



United States
Department of
Agriculture

Forest
Service

National Forests in
North Carolina

160 Zillicoa Street
Suite A
Asheville, NC 28801

File Code: 2720

Date: June 25, 2008

Christopher J. Wood
Burns & McDonnell
9400 Ward Parkway
Kansas City, MO 64114-3319

Dear Mr. Wood,

This letter is in response to your June 23, 2008 Request for Agency Review for the proposed Asheville-Enka 115-kV Transmission Line, Project Number 49163.

Portions of the Study Area are located on National Forest System lands in the Pisgah National Forest on the Bent Creek Experimental Forest.

The Bent Creek Experimental Forest was established in 1925 and is dedicated to long-term ecological research and education. With this, our Forest Plan standards prohibit the issuance of new Special Use permits for other than research objectives. Please remove these lands from further consideration in the study area as any request for a transmission line would conflict with the laws and regulations for the management of experimental forests and would be denied under 36 CFR 251.54(e)(i).

I would like to note that a portion of the lands identified as "Federal Lands" in the Study Area involve the Blue Ridge Parkway (map enclosed). The Parkway is under the jurisdiction of the Department of the Interior and they can be reached at 199 Hemphill Knob Road, Asheville NC 28803 or by telephone at 828-271-4779.

If you have any questions, please call at 828-257-4859.

Sincerely,

Raymond M. Johns II
Lands & Minerals Program Manager

Enclosure





North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

July 1, 2008

Mr. Christopher J. Wood
Burns & McDonnell
9400 Ward Parkway
Kansas City, MO 64114-3319

Subject: Asheville – Enka 115-kV Transmission Line Project
Project Number 49163

Dear Mr. Wood:

The Natural Heritage Program has a number of records of rare species, natural areas, and managed areas in the vicinity of the project area. I have enclosed two maps showing locations of these features. Rare species are (in the French Broad River):

mountain blotched chub (*Erimystax insignis eristigma*), State Significantly Rare
sickle darter (*Percina williamsi* [formerly *P. macrocephala*]), State Special Concern
a mayfly (*Macdunnocia brunnea*), State Significantly Rare

Terrestrial:

bog turtle (*Glyptemys muhlenbergii*), State Threatened and Federal Threatened due to Similarity
mole salamander (*Ambystoma talpoideum*), State Special Concern
warbling vireo (*Vireo gilvus*), State Significantly Rare

The best potential routes are: 1. Along the existing route, which crosses the French Broad River south of NC 280 and goes east of the river in the vicinity of Sandy Bottom and Pisgah National Forest (including the Bent Creek Experiment Station); or 2. A more easterly route that crosses the river only once (instead of three times as does the existing route). However, with option 2, it is imperative to stay away from the location of the bog turtle and mole salamander between I-26 and the river. Thus, a route that stays completely to the east of I-26 would have less potential impacts to natural resources than one to the west of this highway (unless it follows the existing route corridor).

You may wish to check the Natural Heritage Program database website at www.ncnhp.org for a listing of rare plants and animals and significant natural communities in the county and on the quad map. Our Program also has a new website that allows users to obtain information on element occurrences and significant natural heritage areas within two miles of a given location:

<http://nhpweb.enr.state.nc.us/nhis/public/gmap75_main.phtml>. The user name is "public" and the password is "heritage". You may want to click "Help" for more information.

NC OneMap now provides digital Natural Heritage data online for free. This service provides site specific information on GIS layers with Natural Heritage Program rare species occurrences and Significant Natural Heritage Areas. The NC OneMap website provides Element Occurrence (EO) ID numbers (instead of species name), and the data user is then encouraged to contact the Natural Heritage Program for detailed information. This service allows the user to quickly and efficiently get site specific

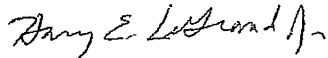
NHR data without visiting the NHP workroom or waiting for the Information Request to be processed by
1601 Mail Service Center, Raleigh, North Carolina 27699-1601
Phone: 919-733-4984 \ FAX: 919-715-3060 \ Internet: www.enr.state.nc.us/ENR/

One
North Carolina
Naturally

NHP staff. For more information about data formats and access, visit www.nconemap.com, then click on "FTP Data Download", and then "nheo.zip" [to the right of "Natural Heritage Element Occurrences"]. You may also e-mail NC OneMap at dataq@ncmail.net for more information.

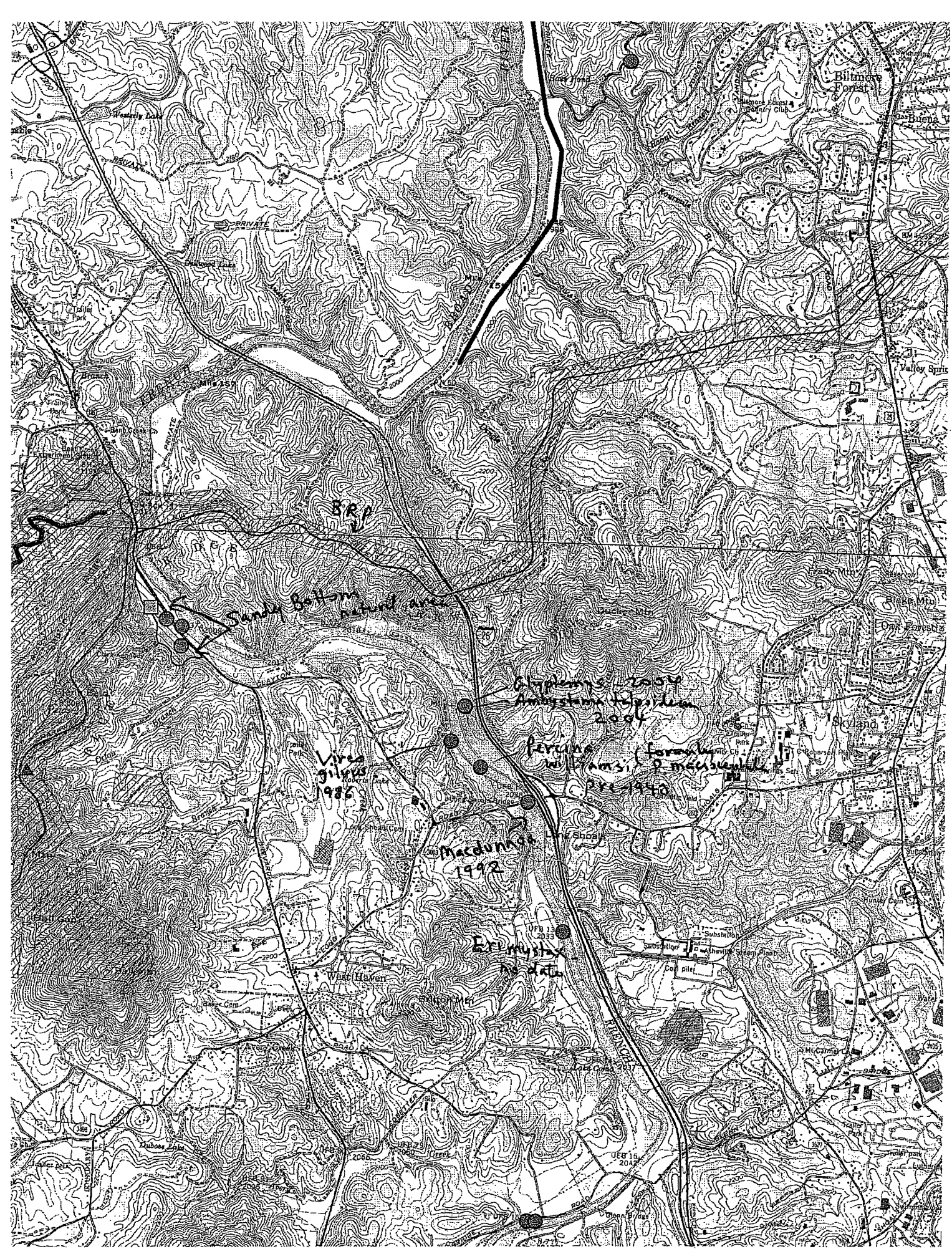
Please do not hesitate to contact me at 919-715-8697 if you have questions or need further information.

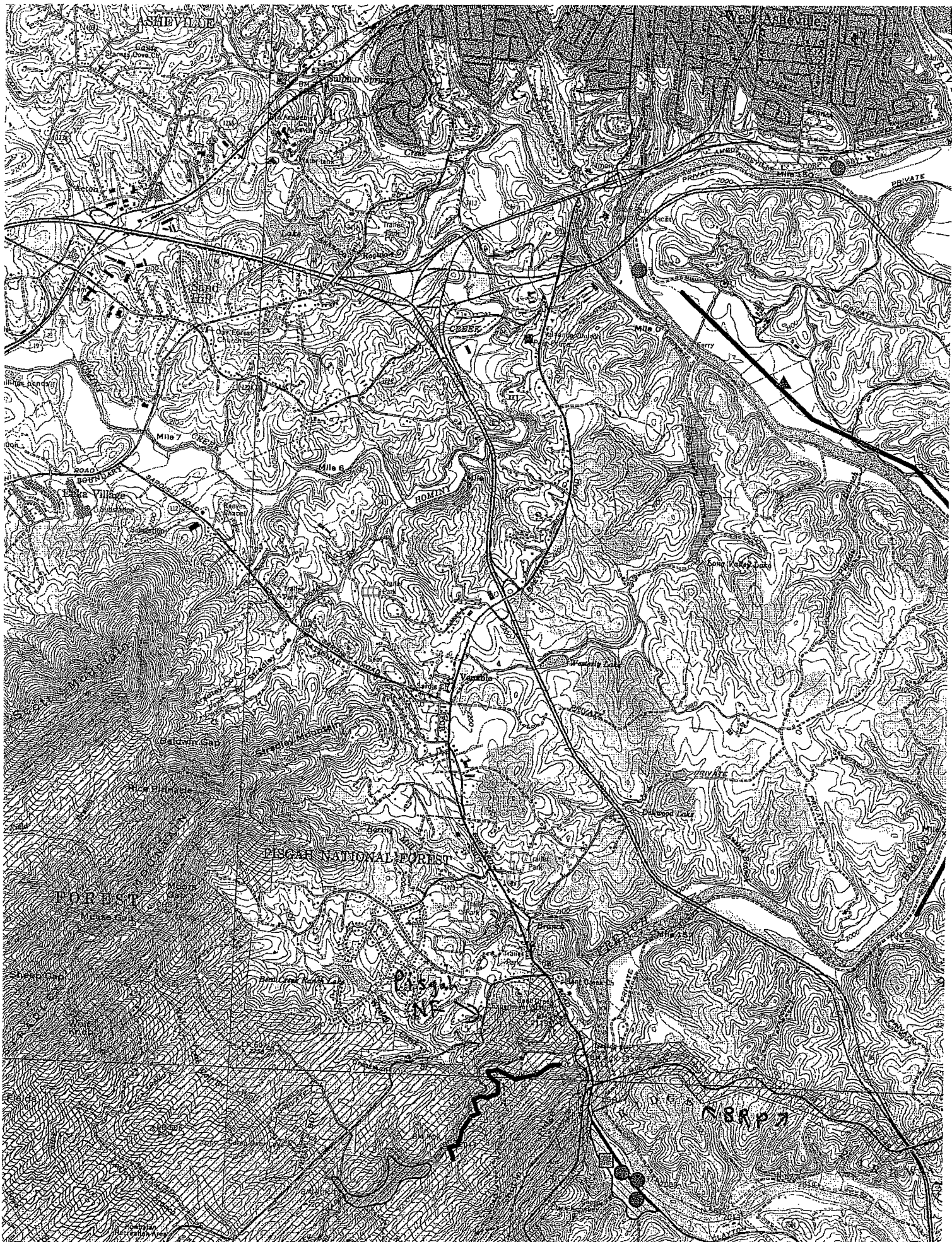
Sincerely,

A handwritten signature in cursive script, reading "Harry E. LeGrand, Jr.", written in dark ink.

Harry E. LeGrand, Jr., Zoologist
Natural Heritage Program

Enclosure







United States Department of the Interior

FISH AND WILDLIFE SERVICE

Asheville Field Office
160 Zillicoa Street
Asheville, North Carolina 28801

July 14, 2008

Mr. Christopher J. Wood
Project Manager
Burns & McDonnell
9400 Ward Parkway
Kansas City, Missouri 64114-3319

Dear Mr. Wood:

Subject: Progress Energy Carolinas, Inc., Asheville-Enka Transmission Line Project, Buncombe County, North Carolina

We received your letter dated June 21, 2008, requesting our comments concerning the subject project. The following comments are provided in accordance with the provisions of the National Environmental Policy Act; Fish and Wildlife Coordination Act, as amended (16 U.S.C. 661-667e); Migratory Bird Treaty Act, as amended (16 U.S.C. 703); and section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1543) (Act).

According to your letter, your company has been retained by Progress Energy Carolinas, Inc. (PEC), to conduct a routing study and environmental review for a 115-kV overhead electric transmission line to be located in Buncombe County, North Carolina. The transmission line will provide an approximately 7-mile connection between PEC's existing Asheville S.E. Plant 115-kV Substation and their existing Enka 115-kV SW Station Substation.

The Asheville S.E. Plant 115-kV Substation is located near the City of Asheville, just east of Interstate 26, west of U.S. Highway 25, and south of SR 280, in Buncombe County. The Enka 115-kV SW Station Substation is located south of Enka, just south of SR 112, in Buncombe County, North Carolina. The exact alignment of the new transmission line is not known at this time. Alternative routes will be identified within the study area in Buncombe County that will minimize environmental and social impacts.

The construction of the line would consist of steel, H-frame structures, with a typical height of about 65 to 85 feet above ground. The average span between structures would be 1,000 feet. The right-of-way width required would be about 100 feet where no other transmission line is

followed. The location of the structures is somewhat flexible in that most sensitive resources, if present, could be avoided. All streams and rivers would be spanned.

Your letter included an accurate list of federally protected species and asked that we identify “any protected species within the study area that could be impacted by the project or species for which presence/absence surveys are likely to be required.” None of the federally listed species known from Buncombe County have been found within the study area, and though there is likely suitable habitat for all of the wetland and riverine species on the list (Appalachian elktoe, tan riffleshell, bunched arrowhead, mountain sweet pitcher plant, rock gnome lichen, bog turtle, spotfin chub, and Virginia spiraea), if these habitats are unaffected (streams and wetlands are “spanned,” riparian buffers¹ [including woody vegetation] are kept intact, no herbicides are used near streams or wetlands, etc.), species surveys will not be required

We are also concerned about the impacts that any connecting high-voltage transmission lines could have on migratory birds, including raptors, wading birds, and waterfowl. We recommend transmission line designs that prevent arcing and flight hazards to these and other bird species. Three-phase lines should be “raptor-proofed” with one of the following design modifications:

1. Separation of Phases - This can be accomplished by either lowering the cross arm, using a longer cross arm, or raising the center phase on a pole-top extension. The objective is to separate the phases by at least 60 inches to prevent large-winged birds from making contact with any two phases.
2. Insulation - An alternative to the vertical separation of phases is to install conductor insulation (commonly known as PVC tubing) that extends a minimum of 36 inches on either side of the pole-top insulator. This alternative should also include the replacement of metal cross-arm braces with wooden or other nonconductive braces.
3. River and Other Wetland Crossings - Such crossings should be avoided whenever possible. Where unavoidable, lines crossing streams and wetlands should be constructed to maximize their visibility to raptors and other birds by installing aviation balls or similar markers on the lines or through some other means.

Your letter states that “alternatives could include following existing transmission line, gas pipeline, or road rights-of-way within the study area.” We strongly support routing the proposed line along existing rights-of-way. To further minimize impacts to environmental resources, we also recommend routing the proposed line so that the Pisgah National Forest is avoided and so that the Blue Ridge Parkway is crossed in an area that has been previously disturbed.

We are also concerned with the introduction and spread of invasive exotic species in association with the proposed project. Without active management, including the revegetation of disturbed

¹Buffers should be 100 feet wide on perennial streams and 50 feet wide on intermittent streams and wetlands.

areas with native species, project corridors will likely only be sources of (and corridors for) the movement of invasive exotic plant species. Exotic species are a major contributor to species depletion and extinction, second only to habitat loss. Exotics are a factor contributing to the endangered or threatened status of more than 40 percent of the animals and plants on the *Federal List of Endangered and Threatened Wildlife and Plants*.² It is estimated that at least 4,000 exotic plant species and 2,300 exotic animal species are now established in the United States, costing more than \$130 billion a year to control.³ Additionally, the U.S. Government has many programs and laws in place to combat invasive species (see www.invasivespecies.gov) and thus cannot spend money to counter these efforts. Specifically, Section 2(a)(3) of Executive Order 13112 - Invasive Species (February 3, 1999) directs federal agencies to “not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere.” Despite their short-term erosion-control benefits, many exotic species used in soil stabilization seed mixes are persistent once they are established, thereby preventing the reestablishment of native vegetation. Many of these exotics plants⁴ are also aggressive invaders of nearby natural areas, where they are capable of displacing already established native species. Therefore, we strongly recommend that only native plant species be used in association with all aspects of this project.

Additionally, because this site is in such close proximity to the Pisgah National Forest, avoiding invasive exotic species is particularly important. Tall fescue (including Kentucky 31 fescue) and Sericea lespedeza are listed as a category 1 exotic invasive plant species on the Regional Forester’s List and Ranking Structure - Invasive Exotic Plant Species of Management Concern for the U.S. Forest Service’s Southern Region. Category 1 exotic plant species are known to be invasive and persistent throughout all or most of their range within the Southern Region. They can spread into, and persist in, native plant communities and displace native plant species. Therefore, they pose a demonstrable threat to the integrity of the natural plant communities in the Southern Region. The use of category 1 species is prohibited on national forest land.

At this stage of project development and without more specifics about potential indirect and cumulative environmental impacts, it is difficult for us to assess the potential effects of this project. We therefore recommend that any environmental document prepared for this project include the following (if applicable):

1. A complete analysis and comparison of the available alternatives (including a no-build alternative).
2. A description of the fishery and wildlife resources within existing and required additional rights-of-way and any other areas that may be affected directly or indirectly by the proposed project.

²Wilcove, D. S., D. Rothstein, J. Dubow, A. Phillips, and E. Losos. 1998. Quantifying threats to imperiled species in the United States. *BioScience* 48:607-615.

³Pimentel, D., L. Lach, R. Zuniga, and D. Morrison. 2000. Environmental and economic costs of nonindigenous species in the United States. *BioScience* 50:53-65.

⁴Lists of invasive exotic plants can be found at <http://www.tneppe.org/> and <http://www.invasive.org/eastern/srs/> on the Internet.

3. The acreage and a description of the wetlands that will be filled because of the proposed project. Wetlands affected by the proposed project should be mapped in accordance with the *Federal Manual for Identifying and Delineating Jurisdictional Wetlands*. We recommend contacting the U.S. Army Corps of Engineers to determine the need for a Section 404 Clean Water Act permit.
4. The extent (linear feet as well as discharge) of any watercourses that will be impacted because of the proposed project. A description of any streams should include the classification (Rosgen 1995, 1996) and a description of the biotic resources.
5. The acreage of upland habitat, by cover type, that will be eliminated because of the proposed project.
6. A description of all expected secondary and cumulative environmental impacts associated with this proposed work.
7. A discussion about the extent to which the project will result in the loss, degradation, or fragmentation of wildlife habitat from direct construction impacts and from secondary development impacts.
8. The mitigation measures that will be employed to avoid, eliminate, reduce, or compensate for habitat value losses (wetland, riverine, and upland) associated with any phase of the proposed project.

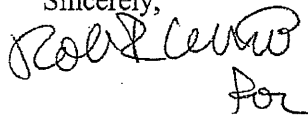
We also offer the following additional recommendations to help address secondary and cumulative impacts associated with this project and to help minimize impacts to fish and wildlife resources.

1. Measures to avoid or minimize impacts to sensitive resources, including wetlands, should be implemented during construction. Where impacts to wetlands are unavoidable, we recommend mitigation for the losses. In addition to providing wildlife habitat, wetland areas perform the important functions of flood control and water quality protection. Disturbed wetland areas should be returned to their original soils and contours. Plant communities should be reestablished that would result in wetland plant community succession into habitat of equal or greater value than the habitat that was destroyed. Temporarily disturbed wetlands should be reseeded with annual small grains appropriate for the season (e.g., oat, millet, rye, wheat, or ryegrass) and be allowed to revert to natural wetland vegetation. The crossing of wetlands and streams should be minimized, located at narrow areas, and made perpendicular to the stream.

2. We strongly discourage the in-fill of 100-year. This process only increases the potential for flooding to adjacent properties and interferes with the natural hydrological process of the waterways. It also disrupts the continuity of migration corridors for wildlife.
3. Efforts should be made to avoid the removal of large trees at the edges of construction corridors. Disturbed areas should be reseeded with seed mixtures that are beneficial to wildlife. Fescue-based mixtures should be avoided; fescue is invasive and provides little benefit to wildlife. Native annual small grains appropriate for the season are preferred and recommended. Where feasible, use woody debris and logs from corridor clearing to establish brush piles and downed logs at the edges (just in the woods) of the cleared rights-of-way to improve habitat for wildlife. Allowing corridor areas to develop into a brush/scrub habitat would maximize benefits to wildlife. Corridor maintenance should be minimized, and mowing should be prohibited between April 1 and October 1 in order to reduce impacts to nesting wildlife. We suggest a maintenance schedule that incorporates a portion of the area (e.g., one-third) each year instead of the entire project every 2 or 3 years. Additionally, herbicides should not be used in wetland areas or near streams.

Thank you for notifying us about this project. If you have any questions, please contact Mr. Allen Ratzlaff of our staff at 828/258-3939, Ext. 229. In any future correspondence concerning this matter, please reference our Log Number 4-2-08-236.

Sincerely,



Brian P. Cole
Field Supervisor

cc:

Mr. David McHenry, Mountain Region Coordinator, North Carolina Wildlife Resources Commission, 20830 Great Smoky Mtn. Expressway, Waynesville, NC 28786



STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

MICHAEL F. EASLEY
GOVERNOR

LYNDO TIPPETT
SECRETARY

July 15, 2008

Mr. Christopher J. Wood, Project Manager
Burns and McDonnell
9400 Ward Parkway
Kansas City, MO 64114-3319

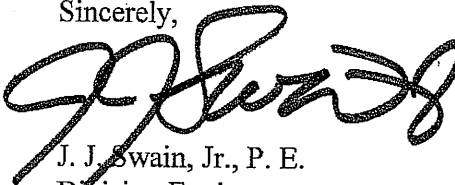
Dear Mr. Wood:

Thank you for your recent letter concerning Progress Energy's proposed transmission line project in Buncombe County. We appreciate your willingness to seek input from us in the early planning stages of this project.

I have forwarded your request to Mr. Jeff Moore, P.E., District Engineer in Asheville. Mr. Moore will be contacting you concerning this matter in the near future.

Again, thank you for your letter. We look forward to being of service to you.

Sincerely,



J. J. Swain, Jr., P. E.
Division Engineer

JJS/pl

cc: Mr. E. A. Green, P. E., Division Maintenance Engineer
Mr. J. H. Moore, P. E., District Engineer



STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

MICHAEL F. EASLEY
GOVERNOR

LYNDO TIPPETT
SECRETARY

July 16, 2008

Mr. Christopher J. Wood, Project Manager
Burns and McDonnell
9400 Ward Parkway
Kansas City, MO 64114-3319

Dear Mr. Wood:


Thank you for your letter and request for input on potential constraints to a proposed 115-kV transmission line project in Buncombe County. We appreciate your willingness to seek input from us in the early planning stages of the project.

I have reviewed the maps of the project area that you included with your letter. Resources in the study area that might be impacted by the project include I-26, NC 191, NC 146, and NC 112. There are at least 3 major construction projects along these routes that might impact the project. I would be happy to review and comment on any specific routings that you may propose. A resource that you might find helpful in planning is the 13th Division NCDOT Transportation Improvement Program website at: <http://www.ncdot.org/planning/development/TIP/TIP/Trans/division13map.html>

Another facility that might be impacted by this project is the Blue Ridge Parkway, which crosses the project area. In addition, the Biltmore Estate is in the project area. You would be advised to coordinate with these agencies concerning any prospective routes that would impact them.

Any encroachments on NCDOT right of way or facilities must be approved in accordance with NCDOT policies and procedures. Please know that my staff and I are available to assist you by explaining the NCDOT Encroachment Procedures and providing any required forms. Please feel free to contact me at the number listed below if you need additional information.

Sincerely,


Jeffrey H. Moore, P. E.
District Engineer

JHM/

cc: Mr. J. J. Swain, Jr., P.E., Division Engineer
Mr. E. A. Green, P. E., Division Maintenance Engineer

MAILING ADDRESS:
NC DEPARTMENT OF TRANSPORTATION
DIVISION OF HIGHWAYS
POST OFFICE BOX 3279
ASHEVILLE, NC 28802

DISTRICT ENGINEER
TELEPHONE: (828) 298-2741
FAX: (828) 299-3747

WEBSITE: WWW.NCDOT.GOV

LOCATION:
DISTRICT OFFICE
11 OLD CHARLOTTE HIGHWAY
ASHEVILLE NC



ENVIRONMENTAL
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MEMORANDUM

Date: July 17, 2008

To: Files

From: Chris Wood

Regarding: Asheville – Enka Field Review of Preliminary Alternative Routes/Agency Contacts

Project No.: 49163

A site review/agency contact visit for the Asheville – Enka 115-kV Project was conducted between June 30 and July 3, 2008 by Chris Wood and John Dunham with Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell). The purpose of the trip was to review and document the preliminary alternative routes in the field and visit with local agencies. Following is a summary of each day.

June 30, 2008

Chris Wood and John Dunham drove throughout the study area to review the preliminary alternative routes and document the various opportunities and constraints (existing residences, new developments, businesses, public facilities, existing rights-of-way, etc.). Aerial photography maps and GIS/GPS software were used to document the information throughout the area. A few areas (Gaston Mountain Subdivision) were not accessible due to gated access.

July 1, 2008

Chris Wood and John Dunham spent the day driving throughout the study area reviewing and documenting the preliminary alternative routes. Photographs were taken at various locations and new developments and other features were documented with GIS/GPS software.

July 2, 2008

The entire day was spent visiting with Buncombe County, City of Asheville, and National Park Service (Blue Ridge Parkway) representatives. These visits included the following:

- *National Park Service – Blue Ridge Parkway (J. David Anderson, RLA, Resident Park Landscape Architect/GIS Coordinator)* – Met with Mr. Anderson (j_david_anderson@nps.gov, 828-271-4779 ext. 217) to discuss the crossing of the Blue Ridge Parkway. Mr. Anderson indicated that there are three existing overhead transmission lines within five miles of where PEC would like to cross the Blue Ridge Parkway. He said PEC's existing transmission line crossing is fully permitted but has no easement. He indicated that PEC would need to submit an application to the NPS to cross the Blue Ridge Parkway (he will e-mail this application document to me). The only way PEC might possibly be able to cross the Blue Ridge Parkway is by

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following an existing corridor (i.e. PEC's existing transmission line crossing or Interstate 26). Mr. Anderson did not think that a new corridor crossing the Blue Ridge Parkway would be acceptable or permissible. Mr. Anderson also mentioned that Interstate 26 would be widened at certain locations along this highway, and he recommended contacting the NCDOT for further information. Mr. Anderson also asked why we couldn't add a third circuit to the existing double-circuit line (so we wouldn't have to parallel PEC's existing double-circuit line).

- *Buncombe County Planning and Development (Deborah M. Truempy, Planner III)* – Met with Ms. Truempy (Debbie.truempy@buncombecounty.org, 828-250-4842) to discuss potential opportunities and constraints within the study area. Ms. Truempy thought that most of the study area was within the city limits of Asheville. Aside from the Biltmore Estate and some other areas outside of the City of Asheville, Ms. Truempy did not identify any other known concerns. She did indicate that Buncombe County does have a master plan, but this plan is not available on-line. Ms. Truempy did provide me with a copy of the Buncombe County Comprehensive Land Use Plan Update (June 21, 2006).
- *Buncombe County Parks and Recreation (Grace Young)* – We spoke with Ms. Young briefly regarding existing and future parks and recreational opportunities within the study area. Ms. Young provided us with a *Your Guide to Buncombe County Government Offices & Facilities* brochure that includes the location of parks and recreation areas within Buncombe County.
- *City of Asheville Information Technology Services (Jason Mann, GIS & Applications Services Manager)* – Met with Jason Mann (jmann@ashevillenc.gov, 828-259-5722) briefly to discuss existing City of Asheville GIS data available for our study area. Jason had previously provided us with the City of Asheville's GIS data, and there was no new GIS data to obtain from their office. I did ask Mr. Mann if there was any more recent aerial photography than the 2006 aerial photography available on their website. Mr. Mann said that there was not any newer aerial photography that he was aware of.
- *City of Asheville Parks, Recreation & Cultural Arts (Roderick Simmons, Director)* – Met with Mr. Simmons regarding parks, recreation, and cultural arts within the study area. Mr. Roderick pointed out a few items that we noted on our map. However, Mr. Simmons said that he would like to have a copy of the study area map so he could spend more time reviewing it, and so he could coordinate with other individuals on his staff, including Al Koptf (Planning & Development/828-259-5838). During our visit, we obtained several brochures, including the *Asheville Parks & Recreation 2008* brochure.
- *City of Asheville Planning and Development (Blake Esselstyn, Urban Planner II)* – Met with Mr. Esselstyn (besselstyn@ashevillenc.gov, 828-259-5798). Mr. Esselstyn

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said that the City of Asheville regulates development in Asheville's extraterritorial jurisdiction (ETJ), but they don't provide city services to this jurisdiction. Mr. Esselstyn also indicated that he thought there might be expansion of the church property for the Biltmore Church. Mr. Esselstyn said that Asheville's comprehensive plan is located on-line, and that Sardis Road may be widened in the future. Mr. Esselstyn was also curious as to whether PEC would allow for bike/pedestrian use beneath the new line. Mr. Esselstyn also noted a few items on our study area map that we documented on the map.

- *French Broad River Metropolitan Planning Organization (Dan Baechtold, AICP, Transportation Planning Manager)* – Stopped by the office of the French Broad River MPO (www.frenchbroadrivermpo.org) to meet with Dan Baechtold (828-259-5457; dbaechtold@ashevillenc.gov), but Mr. Baechtold was unavailable to meet with us. We picked up several brochures from the office.
- *City of Asheville Transportation & Engineering (Ken Putnam, P.E., Assistant Director)* - Stopped by the office of the City of Asheville Transportation & Engineering to meet with Ken Putnam (828-259-5943; kputnam@ashevillenc.gov), but Mr. Putnam was unavailable to meet with us. We picked up several brochures from the office.

July 3, 2008

Chris Wood and John Dunham reviewed the data from the previous three days to determine if there were any areas that needed to be revisited due to concerns of constraints. Several areas were noted on the maps and verified in the field. A visit with the North Carolina Department of Transportation (Division 13) was also conducted, since no one was available to speak with us on July 2, 2008.

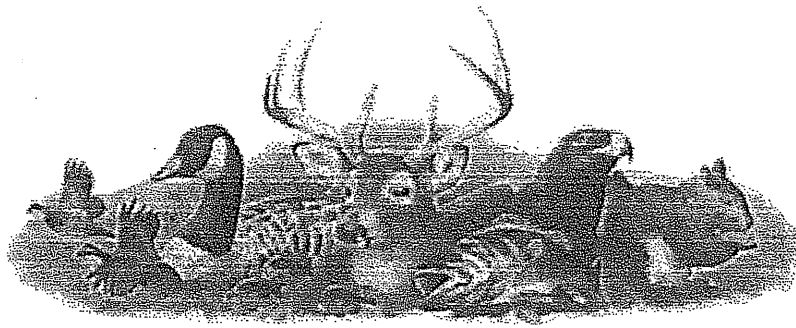
- *North Carolina Department of Transportation (Ricky A. Tipton, P.E., P.L.S., Division Construction Engineer)* – Met with Mr. Tipton (rtipton@dot.gov, 828-251-6171) to discuss existing and future road projects in the study area. Mr. Tipton mentioned several projects, including:
 - Interstate 26 would be widened to eight lanes in the future (north of State Route 146 [Long Shoals Road]), but he wasn't sure exactly when the widening would take place.
 - An improvement to the Interstate 26/Interstate 240/Interstate 40 interchange will take place in the near future.
 - State Route 191 will be widened to four lanes (north of Interstate 26).
 - Addition of a new water line on Clayton Road.
 - State Route 191 south of Blue Ridge Parkway is an unfunded project that is currently a feasibility study.



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- Sardis Road/Sandhill Road will be widened in the future (FS0213A). This project is currently a feasibility study and not funded. Mr. Tipton seemed to think that this project would happen in the future.
- Interchange work at Interstate 26 and State Route 146 (Long Shoals Road).



☒ North Carolina Wildlife Resources Commission ☒

July 21, 2008

Mr. Christopher J. Wood
Burns & McDonnell
9400 Ward Parkway
Kansas City, Missouri 64114-3319

SUBJECT: Progress Energy Carolinas, Inc., Asheville – Enka 115 kV Transmission Line Project
Buncombe County

Dear Mr. Wood:

Biologists with the North Carolina Wildlife Resources Commission (Commission) received your June 21, 2008 letter regarding the proposed Progress Energy Carolinas, Inc., Asheville – Enka 115 kV transmission line project in Buncombe County. The line would run about 7 miles generally northwest from the Asheville Substation to the Enka Substation. You asked for information about any resources in the study area that are under the Commission's purview and about resources that should be avoided. Comments from the Commission are provided under provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661-667d), North Carolina General Statutes (G.S. 113-131 et seq.), and the North Carolina Administrative Code 15A NCAC 10I.0102.

As applicable, impacts to streams and wetlands for roads and transmission line supports will require a 404 Permit from the U.S. Army Corps of Engineers and possibly a 401 Water Quality Certification from the North Carolina Department of Environment and Natural Resources, Division of Water Quality. Streams and wetlands in potential transmission line corridors should be delineated. As part of the 404 Permit process, the Commission offers comments on any request to impact waters in Buncombe County. Comments typically include the need to avoid important or otherwise sensitive aquatic habitats as well as mitigative measures to reduce the harm the project causes. For example, timber mats that span stream channels and support heavy equipment in wetlands are typically recommended to avoid permanent fills associated with culvert crossings and causeways.

Some wetlands along the French Broad River where the transmission line will cross are important to rare species like the Federal and State Threatened bog turtle (*Glyptemys muhlenbergii*) and the State Special Concern mole salamander (*Ambystoma talpoideum*) and four-toed Salamander (*Hemidactylium scutatum*). Commission staff recommends avoiding impacts to streams and wetlands here. There may be

high quality habitats elsewhere in the study area that could be identified with a delineation of streams and wetlands.


Transmission lines and structures can pose a hazard to birds. The July 14, 2008 letter from Mr. Brian Cole of the U.S. Fish and Wildlife Service regarding this project included several design features to minimize this hazard. Commission biologists encourage incorporating these.

Once constructed, management of the transmission line corridor should include measures to reduce adverse effects on wildlife habitats and possibly measures to improve habitats as well. Aerial spraying should be avoided in favor of selective, ground-based herbicide treatment so that beneficial vegetation is maintained. Desirable species include, in part, grapes, hawthorns, elderberry, crab apples, wild plum, and any native warm season grasses. Biologists also recommend holding pre-work training sessions for applicators that include identification of native plants and exotic species which need control. Treatments in and near wetlands and streams should only use herbicides approved for water contact. Any mowing should generally occur in the winter to early spring period to avoid nesting seasons for most wildlife. Some corridor sections on US Forest Service Land, if applicable, could be converted to wildlife openings or plots that Commission staff could maintain if they are accessible and properly sited (e.g., in relatively gentle terrain). Commission biologists can also provide technical assistance regarding maintaining utility line corridors to benefit wildlife.

In addition to direct implications, the Commission has concerns about the secondary and cumulative effects of infrastructure and utility development projects on fish and wildlife resources. These projects often facilitate increased residential and commercial development by providing water, sewer, transportation, or energy where it was previously unavailable or limited. In these cases, it is important that local governments have mechanisms in place that allow development while conserving natural resources. As part of the environmental review for this project, the Commission encourages evaluating this and referring to *Guidance Memorandum to Address and Mitigate Secondary and Cumulative Impacts to Aquatic and Terrestrial Wildlife Resources and Water Quality* (http://www.ncwildlife.org/pg07_WildlifeSpeciesCon/pg7c3_impacts.pdf). Incorporation of mitigative measures for secondary and cumulative impacts may be required should the project require review under the North Carolina Environmental Policy Act.

Thank you for the opportunity to review and comment on this project. If there are any questions regarding these comments, please contact me at (828) 452-2546 extension 24.

Sincerely,



Dave McHenry
Mountain Region Coordinator, Habitat Conservation Program

Cc: Lori Williams, NC Wildlife Resources Commission
Gabrielle Graeter, NC Wildlife Resources Commission

PEC's Proposed Asheville – Enka 115kV Transmission Line
Environmental Stakeholder Meeting
August 19, 2009

Agency Acronyms & Authority:

NCDENR –	North Carolina Department of Environment & Natural Resources
DLR -	Division of Land Resources (erosion control plan approval for land disturbing activities)
DWQ-	Division of Water Quality (construction and post-construction stormwater permitting, general adherence to water quality standards)
NCWRC –	North Carolina Wildlife Resources Commission (review for impacts to trout streams, threatened and endangered [T&E] species)
NPS BRP -	US Department of Interior, National Park Service, Blue Ridge Parkway (easement to cross federal lands; compliance with National Environmental Policy Act [NEPA] to ensure minimal impacts to environment)
USACE -	US Army Corps of Engineers (permits to dredge and fill waters of US, permits for “obstructions to navigation” in/across federally navigable waters)
USDA FS -	US Department of Agriculture, Forest Service (easement to cross federal lands, compliance with forest management plan, compliance with NEPA)
USFWS -	US Fish & Wildlife Service (compliance with Endangered Species Act for impacts to T&E species and their habitats)

Attendees:

NCDENR DLR –	Janet Boyer
NCDENR DWQ –	Roger Edwards, Susan Wilson
NCWRC –	Dave McHenry
NPS BRP –	David Anderson, Gary Johnson
PEC –	Buzz Bryson, Joe Parker, Mark Venvell
USACE –	Liz Hair
USDA FS –	Ray Johns, Linda Randolph
USF&WS –	Mark Cantrell

Meeting Summary:

- PEC provided a quick overview of how the need and timing for new transmission is determined (load growth, regulatory changes) and of how the routing of a new transmission line is evaluated (independent consultant, criteria analyzed, public input, all at a “hands-off” [no on-site surveys] level).
- Following that, PEC seeks input from an environmental stakeholder group (such as this 8/19 meeting), seeks consensus on the going-forward environmental review and permitting process, and establishes agency contacts and key issues.
- The “typical” review and permitting processes will apply. Those include Rivers and Harbors Act Section 10 authorization from the ACOE for any federally navigable waters crossing (i.e., French Broad River), and if there are discharges to wetlands, Clean Water Act (CWA) Section 404 and 401 authorization. The project must be reviewed for compliance with the National Environmental Policy Act (NEPA), Endangered Species

Act (ESA), National Historic Preservation Act (NHPA), and NCWRC policies. DLR must approve an erosion control plan, and the CWA construction stormwater permit conditions apply.

- Because the project seeks to cross federal lands (Pisgah National Forest and Blue Ridge Parkway), the USDA FS and NPS BRP staffs must review the project under their respective NEPA processes. The agencies did agree to a single environmental survey, addressing the unique needs of the USFS, NPS, USACE, and USF&WS, being performed, and all agencies were comfortable with PEC using Environmental Services Inc., a consultant we frequently use for such surveys and which has a good reputation with agencies.
- Based on PEC's previously submitted Burns and McDonnell Routing Study & Environmental Report and the Supplemental Report, the USDA FS indicated that the project appears to be consistent with the forest plan and that it should qualify for a categorical exclusion (CX) under NEPA, pending results of the field environmental survey. The CX would preclude, at least from the USDA FS's perspective, the need to prepare either a formal Environmental Assessment or the more time-consuming Environmental Impact Statement.
- PEC will furnish all agencies with hard copies of the above-referenced Burns & McDonnell documents.
- For the NPS BRP to conduct its NEPA review, PEC needs to provide information on BRP crossing alternative locations, use of existing right-of-way (co-location) or separate ROW, structure type and conductor configuration alternatives, overhead vs. underground options, future expansion and plan to reduce visual exposure for the crossing. To this end, the NPS expects PEC to provide visual simulations of crossing alternatives, and has offered (but not endorsed) at least one source, Parsons. The NPS BRP did not indicate at this point whether a CX, EA or EIS would be required under NEPA.
- PEC must assess T&E species issues during the appropriate "windows" (which are as short as the May-June period for certain plant species), using qualified individuals and with appropriate approvals from USF&WS.
- PEC will follow up on making the GIS "shape" files available to the USF&WS.
- PEC will follow up on the relevancy and potential impact of the TVA Act.

Next Meeting: September 24, 2009, PEC Western Region Office (same building, room TBD).

MEETING MINUTES
Asheville – Enka 115kV Line: Environmental Stakeholders
24Sep09

Location: PEC Western Region Offices

Attendees: Gary Johnson (NPS), David Anderson (NPS), Herbert Young (NPS), Mark Venvell (PEC), Joe Parker (PEC).

Objectives:

- Understand and address questions arising from the National Park Service (NPS) since the previous Stakeholder Meeting.
- Understand where PEC is in the permitting process of the new Asheville – Enka 115kV line across the Blue Ridge Parkway (BRP).
- Determine the steps required to achieve NPS acceptance of PEC's application and issuance of a Special Use Permit.

Key Discussion Points:

- The NPS reiterated that to date, PEC's application to cross the BRP has yet to be approved.
- To achieve approval, PEC committed to working with the NPS to refine the proposed line crossing in such a manner to minimize affects on the existing PEC utility corridor. This would entail PEC partnering with a suitably qualified firm to perform a visual assessment of the crossing.
- Elements of the assessment would include those cited in the NPS's letter dated June 29, 2009, as well as considering how the invasion of exotic species would be controlled (it was noted that in a similar situation (Roanoke, VA) clearing of R/W has introduced or encouraged an invasion of exotic species such as Multi-flora Rose). The NPS requested PEC give consideration to "State-of-the-Art" solutions, where feasible, to design facilities that would help reduce impact to the BRP. The visual assessment should include a view shed analysis and visual simulation. This analysis and simulation would show the view from key vistas on and overlooking the BRP and the impact produced by the new line. Also included in the report should be a summary of the key findings of the Burns & McDonnell Routing Study and should address why the proposed use cannot be satisfied on private lands; e.g., other means by which load growth can be met without requiring passing over the BRP.
- The study area of the visual assessment would encompass the Asheville Corridor, which currently spans the BRP from the French Broad River Overlook, south of the NC Arboretum, to the Haw Creek Overlook. (Following the meeting, the BRP requested that an additional vista about one mile south of the French Broad River Overlook also be included in the study area.)
- The NPS agreed to work with PEC and their consultants to "fine tune" the crossing such that the visual assessment report and PEC's application would be approved by January 1, 2010.
- Once PEC's application is approved the NPS will make a determination as to whether a Categorical Exclusion is possible or if a full Environmental Assessment (EA) might be

required. If an EA is required, it should include present as well as future impacts, such as ongoing maintenance, sub-surface archeological impacts, etc. Other considerations would include such items as "Mountain-to-Sea Trail" which co-habits some areas of the BRP. It is expected that the biological analysis of the EA be completed in the Spring of 2010. The EA would be subject to public review solicited by the NPS, to include Western Carolina Alliance, NPS Coalition, and possibly several hundred individual or organizations which are on a list maintained by the NPS. Following the public review, completion of the final reporting and issuance of the permit should be possible by September, 2010.

- There was some discussion regarding where PEC stood concerning contracting for both the environmental and visual assessment. It was noted that Parsons had indicated that it would not be interested in taking on the task as presented to them. PEC provided the NPS with information on Pike (FPS) who they are considering to perform the initial visual assessment. Both Pike (FPS) and Environmental Services, Inc (ESI) would be qualified to conduct the ensuing EA.
- The NPS requested that, to offset the impact of the new crossing, mitigation of existing utility crossings across the BRP in the Asheville Corridor should be considered; e.g., by exploring the feasibility of placing existing overhead distribution lines underground.

Next Meeting: To be determined.

Meeting Minutes

Meeting with National Park Service, Progress Energy Carolinas, and FPS (Pike).

Date: October 20, 2009.

Attendees: David Anderson (NPS), Herbert Young (NPS), Gary W. Johnson (NPS), W.T.(Buzz) Bryson (PEC), Dwight Hollifield (Pike/FPS), Allen Hines (Pike/FPS), Mark Venvell (PEC), and Joe Parker(PEC).

Meeting Purpose/Objective: The meeting was held at the Blue Ridge Parkway (BRP) offices at Hemphill Knob Road. Based on the outcome of the last meeting, the National Park Service (NPS) requires Progress Energy Carolinas (PEC) to determine alternative approaches for how the new Asheville-Enka 115kV line will cross the BRP and to perform a visual assessment of these alternatives. In this regard, the purpose of this meeting was to:

- Introduce PEC's consultant (FPS/Pike) and review their experience/in-house capabilities for performing visual impact assessments.
- Establish an agreed upon scope, approach, and deliverables for the Visual Impact Assessment.

The following agenda formed the basis for the meeting discussions (key points arising are summarized below):

AGENDA

- **Introductions:**
- **Q & A Session with FPS:**
 - Dwight Hollifield of FPS/Pike provided an overview of their background/20+ years of experience conducting routing and siting, environmental, and visual analysis services.
 - FPS/Pike presented examples of terrain models and photographic simulations, and discussed similar such visual assessments they have conducted for Duke Energy.
- **Review of Visual Impact Assessment Scope:**
 - Reviewed geographical scope (key vistas vs. seen area). Key vistas to include the French Broad River Overlook, as well as pull-offs further south up to the Walnut Cove Overlook. Some of these pull-offs provide views of the Biltmore House in the far-distance.
 - PEC committed to addressing why their proposed use could not be met via alternative routes that did not require crossing the BRP; e.g., importing electricity via the Duke Power Corridor.
 - Additionally, PEC will provide a discussion, in layman's terms, of the NERC requirements which preclude PEC from adding another circuit on the existing double-circuit lattice steel tower structures; namely, triple-circuiting.
 - Both these items will be addressed in the visual assessment report.
- **Review BRP Visual Assessment Requirements:**
 - David Anderson provided a summary of the assessment requirements. When determining the visual impacts of the alternative approaches for crossing the BRP, PEC will need to include evaluating visibility from the:
 - BRP Motor Road (foreground - right under line, middle ground – near French Broad River Overlook, and background - road side vistas south of the French

- Broad River Overlook).
 - French Broad River Overlook (middle-ground).
 - Mountain to Sea Trail (foreground).
 - Additionally, PEC should give consideration to conductor and structure types or treatments to limit reflectivity.
- **Discussion of Visual Assessment Methodology/Approach (Existing Crossing Location):**
 - FPS provided an overview of their suggested visual assessment methodology /approach. This includes:
 - Completion of seen area analysis of alternatives (foreground, middle-ground and background).
 - Determination of structure types /locations for each alternative.
 - Developing terrain models for each alternative.
 - Providing photographic simulation of proposed structures at key locations under a variety of seasonal conditions.
 - David Anderson described the alternatives that the NPS would require PEC to evaluate and where necessary, provide an analysis of the associated visual impact; namely:
 - Alternative One: No Action. Lines are placed without affect to Blue Ridge Parkway (i.e., satisfying proposed use without crossing the BRP)
 - Alternative Two: Approach redesign of energy corridor (new structures) to accommodate capacity within the existing clearing width and mitigations.
 - Alternative Three: Approach redesign of corridor with minimum width of clearing, aesthetic matching structures and mitigations.
 - Alternative Four: Existing proposed width and structure design and mitigations.
 - The team will need to develop a determination of visual impact for each alternative and mitigation options, including:
 - Primary impacts, secondary impacts, and cumulative impacts on visuals, continued maintenance, wildlife, invasive plants etc.
 - Engineering vs. vegetative approaches.
- **Visual Assessment Deliverables:**
 - It was agreed that the final visual assessment deliverables would comprise:
 - A Visual Impact Assessment Report, the table of contents for which will be developed early in the process for general review.
 - Terrain models and photographic simulations for the proposed options for each alternative modeled.
- **Timeline:**
 - The team will be developing a high-level timeline early in the process.
- **Project Team**
 - Dwight Hollifield will be the primary contact for FPS/Pike, who will be performing the modeling associated with the visual impact assessment, as well as providing engineering expertise based on experience from similar projects. Mark Venvell from PEC will be performing the engineering (line spotting), and David Anderson will be the NPS contact during visual impact analysis. Once the permitting stage has been reached, Herbert Young, Jr. will be NPS point of contact.
- **Action Items/Next Steps/Next Meeting**
 - Next meeting set for November 17, 2009.

**Minutes from Environmental Stakeholders Meeting
February 4, 2010
Blue Ridge Parkway Headquarters**

ATTENDEES: David Anderson(BLRI), Suzette Molling(BLRI), Herbert Young(BLRI), Gary W. Johnson(BLRI), Ray Johns(USDA-FS), Liz Hair(USACE), Tasha McCormick(USACE), Susan A. Wilson(NCDENR/DWQ/ARO), Janet S. Boyer(NCDENR/LQ/ARO), Dave McHenry(NCWRC), Mark Cantrell(USFWS), Mark Venvell(PEC), Joe Parker(PEC), and Buzz Bryson(PEC).

PEC asked if one set of environmental documents describing the entire project was sufficient to address NEPA requirements or if the agency-specific processes would require separate documents. Resolution was that because the approvals and pathways, separate documents would be required, as follows:

- One environmental report will be done to describe the existing conditions for the entire proposed route. Contractor (TBD) and PEC will meet with agencies prior to field work, to ensure all required information is collected. For example, USF&WS, NPS and USFS have slightly different species lists for evaluation. Also, the contractor will be asked to include a survey of invasive species present on the existing ROW.
- The NPS is asking us to follow its standard NEPA protocol, and the USFS, it's categorical exclusion (CX) protocol, which will require separate documents, covering the respective jurisdictional areas, and differing process time lines.
- The NPS indicated the NEPA process required draft EA review periods of 30 days (local review), 30 days (regional review), 30 days (public comment) and 30 days (permitting). Additional time will be required between each of those reviews to address comments and revise documents. The additional time will depend upon the magnitude of changes, additional consultation, and PEC's response time. Assuming all goes relatively smoothly it is typical for the environmental survey to occur in the May/June time frame, October public review, and permit issue in December.
- To reduce overall turnaround time from EA to FONSI/permit issuance, the NPS offered to review both locally and regionally draft sections of the EA as they became available. The idea being that by the time the report was finalized, the final review process would be quicker and smoother as potential issues would have been already addressed.
- The USFS indicated that, assuming the environmental report does not identify significant issues, the project would qualify for a CX, Categorical Exclusion. No specific time-frame was given by the USFS for local and public review, except that it could be done relatively quickly due to the CX and so long as permanent access and lay-down areas are not required on USFS lands. However, 5 days after review, the USFS would issue their decision and the permit thereafter.
- It was recommended that contract be made with someone who is familiar with mountain systems. Environmental contractor to be local, with familiarity of "typical" jurisdictional areas and species. It is also requested that following the contract award a meeting be set up with ES/H to review requirements.
- USACE will require wetland delineation, streams, etc... Corps of Engineers suggested PEC request jurisdictional determination (JD) well before submitting permit application (which for the to-be-requested authorization under Nationwide Permit 12, would be a pre-construction notification)
- USACE also noted that Nationwide 12 requires mitigation for mechanical/maintenance – mowing and spraying. Such issues as these should be addressed in documentation – citing, construction, and maintenance. (PEC takes note of this position and will request response from Forestry, Maintenance, and Environmental.)



**North Carolina Department of Cultural Resources
State Historic Preservation Office**

Peter B. Sandbeck, Administrator

Beverly Eaves Perdue, Governor
Linda A. Carlisle, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

December 23, 2010

Paul Webb
TRC Solutions
50101 Governor's Drive
Suite 250
Chapel Hill, NC 27517

Re: 11kV Transmission Line, Asheville to Enka, Blue Ridge Parkway Section, Buncombe County,
ER 08-1510

Dear Mr. Webb:

Thank you for your letter of November 29, 2010, transmitting the archaeological survey report by TRC for the above project. The report meets our guidelines and those of the Secretary of the Interior.

During the course of the survey, no sites were located within the project area. TRC has recommended that no further archaeological investigation be conducted in connection with the Blue Ridge Parkway section of the proposed transmission line. We concur with this recommendation since the project will not involve significant archaeological resources.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919-807-6579. In all future communication concerning this project, please cite the above-referenced tracking number.

Sincerely,

Renee Gledhill-Earley

for Peter Sandbeck

cc: William G. Lapsley & Associates

Rebekah Newton

From: Rebekah Newton
Sent: Tuesday, February 22, 2011 2:08 PM
To: Rebekah Newton
Subject: FW: comments on draft report, ARPA Permit BLRI 2011-001



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(Embedded image moved to file: pic18662.jpg)

OFFICIAL CORRESPONDENCE VIA ELECTRONIC MAIL
NO HARD COPY TO FOLLOW

United States Department of the Interior
NATIONAL PARK SERVICE
Southeast Archeological Center
2035 East Paul Dirac Drive
Johnson Building, Suite 120
Tallahassee, Florida 32310

OFFICIAL CORRESPONDENCE VIA ELECTRONIC MAIL
NO HARD COPY TO FOLLOW

IN REPLY REFER TO:
SEAC

Memorandum

To: Mr. Paul Webb, Principal Archeologist, TRC Environmental Corp.
From: Director, Southeast Archeological Center /s/ David W. Morgan,
Ph.D.
Subject: Draft Report Comments, ARPA Permit BLRI 2011-001, SEAC Acc.
#2319

On November 12, 2010 I received the draft report, "Archaeological Survey for Portions of the Progress Energy Asheville-Enka 115kV Transmission Line Project Involving the Blue Ridge Parkway, Buncombe County, North Carolina."
Overall I am satisfied with the reporting of your efforts, and your report is acceptable under the permit's terms after minor revisions, detailed below:

Please include page numbers for easy reference;
According to the permit, sites occurring on NPS land are to be referred to by both their state site designation and their NPS designation. One of the three sites identified in your background research section—31BN328 (historic outbuilding and scatter)—is on NPS land. It is referred to in the ASMIS database as BLRI-35. Please reference this designation in your manuscript.
If you have the resources available, and if it does not unduly inconvenience you, it would also be convenient to have a map showing the boundary of the park in your project area, with the three sites displayed.

Please revise as indicated, and submit your final deliverables as stipulated by the terms and conditions of the permit. The latter include sending two bound and one unbound copies each to the park superintendent and SEAC. These require acid free, archival quality paper. Also required is a searchable electronic copy in Word or Adobe formats. These are due within 30 days of the postmark of this letter.

Artifacts and project documents will be required within 90 days of receipt of the final report. Catalogs and all analytical findings are due to SEAC 30 days after receipt of artifacts and project documents.

Please see the permit for additional requirements. Please contact me or my staff if you have any questions about this process.

Rebekah Newton

From: Gledhill-earley, Renee [renee.gledhill-earley@ncdcr.gov]
Sent: Wednesday, April 13, 2011 3:00 PM
To: Rebekah Newton
Subject: RE: Progress Energy Crossing the BRP

Rebekah:

The EA will come to us as a SCH review agency. We will review the EA and comment on the possible effects of the proposed crossing on historic properties, including archaeological resources and the Blue Ridge Parkway, which is eligible for listing in the National Register. Affects on the historic landscape will be considered. We will respond to the SCH, which in turn will provide comments to the NPS for the EA.

Renee

--

Renee Gledhill-Earley
 Environmental Review Coordinator
 NC State Historic Preservation Office
 4617 Mail Service Center
 Raleigh, NC 27699-4617
 Phone: 919-807-6579 Fax: 919-807-6599
<http://www.hpo.dcr.state.nc.us>

Special Notice: The State Historic Preservation Office has moved to 109 E. Jones Street. However, our mailing address remains the same.

This message does not necessarily represent the policy of the Department of Cultural Resources. E-Mail to and from me, in connection with the transaction of public business, is subject to the North Carolina Public Records Law (N.C.G.S. 132) and may be disclosed to third parties.

From: Rebekah Newton [mailto:rebekah@cwenv.com]
Sent: Wednesday, April 13, 2011 2:09 PM
To: Gledhill-earley, Renee
Subject: Progress Energy Crossing the BRP

Hi Renee,

Thank you for taking the time to speak with me today. For your reference, the Progress Energy Crossing of the BRP is ER 08-1510. The SHPO received a copy of the archaeological report for the crossing of the BRP from TRC on November 29, 2010 and the SHPO responded by letter to TRC stating concurrence with the archaeological study on December 23, 2010. Based on our conversation, it is my understanding that you can/will provided comments and/or concurrence with the rest of the project at the time you receive the EA for review. You indicated to me that SHPO is included in the State Clearinghouse distribution list. We will follow-up with you after distribution of the EA to make sure you have everything you need to review the project.

If you agree with what I've written above, please send me a quick email back. Thank you.

FYI... To date, the schedule has the project going out for review at the end of April or first part of May.

Rebekah Newton

4/13/2011

ClearWater

224 South Grove Street, Suite F
Hendersonville, NC 28792
Office: 828-698-9800
Mobile: 828-606-6512
rebekah@cwenv.com



Please consider the environment before printing this e-mail.

Rebekah Newton

From: Allen_Ratzlaff@fws.gov
Sent: Wednesday, April 13, 2011 11:46 AM
To: Rebekah Newton
Subject: Re: Progress Energy Crossing of the BRP

Rebekah,

Your summary is correct. We look forward to reviewing the EA.

Allen

Allen Ratzlaff
USFWS
160 Zillicoa St.
Asheville, NC 28801

828/258-3939 x229

"Rebekah Newton" <rebekah@cwenv.com>

04/13/2011 10:34 AM

To <allen_ratzlaff@fws.gov>

cc

Subject Progress Energy Crossing of the BRP

Hi Alan,

Thank you for taking the time to speak with me this morning. The FWS received a scoping letter for this project on June 21, 2008 and the FWS responded with comments on July 14, 2008. Based on our conversation, it is my understanding that you can/will provide comments and/or concurrence with the project at the time you receive the EA for review. You indicated to me that FWS is not always included in the State Clearinghouse distribution list and that we need to confirm that you received a copy for review. We will follow-up with you after distribution of the EA to make sure you have everything you need to review the project (including a copy of the EA).

If you agree with what I've written above, please send me a quick email back. Thank you.

FYI... To date, the schedule has the project going out for review at the end of April or first part of May.

Rebekah Newton

ClearWater

4/13/2011

224 South Grove Street, Suite F
Hendersonville, NC 28792
Office: 828-698-9800
Mobile: 828-606-6512
rebekah@cwenv.com



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