications have been made to Chapter 3 of Appendix Q of the Final EIS. These are shown below.

1 Policy/Purpose and Need/Scope

[From page 3-12 of Appendix Q of the Final EIS]

- Why is the project being considered if it is not part of the National Interest Electric Transmission Corridor? DOE should focus on the National Interest and not on the efforts of a private company. Since the project is not in the National Interest, it makes no sense to involve TVA when the outcome of the NEPA analysis has yet to be determined. DOE should not establish any National Interest Electric Transmission Corridors.

  Response:

  Under Section 1222 of the EPAct, a proposed project must be either (a) located in an area designated under section 216(a) of the Federal Power Act (16 USC 824p(a)) and will reduce congestion of electric transmission interstate commerce; or (b) necessary to accommodate an actual or projected increase in demand for electric transmission capacity. Therefore a proposed project does not need to be part of a National Interest Electric Transmission Corridor designated under section 216(a) of the Federal Power Act (16 USC 824p(a)). The Project would not establish a National Interest Energy Transmission Corridor.

  An additional and parallel process to this EIS was used to review Clean Line's application against the criteria in Section 1222, which began when DOE made the application available for public review through a notice in the Federal Register *(80 FR 23520, April 28, 2015). After considering, among other things, public input from that process, DOE will determine whether the criteria of Section 1222 have been satisfied. Based on that determination and the analysis in the EIS, DOE will either issue a ROD that indicates how and under what conditions DOE will participate in the Applicant Proposed Project or DOE will select the No Action Alternative in the EIS and not participate.*

[From pages 3-13 to 3-14 of Appendix Q of the Final EIS]

- Commenter notes that recently a planned transmission line by Southwestern Electric Power Company (SWEPCO) in northern Arkansas was scrapped because "Southwest Power Pool had notified it that the project was no longer needed due to lower demand and the cancellation of several, large, long-term transmission service reservations", according to an AP article dated 12/30/14. Continuing, the commenter states that since Clean Line would be interconnecting with the Southwest Power Pool, logic would dictate that there would be no need for this transmission line either. In addition, National Grid, one of Clean Line's primary investors, recently pulled out of the Cape Wind project in part because with falling natural gas prices "the contract began to look worse day by day". If the prices for this electricity are not competitive, no utility will buy the product, making the line completely useless. Finally, it is not clear who these customers on the East Coast who so desperately need this energy, at least according to Clean Line, actually are. According to the Department of Energy's "National Electric Transmission Congestion Study" dated August 2014, in reference to the

Southeast region, which Clean Line claims “needs” this service, “There are no reports of persistent transmission constraints within the region”. So, where is the need? Certainly the DOE cannot prove there is a need, by their own admission. The TVA cannot prove the need since they have already met their goals of reducing emissions and the Southwest Power Pool is cancelling projects due to reduced demand for services. It seems as if the “need” for this project is merely a figment of Clean Line executives' imaginations. My greatest fear is that this devastation will be wreaked on Arkansas, the line will be built and no electricity will be transmitted because there is not then, nor was there ever any “need” for the line to be built. Clean Line's “need” is greed, pure and simple.

Response:

DOE recognizes that, under Section 1222 of the EPAct, a proposed project must be either (a) located in an area designated under section 216(a) of the Federal Power Act (16 USC 824p(a)) and will reduce congestion of electric transmission interstate commerce; or (b) necessary to accommodate an actual or projected increase in demand for electric transmission capacity. DOE is evaluating whether the Applicant Proposed Project is needed to accommodate an actual or projected increase in demand for electric transmission capacity in an additional and parallel process to the NEPA process. This parallel process also includes the evaluation of the technical feasibility and economic viability of the Project. These evaluations, coupled with the environmental review of the Project in the Final EIS, provide DOE with the information necessary to make a decision.

As of January 2015, Clean Line has signed term sheets for Precedent Agreements with five transmission service customers. These agreements are commitments to purchase power once certain conditions are met. The agreements are included in Clean Line’s application and will be considered in DOE’s evaluation of the Project under Section 1222.

2 NEPA Process

[From page 3-20 of Appendix Q of the Final EIS]

- Commenters state that in order to prepare the EIS there need to be “boots on the ground.” One commenter questions how an EIS on her property was prepared when no one was allowed to come onto her property.

Response:

DOE prepared the EIS using the best available public data. A Reference CD has been provided for the reader to ensure easy access to certain reference documents used to develop this EIS. Included on the CD are the resource-specific technical reports developed by Clean Line to describe existing environmental conditions in the ROI. Field work has been conducted for threatened and endangered species in suitable habitat where landowners have allowed access on their properties. Initial cultural resource surveys, to identify historic and cultural properties would take place in 2016-2017. Other fieldwork, such as wetland delineations, would occur prior to construction and would be conducted according to specific agency requirements. DOE and the third-party contractor independently verified the

data in the resource-specific technical reports developed by Clean Line, and conducted additional analysis of the best available public data. The methodology and data used for each resource is specifically described in each resource chapter. In addition, the Reference CD includes PDF files of reference works consulted during the development of this EIS that are not available on the internet and not protected by copyright laws.

2E NEPA Compliance

[From page 3-57 of Appendix Q of the Final EIS]

- Commenter believes that the environmental impact study has been performed solely from a desk with no on-site investigation.

Response:

DOE prepared the EIS using the best available public data. A Reference CD has been provided for the reader to ensure easy access to certain reference documents used to develop this EIS. Included on the CD are the resource-specific technical reports developed by Clean Line of existing environmental conditions in the ROI. Field work has been conducted for threatened and endangered species in suitable habitat where landowners have allowed access on their properties. Initial cultural resource surveys to identify historic and cultural properties would take place in 2016-2017. Other fieldwork, such as wetland delineations, would occur prior to construction and would be conducted according to specific agency requirements.

DOE independently verified the data in the resource-specific technical reports developed by Clean Line, and conducted additional analysis using the best available public data. The methodology and data used for each resource is specifically described in each resource chapter. In addition, the Reference CD includes PDF files of reference works consulted during the development of this EIS that are not available on the internet and not protected by copyright laws.

4C Public Good

[From pages 3-13 to 3-14 of Appendix Q of the Final EIS]

- Commenter feels that the public is ill equipped to respond to the legal and technical ramifications of the Clean Line project. The Department of Energy should fund a legal and technical team to represent the public and their concerns. Commenter feels that Clean Line Partners and the Department of Energy together advance agendas of profit and politics at the expense of anyone else.

Response:

An additional and parallel process to review Clean Line's application against the criteria in Section 1222 of the EPAct includes the evaluation of the technical and economic viability of the Project and consideration of public comments. These evaluations, coupled with the environmental review of the Project in the Final EIS, represent the interests of the public. DOE also sought the assistance of independent contractors to advise DOE on the potential

terms of an agreement with Clean Line and means of mitigating risk, but DOE's determination of statutory eligibility does not rely upon the work of the contractors.

8 Routing

[From page 3-139 of Appendix Q of the Final EIS]

- Commenter notes the proposed route would dissect the City of Mulberry right through the location of a new city park.

Response:

DOE asked the Applicant to confirm the location of this park with respect to the Applicant Proposed Project. The park is located approximately 1,400 feet east of the representative ROW centerline of the Applicant Proposed Route and therefore would not be intersected by the Applicant Proposed Project.

- Commenter objects to the route chosen through Cleburne County near the town of Quitman, Arkansas. The route chosen cuts through the City Limits of Quitman, Arkansas, near the Quitman School's football field and wraps around the city limits to the east crossing highway 124. This will cause a severe hardship on future growth in the City of Quitman.

Response:

DOE asked the Applicant to confirm the location of this football field with respect to the Applicant Proposed Project. The field is located approximately 2,185 feet north of the representative ROW for the Applicant Proposed Project and therefore would not be intersected by the Applicant Proposed Project.

8B DOE Alternative Route

[From page 3-168 of Appendix Q of the Final EIS]

- A commenter describes a preference for AR 6-C over the segment of the Applicant Proposed Route that follows County Road 210. The commenter states that the difference in accepted agricultural practices between the two potential routes clearly favors AR 6-C as the route to provide lesser environmental impact due to the more advanced soil erosion, the more obstruction in irrigating, the less desirable soil characteristics for construction and greater interruption to the crop rotation and practices utilized in the area of the Applicant Proposed Route along County Road 210.

Response:

Comment noted. Potential impacts from the Project on soils for the HVDC Applicant Proposed Route in Region 6 (including Link 6, which would follow County Road 210) are described in Section 3.6.1.6.2.3 of the Final EIS. Potential impacts on soils for HVDC Alternative Route 6-C are discussed in Section 3.6.1.6.3.2 of the Final EIS. Potential impacts from the Project on agriculture for the HVDC Applicant Proposed Route in Region 6 (including Link 6) are described in Section 3.2.6.2.3 of the Final EIS. Potential impacts on agriculture for HVDC Alternative Route 6-C are discussed in Section 3.2.6.3.2.

If HVDC Alternative 6-C is the selected route, concerns related to wetlands and waterfowl habitat would be addressed to the extent practicable through micro-siting within the 1,000-foot-wide corridor and implementation of Environmental Protection Measure (EPM) LU-5. EPMs to minimize potential impacts from the Project on soils are included in Section 3.6.2.6.1.2 of the Final EIS. EPMs to minimize potential impacts from the Project on agriculture are included in Section 3.2.6.1 of the Final EIS.

8C AC Collector

[From page 3-169 of Appendix Q of the Final EIS]

- Commenter notes that the Draft EIS identifies 13 different possible routes for these AC collection lines, of which only a half dozen will be built. The decision about which lines will be built is to be made at a later time. We urge DOE to study the AC collection area in more detail, and provide information about which portions of this area contain the highest-value lesser prairie chicken habitat. Sierra Club has compared the maps of the AC Collection Area (see Draft EIS Summary at Figure S-2a), with maps produced by the University of Kansas as part of the Southern Great Plains Crucial Habitat Assessment Tool (SGP CHAT). While it appears that the connected wind development zone will avoid "focal areas" identified in this tool as being of the highest habitat value for this species, DOE should undertake GIS analysis of how the wind development zones correspond to the other habitat categories identified in this tool.

  Because many of the future wind turbine developments may not undergo federal NEPA review, it is important for DOE to discuss the impact of these developments as part of this EIS. Should DOE identify areas with especially valuable lesser prairie chicken habitat, we recommend that AC collection lines that would serve those areas should be eliminated from consideration, or that restrictions be placed on development of those areas.

  Response:

  Figure 3.14-1a in Appendix A illustrates the WDZs and AC collection routes in relation to the four levels of habitat identified in the SGP CHAT and leks and not just the "focal habitat." DOE, Clean Line, and USFWS also are consulting under Section 7 of the ESA in a separate but parallel process to the NEPA review on the potential impact of the Project, including the AC collection lines, on federally listed species. This process will identify specific protective measures and mitigation measures to protect the LEPC and other listed species. Information from the Section 7 consultation and NEPA review would be used to inform the selection of AC collection routes. In addition, although future wind developments may not undergo federal NEPA review because they may be private developments, any wind development project that may adversely affect the LEPC or other federally listed species would have to comply with the ESA.

8D Routing Preference

[From page 3-176 of Appendix Q of the Final EIS]

- Commenter states that "if the project is approved over my opposition, I request that the applicant PROPOSED route for the Clean Line project in Garfield County, Oklahoma be approved as the final route for this project. This route has been studied and shown by the EIS to be the most environmentally friendly and efficient route for this project. My family owns property on the Region 1 HVDC Alternative Route: AR 1-A in Garfield county. If this route is chosen it will cause potential ecological damage, unfavorable environmental impact and an undue hardship on our family. Trees will have to be torn out which could lead to water erosion in a low lying area of our farm. East of this low lying area but along the alternative route is where we are planning to build a new homestead including a house, barn and out buildings. This project would have to be abandoned if the alternative route for this project is approved and the line constructed."

Response:

The alternative preference is noted. DOE asked the Applicant to evaluate potentially new information provided in this comment. A review of the property location indicates that Region 1 HVDC Alternative Route 1-A is not located in Garfield County, Oklahoma, but is located within the area of Region 2 HVDC Alternative Route 2-B according to County tax records. The Applicant anticipates that landowner concerns can be minimized or avoided by micrositing within the 1,000-foot-wide corridor and through implementing EPM LU-5.

9C Arkansas Converter Station

[From page 3-189 of Appendix Q of the Final EIS]

- Commenter notes that the Arkansas converter station is an alternative suggested in the Draft EIS and that the Applicant is under no obligation at this time to construct it.

Response:

- *Comment noted. As described in Section 2.14 of the Final EIS, DOE considered the alternatives analyzed in the Draft EIS, the comparison of potential impacts for each resource area, input received on the Draft EIS, and input from cooperating agencies and identified a DOE preferred alternative for each Project element. The construction and operations and maintenance of the Arkansas converter station within the siting area described in the Final EIS is part of DOE's preferred alternative. As stated in Section 2.14 of the Final EIS, DOE's identification of a preferred alternative does not guarantee that such an alternative will be the alternative selected in DOE's Record of Decision (ROD). Rather, identification of the preferred alternative serves to give the public notice as to which alternative DOE currently favors. Should DOE decide to participate in the Project, the ROD, which would be signed no earlier than 30 days after the EPA Notice of Availability for the Final EIS, would document DOE's decision. Should DOE decide to participate in the Project, and should the Applicant choose to move forward with the Project after DOE publishes the ROD, the Applicant would be bound by all requirements in the ROD, including each of the selected Project elements.*

20 Historic and Cultural Resources

[From pages 3-324 to 3-325 of Appendix Q of the Final EIS]

- The National Park Service (NPS) has identified two National Historic Landmarks (NHLs) that could be impacted by the proposed project. Numerous segments of the Trail of Tears National Historic Trail (NHT) could be crossed by the project. Commenter encourages DOE to assess potential impacts to the Stamper Site National Historic Landmark (Texas County, Oklahoma), which is located in the vicinity of the proposed "Region 1" Wind Development Zone and AC Collection System route. The Draft EIS has not identified this National Historic Landmark in the list of historic and cultural resources. Commenter requests the results of this assessment be sent to NPS, Intermountain Region, and National Historic Landmarks Program.

  Response:

  Commenter correctly notes that the Stamper Site (34TX1, NRIS 66000635), an NHL, was omitted from the Draft EIS. The site, however, is not within the 2-mile wide ROI adjacent to the centerlines of the AC collection system for sections NE-1/NW-2 that were studied for this EIS (see Final EIS Sections 2.4.2.1, 2.5.1, and 3.1.1). It was not considered in Section 3.9 because it was not subject to Project impacts, as defined by the EIS methodology for cultural and historic resources. Although the AC collection system is included as part of the environmental analysis for this Project, DOE will not be making decisions on the locations on these transmission lines, because their specific locations will depend on engineering and other considerations arising from future wind energy development.

22 Noise

[From pages 3-346 to 3-347 of Appendix Q of the Final EIS]

- Commenter notes that the Noise Technical Report and the Electrical Environment Assessment are incomplete and lack correlation to the real human impact inflicted by the project. a. While important for health and safety, Environmental Protection Act standards used for comparison do not correlate to the unprecedented corona noise and visual pollution radiating from this project. Beyond health and safety concerns are property value issues. Corona noise emanating from the transmission line will inflict uncompensated financial losses on directly affected and adjacent property owners up to 2,000 feet to either side of the route. b. The data presented in the reports prematurely cutoff the projection of corona noise at 500 feet from the transmission line where the level is still 40 dB-A. This level of intrusive corona noise can easily be heard over the low level background noises typical in rural areas along the route. Noise pollution from the line only dissipates into the background at four times (4X) that distance. See the enclosed corona noise graphs (as published and with the extended projection). c. The reports fail to measure and predict how difficult it is for ambient background noise to mask the electrical hissing and crackling that is characteristic of corona noise. The corona noise levels presented in the Electrical Environment Assessment reflect a median value (p 25) (another commenter refers to it as “average”) that may be experienced over a one year period. The calculated data should include the peak value plus a number of lesser values with estimates of the duration for each. Further data about corona noise should be provided that predicts how variables such as seasons, temperature, wind direction, and wind speed affect its propagation.

Response:

Results of the noise impact assessment presented in the Draft EIS did not incorporate potential effects of masking by other sound sources in the ambient environment, which would be expected to occur to varying degrees based on location, time of day, prevailing weather conditions and other factors. To determine expected received sound levels from the Project transmission line at further distances, the Applicant completed additional analysis using a methodology consistent with that used for the Draft EIS. This analysis was independently reviewed and verified by DOE. Sound levels from the HVDC transmission line were calculated for fair (worst case) and foul weather conditions at various distances from the line out to 2,000 feet for the highest altitude (3,000 feet) and lowest altitude (200 feet) assuming flat open terrain. Results of these additional calculations show that, at a distance of 2,000 feet sound levels would attenuate to 25 dBA under fair weather and 19 dBA under foul weather assuming an altitude of 3,000 feet and 22 dBA under fair weather and 16 under foul weather assuming an altitude of 200 feet. This additional information has been incorporated into Sections 3.11.6.2 and 3.11.6.3. In addition, considering the conservative measures incorporated into the analysis, received sound levels at NSAs would expect to be lower than those reported on average. It is possible that transmission line noise may be audible at distances of 2,000 feet or more from the Project but at a very low level. The EPA noise guidelines, and other criteria used to evaluate noise impacts in the Final EIS, do not require inaudibility of a sound source and this expectation is not applied to other industrial, commercial, or agricultural activities.

25 Special Status Wildlife, Fish Aquatic Invertebrate, and Amphibian Species

[From pages 3-379 to 3-380 of Appendix Q of the Final EIS]

- Multiple commenters expressed concern that bats in general and specific bat species listed as threatened or endangered (Endangered: Gray bat (*Myotis grisescens*), Ozark big-eared bat (*Corynorhinus townsendii ingens*), and Indiana bat (*Myotis sodalist*), and the threatened Northern long-eared bat (*Myotis septentrionalis*) would be affected. Commenters were specifically concerned about the potential impacts of clearing of vegetation and specifically of roost trees in the right of way based on the potential amount of land that could be cleared (19- 30 square miles) given the length and width of the project. One commenter noted that the primary threat is not habitat loss or alteration but is pandemic mortality associated with white-nosed syndrome (WNS). One commenter expressed concern about the lack of bat surveys for the area where Link 9 (Region 4 Applicant Proposed Route) would cross Johnson County. Concern was also expressed that impacts to bats would increase mosquito populations and risk to people from mosquito borne diseases. Several commenters noted that in January 2015, the presence of the federally listed Ozark big-eared bat was documented in Lee Creek Reservoir Park in Van Buren County and that additional surveys should be conducted to determine if the cave is used as a maternity roost and/or swarming site.

Response:

The EIS addresses potential impacts to federally protected species in Section 3.14.1.7 including the four species of threatened or endangered bat species that could be affected. Section 3.14.1.7.1 lists EPMs that would be implemented to avoid or minimize impacts to wildlife species. With respect to the amount of bat habitat that could be affected, the primary habitat of concern for bats is summer roosting habitat in forested areas. Most of the land cleared for construction would not be forest land. Any potential forest habitat impact would be less than the 19 to 30 square miles suggested in comments. Any potential bat roosting habitat would be surveyed prior to land clearing to determine presence of bats or would be cleared during the non-roosting season to avoid impacts. DOE is consulting with the USFWS under Section 7 of the ESA regarding effects of the Applicant Proposed Project on special status species listed as threatened or endangered, including the Ozark big-eared bat, gray bat, northern long-eared bat, and Indiana bat. USFWS will consider white-nosed syndrome when evaluating cumulative impacts during the Section 7 ESA consultation. Through the separate but parallel Section 7 consultation process, DOE, Clean Line, and USFWS will identify specific protection and mitigation measures to avoid, minimize, and mitigate any potential impacts to these species. Such measures may include surveys. These mitigation measures will be requirements that must be implemented for the Project to be developed. Any potential impacts to bats would expected to be minor so that no effects to mosquito populations would occur. Section 3.14.1.7.2.6.4 has been updated to reflect the most recent information on the presence of the Ozark big-eared bat near Lee Creek Reservoir Park in Region 4. In addition, Clean Line has developed and analyzed a localized variation to the Applicant Proposed Route in the vicinity of the Lee Creek Reservoir as a means to avoid and minimize potential impacts to the Ozark big-eared bat and any other bat species using the caves reported by the City of Fort Smith Utility Department. This is a localized variation to the Applicant Proposed Route and DOE has integrated it into the Applicant Proposed Route in the Final EIS. The variation is approximately 0.75 mile north of Applicant Proposed Route in the vicinity of the caves discovered with Ozark big-eared bats.

29 Visual Resources

[From page 3-418 of Appendix Q of the Final EIS]

- Commenter notes concern that the line will damage the natural beauty of a rural setting notes concern about unsightly towers, and the destruction of the beauty of the community and country. Commenter notes concern that the timber will be cut down and take away the unbelievable view. Commenter has concerns about the loss to aesthetic vistas in the area. Commenters are concerned about the adverse visual impact to their property. One commenter states that towers may rise as much 150 feet over the treetops and be located as little as 300 yards from residences. Landowners in the Association received letters in December of 2014 that the proposed transmission line would pass through the entire length of Paradise River Resort (Region 5 Applicant Proposed Route link 7). This would cause significant damage to the scenic views.

Response:

Visual impacts are anticipated as a result of the construction and operation and maintenance of the Project. Visual impacts will vary depending factors such as location, topography, vegetation, other existing features in the landscape, and distance a viewer is from the Project. As described in Section 3.1 of the Final EIS, the final transmission line ROW could be located anywhere within the 1,000-foot-wide corridor identified in the Final EIS. Through EPM LU-5, Clean Line would be required to make reasonable efforts, consistent with design criteria, to accommodate requests from individual landowners to adjust the siting of the ROW on their properties, with the intent of reducing the impact of the ROW on private properties. As described in Section 2.1.2.2.2 of the Final EIS, structures used to support the HVDC transmission line would typically range in height from 120 to 200 feet. In regard to the portion of the Project that would pass near the Paradise River Resort, Applicant Proposed Route Link 7 in Region 5, the majority of Link 7 would parallel an existing 500kV transmission line, including the portion of the existing line near the resort. The HVDC transmission line would be similar in size and scale to the existing transmission line. The existing landscape has been previously modified by the removal of vegetation for the construction and maintenance of the existing 500kV transmission line. These previous modifications have created long narrow strips and introduced vertical structures within the existing landscape. The Project would appear as a co-dominant feature in the landscape because it would be seen in the context of a similar existing high-voltage transmission line and would create similar modifications to the landscape setting. A general description of visual impacts for Region 5 are discussed in Section 3.18.6.2.3.2.9 and visual impacts by KOP specific to Applicant Proposed Route Link 7 are discussed in Section 3.18.6.2.3.2.9.7 of the Final EIS.