The western box turtle inhabits prairie grasslands, pasturelands, fields, sandhills, and open woodlands. They are essentially terrestrial but sometimes enter slow, shallow streams and creek pools. For shelter, they burrow into soil or utilize burrows previously used by other animals. The species prefers soils that are sandy in texture. With the wide prairie and open woodland habitat association utilized by the western box turtle, there is limited potential for the species to be found within the study area (Conant and Collins, 1998; IUCN, 2022).

The western massasauga inhabits plains and prairies, where it takes advantage of rocky and boggy outcrops for shelter. Its distribution ranges from central parts of the United States to central and south Texas, towards the Gulf. Given the absence of these habitats, it is unlikely the western massasauga would be found in the study area (Conant and Collins, 1998; NatureServe Explorer, 2022).

The Mississippi silvery minnow, common muskrat, swamp rabbit, smooth softshell turtle, and western chicken turtle are listed species that are all associated exclusively with persistent aquatic environments of different types (e.g., streams, ponds, marshes), most of which are not found in the study area. It can be concluded that this group of species would not be found in the study area.

3.6 Community Values and Community Resources

The term "community values" is included as a factor for the consideration of transmission line certification under Section 37.056(c)(4) of the Texas Utilities Code. The PUCT CCN application requires an assessment of values and resources important to the local community. At times, community values and resources could include the following:

- habitable structure locations;
- AM, FM, microwave, and other electronic installations in the study area;
- FAA-registered airstrips, private airstrips, and heliports located in the study area;
- irrigated pasture or croplands utilizing center-pivot or other traveling irrigation systems;
- approvals or permits required from other governmental agencies; and
- comments received from community leaders and members of the public.

In addition to the above-listed items, Halff evaluated the proposed project for community resources that may not be listed by the PUCT, but that may also be important to particular communities as a whole. Halff defines the term "community resources" to be areas or other natural resources recognized by a national, regional, or local community. Examples of community resources would be parks, recreation areas, historical or archaeological sites, or scenic vistas. As discussed in **Section 2.2.1**, Halff mailed consultation letters to elected and appointed officials within the study area and collected information regarding community values and community resources. The above-listed values and resources important to the local community are discussed in the appropriate sections of this document.

3.7 Land Use

3.7.1 Urban/Residential Areas

The study area is situated in a relatively urban area in the City of Keller. The limits of the proposed project are situated within the High Chapparal Addition, Phase I and II Subdivision (Keller, 2022) within an easement through residential lots along neighborhood side streets as shown on **Figure 3-1.** Larger estate-style (i.e., 2-acre) lots are common west of this subdivision. Commercial, rail, and vacant land uses are common along the US 377 corridor. Historical imagery shows an H-frame transmission line consistent with the existing transmission line corridor as early as 1956. The subdivision appears to be constructed in the mid- to late-1980s, being absent in 1981 imagery but almost fully developed by 1990 (Nationwide Environmental Title Research, 2022). Recent imagery shows that land use beneath or near the existing transmission line is common "backyard" use, including, but not limited to, storage sheds, playground equipment, and swimming pools.

Halff solicited information from regional and county officials. Halff received responses from regional officials. Halff also solicited information from the various state and federal agencies regarding environmental and/or land use constraints within the study area. Copies of all written responses received are contained in **Appendix A**. Several of these responses are noted within the discussion in **Section 3.0** and/or **Section 5.0** of this report, relevant to resource-specific comments made by the agency (e.g., NRCS regarding soils,

TPWD and USFWS regarding wildlife). For responses that addressed potential land use constraints in general, the following list provides a summary of each:

- The City of Keller responded that a review of their files concluded that there were no responsive records related to environmental constraints or other issues within the study area.
- Tarrant County responded that a review of their files concluded that there were no responsive records related to transportation projects within the study area.

3.7.2 Recreation Areas

A review of federal, state, and local websites and maps, as well as a field reconnaissance survey, identified no park/recreational facilities (e.g., managed lands, parks, golf courses) within the study area. No conservation easements, wildlife management associations, or hike and bike trails have been identified in the study area. A review of the National Park Service (USNPS) website indicated that no USNPS parks, wild and scenic rivers, national battlefields, historic trails, or national historic sites open to the public are located within the study area (USNPS, 2022). There are no TPWD parks or public hunting units located within or near the study area (TPWD, 2022e; 2022f). Whereas pools associated with individual residences are common within the study area and the overall subdivision, Halff identified no community pool or recreation area commonly associated with newer subdivisions.

3.7.3 Agriculture

Given the urban setting, agricultural land use is virtually absent in the study area. Some of the larger residential lots west of the study area remain in unincorporated county land and appear to have facilities to accommodate livestock in low numbers, such as horses and donkeys. There is no evidence of large-scale crop agriculture, hayfield, or traveling irrigation within or near the study area.

3.7.4 Industry

Whereas oil and natural gas well sites may be found integrated with newer subdivisions further west of the study area, none of the registered records within RRC databases for Tarrant County are located within or near the study area. No oil and gas pipelines are recorded within or near the study area (RRC, 2022). Other than the Union Pacific Railroad

corridor that parallels the east side of the existing Keller Wall Price Substation, industrial land use is limited within or near the study area.

3.7.5 Aesthetics

Aesthetics are included as a factor for consideration in the evaluation of transmission facilities in Section 37.056(c)(4)(A)-(D) of the Texas Utilities Code. For the purposes of this study, the term aesthetics is utilized by Halff to address the subjective perception of natural beauty in a landscape. This evaluation attempts to define and evaluate the scenic qualities of an area.

Consideration of the visual environment includes a determination of aesthetic values (where the major potential effect of an action on the resource is considered visual) and recreational values (where the location of a transmission line could potentially affect the scenic enjoyment of the area). Halff considered the following aesthetic values in this study, which combine to give an area its aesthetic identity:

- topographical variation (hills and valleys);
- prominence of water in the landscape (rivers and lakes);
- vegetation variety (woodlands, meadows);
- diversity of scenic elements;
- degree of human development or alteration; and
- overall uniqueness of the scenic environment compared to the larger region.

As noted in **Section 3.7.1**, the location of the existing transmission line and proposed project lies within the backyard space of several residences. The existing aesthetic is that of a relatively modern subdivision common in north central Texas. Views from neighborhood streets and aerial photography show a modest, healthy tree canopy mostly afforded by individual trees and some clusters, likely from trees that were planted when the area was developed. The existing transmission line is readily observable from any location along California Trail looking south.

In 1997, the THC designated Heritage Trail Regions throughout the state of Texas to create a statewide heritage tourism program centered on the original ten scenic driving routes identified in the 1968 Texas Heritage Trails Program. These Heritage Trail Regions

incorporate the historic highways, historic sites, hiking and biking paths, natural beauty, and cultural attractions unique to the ten regions (THC, 2022a). The study area is within the Texas Lakes Trail Region. The suggested driving trail for this region does not include the Keller area (THC, 2022b). In addition, a review of the USNPS website identified no wild and scenic rivers, historic trails, national parks, national monuments, or national battlefields within the study area (USNPS, 2022). No other aesthetic resources, designated as either scenic views, scenic roadways, or unique visual elements were identified from the literature review or field reconnaissance of the study area.

3.7.6 Transportation/Aviation

A network of neighborhood streets facilitate transportation within the study area. US 377 east of the study area represents the major thoroughfare, which provides a primary point of access to these local streets. Union Pacific Railroad parallels the west side of US 377 along the eastern limits of the study area.

Field reconnaissance coupled with a review of the FAA Southwest Region Airport Directory (FAA, 2022), TxDOT Airport Directory (TxDOT, 2022b), USGS topographic maps (USGS, 1981-2016), and recent aerial photography (NearMap, 2022) revealed no registered airports with a runway length greater than 3,200 feet within 20,000 feet of the study area. No registered airports with a runway length less than 3,200 feet were identified within 10,000 feet of the study area. No heliports were identified within 5,000 feet of the study area. No unregistered private airstrips were identified within 10,000 feet of the study area. No proposed aviation projects were identified during the information gathering process.

3.7.7 Communication Towers

No communication towers are located within the study area. Communication towers commonly include a mix of cellular phone communications, microwave towers, and other similar electronic installations. No AM or FM radio transmitters are located within the study area; no AM radio transmitters are located within 10,000 feet of the study area; no FM radio transmitters are located within 2,000 feet of the study area (Federal Communications Commission [FCC], 2018a; 2018b; 2021; 2022). No other communication towers are located within 2,000 feet of the study area.

3.8 Cultural Resources

A records review of previously recorded archeological historic properties was conducted to determine the likelihood of impacts to cultural resources within the study area. The research was conducted using the THC Texas Archeological Sites Atlas (TASA) database, which contains published and unpublished data on prior cultural resources surveys (THC, 2022d)., districts and properties listed in or eligible for the National Register of Historic Places (NRHP), State Antiquities Landmarks (SALs), Official Texas Historical Markers (OTHMs), cemeteries, and previously recorded archeological historic properties, including those listed in or eligible for listing in the NRHP or SAL designation.

3.8.1 Cultural Chronology

The project area is situated in the north-central Texas Archeological Region of Texas (Perttula, 2004). Although excavations at stratified and intact sites are lacking in north-central Texas, the region's cultural chronology spans from when humans first spread throughout North America to the time of first contact with European explorers. Within this framework, and for the purpose of this study, seven generalized time periods established for north-central Texas by Prikryl (1990), Lintz et al. (2008) and other sources are synthesized below to characterize the cultural chronology of the study area region. To more accurately depict the complexities resulting from European contact with Indigenous societies and, ultimately, colonization in Texas, the cultural period formerly referred to as "prehistoric" is referred to hereafter as Pre-Contact.

TABLE 3-11. NORTH CENTRAL TEXAS CULTURAL CHRONOLOGY

Time Period	Interval (BC/AD)	Interval (BP)
Historic	150 BP – 50 BP	AD 1800 - 1970
European Contact	350 – 150 BP	AD 1600 – 1800
Late Pre-Contact	1250 – 350 BP	AD 750 – 1600
Late Archaic	3500 – 1250 BP	1550 BC – AD 750
Middle Archaic	6000 – 3500 BP	4050 – 1550 BC
Early Archaic	8500 – 6000 BP	6550 – 4050 BC

3.8.1.1 Paleoindian Period

Although there is a growing body of evidence that challenges the previously held notions on the earliest human inhabitation of North America, the first undisputed evidence of an initial presence on the continent is the Paleoindian period, which dates from around 11,500-8500 BP (9550-6550 BC). Given that intact Paleoindian deposits are uncommon in north-central Texas, the regional Paleoindian period sequence has been developed primarily from investigations at well-stratified sites in central Texas (Collins, 1995) and the Southern High Plains (Holliday, 1997).

The Paleoindian period is marked by the waning of the Pleistocene epoch approximately 11,700 years ago and is characterized by small nomadic bands who hunted now-extinct megafauna (e.g., mammoth, mastodon, bison, camel, and horse) using lanceolate-shaped and fluted projectile points hafted to wooden spears thrown with atlatls. Paleoindian projectile point technologies include Clovis, Folsom, Dalton, Scottsbluff, Golondrina, and Plainview. In addition to distinct projectile point types, Paleoindian hunter-gatherers produced a variety of other stone tools, including prismatic blades, flake tools, end scrapers, and gravers. Although widely characterized as "big game hunters," Paleoindian hunters also relied on smaller game such as deer, turtle, mice, raccoons, and frogs (Collins, 1995). The reliance on small game and plant foraging likely increased over time as the large megafauna died out due to the drier and warmer climate conditions of the Late Pleistocene and Early Holocene (Bousman, 1998).

Paleoindian site types in Texas include kill sites, quarries, caches, open campsites, and burials (Collins, 1995; Hester, 1995). Although they occur in higher densities in the central Texas and the Southern High Plains regions, sites dating to the Paleoindian period are found deeply buried in floodplains of the Upper Trinity River basin. At the Aubrey Clovis Site in Dallas County, lithic material was observed beneath some 8 meters of alluvium on the Elm Fork Trinity River floodplain (Ferring, 2001).

3.8.1.2 Archaic Period

The Archaic period in north-central Texas spans over seven millennia and comprises three intervals -- the Early, Middle, and Late Archaic. (Prikryl, 1990). The Early Archaic has been dated from 8500-6000 BP (6550- 4050 BC), the Middle Archaic from 6000-3500 BP (4050-1550 BC), and the Late Archaic from 3500-1250 BP (1550 BC-AD 750). Archaic remains

are usually found in upland settings and are frequently mixed with later material. Archeological sites are most common on the Upper Trinity River basin during the latter part of the Late Archaic period and are usually found in upland settings and occasionally mixed with material from previous intervals. The underrepresentation of sites from the Early and Middle Archaic in the region is poorly understood and may be attributed to a substantial occupation of the area during the Late Archaic due to improved environmental conditions.

The initial assessment of the Archaic period in north-central Texas (Crook and Harris, 1952) that defined the Carrollton and Elam foci was based upon materials from such mixed terrace contexts. Consequently, these time-space constructs are no longer recognized as being acceptable for this area of Texas (Ferring and Yates, 1997; Peter and McGregor, 1988; Prikryl, 1990). General trends that have been proposed as characterizing the Archaic period in north-central Texas include an increasing complexity of settlement systems, increasing population size and density, decreasing mobility, and the development of distinct group territories (Prikryl, 1990). In general, the Archaic period archeological record reflects an increase over time in projectile point type varieties, more intensive reliance on local resources and food processing, and a wider variety of site functions.

Early Archaic

The Early Archaic dates from approximately 8500-6000 BP (6550-4050 BC) and is poorly understood due to a scarcity of Early Archaic components in the region. Although Early Archaic hunter-gatherer subsistence data is scarce, it is believed that deteriorating megafauna populations led to an intensive reliance on smaller game such as deer, fish and plant materials (Ferring and Yates, 1997). In central Texas, lanceolate-shaped projectile points transition to stemmed varieties such as Martindale and Uvalde, with split-stemmed varieties and possibly Angostura points in north-central Texas (Prikryl, 1990).

Middle Archaic

The Middle Archaic dates from approximately 6000-3500 BP (4050-1550 BC) and is characterized by settlement patterns and lithic technologies that were likely influenced by the continuance of the warmer and drier climate that began during the Early Archaic. Prikryl's (1990) synthesis of the lower Elm Fork Trinity River archeological data showed

that Middle Archaic sites were exclusively settled on first terraces above floodplains, occurring primarily along major waterways. The differential development of subsistence economies and lithic technologies between central and north-central Texas may reflect distinct adaptations to local environmental conditions and/or local cultural customs. For example, burned rock middens are widespread in central Texas and commonly found associated with Nolan, Travis, and Bulverde projectile points. Conversely, these point types and burned rock middens are noticeably absent from the Elm Fork region, which instead contains Carrollton, Wells, Calf Creek, Bell, and Andice points associated with smaller features such as rock-lined hearths. Important sites in north-central Texas that contain a Middle Archaic component include R.W. Watts Site Number 2 (41CP14) in Camp County and the Wild Bull site (41HE61) in Henderson County (McKay et al., 2003) and the Calvert site (41DN103) in Denton County (Ferring and Yates, 1997).

Late Archaic

The Late Archaic dates from around 3500-1250 BP (1550 BC-AD 700) and in north-central Texas is marked by peak population density and evidence of decreased mobility, which may reflect increasing use of locally available faunal and floral resources (Lintz et al., 2008) and/or the development of group territories (Prikryl, 1990). Investigations at Joe Pool Lake (Peter and McGregor, 1988) and Lake Ray Roberts (Ferring and Yates, 1997) indicate that Late Archaic site assemblages were left by small bands of foraging hunter-gatherers who occupied different localities on a seasonal basis. Human settlement and subsistence patterns of the Late Archaic are manifested in discrete burned rock concentrations (e.g., rock-lined hearths), the use of local tool, stone, and faunal assemblages that suggest deer, rabbit, turtle, and freshwater mussel shells were primary food resources (Ferring and Yates, 1997). Late Archaic encampments are typically small, reflecting ephemeral occupations, and are commonly found shallowly buried below floodplains on the Trinity River basin. Stratigraphic preservation of features and biotic remains is common in this area along with anthropogenic deposits (e.g., midden deposits and shell lenses) occasionally exposed along stream-cut banks.

3.8.1.3 Late Pre-Contact Period

This period in north-central Texas dates from around 1250-250 BP (AD 700-1700) and is marked by a continuation of Late Archaic lifeways, alongside a transition towards new technologies and settlement patterns perhaps brought about through increased interaction

with distant neighboring groups. The transitionary nature of the early part of this period is reflected in the overlap between dart and arrow points and increased varieties of ceramic tempering (Skinner, 1982). Cook and Hughston (2015) proposed a Woodland period from AD 200-800 to differentiate the material culture at sites along the East Fork Trinity River during the Late Archaic to first interval of this period.

In general, the early portion of this period (1250-750 BP [AD 700-1200]) is characterized by increased sedentism, which is reflected in house ruins and maize horticulture, and artifact assemblages with grog- and sand-tempered pottery and Scallorn, Alba, Steiner, and Catahoula arrow points (Lynott, 1977; Prikryl, 1990). Research at Lake Ray Roberts suggests that regional exchange of technological information, rather than environmental change, likely explains the shift from Late Archaic lifeways (Ferring and Yates, 1997). The advent of the bow and arrow during this interval undoubtedly enabled hunters to harvest prey from safer distances and improved cover.

This late interval of the period in north-central Texas dates from 750-350 BP (AD 1200-1600) and is marked by direct influences from villager groups from the Southern High Plains region. This influence is indicated archeologically by the presence of distinctive end scrapers, arrow points such as Washita, Fresno and Harrell, and Nocona Plain ceramics of the Henrietta focus. Settlement patterns appear concentrated on sandy terraces above floodplains, which Prikryl (1990) attributes to the importance of horticulture, the evidence of which is limited to the presence of bison scapulae posited to be gardening tools.

Like the Southern Plains villager groups concentrated along the Canadian River and its tributaries, lithic and faunal assemblages during this interval on the Upper Trinity River reflect an increasing importance on hunting bison. Investigations during the Joe Pool Lake project at the Cobb-Pool site (41DL148), revealed house structures, roasting pits, Alba points, burned corn, and grog-tempered ceramics, all of which are characteristic elements of the Indigenous lifeway during this period, consisting of regional trade networks and extensive hunting of bison supplemented with smaller game, plant gathering, and marginal horticulture. The period ends with the influx of European explorers around the mid-16th century; permanent Euro-American settlements in Texas by the mid- to late-17th century mark the onset of the European Contact period.

3.8.1.4 Historic European Contact Period

In north-central Texas, the time from A.D. 1600 to 1800 (350-150 BP) is designated the European Contact period, representing the first physical appearance of Europeans into the region and their contact with Indigenous societies. Prior to the founding of New Mexico in 1598, European presence in the Southwest and neighboring Southern High Plains region had been sporadic (e.g., Coronado in 1540-1541, the Rodriguez-Chamuscado party in 1581, Espejo in 1582-1583); however, around the turn of the 17th century, Spanish influence was never absent from the Southern Plains, although actual contact with Europeans continued to be limited and there are only brief records of journeys into or through the area (Lintz et al., 2008). Prior to around 1725-1750, Apachean groups appear to have dominated the western portion of the Southern High Plains, but after this time the area was increasingly controlled by the Comanche and Kiowa. On the eastern portion of the Southern Plains, within north-central Texas, the Wichita tribes became dominant (Bell et al., 1967; Hofman, 1989). Unfortunately, good historical documentation is sparse for the upper Trinity River basin during the Contact period, and thus it is not clear which specific Indigenous groups were residing in the Dallas/Fort Worth region at the beginning of this period.

This period in north-central Texas was one of population fluctuation, movement, and amalgamation (Newcomb, 1993). Available data suggest that many aboriginal occupants of north-central Texas were Caddoan language speakers from the Arikara in the north to the Wichita and Kichai in the south. It has also been suggested that the Socoatino, who were encountered by the survivors of the De Soto expedition in the 16th century, were Caddoan speakers and the same group as the Canohatino identified by the French in the latter part of the 17th century. The latter group was apparently located at that time "on the Blackland Prairies between the Guadalupe and Trinity rivers to the east of present-day San Antonio, Austin, and Waco" (Newcomb, 1993). If the Indigenous occupants of the eastern plains margin in Texas were indeed Caddoan speakers, then it would explain how these groups were absorbed very early into other Caddoan-speaking groups (such as the Yojuane, Kichai, Tawakoni, Taovayas, Iscani, and Wichita proper) who arrived in north-central Texas in the late-17th and early-18th centuries (Lintz et al., 2008). Most groups amalgamated to form the Wichita Tribe, with some absorbed by the united Caddo tribes and the Tonkawa during the late-18th and early-19th centuries. Along with the Comanche, many of these groups were called the Norteños by the Spanish, and the archeological

remains of these peoples postdating approximately 1750 are designated the Norteño Focus for the region.

3.8.1.5 Historic Period

A Handbook of Texas Online search for "Tarrant County" (Odom, 2019) characterizes the historic context of the study area and surrounding region. Little was known of the Indigenous peoples who inhabited the area of present-day Tarrant County before the coming of European explorers in the sixteenth century. Groups thought to have been in the area were the Tonkawas and the Hasinai Caddos. By the late 1700s, the Comanches, Kiowas, and Wichitas had also moved into the region. When white settlers came, they clashed with the native populations. Immigrants from Tennessee, Virginia, and Kentucky settled in the region finding abundant water and good farmland. The Texas Congress encouraged settlement by offering large grants to companies such as the Peters Land Company, which eventually obtained the land that would become Tarrant County. In 1845, a group from Missouri settled to the south of the present northern Tarrant County line, and another group founded Birdville on the banks of Big Fossil Creek. Tarrant County was formally organized in August 1850, when the first elections were held.

During the decade of the 1850s, the population of Tarrant County rose dramatically. By 1860 the population had grown to 5,170. The fastest growing area was in the northeast, near Grapevine Prairie. In the 1870s, Tarrant County cattle and railroads played a central role in economic prosperity. The news of the coming railroad caused a boom in the county. Places such as Hayterville (later renamed Arlington), Athol (later renamed Keller), and Mansfield prospered. The years between 1890 and 1917 found Tarrant County in transition. The era of the long cattle drives ended, and with development of innovations such as the windmill, more farmers moved into the area. Between 1890 and 1900, almost 1,000 new farms were reported in the county. The number of farms remained around 3,500 until the 1950s; the principal crops were cotton, corn, and wheat. The population of the county rose from 41,142 in 1890 to 152,800 in 1920.

During the 1920s, population of the county grew by 45,000. However, the stock market collapse of 1929 slowed the growing prosperity which was ultimately relieved by the start of World War II over a decade later. Many served in the armed forces or worked in factories devoted to war related industries. The county's economy was permanently aided by the

growth of the aviation industry. County population figures show an increase from 197,553 in 1930 to 361,253 in 1950. By 1960, the population of the county had soared to 538,495, an increase of 67 percent, and in 1970, the census recorded 716,317 county inhabitants, an increase of 75 percent. The county transportation network greatly improved in this and the following decades with the construction of several major interstates and turnpikes, as well as numerous airport facilities. In 1990, growth was fully recognized in several suburbs such as Arlington, Hurst, Euless, North Richland Hills, Bedford, and Keller. The county had 1,170,103 residents in 1990. Despite this urban growth, Tarrant County still maintains the atmosphere of a frontier county in parts. This is evident in the western portion of the study area, which still maintains small-scale agriculture.

3.8.2 Records Review

3.8.2.1 Previous Archaeological Investigations

According to a review of the TASA database on October 4, 2022, no previously recorded archeological historic properties are documented in the study area. In addition, the TASA records search revealed that the study area has not undergone any previous cultural resources investigations.

3.8.2.2 Historic Sites

The TASA records search revealed that no NRHP properties/districts, SALs, OTHMs, or cemeteries are documented within the study area. In addition, no state historical sites, century farms, or ranches are mapped in the study area. The earliest available historic USGS topographic map, the 1955 Keller Texas Topographic Quadrangles, was examined for historic structures and farm/ranching features. This topographic map shows open terrain with the only development depicted as a utility corridor running through the center of the study area and the Texas and Pacific Railroad is depicted along the eastern study area boundary. The next available topographic map, the 1974 Keller, Texas Topographic Quadrangle, shows a similar general setting as the previous topographic map year, with the addition of a few residential structures in the western extent of the study area. Historic aerial photography available from the Nationwide Environmental Title Research (NETR, 2022) website depicts an undeveloped pastureland setting throughout the study area with sparse residences visible in the western extent by the mid to late 1970s.

By the late 20th century, the study area was almost entirely built out with modern residential development. Other known and perceived disturbances within the study area include those associated with agricultural processes, roadway and railroad construction and maintenance, installation of overhead and underground utilities, clear cutting of vegetation, and residential and commercial development.

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4.0 PUBLIC INVOLVEMENT PROGRAM

The various data collection activities were utilized in the development of a constraints map and presented at an in-person public participation meeting described in **Section 2.5**. The public participation meeting was held November 29, 2022, at the Suites of Keller Conference Center in Keller, Texas. The figures found in **Appendix B** depict the location of the proposed project that was presented at the public participation meeting. A public meeting handout packet, questionnaire, and *The State of Texas Landowner Bill of Rights* were provided at the public participation meeting and are also provided in **Appendix B**. Only one person signed in as attending the public participation meeting, and no questionnaire was returned at the meeting or received from Oncor after the meeting.

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5.0 EVALUATION OF THE PROPOSED ROUTE

The environmental evaluation presented in this section addresses impacts to the environment in consideration of the requirements of Section 37.056(c)(4)(A)-(D) of the Texas Utilities Code, the PUCT's Substantive Rules Section 25.101 including the PUCT's policy of prudent avoidance, reconnaissance surveys, and the information and responses obtained from local officials and state and federal agencies. Measurements for many of the environmental criteria were obtained from mosaics of ortho-rectified images (NearMap, 2022), whose capture process utilizes global positioning system and precise point positioning technologies to achieve sub-meter (or approximately 7.8 inches) horizontal accuracy to true ground location.

Halff professionals with expertise in different environmental disciplines (e.g., geology/soils, hydrology, terrestrial ecology, wetland ecology, and land use/aesthetics) evaluated the proposed project based upon environmental conditions present along the proposed project and the general routing criteria developed by Oncor and Halff. Each researcher independently analyzed the proposed transmission line routes and the environmental and land use data presented in **Table 5-1** (at the end of this chapter) for the researcher's technical discipline. Halff's evaluations of impacts are discussed below.

5.1 Impacts on Physiography and Geology

Construction of the proposed project would have no significant effect on the physiographic or geologic features/resources of the area. The erection of the structures would require the removal and/or minor disturbance of small amounts of surface and near-surface materials but would have no measurable impact on the geologic resources or features along the proposed project, and no geologic hazards are anticipated.

5.2 Impacts on Soils

The construction and operation of transmission lines normally create very few long-term adverse impacts on soils. The major potential impact upon soils from transmission line construction would be erosion and soil compaction. The potential for soil erosion is

generally greatest during the initial clearing of the ROW until vegetation cover reestablishes.

To provide adequate space for construction activities, improve reliability, and minimize corridor maintenance problems, most woody vegetation would be removed from the ROW of the proposed project as discussed in **Section 1.3.3**. In these areas, only the leaf litter and a small amount of herbaceous vegetation would remain, and both would be disturbed by the movement of heavy equipment during construction, service, and maintenance activities. The most important factor in controlling soil erosion associated with construction activity is to revegetate areas immediately following construction. Oncor will work with individual homeowners to restore disturbed lawn vegetation to match the existing adjacent condition.

The ROW will be inspected both during and after construction to ensure that problem erosion areas are identified. In addition, Oncor will develop a Storm Water Pollution Prevention Plan (SWPPP), if required, which will detail measures to minimize impacts associated with potential soil erosion, as well as measures to be taken following construction to revegetate disturbed areas.

5.3 Impacts on Water Resources

5.3.1 Surface Water and Floodplains

The construction of the proposed project would have no significant impact to surface water resources (e.g., streams, open water lakes, wetlands). No streams would be crossed by the proposed project. Transmission line structures will not be placed within any floodplain. The main potential impacts to surface waters and floodplains resulting from any major construction project would be siltation resulting from erosion and pollution resulting from spillage of petroleum products (e.g., fuel or lubricants) or other chemicals. Vegetation removal could result in increased erosion potential of the affected areas, so that slightly higher than normal sediment yields may be delivered to area streams through the local storm sewer system following a heavy rainfall. However, these short-term effects should be minor from: the relatively small area to be disturbed at any particular time; the short duration of the construction activities; Oncor's efforts to manage runoff from construction

areas through the use of best management practices (BMPs); and implementation of the SWPPP, if required.

The USACE regulates the discharge of dredged and fill material into waters of the United States, including wetlands, under Section 404 of the Clean Water Act (Section 404). USACE regulations implementing Section 404 include specific authorization under Nationwide Permit (NWP) 57 for Utility Line Activities (86 Federal Register 2744, January 13, 2021). NWP 57 authorizes the construction, maintenance, or repair of utility lines (including overhead transmission lines), associated foundations, access roads, and substations, in all jurisdictional water features. An overhead transmission line must not result in a loss greater than 0.5-acre of waters of the United States. Generally, transmission lines are designed to span stream or wetland crossings in most instances, thereby minimizing impacts to waters of the United States. The USACE Fort Worth District responded to the solicitation for information (see **Section 2.2.1**) and assigned the project with project number SWF-2022-00450.

Given the absence of streams or any other aquatic resources in the study area, authorization of project construction pursuant to Section 404 is not required, and future correspondence with the USACE will not be required. Consistent with TPWD (2022d) guidance, the location of the proposed project minimizes impacts to waterways, associated floodplains, riparian corridors, and wetlands. Oncor will implement a SWPPP, if required, and will seek to minimize indirect impacts to regional surface waters outside of the study area during construction of the proposed project. The proposed project should have no significant impacts to surface water.

5.3.2 Groundwater/Aquifer

The construction, operation, and maintenance of the proposed project are not expected to adversely affect groundwater resources in the study area or its vicinity. The amount of recharge area disturbed by construction is insignificant compared with the total amount of recharge area available for the groundwater systems in the region. No measurable alteration of aquifer recharge capacity should occur, and the likelihood of groundwater contamination would not be significant.

The main potential impact on groundwater resources from any construction project is pollution resulting from the accidental spillage of petroleum or other chemical products. Use of industry standard BMPs during construction for proper control and handling of any petroleum or other chemical products will be implemented. Therefore, the project should have no significant impacts to groundwater.

5.4 Impact on Ecosystems

5.4.1 Vegetation

5.4.1.1 Terrestrial Vegetation

The primary impact to vegetation resulting from the site preparation and construction of the proposed project would be the removal of existing woody vegetation from the areas required for the ROW. As shown in **Table 5-1**, much of the proposed project crosses what is classified as maintained yard landscape, which typically consists of planted turf grasses maintained as yard space for regular use by the homeowner. Woody vegetation removal will be associated with select trees within the existing ROW and those around the substation to facilitate new structures and substation expansion. Disturbance associated with the removal of vegetation is expected to be minimal.

Consistent with project-specific recommendations from TPWD regarding prevention of habitat fragmentation, construction within the ROW will be performed in such a manner as to minimize adverse impacts to adjacent habitats. TPWD recognizes that the project is in an urban area and does not anticipate significant adverse impacts to wildlife resources, but still encourages measures to avoid or minimize impacts to what limited habitats may occur (TPWD, 2022d).

5.4.1.2 Aquatic/Hydric Vegetation

Based on interpretation of aerial photography, review of USGS topographic maps (USGS, 1981-2016), and review of NWI maps (USFWS, 2022), impacts to aquatic vegetation are not anticipated.

5.4.1.3 Commercially or Recreationally Important Vegetation

Commercially important cropland vegetation is absent from the study area and will not be crossed by the proposed project. Impacts are not anticipated to these resources.

5.4.1.4 Endangered and Threatened Plant Species

No federally listed endangered or threatened plant species are known to occur within the study area (TPWD, 2022c; USFWS, 2022a; USFWS, 2022b). In addition, the TPWD NDD search found no records of occurrences within the study area of plant species on the state or federal threatened and endangered species lists (TPWD, 2022b). TPWD (2022d) provided no additional recommendation for rare species or vegetation communities.

5.4.2 Fish and Wildlife

5.4.2.1 Terrestrial Wildlife

The primary impact of construction activities on wildlife would be the result of vegetation clearing and associated ground disturbances. Increased noise and activity levels during construction may also affect wildlife outside the perimeter of the construction area, temporarily displacing animals for a short distance on either side of the transmission line corridor. The impacts of transmission lines on wildlife can be divided into short-term effects resulting from physical disturbance during construction and long-term effects resulting from habitat modification. The net effect on local wildlife of these two types of impacts is usually minor given the narrow focus of transmission line corridors. A general discussion of the impacts of transmission line construction and operation on terrestrial wildlife is presented below.

The increased noise and activity levels during construction may potentially disturb breeding or other activities of species inhabiting the areas adjacent to the ROW. However, given the current setting, most wildlife utilizing the study area are generalist species that are adapted to a modified human environment and human presence. Wildlife should be minimally affected by noise, dust, or gaseous emissions. Although the normal behavior of many wildlife species would be disturbed during construction, little permanent damage to the populations of such organisms should result.

Construction-related activities could directly and/or indirectly affect animals that reside or wander within the transmission line ROW. Some small, low-mobility animals may be harmed by the heavy machinery. These include several species of amphibians, reptiles, and mammals. If construction occurs during the breeding season, impacts may occur to the young of many species, including nestling and fledgling birds. Impacts to nesting birds will require mitigating measures to ensure compliance with the Migratory Bird Treaty Act (MBTA). Fossorial animals, such as mice, may be harmed or displaced because of soil compaction caused by heavy machinery. Larger, more mobile species, such as birds, rabbits, and other urban wildlife, would likely vacate the area upon initial clearing and move into adjacent areas outside the ROW.

After construction is completed, the ROW will be revegetated in a manner consistent with the existing managed turf conditions. Vegetation maintenance within the ROW will likely be resumed by individual homeowners, and within several years of construction, the ROW will resemble the existing landscaped condition.

Transmission line structures could benefit some bird species, particularly raptors, by providing resting and hunting perches, especially in open, treeless habitats (Avian Power Line Interaction Committee [APLIC], 2006). Study area resident raptors, such as the American kestrel and the red-tailed hawk, often utilize the support structures as nesting sites, as well as hunting or resting perches. By such benefits, transmission lines have increased raptor populations in some areas of the U.S. (APLIC, 2006). The danger of electrocution to birds would be insignificant because the distance between conductors, or between conductor and ground wire on 138 kV transmission lines, is greater than the wingspan of any bird in the area (i.e., greater than eight feet). Also, it is Oncor's standard practice to install devices to deter bird landings on the insulator between the conductor and structure. This standard practice is consistent with agency-recognized guidelines for minimizing bird collision risks (APLIC, 2006; 2012).

Transmission lines (both structures and wires) could present a hazard to flying birds, particularly migrants, and especially near crossings of water features. Collisions tend to increase in frequency during the fall when migrating flocks are denser and flight altitudes are lower in association with cold air masses, fog, or inclement weather. Studies indicate that higher rates of mortality exist during periods when poor light and weather conditions

persist (Bevanger and Brøseth, 2004; Electric Power Research Institute [EPRI], 1993). This is important to note, given that most migratory species will continue to migrate regardless of weather conditions (Gauthreaux, 1971). Overall, wire strikes are greatly reduced during bright daylight hours (Pandey et al., 2008). Species at higher risk for wire strikes are those that fly in fast-moving and/or tight flocks and larger-bodied birds with more awkward flight characteristics (Winning and Murray, 1997; Rusz et al., 1986). For resident birds or for birds during periods of non-migration, those most prone to collision are often the most common raptors in a given area because of a greater number of repeated flights across power lines, particularly when in pursuit of prey (APLIC, 2006). Nevertheless, resident birds and those in an area for an extended period may learn the location of power lines and become less susceptible to wire strikes (Janss, 2000).

The proposed project will re-build an existing transmission line corridor which crosses maintained yard landscapes. Any wildlife that utilizes the area are generalist species adapted to modified environments, including the existing transmission line. Any impacts to wildlife are anticipated to be temporary and minimal.

5.4.2.2 Fish and Aquatic Wildlife

Potential impacts to aquatic systems by an action of this nature involve mainly the effects of increased erosion and sedimentation. Land clearing and/or construction may result in increased suspended solids entering streams traversed by the transmission line, which in turn may negatively affect many aquatic organisms that require relatively clear water for feeding and reproduction. However, the proposed project will not cross any stream features, so the effects from erosion and sedimentation at stream crossings will not be present.

In evaluating impacts to aquatic systems, factors taken into consideration include potential wetlands crossed, the amount of ROW within 100 feet of streams, the number of stream crossings, and the amount of open water crossed. Although streams and wetlands can usually be spanned, increased sedimentation and turbidity could result during rainfall. Routes parallel to and within 100 feet of a stream could have a similar effect. The proposed project does not cross any open water features or emergent wetlands, and does not parallel any stream within 100 feet. No significant impact to aquatic fish and wildlife is anticipated.

5.4.2.3 Commercially or Recreationally Important Fish and Wildlife Species

Construction of the proposed project is not expected to have significant impacts on commercially or recreationally important species occurring within the study area. Furbearers, such as the common raccoon, Virginia opossum, common gray fox, coyote, bobcat, striped skunk, mourning dove, and eastern cottontail rabbit are very common urban wildlife residents, are highly mobile, and would leave the immediate vicinity during the initial construction phase.

5.4.2.4 Endangered and Threatened Fish and Wildlife Species

A few federally listed threatened or endangered wildlife species may pass over the study area strictly in a flyover migratory capacity. As shown on **Figure 3-1**, the proposed project is in an urban environment consisting mostly of lawn landscapes for individual residences. The proposed project would not affect any listed species. This conclusion is based on consultation with TPWD (2022d) which noted their program "does not anticipate significant adverse impacts to wildlife resources, including threatened and endangered species," and a reconnaissance survey of the study area. Information from the USFWS (2022b) indicates there is no designated critical habitat for any federally listed threatened or endangered species within the study area.

Many of the endangered or threatened species and unlisted rare species of potential occurrence in the study area are either migratory and present only for brief periods, or highly mobile. Although TPWD acknowledges that significant impacts to fish and wildlife resources are not anticipated, they still recommend that Oncor recognize provisions of the MBTA and other wildlife BMPs to avoid or minimize any potential impacts to wildlife and remaining habits that may remain in the study area.

Certain state-listed threatened species such as the Texas horned lizard, which has limited potential to occur near the existing substation, may have more limited mobility and could be harmed by the heavy machinery during construction. TPWD (2022d) provides a BMP for wildlife observations should wildlife be observed during construction, recommending relocation of reptile species when individuals are found. This BMP would also apply to certain SGCN with limited mobility, which include the Woodhouse's toad, eastern spotted skunk, western hog-nosed skunk, eastern box turtle, prairie skink, slender glass lizard, Texas garter snake, timber rattlesnake, western box turtle, and massasauga.

Endangered, threatened, or rare species listed in **Table 3-10**, but not mentioned in this section, are species that require habitat within or near perennial waters (e.g., mollusks). These habitats are not present in the study area, and these species will not be affected by construction and operation of the proposed project. TPWD (2022d) provided additional comment for the monarch conservation plan due to significant declines of North American migrating populations of the monarch butterfly (*Danaus plexippus*). TPWD encourages Oncor to restore or revegetate impacted areas with vegetation that provides habitat for monarch butterflies and other pollinator species, where feasible.

5.5 Summary of Natural Resources Impacts

Several natural resource areas have been evaluated to determine the relative ecological impacts of the proposed project. For the proposed project, these areas primarily included potential impacts to vegetation and wildlife. Although the proposed project has the potential to impact natural resources, it is anticipated to have no significant impacts to the natural resources of the area.

5.6 Impacts on Community Values and Community Resources

Impacts on community resources can be classified into two areas: (1) direct effects, which are those effects that would occur if the location and construction of a transmission line results in the removal of a valued resource or loss of public access to a valued resource; and (2) indirect effects, or those effects that would result from a loss in the enjoyment or use of a resource due to the characteristics (primarily aesthetic) of the proposed transmission line, structures, or ROW.

Impacts on community resources, whether direct or indirect, can be more accurately gauged as they affect recreation areas, recreational resources, or the visual environment of an area (aesthetics). The sections that follow discuss impacts to community values and community resources.

5.7 Land Use Impacts

PUCT Substantive Rules Section 25.101(b)(3)(B) requires, among other things, that the PUCT consider whether new transmission line routes parallel existing compatible ROW, property lines, or other natural or cultural features in selection of a route. Because the proposed project will be constructed within existing ROW on structures designed to

accommodate the proposed project, the entire length of the proposed project (100%) will utilize existing compatible corridors.

5.7.1 Urban/Residential

Important measures of potential land use impacts include the number of habitable structures located near each transmission line route and the proximity of each habitable structure to the route. Halff determined the number and distance of habitable structures located within 300 feet of the centerline of each transmission line route through the interpretation of aerial photography and verification during reconnaissance surveys, where practical. To account for photographic interpretation limitations such as shadows, tree canopies, and horizontal accuracy of the photography, Halff identified all habitable structures within a measured distance of 320 feet of each project centerline. Habitable structures within the study area consist mostly of single-family residences (SFR), as shown in **Tables 5-2 and 5-3** in **Appendix C** and on **Figure 3-1** in **Appendix D**.

During construction, temporary impacts within the ROW will occur due to the movement of workers and materials through the area. As documented in **Section 1.3.3**, access through existing privacy fences will be required and will be coordinated with the property owners to secure access during construction and access for future maintenance. Temporary chain-link fencing panels will be provided during construction until fences can be replaced with like-kind materials after construction. Noise and dust from construction, as well as disruption of traffic flow, may also temporarily affect residents immediately adjacent to the ROW. Permanent long-term closures of neighborhood streets that provide access to the ROW are not anticipated. Coordination between Oncor, its contractors, and landowners regarding daily access to the ROW and construction scheduling should minimize these disruptions and maintain a safe environment for residents until construction is completed.

5.7.2 Recreation Areas

As noted at the bottom of **Table 5-1**, parks and recreation areas are identified as areas owned by a governmental body or an organized group, club, or church. Potential impacts to recreation areas include the disruption or preemption of recreational activities. No parks, trails, or recreational points of interest are located within the study area. No parks,

trails, or recreational points of interest are within 1,000 feet of the proposed project. Therefore, no impacts to parks/recreational areas are anticipated.

5.7.3 Agriculture

Most of the study area is occupied by high-density residential development with maintained and manicured landscape. Within the study area, measurable agricultural practices are not apparent. Impacts are not anticipated to these resources.

5.7.4 Aesthetics

Aesthetic impacts, or impacts on visual resources, exist when the ROW, lines, and/or structures of a transmission line system create an intrusion into, or substantially alter the character of, the existing view. The significance of the impact is directly related to the quality of the view, in the case of natural scenic areas. In the case of valued community resources and recreation areas, the significance of the impact is related to the importance of the existing setting in the use and/or enjoyment of an area.

Temporary impacts may include views of the actual assembly and erection of the structures. Where woody vegetation is cleared, the brush and wood debris could have an additional negative temporary impact on the local visual environment. However, the completed project will be very similar to the visual character of the existing facilities, and construction of the proposed project should have little temporary or permanent aesthetic effects.

To further evaluate aesthetic impacts, a reconnaissance survey was conducted to determine whether the proposed project would be visible from selected publicly accessible areas. These areas included those of potential community value, community resources, public recreation areas, and federal and state highways that cross the study area. Measurements were made to estimate the length of the proposed transmission line route that would fall within a recreational or major highway foreground visual zone (i.e., one-half mile, unobstructed by topography, structures, or vegetation). This determination of the visibility of the transmission line from various points was calculated from USGS maps and recently flown aerial photography.

Halff's evaluation of potential aesthetic impacts generally considers portions of the project that would be within the foreground visual zone of the federal and state highways within the study area. US 377, also known locally as Denton Highway, located east of the study area is the only federal or state highway within the visual foreground zone of the proposed project. The entirety of the project is within the one-half mile visual foreground zone of US 377, as shown in **Table 5-1**.

The evaluation of potential aesthetic impacts also includes the proximity of the proposed project within the visual foreground zone of public parks and recreation areas. The discussion in **Section 5.7.2** considered potential interference of the proposed project with activities occurring in parks and recreation areas within 1,000 feet of the proposed project. In contrast, this evaluation considers the parks and recreation areas within the visual foreground zone and whether the proposed project would affect aesthetic views from these areas. Portions of the proposed project would be located within one-half mile of the southernmost ball fields of the Keller Sports Park located north of the study area. However, the riparian vegetation along Big Bear Creek within this portion of the park would obscure most of the proposed project, limiting any impact to the viewshed of the park.

5.7.5 Transportation/Aviation

Potential impacts to transportation could include temporary disruption of traffic and conflicts with proposed roadway and/or utility improvements and may include slightly increased traffic during construction of the proposed project. However, such impacts are usually temporary and short-term.

The FAA provided a letter dated September 21, 2022, in response to a solicitation for information relevant to the proposed project. The FAA's letter requested compliance with its guidelines for the construction of structures that may affect navigable airspace and provided instructions on the procedure for obtaining FAA approval for transmission lines proposed near an airport (FAA, 2000).

Typical transmission line structure heights will be approximately 110 to 120 feet. According to Federal Aviation Regulations (14 CFR Part 77), notification of the construction of the proposed project is required if structure heights exceed the height of an imaginary surface extending outward and upward at a slope of 100 to 1 for a horizontal

distance of 20,000 feet from the nearest point of the nearest runway of a public or military airport having at least one runway longer than 3,200 feet in length; 50 to 1 for a horizontal distance of 10,000 feet from the nearest runway of a public or military airport where all runways are less than 3,200 feet in length; or 25 to 1 for a horizontal distance of 5,000 feet for heliports.

Halff's review of federal and state aviation/airport maps and directories, aerial photo interpretation, and reconnaissance surveys identified:

- no FAA-registered airport with a runway greater than 3,200 feet in length within 20,000 feet of the proposed project;
- no FAA-registered airport runways less than 3,200 feet in length within 10,000 feet of the proposed project;
- no private airstrips within 10,000 feet of the proposed project; and
- no heliport within 5,000 feet of the proposed project.

5.7.6 Communication Towers

As noted in **Section 3.7.7**, no communication tower was identified within the study area. No commercial AM radio transmitters were identified within the study area; the proposed project is not located within 10,000 feet of any AM radio transmitter. No FM radio transmitters were identified in the study area; the proposed project is not within 2,000 feet of any FM radio transmitter (FCC, 2018a; 2018b; 2021; 2022). There are no other communication towers that are located within 2,000 feet of the proposed project.

5.8 Cultural Resources Impacts

Construction activities associated with a project may have the potential to adversely impact cultural resources through changes in the quality of the archeological, historical, or cultural characteristics that qualify a property to meet the eligibility for listing in the NRHP. These impacts occur when an undertaking alters the integrity of location, design, setting, materials, construction, or association that contribute to a resource's significance in accordance with the NRHP criteria.

As discussed in 36 CFR Part 800, adverse impacts on the NRHP or eligible properties may occur under conditions that include, but are not limited to:

- destruction or alteration of all or part of a property;
- isolation from or alteration of the property's surrounding environment (setting); or
- introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting.

Impacts may be direct or indirect. Direct impacts typically occur during construction. Indirect impacts include those caused by construction that occur later in time or are farther removed but foreseeable. These impacts may include alterations in the pattern of land use, changes in population density, or accelerated growth rates, all of which may have an impact on properties with historical, architectural, archeological, or cultural significance.

The preferred form of mitigation for direct or indirect impacts for cultural resources is avoidance. An alternative form of mitigation of direct impacts can be developed for archeological and historical sites with the implementation of a program of detailed data retrieval. Additionally, relocation may be possible for some historic structures. Indirect impacts on historical properties and landscapes can be lessened through careful design considerations and landscaping.

One of the methods utilized to assess an area for potential prehistoric cultural resources is to identify high probability areas (HPA). Locations that are usually identified as HPAs for the occurrence of prehistoric sites include water crossings, stream confluences, drainages, alluvial terraces, wide floodplains, upland knolls, and other areas where lithic resources could be found. When defining HPAs, a distance relationship to a water resource (about 1,000 feet) is set to encompass landforms that may have attracted past human activity and are therefore deemed appropriate for the presence of cultural resource sites.

5.8.1 Historical Summary

There are no sites in the study area that have been recorded in the NRHP or designated as a SAL. The study area does not include a farm or ranch recorded as a century farm or ranch (TDA, 2022). No historic cemeteries were identified within or in the vicinity of the project area; there were no cemeteries within 1,000 feet of the proposed project. No OTHMS are located within the study area or within 1,000 feet of the proposed project. Most of the study area is a residential neighborhood intermixed with light industry on the

eastern edge. Historic structural elements are absent in the study corridor. These observations are based on views of the study area from public roadways.

5.8.2 Archaeological Summary

As documented in **Section 3.8.2**, no previously recorded archaeological sites or historic structures have been identified in the study area. No sites listed on the NRHP or designated as a SAL were identified or in proximity to the study area. No recorded archaeological sites or historic structures are within 1,000 feet of the proposed project.

As part of this environmental assessment, a qualified archeologist identified no HPAs along the project. As a formal cultural resources survey has not been conducted for the existing ROW, a limited possibility of affecting unknown archeological sites exists. Correspondence from THC (2022c) advised that a qualified archeologist prepare a detailed desktop cultural resources assessment for this project that includes known ground disturbance and existing archeological sites within a mile radius and noted that any proposed new ground disturbance will need to be professionally surveyed prior to construction. Following PUCT approval for the proposed project, a cultural resources study per the THC recommendation will be conducted in accordance with the pre-approved research design developed by Oncor and THC for new transmission line studies. Any required field studies will be coordinated with the property owner. Any cultural resources discovered during this initial survey will be mitigated, if required, during consultation with the THC. In the event Oncor or its contractors encounter any archeological artifacts or other cultural resources during construction of the proposed project, Oncor will cease work in the immediate vicinity of the resource and report the discovery to the THC. It is anticipated that the proposed project will have no substantial impacts to cultural resources.

TABLE 5-1. ENVIRONMENTAL DATA FOR ROUTE EVALUATION

	KWP—KM	KWP—R
Length of proposed transmission line route	2,036	1,703
Length of route parallel to existing electric transmission lines	1,475	1,703
Length of route parallel to railroads	0	0
Length of route parallel to existing public roads/highways	425	0
Length of route parallel to pipelines	0	0
Length of route parallel to apparent property boundaries	1,901	1,703
Total length of route parallel to or within existing compatible rights-of-way	2,036	1,703
Number of habitable structures within 300 feet of the route centerline[1]	74	65
Number of parks or recreational areas within 1,000 feet of the route centerline[2]	0	0
Length of the route across parks/recreational areas	0	0
Length of route across impervious material	155	367
Length of the route across cropland/hay meadow	0	0
Length across maintained yard landscape	1,320	1,336
Length of route across agricultural cropland with mobile irrigation systems	0	0
Length of route across upland woodlands	561	0
Length of route across riparian areas	0	0
Length of route across potential wetlands	0	0
Number of stream crossings by the route	0	0
Length of route parallel to streams (within 100 feet)	0	0
Length across lakes or ponds (open waters)	0	0
Number of known rare/unique plant locations within the right-of-way	0	0
Length of route through known habitat of endangered or threatened species	0	0
Number of recorded cultural resource sites crossed by the route	0	0
Number of recorded cultural resources within 1,000 feet of the route centerline	0	0
Length of route across areas of high archaeological/historical site potential	0	0
Number of private airstrips within 10,000 feet of the route centerline	0	0
Number of FAA-registered airports with at least one runway more than 3,200 feet in length within 20,000 feet of route centerline	0	0
Number of FAA-registered airports with no runway greater than 3,200 feet in length within 10,000 feet of the route centerline	0	0
Number of heliports located within 5,000 feet of the route centerline	0	0
Number of commercial AM radio transmitters located within 10,000 feet of the route centerline	0	0
Number of FM, microwave and other electronic installations within 2,000 feet of the route centerline	0	0
Number of U.S. or State Highway crossings by the route	0	0
Number of Farm-to-Market (FM), county roads, or other street crossings by the route	0	3
Estimated length of right-of-way within foreground visual zone of US highways	2,036	1,703
Estimated length of right-of-way within foreground visual zone of park/recreational areas	1,389	1,416

Notes:
All length measurements are in feet. Measurements for many of the environmental criteria were obtained from mosaics of ortho-rectified images (NearMap, 2022), whose capture process utilizes global positioning system and precise point positioning technologies to achieve sub-meter (or approximately 7.8 inches) horizontal accuracy to true ground location.

1. Structures normally inhabited by humans on a daily or regular basis. Habitable structures include but are not limited to single-family and multi-family dwellings and related structures, mobile homes, apartment buildings, commercial structures, industrial structures, churches, hospitals, nursing homes, and schools.
2. Defined as parks and recreational areas owned by a governmental body or an organized group, club, or church.

6.0 LIST OF PREPARERS

Halff prepared this Environmental Assessment for Oncor; **Table 6-1** provides a list of the project team with primary responsibilities for the preparation of this document.

TABLE 6-1. LIST OF PREPARERS.

Responsibility	Name	Title
Project Manager	Russell Marusak	Environmental Scientist
Assistant Project Manager	Jody Urbanovsky	Environmental Scientist
Physiography and Geology	Margaret Harpe	Environmental Scientist
Water Resources and Soils	Margaret Harpe	Environmental Scientist
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Maps/Figures/Graphics	Melissa Mills	Environmental Scientist
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Cultural Resources	Michael Mudd Lindsay Vermillion	Archaeologist Archaeologist
Quality Review	Jody Urbanovsky	Environmental Scientist

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Map Name	Original Map	Photo-Revision
Keller	2016	
Keller	1955	1981

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Appendix A
Agency Correspondence

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APPENDIX A
AGENCY CORRESPONDENCE

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HALFF

September 9, 2022
AVO 52672.001

The Honorable Armin Mizani
Mayor
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mayor Mizani:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

Halff Associates, Inc. (Halff) is preparing an Environmental Assessment (EA) to support an application for a Certificate of Convenience and Necessity (CCN) from the Public Utility Commission of Texas (PUC). Halff is currently in the process of gathering data on the existing environment and identifying environmental and land use constraints within the project study area that will be used in the creation of an environmental and land use constraints map.

Halff is requesting that your agency/office provide information concerning environmental and land use constraints or other issues of interest to your agency/office within the study area. Your comments will be an important consideration in the assessment of potential impacts. Upon certification for the proposed project, Oncor will determine the need for other approvals and/or permits. If your jurisdiction has approvals and/or permits that would apply to this project, please identify them in response to this inquiry. If permits are required from your office, Oncor will contact your office following route certification.

Thank you for your assistance with this transmission line project. If you have any questions or require additional information, please contact me at (214) 346-6367. Electronic data may also be shared at rmarusak@halff.com. Your earliest reply will be appreciated.

Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

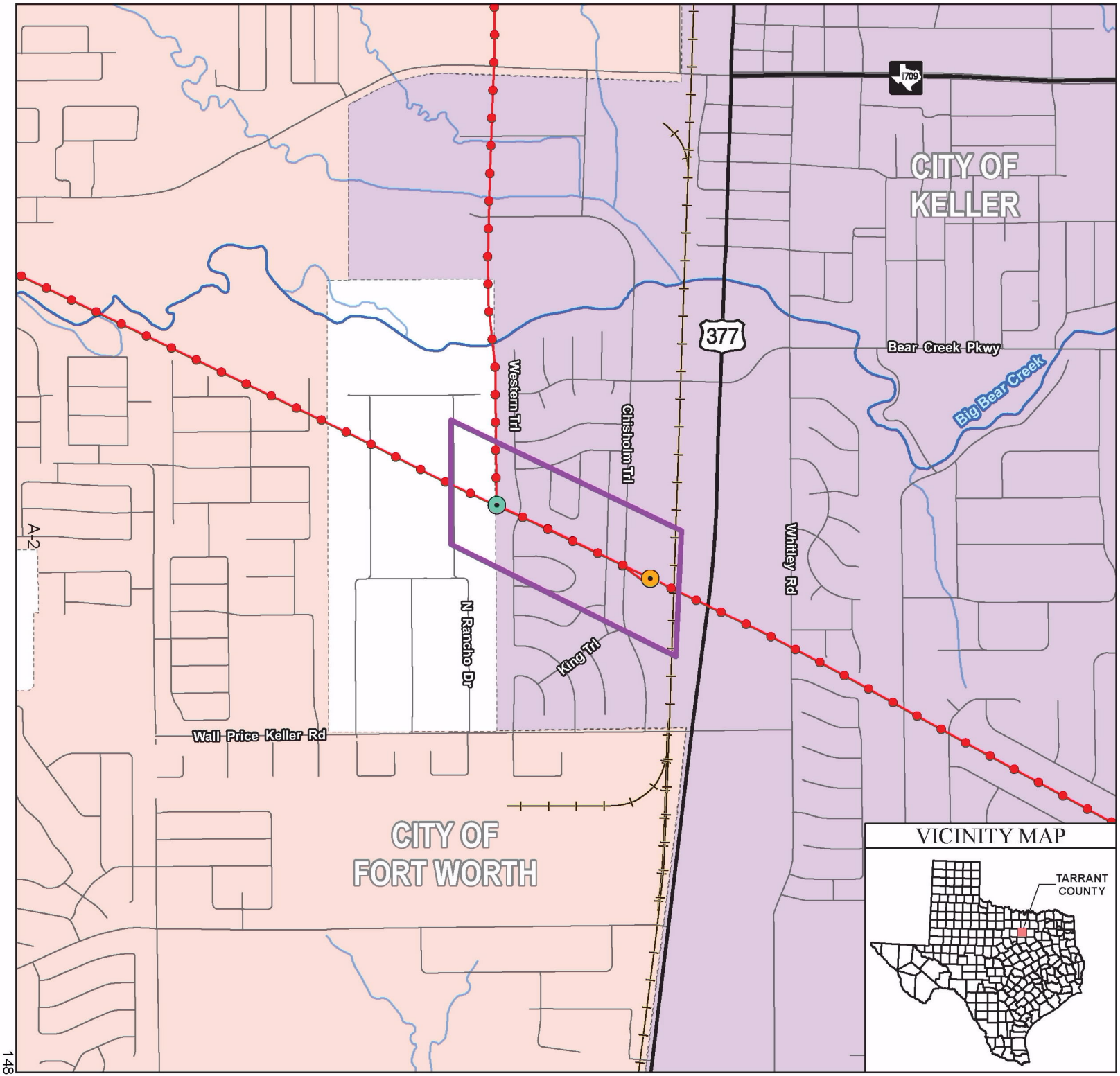
Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM



KELLER WALL PRICE — KELLER MAGNOLIA 138 kV TRANSMISSION LINE

LEGEND

- PROPOSED STUDY AREA
- REBUILD ENDPOINT
- EXISTING KELLER WALL PRICE SUBSTATION
- COUNTY BOUNDARY
- MAJOR ROADS
- MINOR ROADS
- RAILROADS
- EXISTING TRANSMISSION LINE
- NAMED TRIBUTARY
- UNNAMED TRIBUTARY

CITY LIMIT BOUNDARIES

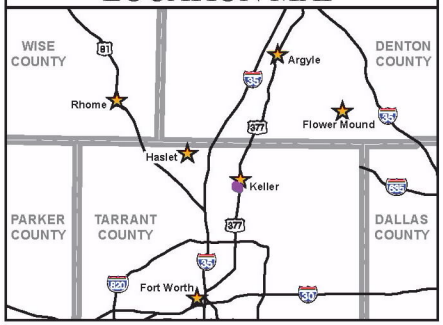
- CITY OF FORT WORTH
- CITY OF KELLER
- UNINCORPORATED AREAS

Notes:
1. Some legend symbols are enlarged for easier identification.
2. Data is for display purposes only. All features and boundaries have been approximated based on information gathered from review of public resources and from field reconnaissance.

Date Plotted: 9/9/2022
Date Revised: 9/9/2022

VICINITY MAP

LOCATION MAP



0 0.25 0.5

SCALE IN MILES

HALFF

HALFF

September 9, 2022
AVO 52672.001

The Honorable Sean Hicks
Mayor Pro Tem; Council Member
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Council Member Hicks:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Thank you for your assistance with this transmission line project. If you have any questions or require additional information, please contact me at (214) 346-6367. Electronic data may also be shared at rmarusak@halff.com. Your earliest reply will be appreciated.

Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

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HALFF

September 9, 2022
AVO 52672.001

The Honorable Shannon Dubberly
Council Member, Place 1
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Council Member Dubberly:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

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HALFF

September 9, 2022
AVO 52672.001

The Honorable Jessica Juarez
Council Member, Place 3
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Council Member Juarez:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

Halff Associates, Inc. (Halff) is preparing an Environmental Assessment (EA) to support an application for a Certificate of Convenience and Necessity (CCN) from the Public Utility Commission of Texas (PUC). Halff is currently in the process of gathering data on the existing environment and identifying environmental and land use constraints within the project study area that will be used in the creation of an environmental and land use constraints map.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

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RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

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HALFF

September 9, 2022
AVO 52672.001

The Honorable Tag Green
Council Member, Place 4
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Council Member Green:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

The Honorable Chris Whatley
Council Member, Place 5
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Council Member Whatley:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

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HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
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WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

The Honorable Ross McMullin
Council Member, Place 6
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Council Member McMullin:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

Halff Associates, Inc. (Halff) is preparing an Environmental Assessment (EA) to support an application for a Certificate of Convenience and Necessity (CCN) from the Public Utility Commission of Texas (PUC). Halff is currently in the process of gathering data on the existing environment and identifying environmental and land use constraints within the project study area that will be used in the creation of an environmental and land use constraints map.

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Thank you for your assistance with this transmission line project. If you have any questions or require additional information, please contact me at (214) 346-6367. Electronic data may also be shared at rmarusak@halff.com. Your earliest reply will be appreciated.

Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

Ms. Kelly Ballard
City Secretary
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Ms. Ballard:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Russell Marusak
Environmental / Natural Resources Team Leader

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RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

From: City of Keller Open Records <cityofkellertx@govqa.us>
Sent: Monday, September 26, 2022 10:16 AM
To: Marusak, Russell
Subject: City Open Records Request :: R000205-092222

Follow Up Flag: Follow up
Flag Status: Flagged

--- Please respond above this line ---

RE: City Open Records Request of September 22, 2022, Reference # R000205-092222

Dear Russell Marusak,

The City of Keller received a public information request from you on September 22, 2022. Your request mentioned:

> **Oncor proposes to re-build an existing double-circuit 138 kV transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail & King Trail in the City of Keller. The rebuild will extend approx. 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line & a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.**
>
> **Half Associates is preparing an Environmental Assessment to support an application for a CCN from the Public Utility Commission of Texas.**
>
> **Half is requesting that your agency/office provide information concerning environmental and land use constraints or other issues of interes to your agency/office within the study area. If your jurisdiction has approvals and/or permits that would apply to this project, please identify them in response to this inquiry. If permits are required from your office, Oncor will contact your office following route certification.**

The City of Keller has reviewed its files and has determined there are no responsive records on file related to your request.

If we can assist with anything further, please let us know.

Sincerely,

Andrea McDonald, TRMC, CMC

Assistant City Secretary

HALFF

September 9, 2022
AVO 52672.001

Mr. Mark Hafner
City Manager
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Hafner:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Thank you for your assistance with this transmission line project. If you have any questions or require additional information, please contact me at (214) 346-6367. Electronic data may also be shared at rmarusak@halff.com. Your earliest reply will be appreciated.

Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

Mr. Chad Bartee, City Engineer
Public Works
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Bartee:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

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RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

Ms. Mary Culver
Economic Development Director
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Ms. Culver:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

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1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

Mr. Alonzo Liñán, Director of Public Works
Public Works
City of Keller
P.O. Box 770
Keller, Texas 76244

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Liñán:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

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RICHARDSON, TX 75081-2275

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FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

The Honorable Glen Whitley
County Judge and Commissioner
Tarrant County
100 East Weatherford Street
Fort Worth, Texas 76196

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Judge Whitley:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

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RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

The Honorable Roy Brooks
Precinct 1 Commissioner
Tarrant County
6551 Granbury Road
Fort Worth, Texas 76133

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Commissioner Brooks:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

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1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

The Honorable Devan Allen
Precinct 2 Commissioner
Tarrant County
700 E. Abram St., Ste. 304
Arlington, Texas 76010

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Commissioner Allen:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

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RICHARDSON, TX 75081-2275

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WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

The Honorable Gary Fickes
Precinct 3 Commissioner
Tarrant County
645 Grapevine Highway, Suite 200
Hurst, Texas 76054

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Commissioner Fickes:

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Russell Marusak
Environmental / Natural Resources Team Leader

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1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

From: Mark C. Kratovil <mckratovil@tarrantcountytx.gov>
Sent: Wednesday, September 14, 2022 12:10 PM
To: Marusak, Russell
Subject: Correspondence to Tarrant County
Attachments: ScaNovatech22091310110.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

Tarrant County is in receipt of the attached correspondence seeking records relating to a property within the City of Keller. Generally, these records would be kept by the Tarrant County Transportation Department and your letter was forwarded to Transportation. After reviewing its records, Transportation concluded it was not in possession of any documents responsive to your request. Because this property is located within the city limits of Keller, Transportation has recommended you place your request with the City of Keller directly. You may place a records request with Keller using the information at this link: https://www.cityofkeller.com/services/police/open-records-request

To the extent this property is also within Fort Worth, you can place your request with the City of Fort Worth at this link: https://www.fortworthtexas.gov/departments/citysecretary/records

Regards,

Mark Kratovil
Assistant Criminal District Attorney
Tarrant County Criminal District Attorney's Office – Civil Division
Tim Curry Criminal Justice Center
401 W. Belknap
Fort Worth, Texas 76196

Office: (817)-884-1233
Email: mckratovil@tarrantcountytx.gov

Sharen Wilson
Criminal District Attorney
Tarrant County, Texas

HALFF

September 9, 2022
AVO 52672.001

The Honorable Gary Fickes
Precinct 3 Commissioner
Tarrant County
645 Grapevine Highway, Suite 200
Hurst, Texas 76054

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

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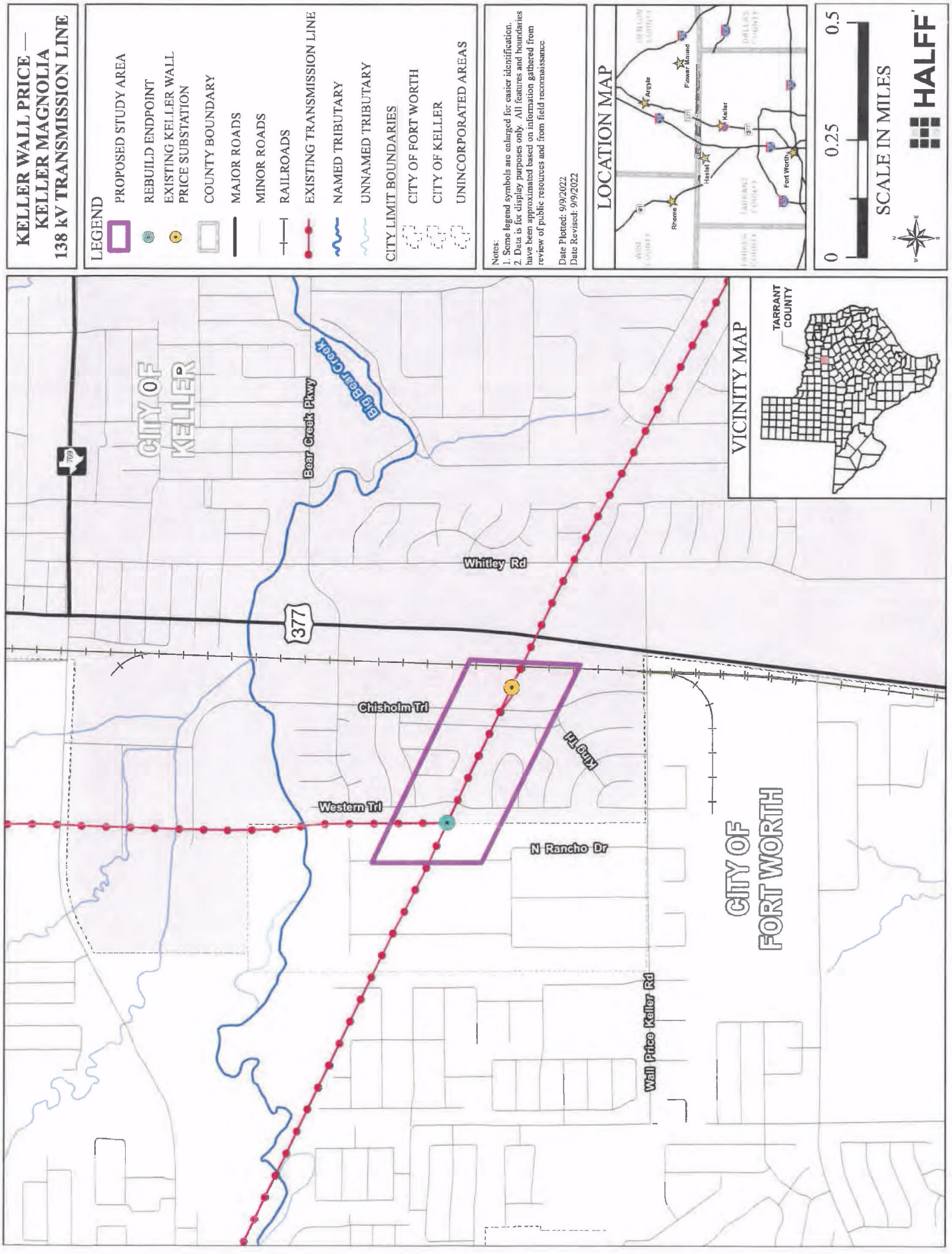
Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.
1201 NORTH BOWSER ROAD TEL (214) 346-6200 WWW.HALFF.COM
RICHARDSON, TX 75081-2275 FAX (214) 739-0369


KELLER WALL PRICE — KELLER MAGNOLIA 138 kV TRANSMISSION LINE
LEGEND
PROPOSED STUDY AREA
REBUILD ENDPOINT
EXISTING KELLER WALL PRICE SUBSTATION
COUNTY BOUNDARY
MAJOR ROADS
MINOR ROADS
RAILROADS
EXISTING TRANSMISSION LINE
NAMED TRIBUTARY
UNNAMED TRIBUTARY
CITY LIMIT BOUNDARIES
CITY OF FORT WORTH
CITY OF KELLER
UNINCORPORATED AREAS
Notes:
1. Some legend symbols are enlarged for easier identification.
2. Data is for display purposes only. All features and boundaries have been approximated based on information gathered from review of public resources and from field reconnaissance.
Date Plotted: 9/9/2022
Date Revised: 9/9/2022
LOCATION MAP
Argyle
Flower Mound
Keller
Haslet
Rhome
Fort Worth
0
0.25
0.5
SCALE IN MILES
HALFF
VICINITY MAP
TARRANT COUNTY
CITY OF KELLER
Big Bear Creek
Bear Creek Pkwy
Whitley Rd
377
Chisholm Trl
King Trl
Western Trl
N Rancho Dr
Wall Price Keller Rd
CITY OF FORT WORTH

HALFF

September 9, 2022
AVO 52672.001

The Honorable J.D. Johnson
Precinct 4 Commissioner
Tarrant County
6713 Telephone Road, Suite 301
Fort Worth, Texas 76135

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Commissioner Johnson:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Thank you for your assistance with this transmission line project. If you have any questions or require additional information, please contact me at (214) 346-6367. Electronic data may also be shared at rmarusak@halff.com. Your earliest reply will be appreciated.

Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

Tarrant County Historical Commission
200 Taylor Street 5th Floor
Fort Worth, Texas 76196

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear To whom it may Concern:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Russell Marusak
Environmental / Natural Resources Team Leader

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RICHARDSON, TX 75081-2275

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FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

Dr. Rick Westfall
Superintendent of Schools
Keller Independent School District
350 Keller Parkway
Keller, Texas 76248

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Dr. Westfall:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

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WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

Mr. Rob Lowe
Regional Administrator, Southwest Region
Federal Aviation Administration
10101 Hillwood Parkway
Fort Worth, Texas 76117-1524

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Lowe:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

From: 9-ASW-RA-Office (FAA) <9-ASW-RA-Office@faa.gov>
Sent: Thursday, September 22, 2022 6:27 PM
To: Marusak, Russell
Subject: Keller Wall Price-Keller Magnolia Transmission Line Project
Attachments: 2022-09-09 - Marusak - Halff - Keller TX.pdf; Correspondence - HALFF - Keller Wall Price - rcvd Sept 21 2022.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon, Mr. Marusak,

Please find the response to your correspondence regarding the Keller Wall Price-Keller Magnolia Transmission Line Project attached.

Have a great day!

Office of the Regional Administrator

U.S. Department of Transportation
Federal Aviation Administration

Southwest Region

10101 Hillwood Parkway
Fort Worth, TX 76177

September 21, 2022

Russell Marusak
Halff Associates, Inc.
1201 North Bowser Road
Richardson, TX 75081-2275

Dear Mr. Marusak:

This is in response to your September 9, 2022, correspondence concerning Oncor Electric Delivery Company LLC proposed construction to rebuild an existing double-circuit 138-kilovolt (kV) transmission line in Keller, Texas. You requested information regarding environmental and land use constraints or other issues of interest within the study area. You also requested information about any approvals or permits that would apply to the project.

As set forth in Title 14 of the Code of Federal Regulations Part 77, Objects that Affect the Navigable Airspace, the prime concern of the Federal Aviation Administration is the effect of certain proposed construction on the safe and efficient use of the navigable airspace.

To accomplish this mission, aeronautical studies are conducted based on information provided by sponsors on FAA Form 7460-1, Notice of Proposed Construction or Alteration. If your organization is planning to sponsor any construction or alterations that may affect navigable airspace, you must file FAA Form 7460-1 electronically via https://oeaaa.faa.gov/oeaaa/external/portal.jsp.

For additional information and assistance, please feel free to contact the Obstruction Evaluation Group at 10101 Hillwood Parkway, Fort Worth, Texas 76177 or (817) 222-5954.

Sincerely,

DOUGLAS E LANE

Digitally signed by DOUGLAS E LANE
Date: 2022.09.22 15:51:28 -05'00'

For Rob Lowe
Regional Administrator, Southwest Region

CC: Obstruction Evaluation Group, AJV-15

HALFF

September 9, 2022
AVO 52672.001

Mr. Tony Robinson
Regional Administrator
Federal Emergency Management Agency - Region VI
FRC 800 North Loop 288
Denton, Texas 76209-3698

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Robinson:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Thank you for your assistance with this transmission line project. If you have any questions or require additional information, please contact me at (214) 346-6367. Electronic data may also be shared at rmarusak@halff.com. Your earliest reply will be appreciated.

Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

Mr. Mike Eastland
Executive Director
Centerpoint II North Central Texas Council of Governments
616 Six Flags Drive
Arlington, Texas 76011-6347

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Eastland:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

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HALFF

September 9, 2022
AVO 52672.001

Mr. Steven Ray, District Conservationist
Denton Service Center
Natural Resources Conservation Service
525 S. Loop 288, Suite C
Denton, Texas 76205-4515

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Ray:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

From: Araya, Samuel - FPAC-NRCS, Temple, TX <Samuel.Araya@usda.gov>
Sent: Wednesday, September 21, 2022 12:58 PM
To: Marusak, Russell
Cc: Stahnke, Alan - NRCS, Temple, TX
Subject: Proposed Oncor Transmission Line Project in Tarrant County TX
Attachments: Soil Report - Oncore-HALFF - Tarrant.pdf; Soil Letter - Oncor-HALFF - Tarrant TX.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Russell Marusak,

I am writing in response to your letter dated September 9, 2022 requesting information related to the Oncor, Keller Wall Price—Keller Magnolia 138-kV Transmission Line Project in Tarrant County, Texas. Please find attached a letter and a soils report on the project study area.

If you have any questions, please feel free to contact me.

Sincerely,

Samuel Araya
Soil Scientist
Natural Resources Conservation Service
United States Department of Agriculture
101 S Main St., Temple, Texas
(254) 742-9874
samuel.araya@usda.gov
www.tx.nrcs.usda.gov

United States Department of Agriculture

Natural Resources and Conservation Service

State Office

101 S. Main Street
Temple, TX 76501
Tel: 254.742.9800
Fax: 844.496.8111

September 21, 2022

HALFF Associates, Inc.
1201 North Bowser Road
Richardson, TX 75081

Attention: Russell Marusak

Subject: Proposed Oncor Ramhorn Hill—Dunham 345-kV Transmission Line Project in Denton and Wise Counties, Texas

Thank you for the opportunity to provide input on the potential environmental impacts associated with the proposed transmission line project in Denton and Wise Counties, Texas.

The project study area does not involve any USDA-NRCS easements.

The soils in the project study area have been reviewed and there are a few limitations that should be taken into consideration while planning for the project. Approximately 78,000 acres, 80%, of the study area is rated as highly vulnerable to erosion by wind, and portions of the study area experience frequent flooding. Soil erosion prevention practices are recommended for this project. Shallow soils, less than 40-inches deep, are spread out in the area totaling about a third of the study area. Most of the study area is rated high-risk for soil-induced steel corrosion.

Enclosed is a report based on our latest soils database that contains maps and details of relevant soil ratings. We encourage you to consider this information and take measures to protect the soil and water quality.

Please contact me by email at samuel.araya@usda.gov if you have any questions.

Sincerely,

Samuel Araya
Soil Scientist

Attachments are voluminous and may be made available on request.

HALFF

September 9, 2022
AVO 52672.001

Ms. Edith Marvin, Director of Environment and Development
Centerpoint II
North Central Texas Council of Governments
616 Six Flags Drive
Arlington, Texas 76011-6347

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Ms. Marvin:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

Ms. Karen Sanchez
Program Specialist
Railroad Commission of Texas
P.O. Box 12967
Austin, Texas 78701-2967

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Ms. Sanchez:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

From: Karen Sanchez <Karen.Sanchez@rrc.texas.gov>
Sent: Tuesday, September 20, 2022 7:38 AM
To: Marusak, Russell
Subject: Letter received 9/19/22
Attachments: 0464_001.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Marusak,

We have received your letter dated September 13, 2022, received September 19, 2022.

Based on the information provided, we cannot search for responsive information. You will need to go to our online GID mapping system and determine if there are any RRC regulated facilities in the area of your project. Once you have those identify numbers, we will be happy to search for information.

Public GIS Viewer (Map) (texas.gov)

Sincerely,

Karen Sanchez
Legal Assistant
Office of General Counsel
Railroad Commission of Texas

HALFF

September 9, 2022
AVO 52672.001

TRANSMITTED VIA EMAIL: Jonathan@Austin.Utexas.edu

Mr. Fred Valdez, Director
Texas Archeological Research Laboratory
The University of Texas at Austin
1 University Station, R7500
Austin, Texas 78712-0100

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Valdez:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Russell Marusak
Environmental / Natural Resources Team Leader

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Texas Archeological Research Laboratory
College of Liberal Arts

1 University Station •R7500 • Austin, TX 78712 • 512-471-5960 • FAX 512-232-6563
https://liberalarts.utexas.edu/tarl/

12 September 2022

Russell Marusak
Halff Associates, Inc.
1201 North Bowser Rd.
Richardson, TX 75081-2275

Re: Oncor's Proposed Keller Wall Price – Keller Magnolia 138 kV Transmission Line Rebuild, Tarrant County, Texas

Russell:

This letter is provided in response to a file search request received by the Texas Archeological Research Laboratory (TARL) on 9 September 2022 concerning the above referenced project and the possible location of archeological sites within the study area boundaries depicted on the 7.5' USGS Keller quadrangle. Please note that information regarding archeological site locations is not intended for public disclosure; site location information is protected by the National Historic Preservation Act of 1966, Title III, §304, and by §191.004 of the Texas Antiquities Code. If you have any questions regarding this policy please feel free to contact me at the phone number or email address below.

A search of the records on file at TARL indicates that no archeological sites have been documented within the study area as mapped.

TARL does not maintain cultural resource information other than the archeological site files and spatial data. As a courtesy, however, the current file search included a search of the Texas Historical Commission's (THC) restricted online Texas Archeological Sites Atlas and the publicly accessible Texas Historic Sites Atlas. Based on the results of that search, no State Antiquities Landmarks or properties listed on the National Register of Historic Places are present within the study area. Likewise, no Texas Historical Markers or documented historic cemeteries are present within the study area.

1

For regulatory matters pertaining to your project, contact the Archeology Division of the Texas Historical Commission at 512/463-6096. For any other questions, please contact me at 512/471-5959 or jjarvis@mail.utexas.edu.

Sincerely,

Jonathan H. Jarvis, RPA
Associate Director

JHJ\hs

HALFF

September 9, 2022
AVO 52672.001

Mr. Dan Harmon, Director
Aviation Division
Texas Department of Transportation
125 East 11th Street
Austin, Texas 78701-2409

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Harmon:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

Halff Associates, Inc. (Halff) is preparing an Environmental Assessment (EA) to support an application for a Certificate of Convenience and Necessity (CCN) from the Public Utility Commission of Texas (PUC). Halff is currently in the process of gathering data on the existing environment and identifying environmental and land use constraints within the project study area that will be used in the creation of an environmental and land use constraints map.

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Thank you for your assistance with this transmission line project. If you have any questions or require additional information, please contact me at (214) 346-6367. Electronic data may also be shared at rmarusak@halff.com. Your earliest reply will be appreciated.

Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

HALFF ASSOCIATES, INC.

1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275

TEL (214) 346-6200
FAX (214) 739-0095

WWW.HALFF.COM

HALFF

September 9, 2022
AVO 52672.001

Mr. Carl L. Johnson, P.E.
Fort Worth Distict
Texas Department of Transportation
2501 SW Loop 820
Fort Worth, Texas 76133

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Johnson:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Russell Marusak
Environmental / Natural Resources Team Leader

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September 9, 2022
AVO 52672.001

Mr. Carlos Swonke, Director
Office of Environmental Affairs
Texas Department of Transportation
125 East 11th Street
Austin, Texas 78701-2409

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Swonke:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Russell Marusak
Environmental / Natural Resources Team Leader

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HALFF

September 9, 2022
AVO 52672.001

Commissioner George P. Bush
Texas General Land Office
1700 North Congress Avenue
Austin, Texas 79756-1496

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Commissioner Bush:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Russell Marusak
Environmental / Natural Resources Team Leader

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HALFF

September 9, 2022
AVO 52672.001

Mr. Mark Wolfe
Executive Director
Texas Historical Commission
PO Box 12276
Austin, Texas 78701-2276

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Wolfe:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

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RICHARDSON, TX 75081-2275

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FAX (214) 739-0095

WWW.HALFF.COM

From: noreply@thc.state.tx.us
Sent: Thursday, December 1, 2022 10:12 AM
To: Marusak, Russell; reviews@thc.state.tx.us
Subject: Section 106 Submission

TEXAS HISTORICAL COMMISSION
real places telling real stories

Re: Project Review under Section 106 of the National Historic Preservation Act
THC Tracking #202300480
Date: 12/01/2022
Oncor- Keller Wall Price Substation
west of State Hwy 377

Description: re-build an existing double-circuite 138 kV transmission line

Dear Russell Marusak:
Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Arlo McKee and Caitlin Brashear, has completed its review and has made the following determinations based on the information submitted for review:

We have the following comments: Please prepare a detailed desktop cultural resources assessment for this project that includes known ground disturbance and existing archeological sites within a mile radius. Any proposed new ground disturbance will need to be professionally surveyed prior to construction.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: Arlo.McKee@thc.texas.gov, caitlin.brashear@thc.texas.gov.

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit http://thc.texas.gov/etrac-system.

Sincerely,

Caitlin Brashear

for Mark Wolfe, State Historic Preservation Officer
Executive Director, Texas Historical Commission

Please do not respond to this email.

HALFF

September 9, 2022
AVO 52672.001

Mr. Roger Wolfe
District Leader
Texas Parks and Wildlife Department
11942 FM 848
Tyler, Texas 75707-5234

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Mr. Wolfe:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Sincerely,
HALFF ASSOCIATES, INC.

Russell Marusak
Environmental / Natural Resources Team Leader

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HALFF

September 9, 2022
AVO 52672.001

TRANSMITTED VIA EMAIL: WHAB@TPWD.TEXAS.GOV

Ms. Karen Hardin
Habitat Assessment Biologist
Habitat Assessment Program
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, Texas 78744-3218

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Ms. Hardin:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Russell Marusak
Environmental / Natural Resources Team Leader

Attachment (1)

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1201 NORTH BOWSER ROAD
RICHARDSON, TX 75081-2275
TEL (214) 346-6200
FAX (214) 739-0095
WWW.HALFF.COM

From: Karen Hardin <Karen.Hardin@tpwd.texas.gov>
Sent: Monday, September 26, 2022 9:20 AM
To: Marusak, Russell
Subject: RE: Keller Wall Price--Keller Magnolia 138 kV transmission line; TPWD Project 49185
Attachments: WL49185-OncorKellerWallPrice-KellerMagnolia138kV-TARRANT-C09-26-2022.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Russell Marusak,

Please see the attached Texas Parks and Wildlife Department comments regarding the proposed Keller Wall Price to Keller Magnolia 138 kV Transmission Rebuild Project.

Sincerely,

Karen Hardin
Natural Resource Specialist
Wildlife Habitat Assessment Program
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, TX 78744
903-322-5001
Karen.Hardin@tpwd.texas.gov

From: Marusak, Russell <RMarusak@Halff.com>
Sent: Friday, September 9, 2022 3:54 PM
To: WHAB <WHAB@tpwd.texas.gov>
Subject: Keller Wall Price--Keller Magnolia 138 kV transmission line

Good afternoon,

Please see the attached Wildlife Habitat Assessment Program request. Small project in an urban area. A shapefile of the study area is provided as well. Thanks.

Russell Marusak
Environmental / Natural Resources Team Leader
Halff Associates, Inc.

O: (214) 346-6367
C: (469) 569-6982

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Dallas

Lee M. Bass
Chairman-Emeritus
Fort Worth

T. Dan Friedkin
Chairman-Emeritus
Houston

Carter P. Smith
Executive Director

September 26, 2022

Mr. Russell Marusak
HALFF Associates, Inc.
1201 North Bowser Road
Richardson, TX 75081-2275

RE: Oncor Electric Delivery Company's Proposed Keller Wall Price – Keller Magnolia 138 kV Transmission Line Rebuild, Tarrant County

Dear Mr. Russell Marusak:

Texas Parks and Wildlife Department (TPWD) received a project review request dated September 9, 2022, regarding the proposed transmission project referenced above.

Under Texas Parks and Wildlife Code (PWC) section 12.0011(b)(2) and (b)(3), TPWD has authority to provide recommendations and informational comments that will protect fish and wildlife resources to local, state, and federal agencies that approve, license, or construct developmental projects or make decisions affecting those resources. TPWD is providing input on this proposed project to facilitate the incorporation of beneficial management practices (BMP) during construction, operation, and maintenance that may assist the project proponent in minimizing impacts to the state's natural resources. Pursuant to PWC section 12.0011(b)(2) and (b)(3), TPWD offers the following comments and recommendations concerning this project.

Project Description

Oncor Electric Delivery Company, LLC (Oncor) proposes to rebuild an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377 and northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. Existing structures will be replaced with new structures to accommodate the rebuild. On behalf of Oncor, HALFF Associates, Inc. (HALFF) is preparing an Environmental Assessment (EA) to support an application for a Certificate of Convenience and Necessity from the Public Utility Commission of Texas for the proposed project. HALFF is requesting environmental and land use constraints information or other issues of interest to TPWD within the study area for the project.

Comment: A benefit of Oncor utilizing an existing easement for the proposed rebuild project is that the proposed project avoids the need for new-location right-of-way and avoids potential habitat loss and fragmentation.

Comment: Based on the project description and study area map, the project has minimal length and occurs within an urban area. The TPWD Wildlife Habitat Assessment Program does not anticipate significant adverse impacts to wildlife resources, including threatened and endangered species, in the construction of the

4200 SMITH SCHOOL ROAD
AUSTIN, TEXAS 78744-3291
512.389.4800
www.tpwd.texas.gov

proposed project. However, TPWD encourages Oncor to consider the recommendations below to avoid or minimize potential impacts to wildlife and their habitats that may occur within the study area.

Federal Law

Federal Law: Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits taking, attempting to take, capturing, killing, selling, purchasing, possessing, transporting, and importing of migratory birds, their eggs, parts, or nests, except when specifically authorized by the Department of the Interior. This protection applies to most native bird species, including ground nesting species. The U.S. Fish and Wildlife Service (USFWS) Migratory Bird Office can be contacted at (505) 248-7882 for more information on potential impacts to migratory birds.

Within the project area, potential impacts to migratory birds may occur during disturbance of existing vegetation and bare ground that may contain active bird nests within the existing easement.

Recommendation: TPWD recommends excluding ground disturbance activities during the general bird nesting season, March 15 through September 15, to avoid adverse impacts to breeding birds. If disturbing vegetation during the migratory bird nesting season is unavoidable, TPWD recommends surveying the area proposed for disturbance to ensure that no nests with eggs or young will be disturbed by construction. TPWD generally recommends a 150-foot buffer of vegetation remain around active nests until the eggs have hatched and the young have fledged; however, the size of the buffer zone depends on various factors and can be coordinated with the local or regional USFWS office.

Sky glow because of light pollution can have negative impacts on wildlife and ecosystems by disrupting natural diurnal and nocturnal behaviors such as migration, reproduction, nourishment, rest, and cover from predators.

Recommendation: As bird protection measures, TPWD recommends Oncor retrofit existing substations to utilize the minimum amount of permanent night-time lighting needed for safety and security. TPWD recommends focusing light downward, with cutoff luminaries to avoid light emitting above the horizontal, and to use dark-sky friendly lighting that is illuminated only when needed, down-shielded, as bright as needed, and minimizes blue light emissions. Appropriate lighting technologies, BMP, and other dark sky resources can be found at the International Dark-Sky Association and McDonald Observatory websites.

State Law

State Law: Chapter 64, Birds

PWC section 64.002, regarding protection of nongame birds, provides that no person may catch, kill, injure, pursue, or possess a bird that is not a game bird. PWC section

64.003, regarding destroying nests or eggs, provides that, no person may destroy or take the nests, eggs, or young and any wild game bird, wild bird, or wild fowl.

Recommendation: Please review the *Migratory Bird Treaty Act* section above for recommendations because they are also applicable for compliance with PWC.

Beneficial Management Practices

TPWD recommends implementing the following BMP to avoid or minimize impacts to wildlife and species of greatest conservation need (SGCN), including state listed SGCN, potentially occurring at the construction site for this project:

1. TPWD recommends designing the project to minimize removal of vegetation and retain native habitats. Areas exhibiting a native grass and forbs component should be protected from disturbance and from introduction of non-native vegetation.

2. Wildlife observed during construction should be allowed to safely leave the site or be translocated to a nearby area with similar habitat that would not be disturbed during construction. TPWD recommends that any translocations of reptiles be the minimum distance possible no greater than one mile, preferably within 100-200 yards from the initial encounter location. For purposes of relocation, surveys, monitoring, and research, state listed species may only be handled by persons with the appropriate authorization obtained through the TPWD Wildlife Permits Program. For more information on this authorization, please contact the Wildlife Permits Office at (512) 389-4647. Information regarding SGCN with potential to occur in Tarrant County can be found at the TPWD *Rare, Threatened, and Endangered Species of Texas by County* webpage.

3. Where trenching or other excavation is involved in construction, such as during structure installation, TPWD recommends that contractors minimize the number of excavation areas left open at any given time during construction. Any holes left open for more than two daylight hours should be inspected for the presence of trapped wildlife prior to backfilling. TPWD recommends that any open trenches or excavation areas be covered overnight and inspected every morning to ensure no wildlife species have been trapped.

4. For soil stabilization and revegetation of disturbed areas within the proposed project area, TPWD recommends erosion control and seed and mulch stabilization materials that avoid entanglement hazards to snakes and other wildlife species. Because the mesh found in many erosion control blankets or mats pose an entanglement hazard to wildlife, TPWD recommends the use of no-till drilling, hydromulching, or hydroseeding rather than erosion control blankets or mats due to a reduced risk to wildlife. If erosion control blankets or mats will be used, the product should contain no netting or contain loosely woven, natural fiber netting in which the mesh design allows the threads to move, therefore allowing expansion of the mesh openings. Plastic mesh matting and hydromulch containing microplastics should be avoided.

5. Significant declines in the population of migrating monarch butterflies (*Danaus plexippus*), a federal candidate species, have led to widespread concern about this

species and other native insect pollinator species due to reductions in native floral resources. To support pollinators and migrating monarchs, TPWD encourages the establishment of native wildflower habitats on private and public lands, including infrastructure right-of-way (ROW). TPWD encourages Oncor to restore or revegetate impacted areas with vegetation that provides habitat for monarch butterflies and other pollinator species, where feasible. Species appropriate for establishment within the project area can be found by accessing the Lady Bird Johnson Wildflower Center, working with TPWD biologists to develop an appropriate list of species, or utilizing resources found at the Monarch Watch website or the Xerces Society's Guidelines webpage. TPWD recommends incorporating pollinator conservation into maintenance plans for the site to promote and sustain the availability of flowering species throughout the growing season. TPWD recommends scheduling vegetation maintenance to occur once the seed from pollinator plants has been released and avoiding herbicides that affect floral resources.

6. To aid in the scientific knowledge of a species' status and current range, TPWD encourages reporting encounters of SGCN to the Texas Natural Diversity Database according to the data submittal instructions found at the *TPWD Texas Natural Diversity Database: Submit Data* webpage. An additional method for reporting observations of species is the iNaturalist community app in which plant and animal observations are uploaded from a smartphone. The observer adds the observation to specific TPWD Texas Nature Tracker Projects appropriate for the taxa observed, including Herps of Texas, Birds of Texas, Texas Eagle Nests, Texas Whooper Watch, Mammals of Texas, Rare Plants of Texas, Bees & Wasps of Texas, Terrestrial Mollusks of Texas, Texas Freshwater Mussels, Fishes of Texas, and Texas Milkweeds for Monarchs.

Thank you for considering the fish and wildlife resources of Texas. Please contact me at Karen.Hardin@tpwd.texas.gov or (903) 322-5001 if you have any questions.

Sincerely,

Karen B. Hardin
Wildlife Habitat Assessment Program
Wildlife Division

KBH:49185

HALFF

September 9, 2022
AVO 52672.001

Ms. Jennifer Walker, Permit Section Chief
Environmental Division - Regulatory Branch CESWF-PER-R (Room 3A37)
U.S. Army Corps of Engineers
P.O. Box 17300
Fort Worth, Texas 76102-0300

Re: Oncor Electric Delivery Company's Proposed Keller Wall Price—Keller Magnolia 138 kV Transmission Line Rebuild Project in Tarrant County, Texas

Dear Ms. Walker:

Oncor Electric Delivery Company LLC (Oncor) proposes to re-build an existing double-circuit 138 kilovolt (kV) transmission line beginning at the existing Keller Wall Price Substation, located directly west of State Highway 377, northeast of and adjacent to the intersection of Chisolm Trail and King Trail in Keller, Texas. The rebuild will extend approximately 0.3 mile to the northwest, entirely within the existing transmission line easement. New structures will be needed to accommodate the existing double-circuit 138 kV transmission line and a new proposed double-circuit 138 kV transmission line. Please refer to the attached map depicting the study area.

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Russell Marusak
Environmental / Natural Resources Team Leader

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