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DEC 29 2014

Ref: Ref: EPR-N

Craig Bobzien, Forest Supervisor
United States Forest Service
Black Hills National Forest
1019 N. 5th Street
Custer, SD 57730-8214

RE: U.S. Environmental Protection Agency Comments on The Final Environmental Impact Statement and Draft Record of Decision for the Teckla-Osage-Rapid City Transmission Project **CEQ # 20140342**

Dear Mr. Bobzien:

This letter is in response to your November 21, 2014 notification of availability of a Final Environmental Impact Statement (Final EIS) and Draft Record of Decision (Draft ROD) pre-decisional objection process for the 230kV Teckla-Osage-Rapid City Transmission Line Project. We have completed a review consistent with our responsibilities and authorities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. The EPA submitted project scoping comments on October 27, 2011 and comments on the Draft EIS on February 2, 2014

Project Description
Black Hills Power (BHP) has requested a right-of-way (ROW) authorization to construct and operate a 230kV transmission line between the Teckla and Osage Substations in northeastern Wyoming to the Lange Substation near Rapid City, South Dakota. The project is proposed to strengthen the transmission network, improve transmission system reliability, and to help meet future demand for electricity and economic development in the region.

The proposed action begins at the existing Teckla Substation, approximately 67 miles north of Douglas, Wyoming. The project would be approximately 144 miles long and would cross private lands in both Wyoming and South Dakota, U.S. Forest Service (USFS) lands, Bureau of Land Management (BLM) lands (in Wyoming), and state lands (in Wyoming). The USFS lands crossed by the proposed project are managed by the Black Hills National Forest (BHNF) in South Dakota and Thunder Basin National Grassland (TBNG) in Wyoming. Specifically, the approximately 36.3 mile segment of the proposed action on the BHNF would require approximately 440 acres of transmission line right-of-way (ROW). Under the preferred alternative, alternative 3, the entire line would be approximately 144 miles long, would be constructed on wood or steel H-frame structures for most of its length with possibly some steel monopole structures in the Rapid City Area. The support structures would be 65 to 75 feet tall, and the line would require a ROW of approximately 125 feet.

EPA's Comments and Recommendations

The EPA appreciates that the USFS and BLM carefully considered, and included in the Final EIS, information regarding EPA's comments. Specifically, the EPA appreciates changes made to the Final EIS that incorporate our recommendations on following wetlands protection requirements under the U.S. Army Corps of Engineers' Nationwide Permitting # 12 power lines program and adding measures to reduce vehicle emissions from construction and maintenance activities. We note that these changes are required by incorporation in the Draft ROD and recommend these changes be included in the Final ROD.

The EPA also appreciates that the USFS clarified in the Response to Comments section of the Final EIS that BHP does not use system transformers that contain Sulfur Hexafluoride (SF_6), a major greenhouse gas, but does use SF_6 circuit breakers. According to the Response to Comments section of the Final EIS BHP does implement maintenance practices that include monitoring and mitigation of leaks from all SF_6-based equipment.

We support the USFS and BLM commitment to protect natural resources while increasing the capacity and resiliency of the nation's power grid infrastructure. Thank you for the opportunity to provide comments and your inclusion of EPA's comments on the Teckla-Osage-Rapid City Transmission Line Final EIS and Draft ROD. If you have any further questions, please contact me at 303-312-6704, or Nat Miullo, the Lead NEPA Reviewer at 303-312-6233.

Sincerely,

Philip S. Strobel
Acting Director, NEPA Compliance and Review Program
Office of Ecosystem Protection and Remediation

cc by e-mail: Dennis Jaeger, Forest Supervisor, and Thunder Basin National Grassland
Stephanie Connally, District Manager, BLM High Plains District

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