



Engineers, Surveyors, Planners, Scientists

November 15, 2013

Melinda Stahl
Environmental Coordinator
Utility Technologies International
4700 Homer Ohio Lane
Groveport, OH 43125

Subject: Threatened and Endangered Species Assessment Summary
Vectren Z-167 Natural Gas Pipeline Relocation Project

Dear Ms. Stahl,

EMH&T has completed a field review for threatened and endangered species in coordination with the proposed natural gas pipeline relocation project. The following summarizes Threatened & Endangered Species coordination efforts completed with the United States Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR). Also included is a summary of field observations noted by EMH&T during our July 24th – 25th, October 28th, and November 14, 2013 field visits.

Project Description

The project includes the proposed relocation of a 12-inch natural gas transmission pipeline around Dayton International Airport in the City of Dayton, Butler Township, Montgomery County, Ohio. The review area for the alignment consisted of a 200-foot wide corridor approximately 8.1 miles long (this includes approximately 6.5 miles for the preferred route and an additional 1.6 miles for the alternate route) associated with the preferred and alternate routes as shown on Exhibit 1. Construction of the pipeline will require limited tree clearing, grading, and earth movement throughout the corridor. Horizontal directional drilling will be implemented on all wetland and stream crossings to minimize the impacts associated with the proposed pipeline.

Agency Coordination

U.S. Fish and Wildlife Service (USFWS)

Utility Technologies International (UTI) initiated coordination with the USFWS for this project on July 10, 2013. In a letter dated July 18, 2013 (see attached) the USFWS reported that there are no Federal wildlife refuges, wilderness areas, or Critical Habitat within the vicinity of the proposed pipeline alternatives. They recommended that impacts to all aquatic resources be avoided and the buffers surrounding these systems be preserved. They also stated that best construction techniques be followed during the construction phase of the project to minimize erosion and specified that all disturbed areas be mulched and re-vegetated with native plants once construction has been completed.

The proposed project lies within the range of four federally listed species: *Myotis sodalis* (Indiana bat), *Villosa fabalis* (rayed bean), *Epioblasma triquetra* (snuffbox), and *Sistrurus catenatus* (eastern massasauga). Since the determination for the project's potential to impact threatened and endangered species was received from the USFWS, the USFWS released an updated listing of

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federally listed threatened, endangered, proposed, and candidate species for Ohio on October 2, 2013. In the updated listing, *Myotis septentrionalis* (northern long-eared bat) was proposed to be federally listed as an endangered species throughout its range, which includes Montgomery County, Ohio.

Haliaeetus leucocephalus (bald eagle) is also in the range of the project and is protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act. However, due to the project type, location, and onsite habitat, it is the USFWS's opinion that the bald eagle would not be expected to be in the project area, no impacts to this species is expected, and no further action for this species is needed on this project.

According to the USFWS, northern long-eared bats are found in habitat similar to Indiana bats. Preferred habitat for these bat species includes large living or dead trees with large cavities, cracks or exfoliated bark along stream corridors, riparian areas, and upland woodlots. Because several small stands of trees will need to be removed during the construction of the pipeline it is USFWS's recommendation that any trees, including surrounding trees, exhibiting any potential bat habitat be saved wherever possible. However, if these trees cannot be avoided, the USFWS recommends that trees only be cut between October 1 and March 31.

Suitable habitat for rayed bean and snuffbox includes headwater creeks, streams, and larger rivers with gravel or sand substrates as well as streams with areas of swift current. These species have been documented in the Great Miami River several miles to the east and in the Stillwater River, several miles to the west of the project site. Due to the project location and use of horizontal directional drilling for all stream crossings to avoid impacts to the streams onsite, it is the USFWS's opinion that no impacts are expected for these species.

The eastern massasauga is a small rattlesnake that is currently a Federal candidate species. The snake prefers habitat with both an upland and wetland component and relies on each at different times throughout the year. Due to the fact that wetlands will either be routed around or bored under using horizontal directional drilling and limited habitat exists for this species in the project location, it is the USFWS's opinion that no significant impacts are expected for this species.

Ohio Department of Natural Resources (ODNR)

Coordination with the Ohio Department of Natural Resources (ODNR) was initiated by Utility Technologies International on July 10, 2013. In correspondence dated August 12, 2013 (see attached) the ODNR offered comments on the proposed project. According to the ODNR, the project lies within range of five State listed species: *Bartramia longicauda* (upland sandpiper), *Myotis sodalis* (indiana bat), *Sistrurus catenatus* (eastern massasauga), *Villosa fabalis* (rayed bean), *Epioblasma triquetra* (snuffbox), and *Cryptobranchus alleganiensis* (eastern hellbender).

According to the ODNR, the Natural Heritage Database has a record in the vicinity of the project for the upland sandpiper. This State endangered bird utilizes dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). ODNR recommended that should this type of habitat be impacted, construction must be avoided in these habitats during the species' nesting period of April 15th to July 31st. If this type of habitat will not be impacted, ODNR concluded that the proposed project is not likely to impact the upland sandpiper.

Similar to the USFWS, the ODNR also noted that the project is within range of the State and Federally listed Indiana bat. ODNR recommended that if suitable habitat is present within the project area that said habitat should be preserved. However, if suitable habitat occurs and must be cut, ODNR stated that cutting must occur between October 1st and March 31st. If suitable trees must be cut during the summer months, a mist-net survey must be conducted between June 15th and July 31st. ODNR concluded by noting that if no tree removal is proposed, the project is not likely to impact the Indiana bat.

The ODNR has historical records for the eastern massasauga in Montgomery County. The eastern massasauga is a state endangered and previously described Federal candidate snake species. The ODNR states that if the snake's habitat (wetlands, wet prairies, etc.) is not going to be impacted, the project is not likely to impact this species. If the eastern massasauga is encountered during construction, work should stop and Frank Lopez of the ODNR-DOW should be contacted immediately (419-625-8062).

The project is also in the range of the rayed bean and snuffbox, state endangered and federal endangered mussel species. The ODNR concludes that the project must not have an impact on freshwater mussels in the area. However, if no in-water work in perennial streams is planned, it is their opinion that the project is not likely to impact these species. If mussels are encountered during construction, work should stop and John Navarro of the ODNR-DOW should be contacted immediately (614-265-6346).

The project is in the range of the eastern hellbender, a state endangered amphibian currently being evaluated for Federal Candidate status. This salamander is a long-lived species inhabiting perennial streams with large flat rocks. In-water work can reduce the availability of these cover rocks as well as kill adults and juveniles. Projects that alter flow regimes and/or contribute additional sediment into hellbender streams can adversely affect suitable habitat for the species. However, it is ODNR's opinion that due to the location and the characteristics of the streams being crossed, this project is not likely to impact this species.

The ODNR Natural Heritage Database has no other records for rare or endangered species at this project site. They are unaware of any unique ecological sites, geologic features, nature preserves, or other protected natural areas within the project area.

Field Review

EMH&T conducted a field review for threatened and endangered species for the proposed pipeline alignment on July 24th and 25th, October 28th, and November 14, 2013. As shown on Exhibit 1, the predominant land use within the proposed corridor is agricultural; the alignment crosses few forested and old field areas.

There are five potential stream crossings along the preferred route and four potential stream crossings associated with the alternate route. Stream conditions were reviewed by EMH&T at each potential crossing to determine the likelihood of habitat suitable for rayed bean, snuffbox, and eastern hellbender (Photographs 1-3). It was determined that favorable conditions were not present at any potential stream crossing and a presence/absence survey revealed no signs of any aquatic bivalves or salamanders at any of the sites. Should horizontal directional drilling be implemented, it is unlikely that significant impacts to rayed bean, snuffbox, or eastern hellbender will occur.

There are eight (8) potential wetland crossings along the preferred and alternate routes of the pipeline alignment (Photographs 4-8). The wetlands and surrounding habitat were studied to determine the likelihood of habitat favorable for the eastern massasauga. Due to minimal wetland habitat in the area and habitat fragmentation resulting from past commercial development, should horizontal directional drilling be implemented to cross the wetland features, it is unlikely that significant impacts to the eastern massasauga will occur.

Habitat suitable for use by the upland sandpiper was looked for throughout the alignment. The majority of the alignment traverses active corn and soybean agricultural fields. The remaining areas (forested areas, commercial and residential properties) offer limited to no habitat favorable for the upland sandpiper. Due to the lack of suitable habitat, it is unlikely that impacts to the upland sandpiper will occur.

The alignment passed through a limited amount of forested habitat. The forested areas present in the alignment were comprised of small wooded lots and fencerows along agricultural fields. Potential Indiana bat and northern long-eared bat habitat (Photographs 9-10) was prevalent throughout some of the wooded fencerows as shown on Exhibits 2A – 2E. The majority of the bat habitat was confined to *Carya ovata* (shagbark hickory) and dead *Fraxinus* spp. (ash) trees exhibiting excessive exfoliating bark as well as hollow cavities formed from broken tree branches or tops. EMH&T identified eight wooded areas throughout the alignment as shown on Exhibits 2A – 2E and a summary of these areas is provided below.

Woodlot #1 is located northwest of the airport and just east of Dog Leg Road (Exhibit 2B). It is a young forest dominated by *Acer saccharum* (sugar maple) and *Robinia pseudoacacia* (Black locust). *Morus* spp. (mulberry) and *Ulmus rubra* (slippery elm) are present in moderate amounts as well. This woodlot has a heavy vegetated understory dominated by *Vitis aestivalis* (summer grape), *Lonicera morrowii* (Morrow's honeysuckle) and *Rosa multiflora* (Rambler rose).

Woodlot #2 is located to the east of woodlot #1 (Exhibit 2B). The area is an immature forest with *Quercus alba* (white oak) and *Juglans nigra* (black walnut) dominating the canopy. *Carya ovata*, *Acer saccharum*, and *Celtis occidentalis* (common hackberry) are all present in moderate amounts throughout the wooded area. The understory is dominated by moderate amounts of *Lonicera morrowii* and *Acer saccharum* saplings. The herbaceous layer is dominated by *Toxicodendron radicans* (poison ivy).

Woodlot #3 is located northwest of the intersection of Dog Leg Road and West National Road (Exhibit 2C). The canopy is dominated by *Acer saccharum* and *Juglans nigra*. *Robinia pseudoacacia* is also present in moderate amounts. The understory is dominated by *Lonicera morrowii* and *Rosa multiflora*. *Toxicodendron radicans*, *Parthenocissus quinquefolia* (Virginia-creeper), and *Geum vernum* (spring avens) are present as ground cover.

Woodlot #4 is located south from Woodlot #3 across West National Road (Exhibit 2C). The canopy is dominated by *Celtis occidentalis* and *Juglans nigra*. The understory is covered heavily by *Lonicera morrowii*.

Woodlot #5 is located to the southeast of woodlot #4 (Exhibit 2C). The canopy is dominated by *Robinia pseudoacacia*. *Juglans nigra* and *Ulmus rubra* are also present in moderate amounts in the understory. The understory is covered heavily by *Lonicera morrowii*. A stream runs through the western side of the woodlot.

Woodlot #6 is located just east of woodlot #5 (Exhibit 2D). There are many tall trees throughout this woodlot. The canopy is dominated by *Acer saccharum*. *Carya ovata*, *Prunus serotina* (black cherry), *Celtis occidentalis*, and *Fraxinus americana* (white ash) are present as well. The understory is sparsely vegetated with *Lindera benzoin* (northern spicebush). A stream runs through the center of the woodlot.

Woodlot #7 is located south of the airport near the southern end of the proposed pipeline (Exhibit 2D). The canopy is dominated by *Fraxinus americana* and *Acer saccharum*. *Acer negundo* (ash-leaf maple), *Ulmus rubra* are also present in moderate amounts. The understory is heavily vegetated with *Lonicera morrowii* and *Vitis aestivalis*. *Toxicodendron radicans*, *Parthenocissus quinquefolia*, and *Geum vernum* are present as ground cover.

Woodlot #8 is located to the west of Woodlot #3 just north of West National Road (Exhibit 2C). Tree cover is intermittent and when present is dominated by large mature trees. *Acer saccharum*, *Fraxinus Americana*, *Quercus alba*, *Liriodendron tulipifera* (tulip tree), *Prunus serotina*, *Fagus grandifolia* (American beech), and *Juglans nigra* are the main species found in the canopy. The understory is heavily vegetated with *Lonicera morrowii*. Subsequently, ground cover is sparse due to how thick the invasive shrub layer has grown.

Summary

This project proposes the relocation of a 12-inch natural gas transmission pipeline around Dayton International Airport in the City of Dayton, Butler Township, Montgomery County, Ohio. As indicated by the ODNR and USFWS response letters, due to the location of the project site and the use of horizontal directional drilling to avoid or minimize impacts to all streams and wetlands, impacts to Federal and State listed species should not be expected for this project.

However, if horizontal directional drilling is determined to not be feasible in certain locations, EMH&T recommends the temporary impacts be limited to the footprint of the crossing. If at any time during construction a species discussed herein is observed, EMH&T recommends stopping work and contacting the appropriate agency representatives as noted above.

EMH&T's field investigation identified 89 potential Indiana bat habitat trees. As mentioned above, the northern long-eared bat utilizes habitat similar to that of the Indiana bat. The majority of the trees exhibiting potential bat habitat are located along wooded fencerows adjacent to active agricultural fields. EMH&T concurs with the USFWS and the ODNR's correspondence and recommends that tree clearing be minimized where appropriate and only be conducted between October 1 and March 31 to minimize all potential impacts to the abovementioned bat species.

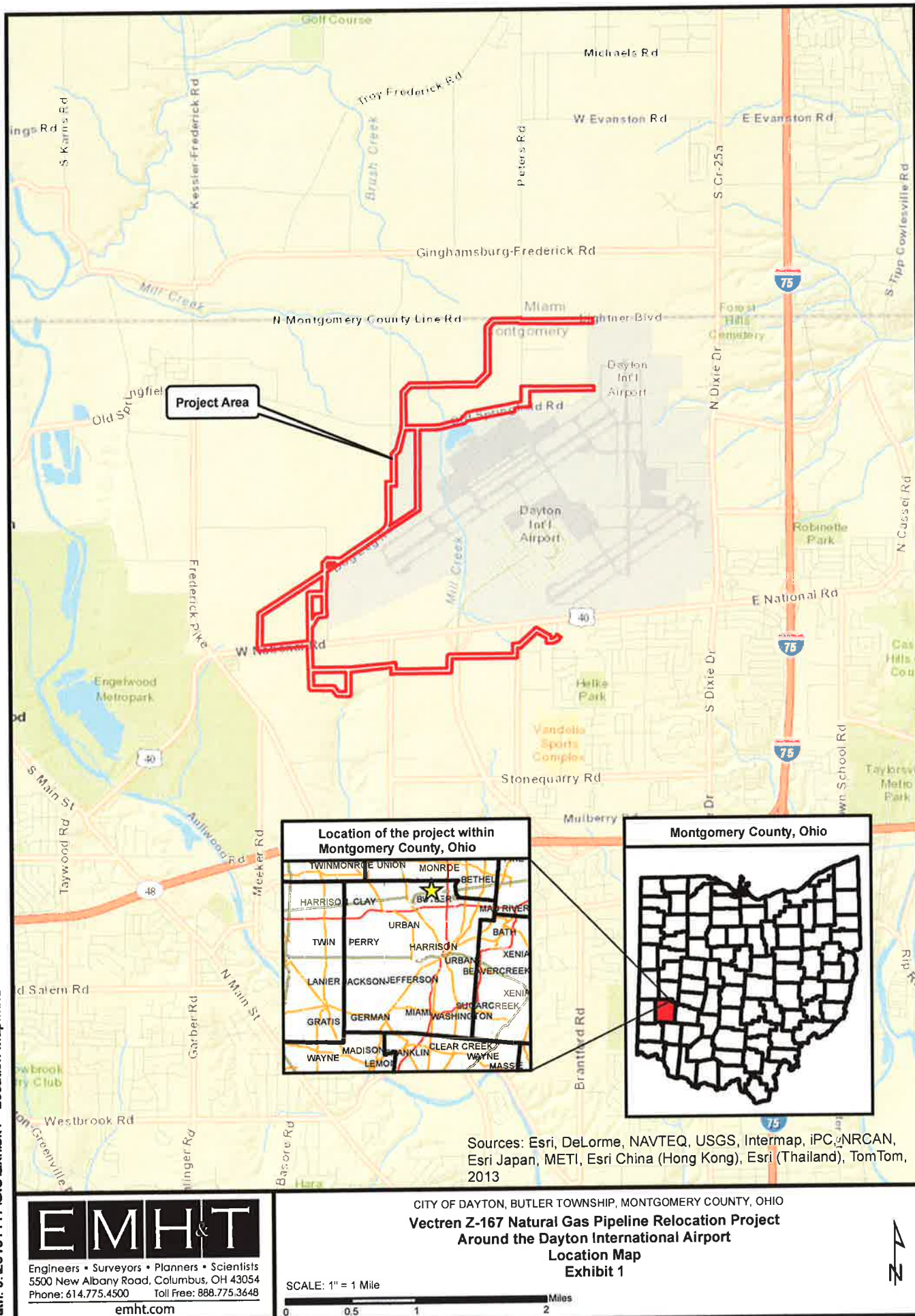
If you would like to discuss these findings, please contact me at (614) 775-4509 or via email at mkrokonko@emht.com.

Sincerely,

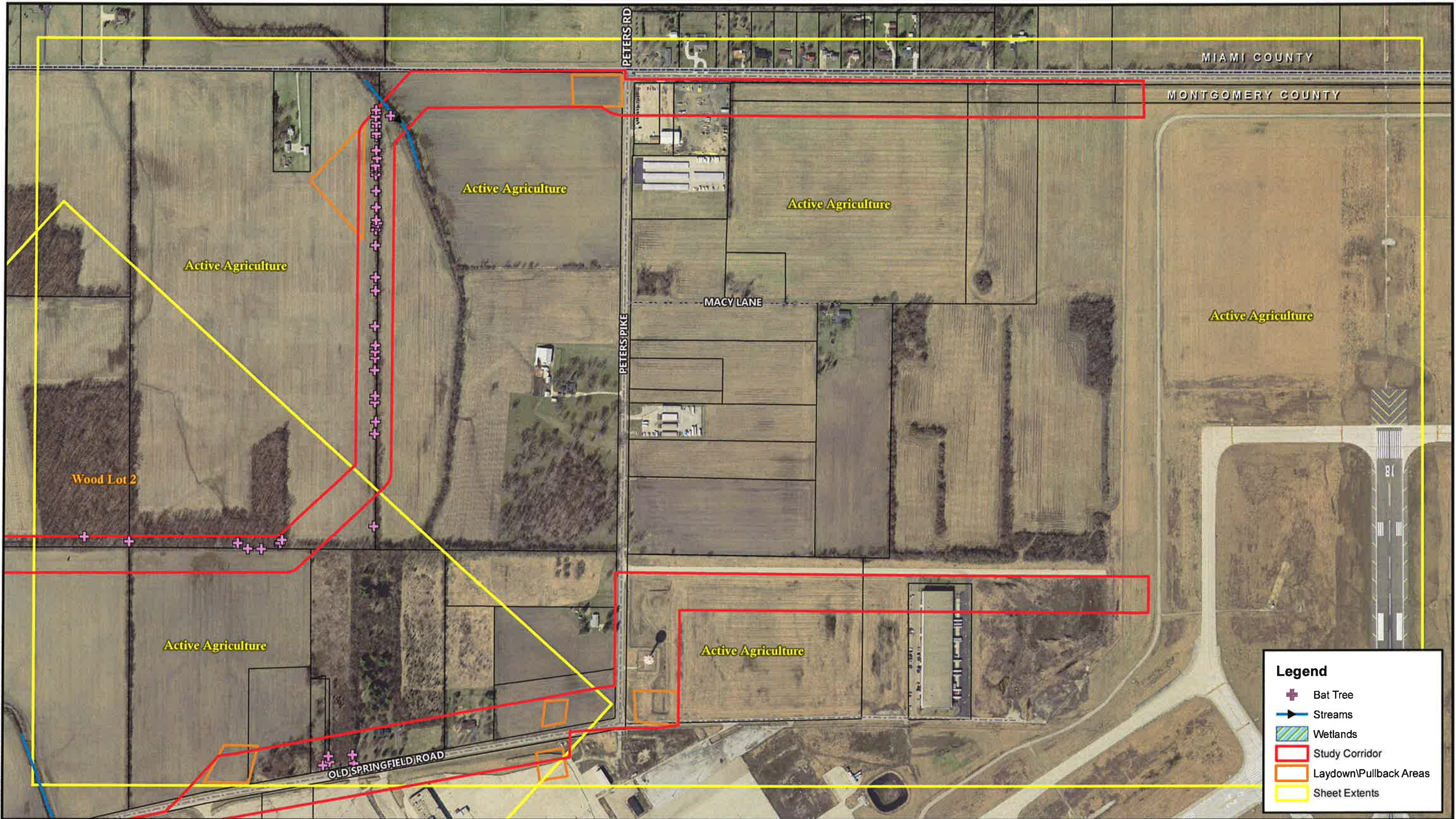


Michael A. Krokonko
Sr. Environmental Scientist

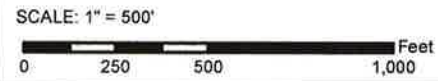
EXHIBITS



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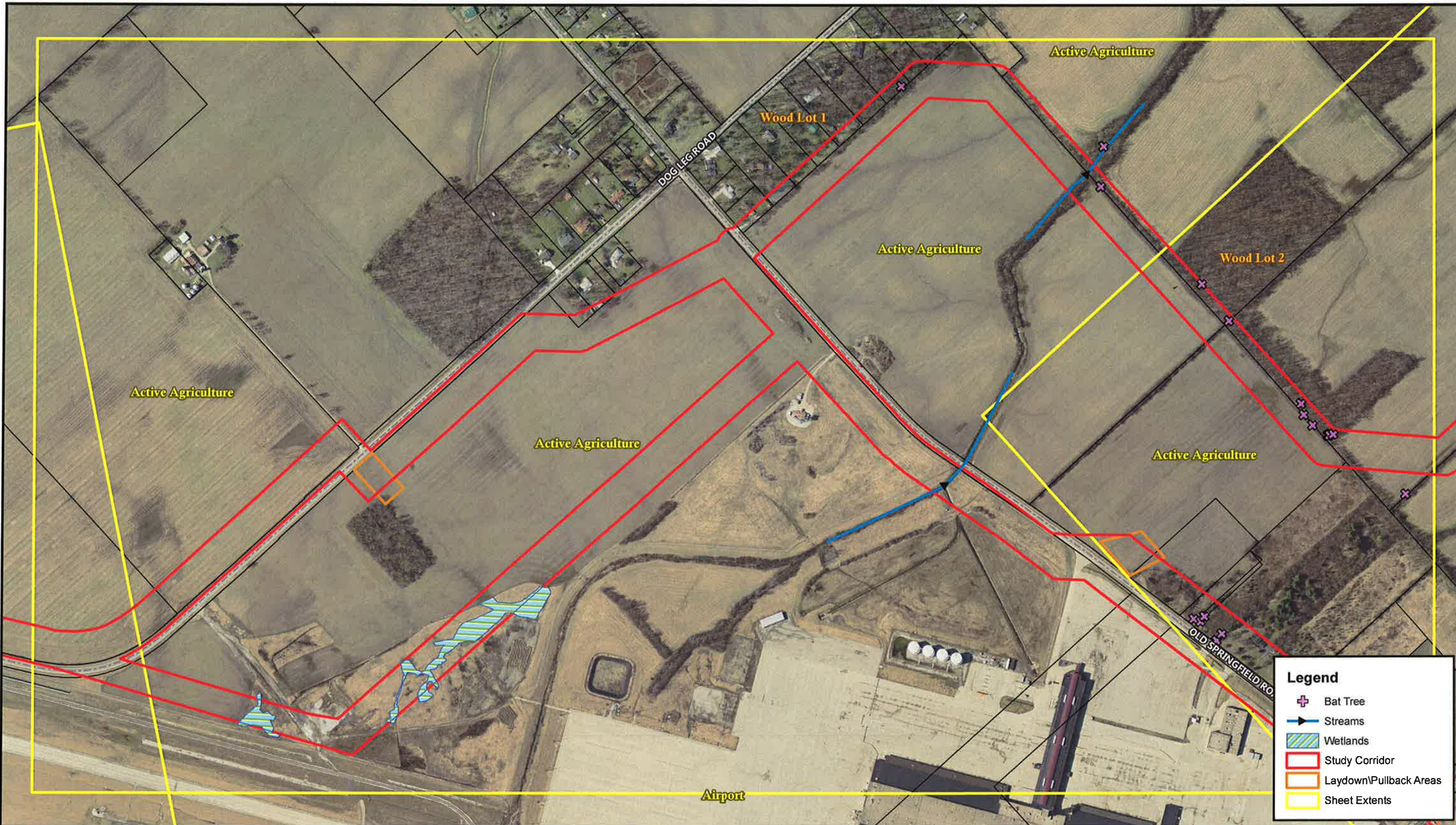


CITY OF DAYTON, BUTLER TOWNSHIP, MONTGOMERY COUNTY, OHIO
Vectren Z-167 Natural Gas Pipeline Relocation Project
Around the Dayton International Airport
Habitat Assessment
Exhibit 2A



Revised: 11/15/2013

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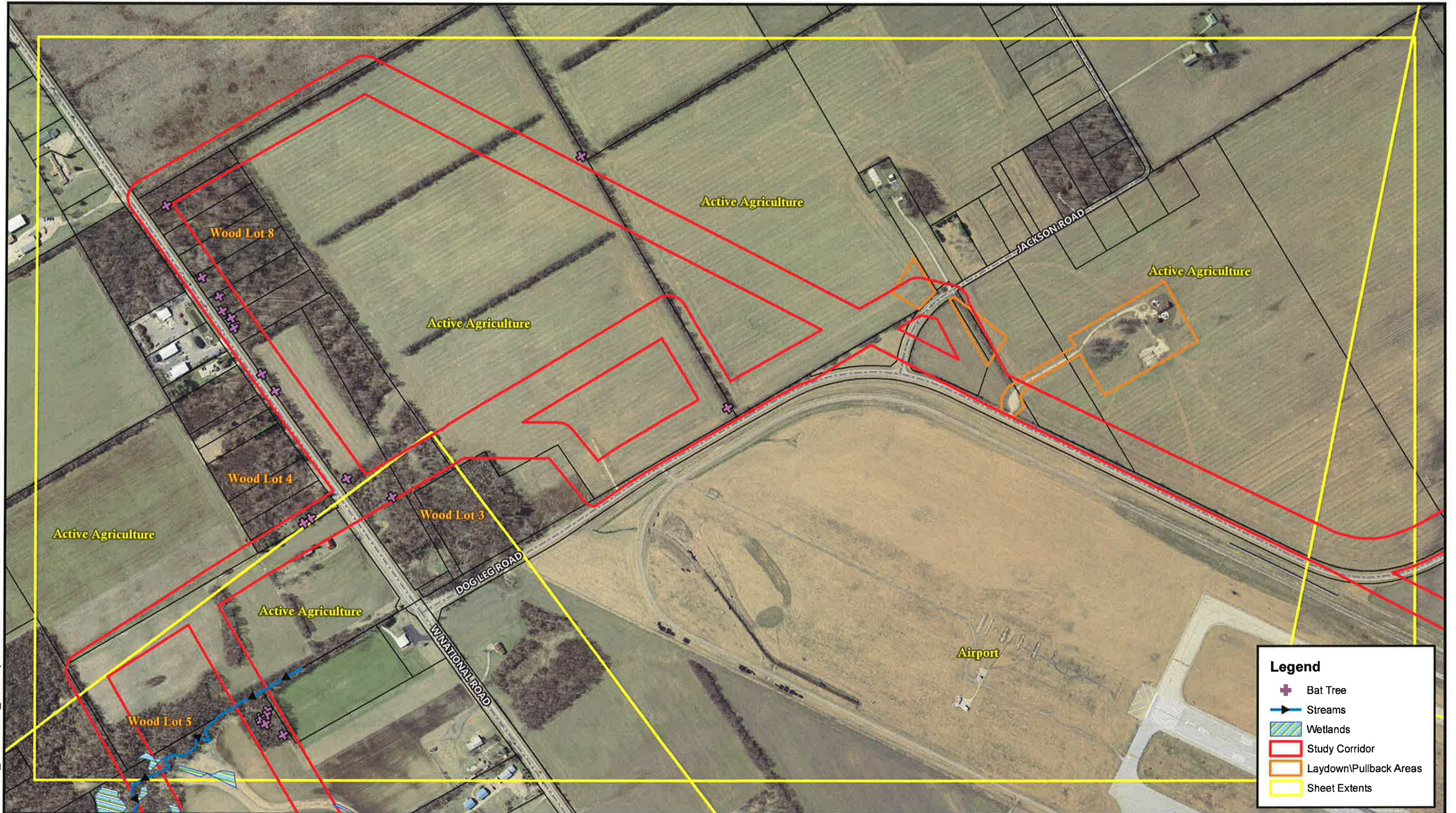
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CITY OF DAYTON, BUTLER TOWNSHIP, MONTGOMERY COUNTY, OHIO
Vectren Z-167 Natural Gas Pipeline Relocation Project
Around the Dayton International Airport
Habitat Assessment
Exhibit 2B

Revised: 11/15/2013

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CITY OF DAYTON, BUTLER TOWNSHIP, MONTGOMERY COUNTY, OHIO
Vectren Z-167 Natural Gas Pipeline Relocation Project
Around the Dayton International Airport
Habitat Assessment
Exhibit 2C

Revised: 11/15/2013

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SCALE: 1" = 500'
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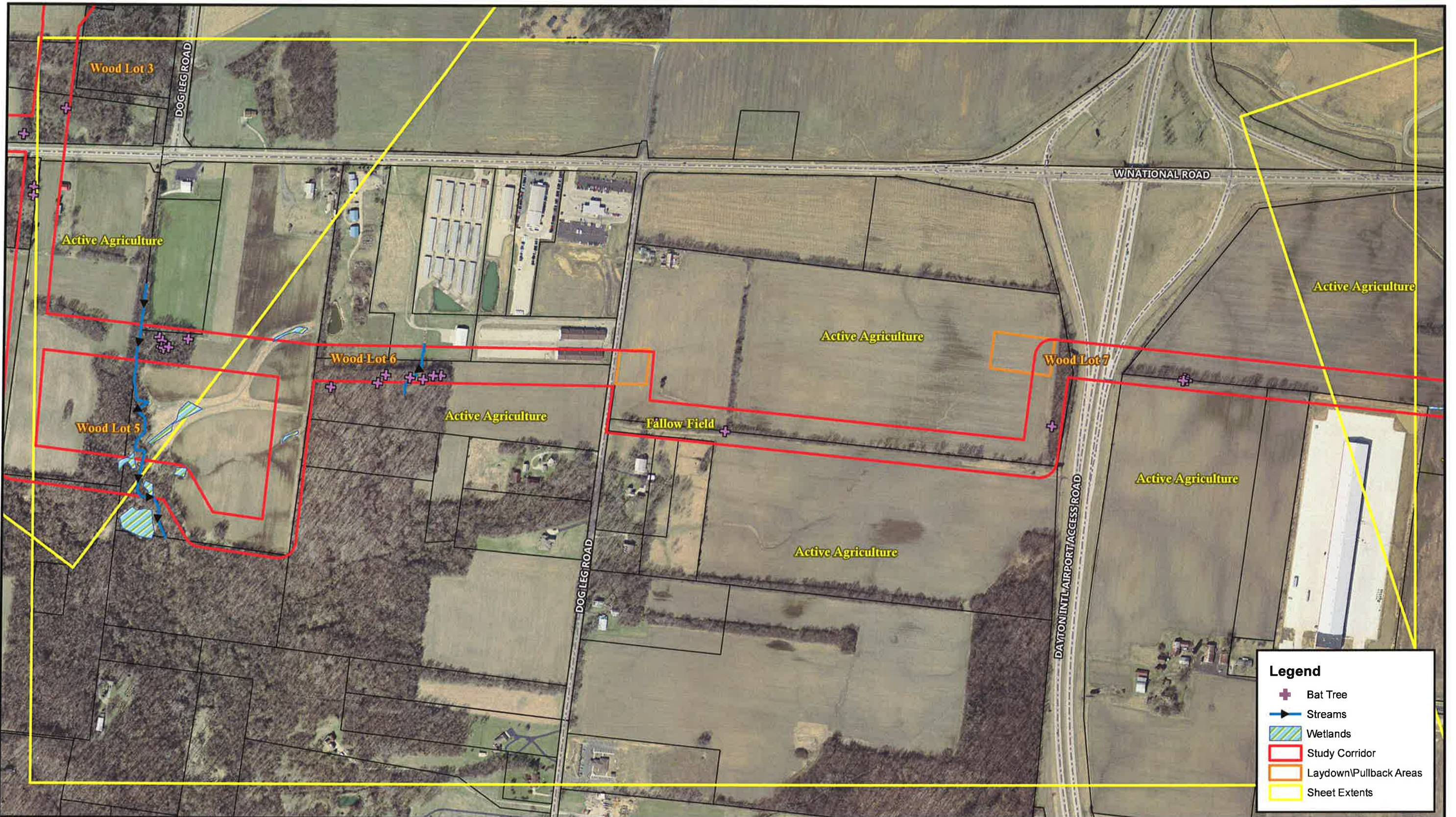
CITY OF DAYTON, BUTLER TOWNSHIP, MONTGOMERY COUNTY, OHIO
Vectren Z-167 Natural Gas Pipeline Relocation Project
Around the Dayton International Airport
Habitat Assessment
Exhibit 2D

Legend

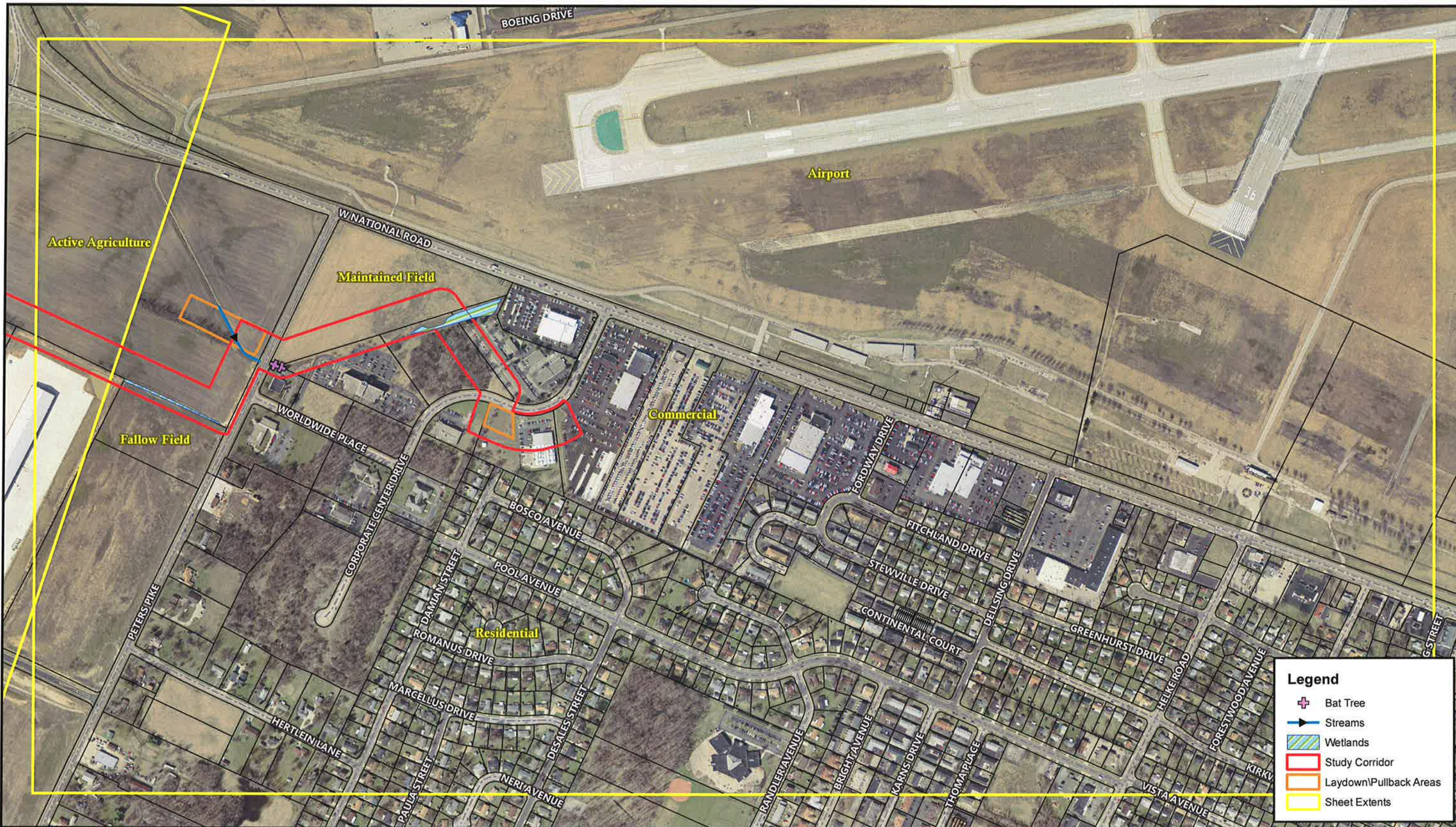
- Bat Tree
- Streams
- Wetlands
- Study Corridor
- Laydown/Pullback Areas
- Sheet Extents



Revised: 11/15/2013



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- Legend**
- Bat Tree
 - Streams
 - Wetlands
 - Study Corridor
 - Laydown/Pullback Areas
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SCALE: 1" = 500'
0 250 500 1,000 Feet

CITY OF DAYTON, BUTLER TOWNSHIP, MONTGOMERY COUNTY, OHIO
Vectren Z-167 Natural Gas Pipeline Relocation Project
Around the Dayton International Airport
Habitat Assessment
Exhibit 2E



Revised: 11/15/2013

PHOTOGRAPHS



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Photograph No. 1

View of Mill Creek (perennial stream) at alignment crossing
(EMH&T, 7/24/2013)



Photograph No. 2

View of perennial stream within alignment
(EMH&T, 7/24/2013)



Photograph No. 3
View of ephemeral stream within alignment
(EMH&T, 7/24/2013)



Photograph No. 4
View of wetland near Peters Pike
(EMH&T, 7/25/2013)



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Photograph No. 5
View of wetland near Peters Pike
(EMH&T, 7/25/2013)



Photograph No. 6
View of wetland near Dog Leg Road
(EMH&T, 10/28/2013)



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Photograph No. 7

View of wetland located south of W. National Road
(EMH&T, 11/14/2013)



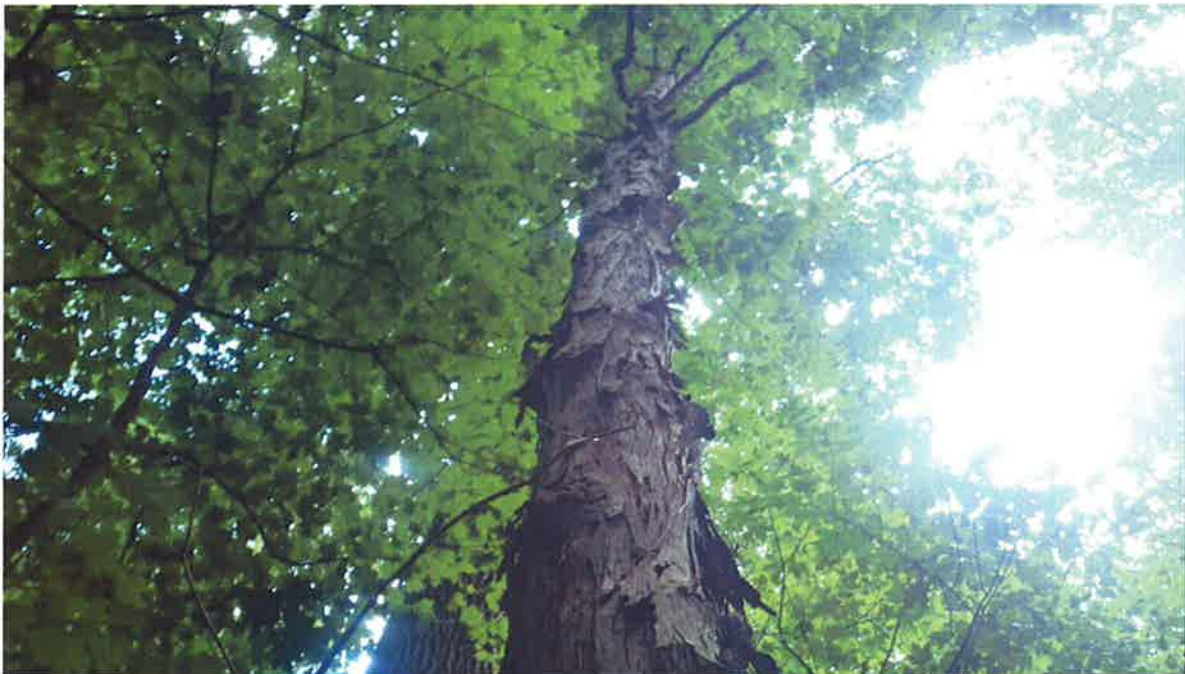
Photograph No. 8

View of wetland located south of W. National road
(EMH&T, 11/14/2013)



Photograph No. 9

View of tree exhibiting potential Indiana bat habitat
(EMH&T, 7/25/2013)



Photograph No. 10

View of tree exhibiting potential Indiana bat habitat
(EMH&T, 7/24/2013)

AGENCY COORDINATION

Krokonko, Michael

Subject: FW: Data Request - Natural Gas Pipeline Relocation, Dayton International Airport

From: "Finfera, Jennifer" <jennifer_finfera@fws.gov>

Date: July 18, 2013, 1:00:41 PM EDT

To: Melinda Stahl <mstahl@uti-corp.com>

Subject: Re: Data Request - Natural Gas Pipeline Relocation, Dayton International Airport

July 18, 2013

TAILS: 03E15000-2013-TA-1267

Dear Ms. Stahl:

This is in response to your July 10, 2013 email requesting information on threatened and endangered species within the vicinity of the proposed relocation of a 12-inch natural gas transmission pipeline around the Dayton International Airport. The proposed relocation will occur west of the airport. The project site is located in northern Montgomery County in Butler Township. Three stream crossings would occur and this will be completed using horizontal directional drilling to avoid impacts to aquatic resources. The project area currently consists of agricultural areas, rural residences, and limited forested habitat.

There are no Federal wildlife refuges, wilderness areas, or Critical Habitat within the vicinity of this site.

The Service recommends that impacts to streams and wetlands be avoided and buffers surrounding these systems be preserved. Streams and wetlands provide valuable habitat for fish and wildlife resources, and the filtering capacity of wetlands helps to improve water quality. Buffers of native vegetation surrounding these systems are also important in preserving their wildlife-habitat and water quality-enhancement properties. We recommend that any proposed projects use best construction techniques to minimize erosion. Prevention of non-native, invasive plant establishment is critical in maintaining quality habitats. All disturbed areas should be mulched and re-vegetated with native plants.

The project lies within the range of the **bald eagle** (*Haliaeetus leucocephalus*), a species protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act. Due to the project type, location, and onsite habitat, this species would not be expected within the project area, and no impact to this species is expected. Relative to this species, this precludes the need for further action on this project as required by the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act.

ENDANGERED SPECIES COMMENTS:

The proposed project lies within the range of the **Indiana bat** (*Myotis sodalis*), a federally listed endangered species. Since first listed as endangered in 1967, their population has declined by nearly 60%. Several factors have contributed to the decline of the Indiana bat, including the loss and degradation of suitable hibernacula, human disturbance during hibernation, pesticides, and the loss and degradation of forested habitat, particularly stands of large, mature trees. Fragmentation of forest habitat may also contribute to declines. Most recently white-nose syndrome (WNS), a novel fungal pathogen, has caused serious declines in the Indiana bat population in the northeastern U.S. WNS has also been documented in Ohio and declines of Indiana bats during winter censuses have been noted, but the full extent of the impacts from WNS in Ohio are not yet known.

During winter, Indiana bats hibernate in caves and abandoned mines. Summer habitat requirements for the species are not well defined but the following are considered important:

- (1) dead or live trees and snags with peeling or exfoliating bark, split tree trunk and/or branches, or cavities, which may be used as maternity roost areas;

(2) live trees (such as shagbark hickory and oaks) which have exfoliating bark;

(3) stream corridors, riparian areas, and upland woodlots which provide forage sites.

You have indicated that several small stands of trees will need to be removed during construction of the pipeline. A 75-foot corridor will need to be cleared for pipeline construction. The photos and site description provided indicate that habitat availability for the Indiana bat at the proposed site is limited. Therefore, we recommend that any trees exhibiting any of the characteristics listed above, as well as surrounding trees, be saved wherever possible. However, if these trees cannot be avoided, they should only be cut between October 1 and March 31.

The proposed project lies within the range of the **rayed bean** (*Villosa fabalis*), and **snuffbox** (*Epioblasma triquetra*). These species have been documented in the Great Miami River several miles to the east of the project site and in the Stillwater River, several miles to the west of the project site. You have indicated that the 3 streams will be crossed using horizontal directional drilling (HDD). Due to the project location and use of HDD to avoid impacts to the streams onsite, no impacts are expected for these species

The project lies within the range of the **eastern massasauga** (*Sistrurus catenatus*), a small, docile rattlesnake that is currently a Federal candidate species. Since designated as a candidate species in 1999, it has declined significantly throughout its range and populations in Ohio that were once throughout glaciated portions of the state, are now small and isolated. The species has been listed by the State of Ohio as endangered since 1996. Several factors have contributed to the decline of the species including habitat loss and fragmentation, indiscriminate killing, collection, gene pool contamination and incompatible land use practices.

Eastern massasaugas use both upland and wetland habitat and these habitats differ by season. During the winter, massasaugas hibernate in low wet areas, primarily in crayfish burrows, but may use other structures. Presence of a water table near the surface is important for a suitable hibernaculum. In the summer, massasaugas use drier, open areas that contain a mix of grasses and forbs such as goldenrods and other prairie plants that may be intermixed with trees or shrubs. Adjoining lowland and upland habitat with variable elevations between are critical for the species to travel back and forth seasonally. You have indicated that no wetlands were identified in the area according to the Ohio Department of Natural Resources website. If any wetlands are identified during the field study you have indicated that the pipeline will be routed around them or they will be crossed using the HDD method. Due to the limited onsite habitat, the project location, and the avoidance of impacts to wetlands; no significant impacts are expected for this species.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the Endangered Species Act of 1973, as amended, and are consistent with the intent of the National Environmental Policy Act of 1969 and the U.S. Fish and Wildlife Service's Mitigation Policy. Please note that consultation under section 7 of the ESA may be warranted for this project if suitable habitat for federally listed species may be impacted by this project. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

If you have any questions regarding our response or if you need additional information, please contact me.

Thank you,

Jenny Finfera
Wildlife Biologist
Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
Phone: 614-416-8993 ext.13
Fax: 614-416-8994



Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZIEHRINGER, DIRECTOR

Office of Real Estate

Paul R. Baldrige, Chief

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Columbus, OH 43229

Phone: (614) 265-6649

Fax: (614) 267-4764

August 12, 2013

Utility Technologies International Corporation

4700 Homer Ohio Lane

Groveport, OH 43125

Attn: Melinda Stahl; mstahl@uti-corp.com

Re: Natural Gas Pipeline Relocation

Project: 13-367 Dayton International Airport Pipeline Reroute – Vectren Energy

Location: Dayton International Airport, Vandalia Township, Montgomery County, Ohio

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The ODNR Natural Heritage Database has a record in the vicinity of the project for the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction **must be avoided in this habitat during the species' nesting period of April 15 to July 31**. If this type of habitat will not be impacted, the project is not likely to impact this species.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees: Shagbark hickory (*Carya ovata*), Shellbark hickory (*Carya laciniosa*), Bitternut hickory (*Carya cordiformis*), Black ash (*Fraxinus nigra*), Green ash (*Fraxinus pennsylvanica*), White ash (*Fraxinus americana*), Shingle oak (*Quercus imbricaria*), Northern red oak (*Quercus rubra*), Slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), Eastern cottonwood

(*Populus deltoides*), Silver maple (*Acer saccharinum*), Sassafras (*Sassafras albidum*), Post oak (*Quercus stellata*), and White oak (*Quercus alba*). Indiana bat habitat consists of suitable trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. If suitable trees occur within the project area, these trees should be conserved. If suitable habitat occurs on the project area and trees must be cut, cutting must occur between October 1 and March 31. If suitable trees must be cut during the summer months, a net survey must be conducted between June 15 and July 31, prior to cutting. Net surveys shall incorporate either two net sites per square kilometer of project area with each net site containing a minimum of two nets used for two consecutive nights, or one net site per kilometer of stream within the project limits with each net site containing a minimum of two nets used for two consecutive nights. If no tree removal is proposed, the project is not likely to impact this species.

The project is within a county where historical records exist for the eastern massasauga (*Sistrurus catenatus*), a state endangered and a Federal candidate snake species. The habitat of the eastern massasauga includes bogs, fens, wet prairies, delineated wetlands and other moist grasslands. If this type of habitat is not going to be affected, this project is not likely to impact this species. However, if the eastern massasauga is encountered during the project, Frank Lopez of the DOW should be contacted immediately (419) 625-8062.

The project is within the range of the rayed bean (*Villosa fabalis*), a state endangered and federal endangered mussel species, and the snuffbox (*Epioblasma triquetra*), a state endangered and federal endangered mussel. The project must not have an impact on freshwater native mussels in the area. If mussels are encountered during the restoration, work should immediately be stopped and John Navarro of the DOW should be contacted (614-265-6346). If there is no in-water work in perennial streams planned, this project is not likely to impact these species.

The project is within the range of the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*), a state endangered amphibian currently being evaluated for Federal Candidate status. This long-lived, entirely aquatic salamander inhabits perennial streams with large flat rocks. In-water work in hellbender streams can reduce availability of these large cover rocks and can destroy hellbender nests and/or kill adults and juveniles. The contribution of additional sediment to hellbender streams can smother large cover rocks and gravel/cobble substrate (used by juveniles), making them unsuitable for refuge and nesting. Projects that contribute to altered flow regimes (e.g., by increasing areas of impervious surfaces or modifying the floodplain) can also adversely affect hellbender habitat. Due to the location and the characteristics of the streams being crossed, this project is not likely to impact this species.

The ODNR Natural Heritage Database has no other records for rare or endangered species at this project site. We are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forests, national wildlife refuges or other protected natural areas within the project area. Our inventory program does not provide a complete survey of Ohio wildlife, and relies on information supplied by many individuals and organizations. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area.

ODNR appreciates the opportunity to provide these comments. Please contact John Kessler at (614) 265-6621 if you have questions about these comments or need additional information.

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Summary: Amended Application of Vectren Energy Delivery of Ohio, Inc. - Appendix 7-2
electronically filed by Teresa Orahod on behalf of Sally Bloomfield