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October 31, 2016

*Via Electronic Filing*

Ms. Barcy McNeal  
Public Utilities Commission of Ohio  
Administration/Docketing  
180 East Broad Street, 11<sup>th</sup> Floor  
Columbus, OH 43215-3793

**Re: Hardin Wind Energy LLC, Case No. 09-479-EL-BGN**

Dear Ms. McNeal:

The March 22, 2010 Opinion, Order, and Certificate ("Certificate") approving Hardin Wind Energy LLC's ("Hardin Wind Energy") Certificate of Environmental Compatibility and Public Need established a set of conditions as part of the Certificate. On April 29, 2011 in Case No. 11-3446-EL-BGA, the Ohio Power Siting Board ("OPSB") approved an amendment ("Amended Certificate") to Hardin Wind Energy's Certificate, which also established an additional set of conditions.

Within this set of conditions, **Certificate Condition No. 15** requires that:

**Hardin shall perform a plant survey within the study area prior to construction to determine the presence of the state listed *Setaria parviflora*. The results of this survey shall be provided to staff and ODNR prior to start of construction. All populations found shall be marked for avoidance.**

In compliance with Certificate Condition No. 15, attached is a copy of the plant survey that shows there were no *Setaria parviflora* present in the study area. Thus, this letter is to inform the OPSB Staff that Hardin Wind Energy is in compliance with Certificate Condition No. 15.

If you have any questions please call at the number listed above.

Sincerely,

Sally W. Bloomfield

Attachment

cc: Derek Collins (w/Attachment)  
Andrew Conway (w/Attachment)

Hardin Wind Energy Project  
Marsh Brittlegrass (*Setaria parviflora*)  
Survey Report  
FINAL

Hardin County, Ohio

Prepared for:  
Hardin Wind LLC

Prepared by:



October 2016

Confidential Business Information

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## 1.0 INTRODUCTION

Tetra Tech, Inc. (Tetra Tech) was contracted by Hardin Wind LLC to complete a rare plant survey for marsh brittlegrass (*Setaria parviflora*) at the Hardin Wind Energy Project (Project), located in Hardin County, Ohio. The objective of this survey was to identify any populations of marsh brittlegrass located within the Project area (Figure 1). The survey is a condition of the Project's Ohio Power Siting Board certificate. Additionally, field surveys were intended to provide occurrence data for marsh brittlegrass, if any were identified.

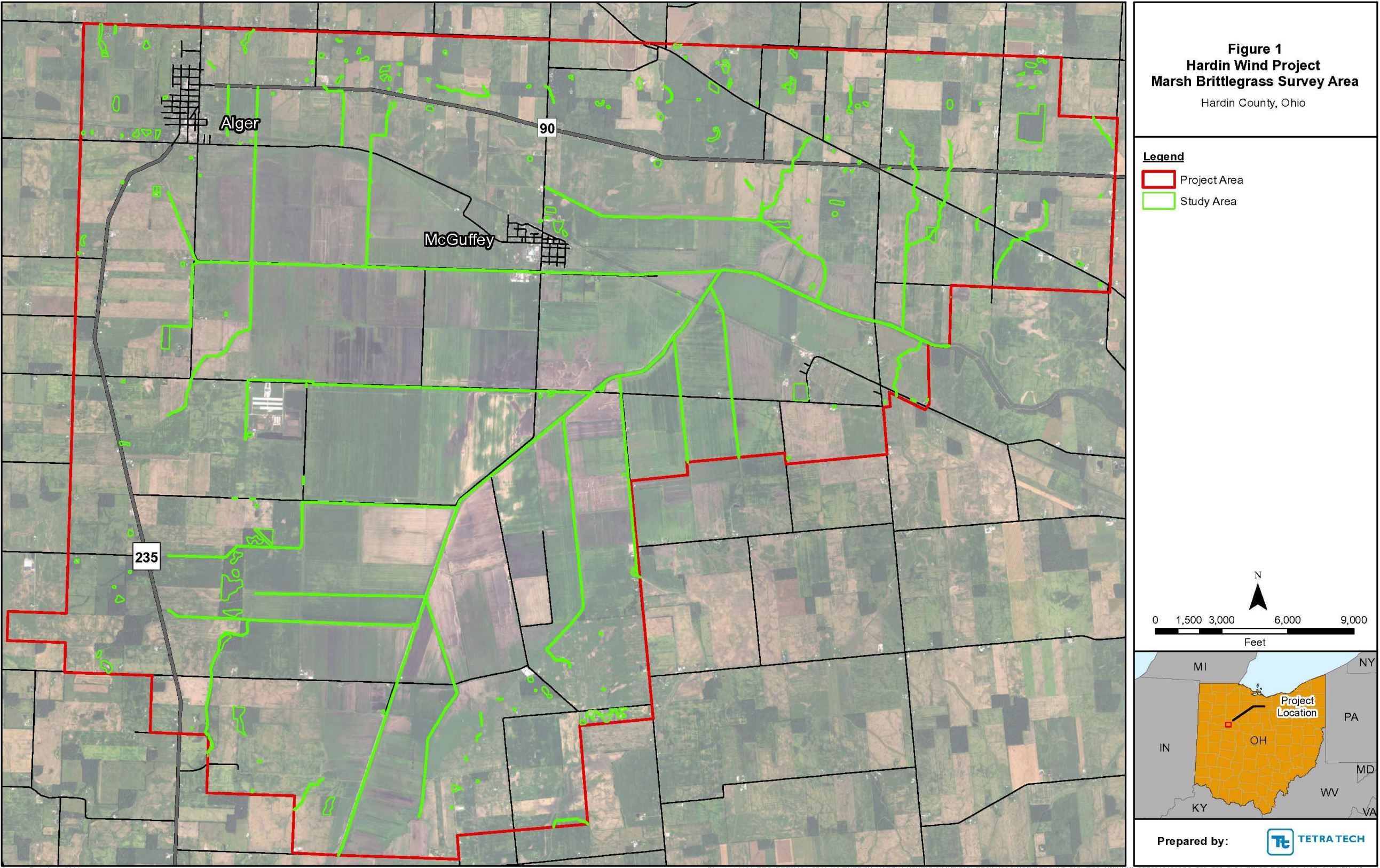
Marsh brittlegrass is a perennial, rhizomatous grass species in the Poaceae family (Rominger 2003). Marsh brittlegrass is the most morphologically diverse and widely distributed of the indigenous, perennial species of *Setaria* (Rominger 2003). Although this species is most frequently found along the Atlantic and Gulf coasts, it also is found west through the central United States to the Central Valley of California and south through Mexico to Central America (Rominger 2003). Habitat for this species includes moist ground near lakes, ponds, streams, or river banks (NPIN 2016), as well as wetland habitat such as bogs, marshes, swamps, fens peatlands, and seasonal or intermittent saline, brackish, or alkaline marshes or pools (Thacker 2013).

## 2.0 METHODS

Prior to initiation of field surveys, Tetra Tech conducted a desktop analysis to identify potential habitat for marsh brittlegrass within the Project area. Since habitat for this species includes wetland and stream, river, pond, and lakeside habitats, the desktop analysis included a review of Phase 1, Phase 1a, and Phase 2 wetland delineation reports that described wetland and other waters of the U.S. (e.g., streams, rivers) identified and delineated during previous surveys for the Project (Tetra Tech 2011). Additionally, other available geographic information system (GIS) and spatial imagery data were reviewed to determine the presence of potential habitat for marsh brittlegrass within the Project area. Sources reviewed include:

- United States Geologic Survey (USGS) and United States Department of Agriculture (USDA) National Aerial Imagery Program (NAIP) aerial imagery (USGS and USDA 2011);
- USGS National Hydrography Datasets (NHD) (USGS 2016);
- USGS topographic quadrangle maps obtained from ESRI ArcGIS WebMap Server (National Geographic Society, i-cubed 2014);
- U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) (USFWS 2016); and
- USDA Natural Resources Conservation Service soils survey data (NRCS 2016).







Field surveys for marsh brittlegrass were completed during the week of August 22, 2016. Surveys were focused in locations of suitable habitat, including wetlands, streams, rivers, riparian areas, ponds, and marsh habitats that could support marsh brittlegrass populations located within the Project area (Figure 1).

Marsh brittlegrass can readily be confused with other foxtails (genus *Setaria*). Because there are multiple, similar species in the area, the chance for mistaken identity is high. Therefore, to avoid this issue, a Tetra Tech botanist experienced with this species led the field effort. Surveys were conducted using a “Focused” or otherwise referred to as an “Intuitive Controlled” survey method, whereby potential suitable habitat is identified during pre-field analysis and the survey effort is focused in these areas (USFS 2005). Surveys were completed by walking through areas of potential habitat searching for populations of marsh brittlegrass.

### 3.0 RESULTS

Marsh brittlegrass was not observed within the Project area during the survey effort. Although potential habitat that could support this species was observed along streams and rivers, within riparian areas, and within the few potential wetlands previously delineated within the Project area, no individuals or populations of marsh brittlegrass were identified.

### 4.0 REFERENCES

- Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community. 2014. Aerial imagery and road features.
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- Thacker, H. 2013. *Setaria parviflora*. The IUCN Red List of Threatened Species 2013. Available online at: <http://www.iucnredlist.org/details/18963261/0>. Accessed September 2016.

USDA NRCS (U.S. Department of Agriculture, Natural Resources Conservation Service). 2016. Soil Survey Geographic (SSURGO) Database. Available online at: <http://websoilsurvey.nrcs.usda.gov>. Accessed August 2016.

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**in**

**Case No(s). 09-0479-EL-BGN**

Summary: Correspondence of Hardin Wind Energy LLC in Compliance with Certificate  
Condition No. 15 - Plant Survey electronically filed by Teresa Orahod on behalf of Sally W.  
Bloomfield