

**CASE No. 14-1717-GA-BLN
LON
AVON LAKE GAS ADDITION PROJECT
PROPOSED NATURAL GAS PIPELINE**

ATTACHMENT G

U.S. FISH AND WILDLIFE SERVICE CORRESPONDENCE



AECOM
4 Neshaminy Interplex, Suite 300
Trevose, PA 19053-6940

215.244.7100 tel
215.244.7179 fax

January 22, 2014

Dr. Mary Knapp
U.S. Fish and Wildlife Service
4625 Morse Rd Suite 104
Columbus, OH, 43230

**Subject: NRG Ohio Pipeline Company LLC
Avon Lake Pipeline Project
Lorain County, Ohio**

Dear Dr. Knapp:

On behalf of NRG Ohio Pipeline Company LLC ("NRG"), AECOM hereby requests rare, threatened and endangered species consultation for NRG's proposed 20-mile Avon Lake Pipeline Project (the "Project") (Figure 1) which will be located in Lorain County, Ohio.

NRG will seek approval from the Ohio Power Siting Board ("OPSB") process. AECOM has been retained to assist NRG with the preparation of environmental studies, permits and consultations required for planning and construction of the Project. On behalf of NRG, AECOM hereby requests information related to the presence of federally-listed species and their habitats located within 0.5 miles (1 mile total centered over the pipeline centerline) of the Project area. More specifically, AECOM seeks the following information for the Project area:

- Federally-listed threatened or endangered species;
- Federally-proposed threatened or endangered species;
- Federally-proposed or designated critical habitat;
- Federally-designated trails, parks, nature preserves, Wildlife Management Areas, National Refuges, etc; and
- Other unique ecosystems or sensitive communities.

Upon your review, we ask that you please send a written response to the AECOM address above, listing specific findings or concerns. In order to assist you in this process, we have attached 7.5-minute USGS quadrangle maps of the Project area (Figure 1), aerial maps of the Project area with NWI wetlands (Figure 2), and shapefiles of the proposed alignment.

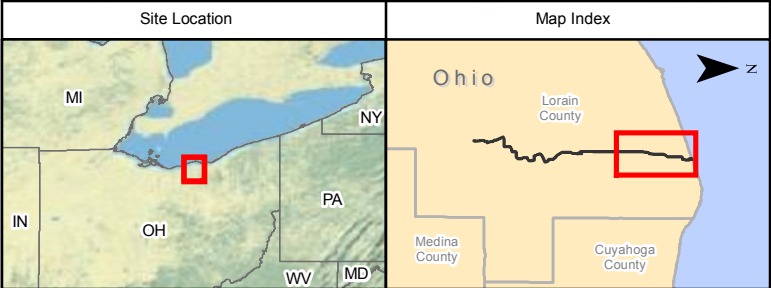
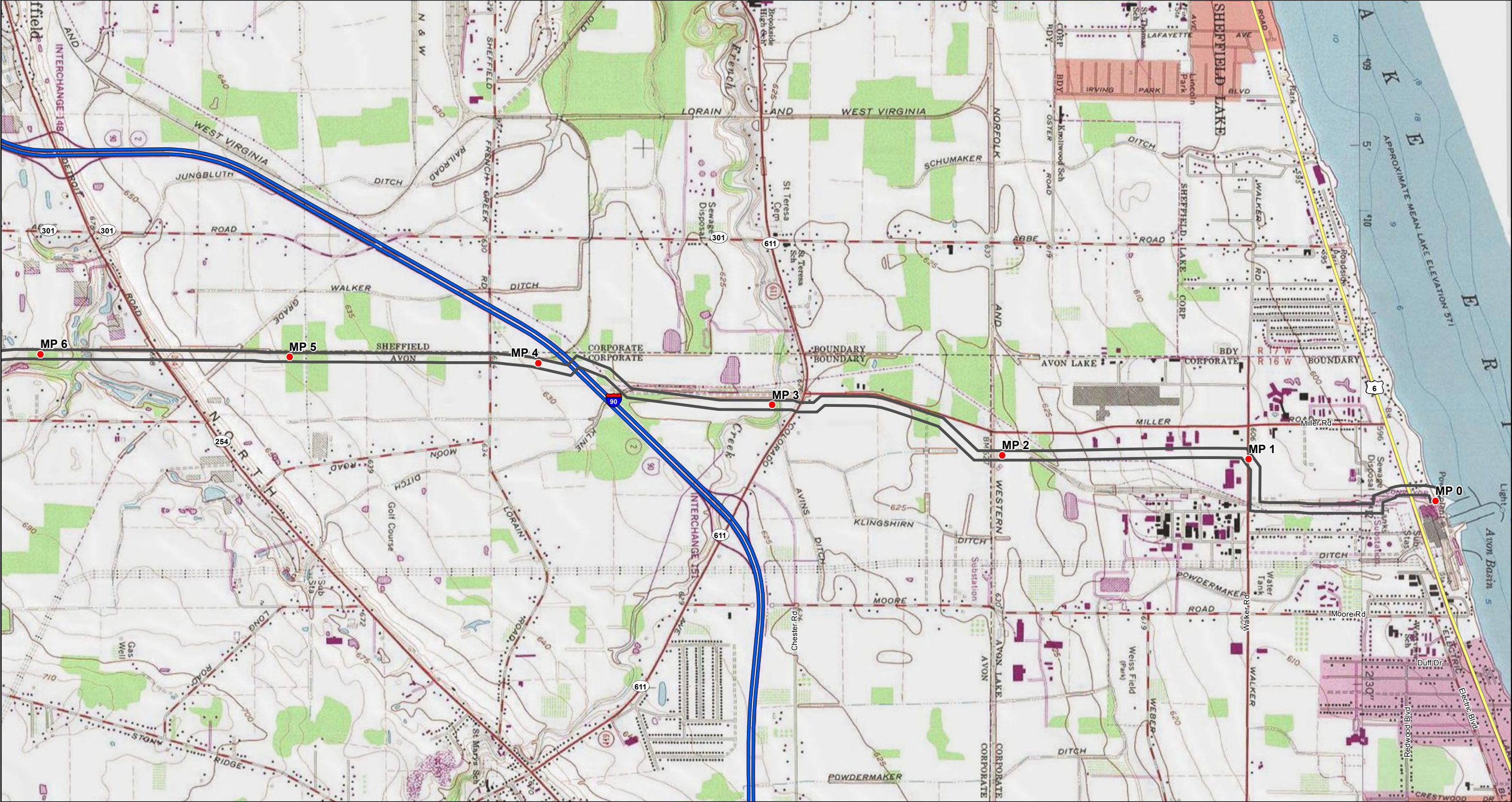
If you require any further information or have any questions regarding the Project, please do not hesitate to contact Heather Brewster at (215) 244-7155 or e-mail heather.brewster@aecom.com.

Sincerely,

Project Manager

cc: Mr. Ron Bevacqua, NRG
Mr. Nate Rozic, NRG

Attachments: USGS Location Map (Figure 1)
Aerial Location Map (Figure 2)
Project Shapefiles



- Legend
- Milepost Preferred Route

Preferred Route 200' Corridor

Highway

Major Road

Other Major Road
- 0

1,000

2,000

4,000

Feet

1:24,000

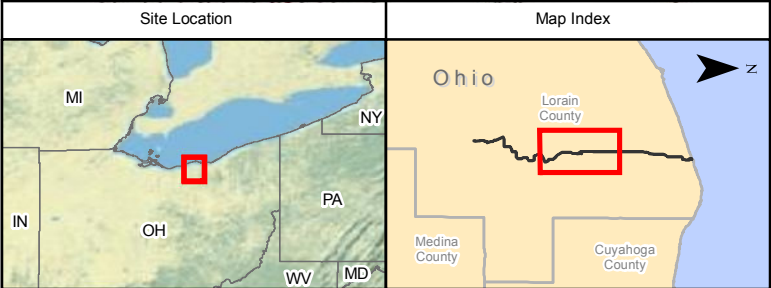
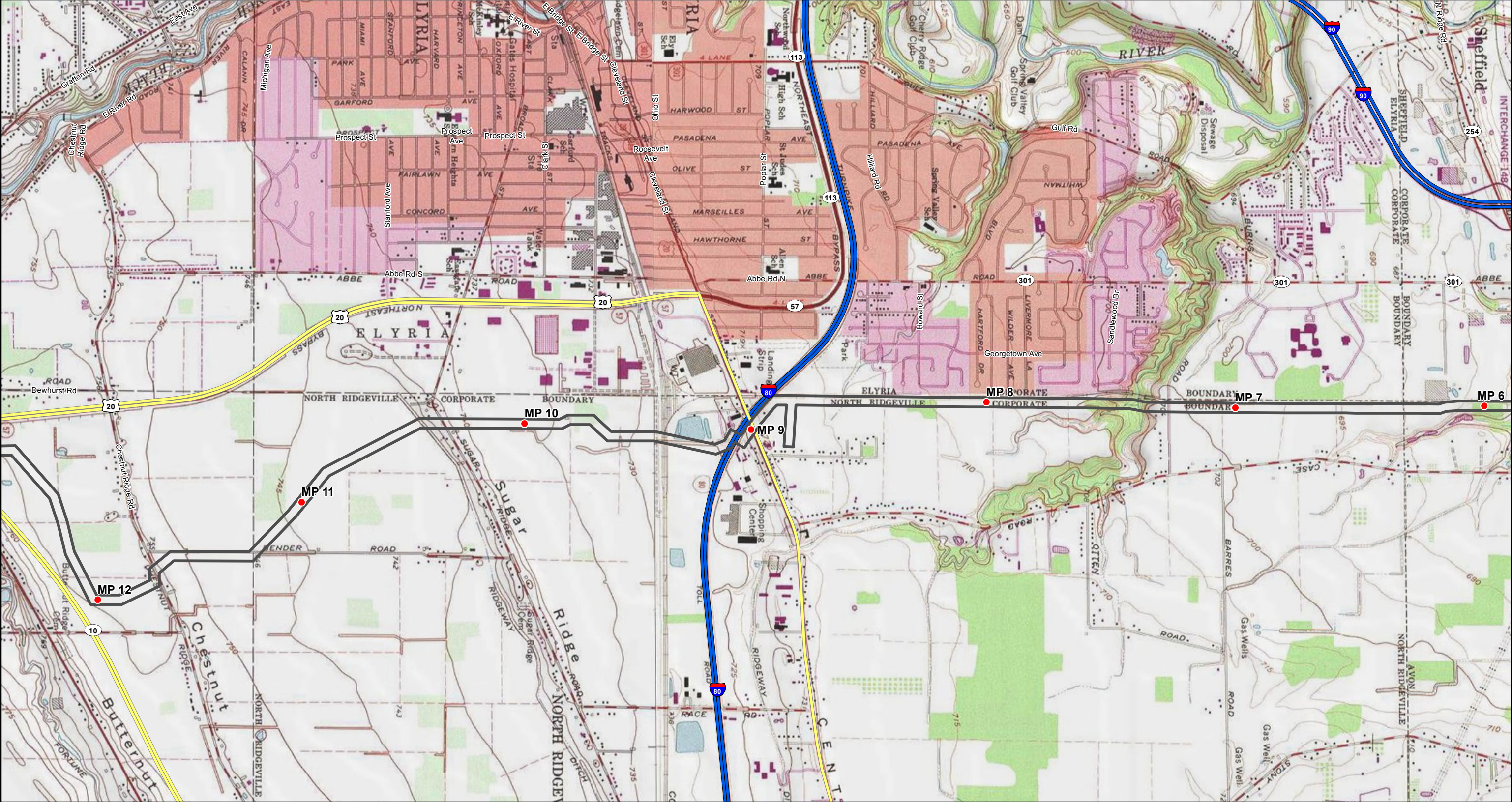
NRG Ohio Pipeline Company LLC
Avon Lake Pipeline Project

Location Map

Page 1 of 3

Figure 1
January 2014

Data Sources: Lorain County GIS Data 2013
Imagery: Bing Map Topo



Legend

- Milepost Preferred Route
- Preferred Route 200' Corridor
- Highway
- Major Road
- Other Major Road



0 1,000 2,000 4,000 Feet
1:24,000

NRG Ohio Pipeline Company LLC
Avon Lake Pipeline Project

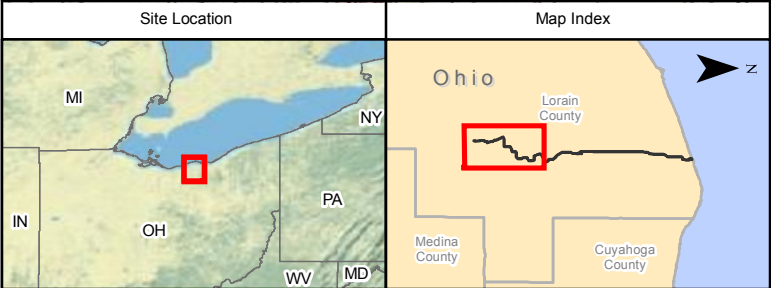
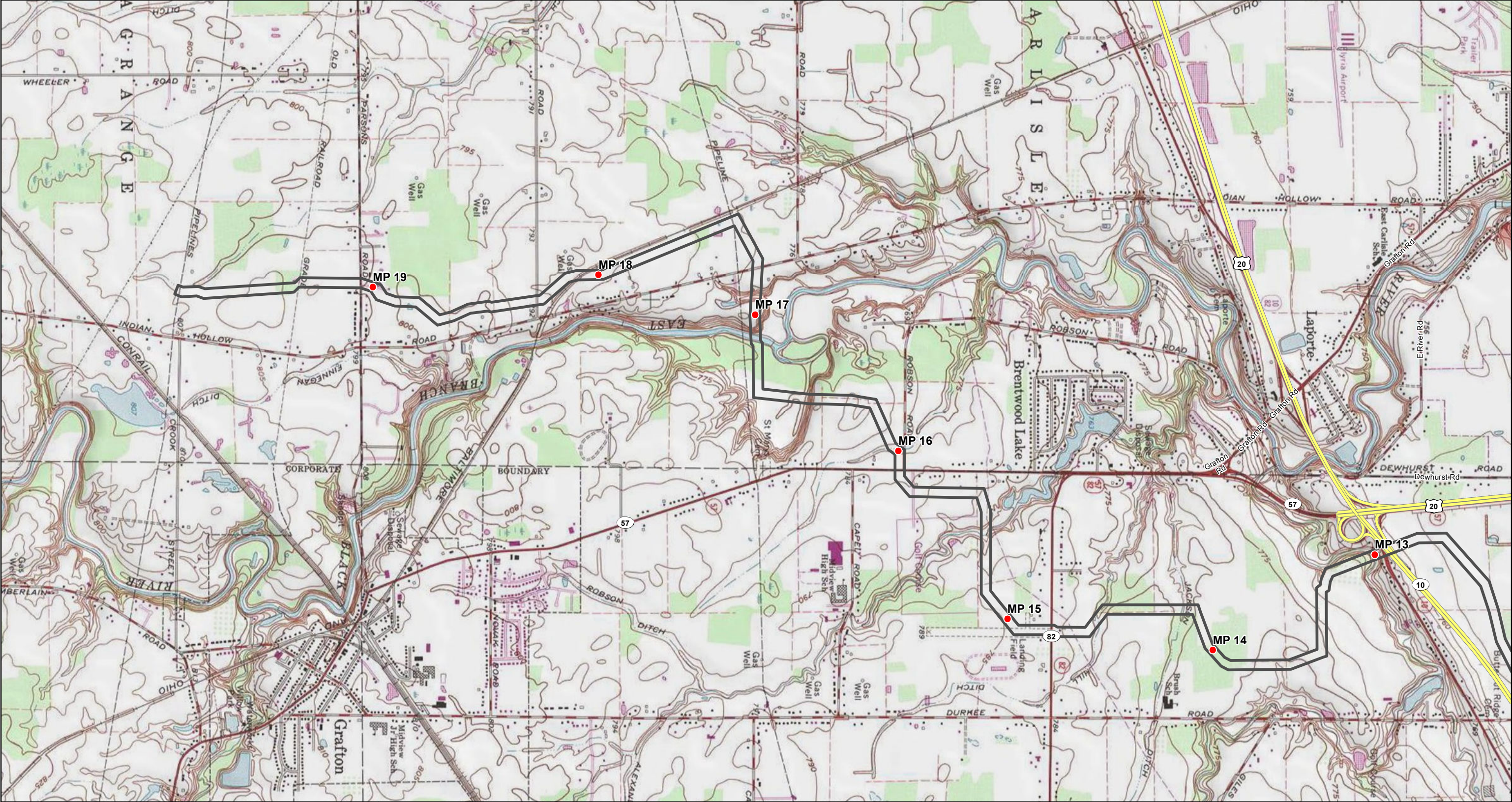
Location Map

Page 2 of 3



Figure 1

January 2014



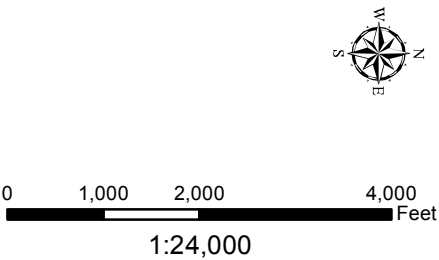
Legend

- Milepost Preferred Route

Preferred Route 200' Corridor
- Highway

Major Road

Other Major Road



NRG Ohio Pipeline Company LLC
Avon Lake Pipeline Project

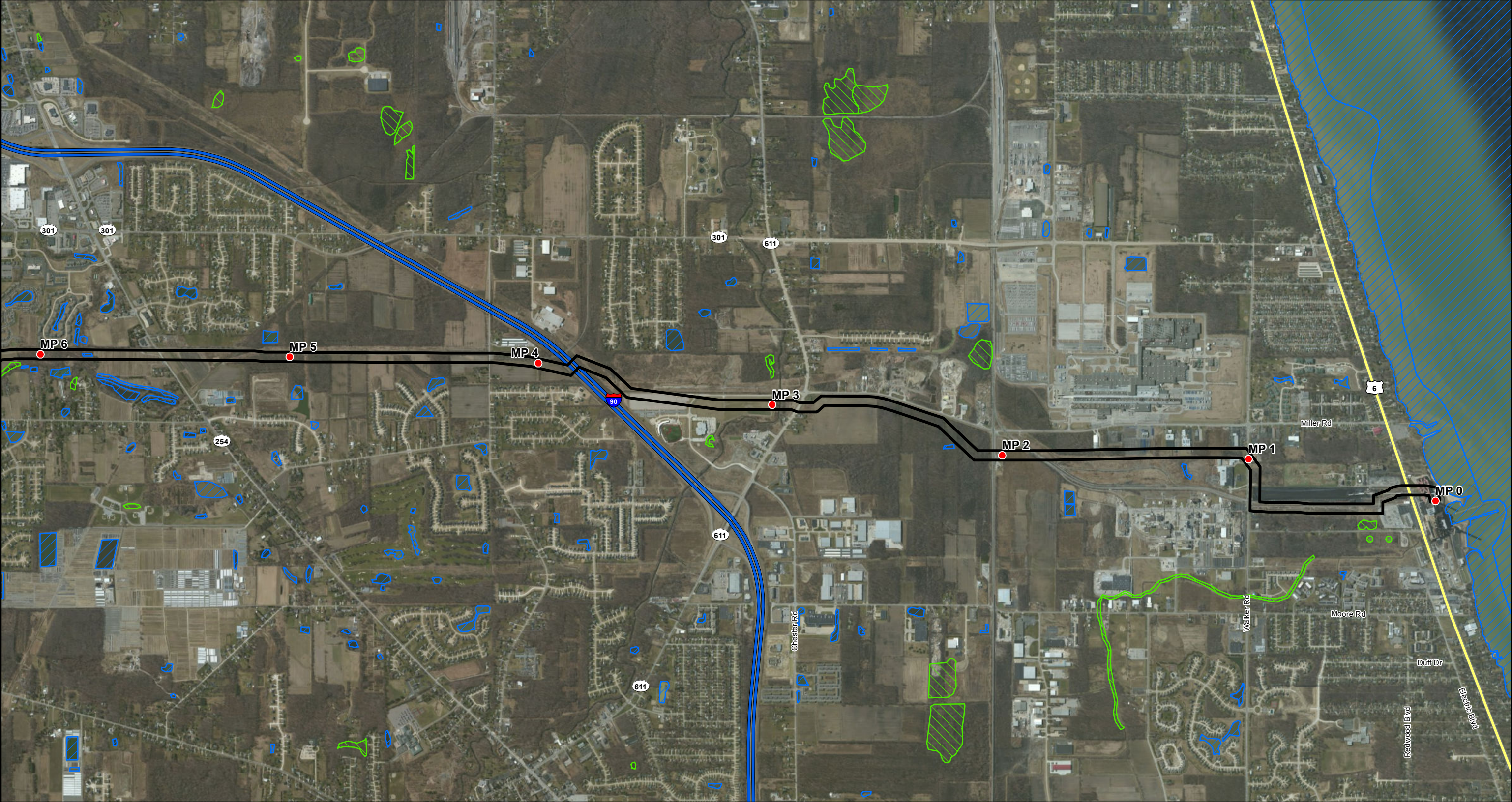
Location Map

Page 3 of 3

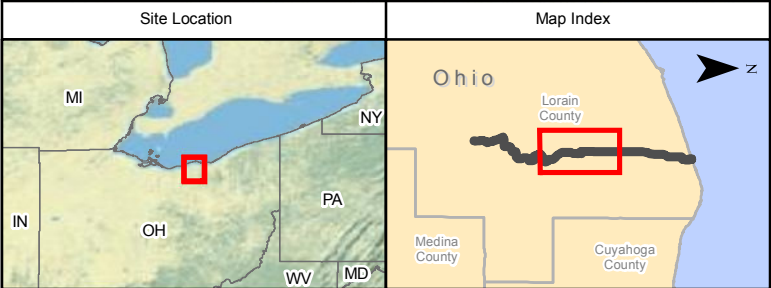
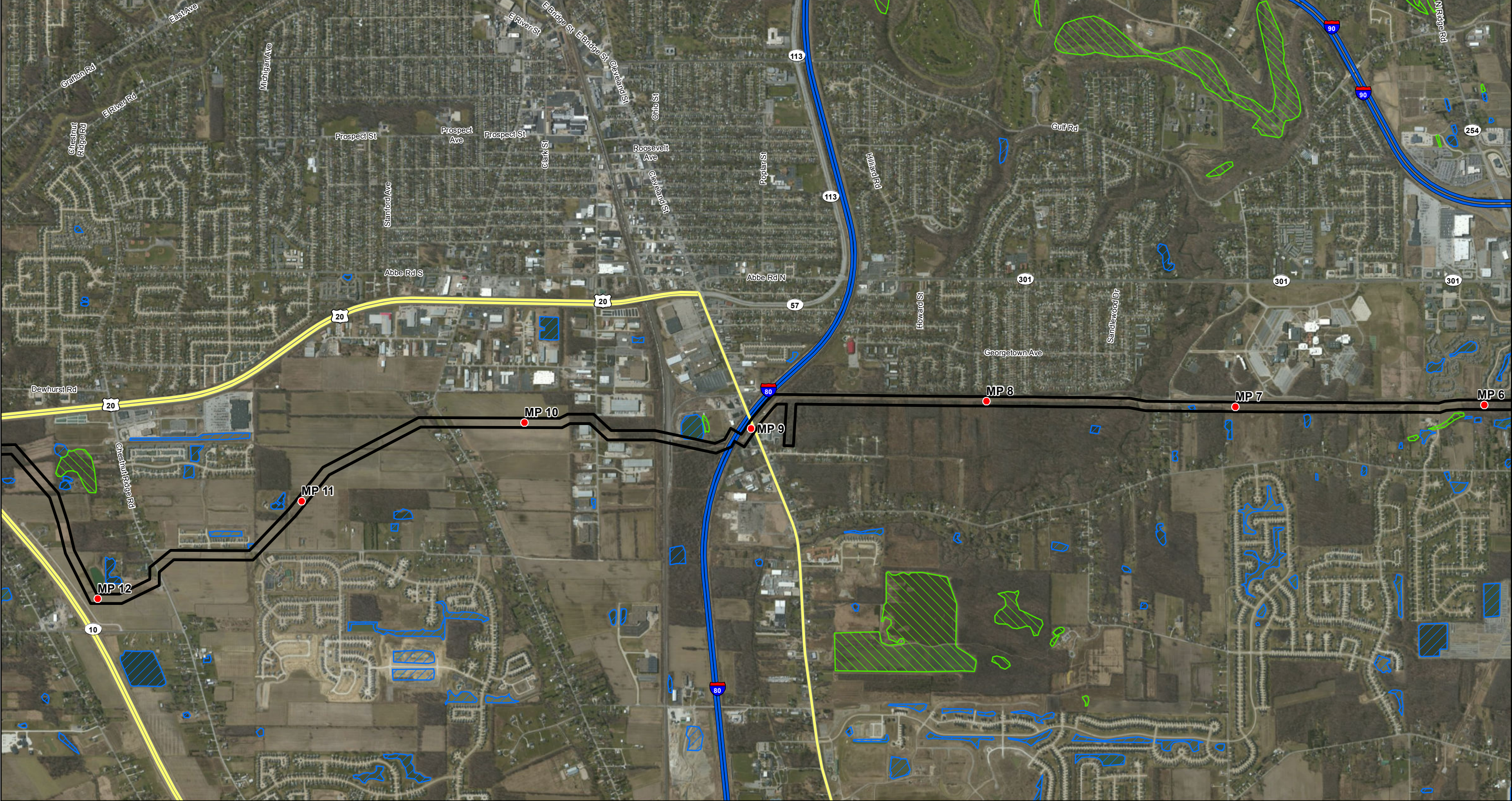


Figure 1

January 2014



<p>Site Location</p>	<p>Map Index</p>	<p>Legend</p> <ul style="list-style-type: none">● Milepost Preferred Route▬ Preferred Route 200' Corridor▨ NWI Wetland▨ NWI Waterbody▬ Highway▬ Major Road▬ Other Major Road <p>0 1,000 2,000 4,000 Feet</p> <p>1:24,000</p>	<p>NRG Ohio Pipeline Company LLC Avon Lake Pipeline Project</p> <p>Aerial Map</p> <p>Page 1 of 3</p>	<p>AECOM</p> <p>Figure 2</p> <p>January 2014</p>
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Legend

- Milepost Preferred Route
- ▬ Preferred Route 200' Corridor
- ▨ NWI Wetland
- ▨ NWI Waterbody
- ▬ Highway
- ▬ Major Road
- ▬ Other Major Road



0 1,000 2,000 4,000 Feet
1:24,000

NRG Ohio Pipeline Company LLC
Avon Lake Pipeline Project

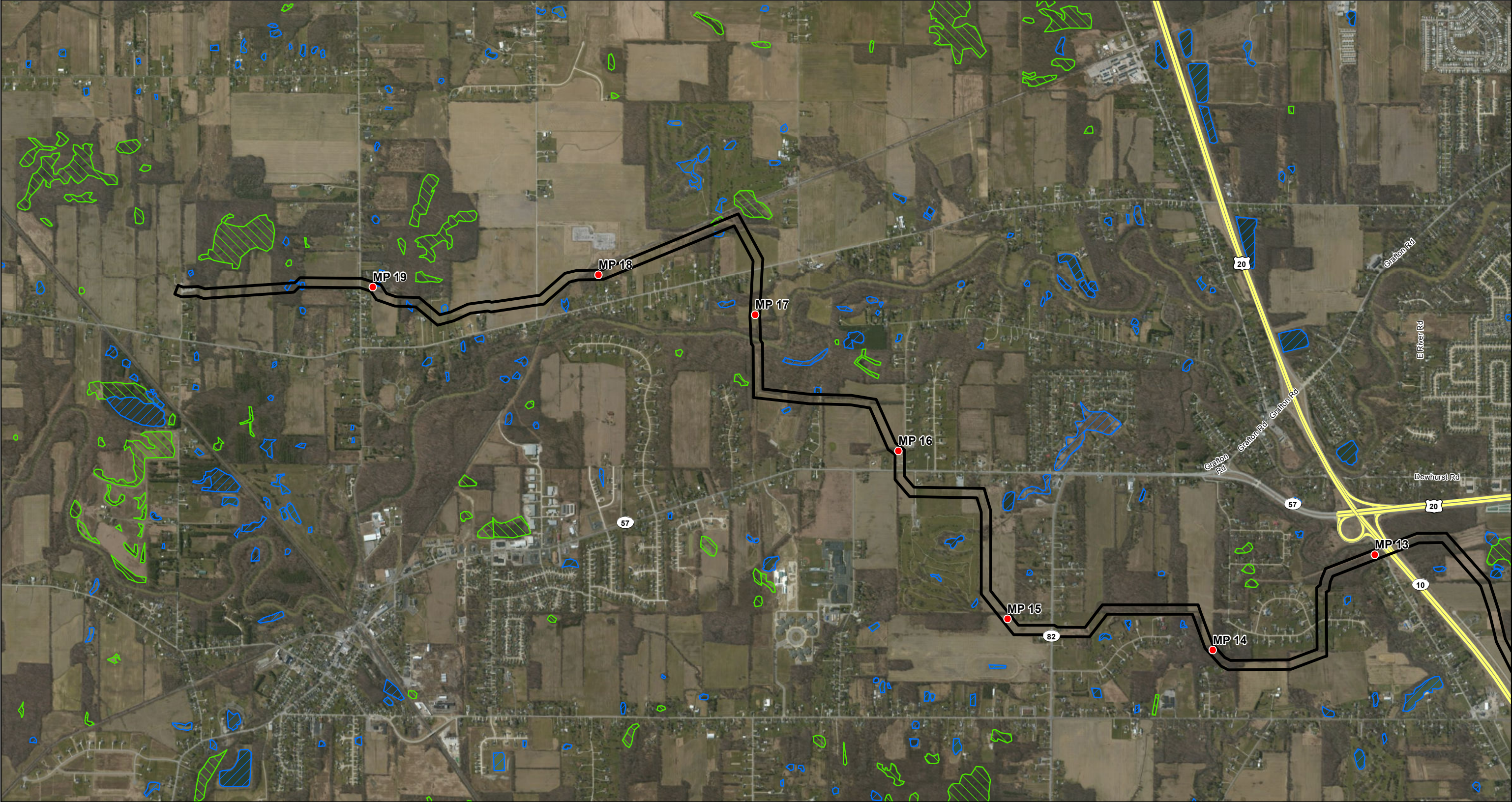
Aerial Map

Page 2 of 3

AECOM

Figure 2

January 2014



<p>Site Location</p>	<p>Map Index</p>	<p>Legend</p> <ul style="list-style-type: none">Milepost Preferred RoutePreferred Route 200' CorridorNWI WetlandNWI WaterbodyHighwayMajor RoadOther Major Road <p>0 1,000 2,000 4,000 Feet</p> <p>1:24,000</p>	<p>NRG Ohio Pipeline Company LLC Avon Lake Pipeline Project</p> <p>Aerial Map</p> <p>Page 3 of 3</p>	<p>AECOM</p> <p>Figure 2</p> <p>January 2014</p>
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United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994

February 4, 2014

Heather Brewster
AECOM Neshaminy Interplex, Suite 300
Trevose, PA 19053-6940

Re: Avon Lake Pipeline Project in Lorain County, Ohio

Dear Ms. Brewster,

TAILS# 03E15000-2014-TA-0602

We have received your recent correspondence requesting information about the subject proposal. There are no Federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The Service recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

ENDANGERED SPECIES COMMENTS: All projects in the State of Ohio lie 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. 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.

It appears that habitat exhibiting the characteristics described above may be present along the proposed project route. However, 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.

If there is a Federal nexus for the project (Federal funding provided, Federal permits required to construct, etc.) then no tree clearing on any portion of the parcel should occur until consultation under section 7 of the Endangered Species Act of 1973, as amended, between the Service and the Federal action agency is completed. We recommend that the Federal action agency submit to this office a determination of effects to the Indiana bat for our review and concurrence.

If the applicant plans to clear trees prior to issuance of a 404 and/or 401 permit the following two conditions must be adhered to: 1) Section 7 consultation for the Indiana bat between the Service and the Corps of Engineers must be completed; and 2) No tree clearing on any portion of the parcel should occur until both the Corps and the Ohio EPA anticipate that issuance of both a 404/NWP and a 401 permit authorizing the project as a whole is imminent. This will ensure that clearing will be limited to the footprint of whichever alternative is ultimately permitted, and that no unnecessary clearing will occur. No tree clearing should occur until these two conditions have been satisfied.

All projects in the State of Ohio lie within the range of the **northern long-eared bat** (*Myotis septentrionalis*), a species that is currently proposed for listing as federally endangered. Recently white-nose syndrome (WNS), a novel fungal pathogen, has caused serious declines in the northern long-eared bat population in the northeastern U.S. WNS has also been documented in Ohio, but the full extent of the impacts from WNS in Ohio are not yet known.

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

- (1) Roosting habitat in dead or live trees and snags with cavities, peeling or exfoliating bark, split tree trunk and/or branches, which may be used as maternity roost areas;
- (2) Foraging habitat in upland and lowland woodlots and tree lined corridors;
- (3) Occasionally they may roost in structures like barns and sheds.

The proposed project is in the vicinity of one or more confirmed records of northern long-eared bats. Should habitat exhibiting the characteristics described above be present at the proposed project site, we recommend that they, as well as surrounding trees, be saved wherever possible. Because the project will result in a small amount of forest clearing relative to the available habitat in the immediately surrounding area, habitat removal is unlikely to result in significant impacts to this species. However, because northern long-eared bat presence in the vicinity of the project has been confirmed, clearing of trees during the summer roosting season

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 14-1717-GA-BLN

Summary: Application of NRG Ohio Pipeline Company LLC continued - Attachment G (Part 1)
electronically filed by Teresa Orahod on behalf of Sally Bloomfield