



THE DEPARTMENT OF ARKANSAS
HERITAGE

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Arkansas Arts Council

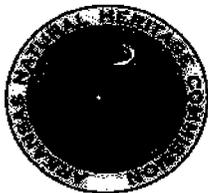
Arkansas Historic
Preservation Program

Delta Cultural Center

Mosaic Templars
Cultural Center

Old State House Museum

Historic Arkansas Museum



Arkansas Natural Heritage
Commission



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Date: May 14, 2013

Subject: Certificate of Environmental Compatibility and Public Need
Southwestern Electric Power Company
345 kV Transmission Line, Shipe Road to Kings River
Docket No.: 13-041-U

ANHC No.: P-CF.-13-027

Secretary of the Commission
Arkansas Public Service Commission
P.O. Box 400
Little Rock, AR 72203-0400

Dear Sir/Madam:

Staff members of the Arkansas Natural Heritage Commission have reviewed the Application for a Certificate of Environmental Compatibility and Public Need for the construction, ownership, operation and maintenance of the proposed 345 kV transmission line between the Shipe Road Station and the proposed Kings River Station. Southwestern Electric Power Company (SWEPCO) proposes to construct approximately 48 miles of new 345 kV transmission line originating at the company's Shipe Road Station currently under construction west of Centerton in Benton County and terminating at the proposed Kings River Station northwest of Berryville in Carroll County. The proposed facilities are intended to meet the transmission demand of the growing North Arkansas and South Missouri area. Six alternative routes have been developed and carried forward. A northern route, labeled as Route 33, has been identified as the proposed route.

This agency is concerned about the selection of Route 33 as the preferred alignment. This route, along with all of the northern alternatives (Routes 62, 86, 91, and 109), would result in the clearing of significant amounts of forest and woodland habitat. The Environmental Impact Statement (EIS) for the project notes this impact, but fails to acknowledge the long-term adverse effects of this clearing. Creating a right-of-way through a large contiguous block of forest fragments it into smaller pieces. This can have negative impacts to species dependent on forest interior habitat. Many birds become more vulnerable to predation and nest parasitism when a permanent forest opening, such as a road or utility right-of-way, is created. Fragmentation can also promote the introduction and expansion of exotic, invasive plants and animals which can out compete native species.

Glades make up much of the woodland habitat crossed by the northern alignments in northeastern Benton and northwestern Carroll Counties. Glades occur where the bedrock is at or near the surface. They are characterized by areas of bare rock, expanses with grasses and forbs, and cedar trees where the soil is deeper. In the past, these areas were subject to wildfires, which maintained an open character and reduced the number

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of cedar trees. Glades often support rare plant species, including the federally threatened plant, Missouri bladderpod (*Lesquerella filiformis*). Glade habitat is rapidly declining in Arkansas. Clearing for powerline construction would not in itself damage glades, however herbicides used to maintain powerline rights-of-way can be detrimental to glade flora.

The EIS notes that the southern alternative (Route 108) was rejected, in part, because of the higher environmental impacts related to the number of wetlands and floodplains crossed. Although this may be technically accurate, it does not factor habitat quality into the assessment. The large blocks of forests and woodlands in the northern portion of the study area are of higher natural quality than the urban areas and pastureland in the southern part of the study area. Although the northern alignments are avoiding known sensitive sites, such as Devil's Eyebrow Natural Area, there are very likely other undocumented areas supporting rare species along these alignments. There is a greater potential to impact sensitive habitat in the northern part of the study area where the terrain is rugged and less disturbed than in the southern part of the study area. Also, it should be recognized that erosion will be a more significant issue, with long-term management implications, for the northern alignments. For these reasons, this agency prefers Route 108 to any of the northern alignments.

The opportunity to comment is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Colclasure". The signature is fluid and cursive, with a long horizontal stroke at the end.

Chris Colclasure
Director