

# South Carolina Department of Natural Resources

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Alvin A. Taylor  
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September 27, 2013

Julie A. Smith  
Office of Electricity Delivery and Energy Reliability  
Mail Code: OE-20  
U.S. Department of Energy  
1000 Independence Avenue SW.  
Washington, DC 20585

REF: Request for Information (RFI)  
Improving Performance of Federal Permitting and Review of Infrastructure Projects

Dear Ms. Smith,

DNR is the state agency charged by state law with the management, protection, and enhancement of wildlife, fisheries, and marine resources in South Carolina. DNR is responsible for formulating comprehensive policies for water resources through a State Water Plan to address issues affecting water supply, water quality, navigation, hydroelectric power, outdoor recreation, fish and wildlife needs, and other water resource interests. DNR is also charged with the statewide responsibilities for regulating watercraft operation and associated recreation on state waters, conducting geological surveys and mapping, promoting soil and water conservation, management of invasive aquatic plants, flood mitigation, drought response planning and coordination, and the state scenic rivers program. DNR's mission is to serve as the principal advocate for and steward of South Carolina's natural resources. (DNR authorities and responsibilities are described in Titles 48, 49 and 50, South Carolina Code of Laws (1976), as amended.)

DNR staff has reviewed the draft Integrated, Interagency Pre-Application (IIP) Process for significant onshore electric transmission projects requiring federal authorization(s). The Department supports the goal of the IIP Process to improve the efficiency, effectiveness, and predictability of transmission siting, permitting, and review processes through the involvement of federal, state and local agencies and other interested stakeholders early in the project planning process. Timely consultation by the Project Proponent allows the exchange of the most accurate, up-to-date data and technical information and facilitates the timely review of state and federal authorization requests, preventing unnecessary delays in the siting and permitting process.

In response to the RFI for questions 1 and 2 (page 53437):

- 1) The draft IIP Process, as set forth in Vol. 78, No. 168 of the August 29, 2013 Federal Register notice, appears to facilitate the identification of natural resource issues of interest to and under the purview of our agency in an efficient and timely manner.

- 2) DNR supports early consultation for all projects which have significant natural resource impacts, are complex or controversial. With minor revisions, it appears the draft IIP Process could be adapted to apply to other sectors seeking federal authorization(s).

Please feel free to contact me at (803) 734-4199 if you have any questions.

Sincerely,

*Vivianne Vejdani*

Vivianne Vejdani,  
Environmental Coordinator,  
Wildlife and Freshwater Fisheries Division

Cc: Bob Perry