

Appendix F-3 –Additional Correspondence with Ga DNR



WALTER RABON
COMMISSIONER

TED WILL
DIRECTOR

October 12, 2024

Heather Ahrens
Environmental & Regulatory Coordinator
Georgia Transmission Corporation

Subject: Known occurrences of natural communities, plants, and animals of highest priority conservation status on or near ECGR Project, Walton, Oconee, Morgan, and Putnam Counties, Georgia

Dear Heather Ahrens:

This is in response to your request of June 14, 2024. The following Georgia natural heritage database element occurrences (EOs) were selected for the current site using the local Hydrologic Unit Code (HUC) 10 watershed for elements whose range distribution is limited by aquatic systems (AQ) and within 3 miles for all other EOs (TR).

ECGR Project (-83.412248, 33.617286, WGS84)

- US *Amphianthus pusillus* (Pool Sprite, Snorkelwort) (TR), approx. 1.4 mi N of site
- Anguilla rostrata* (American Eel) in Hard Labor Creek (AQ), approx. 8.9 mi SW of site
- Bombus fraternus* (Southern Plains Bumble Bee) (TR), approx. 1.0 mi S of site
- Bombus fraternus* (Southern Plains Bumble Bee) (TR), on or in immediate vicinity of site**
- Bombus pensylvanicus* (American Bumblebee) [Historic] (TR), approx. 1.1 mi NE of site
- GA *Cambarus howardi* (Chattahoochee Crayfish) in unnamed tributary to Middle Oconee River (AQ), approx. 9.8 mi E of site
- GA *Cyprinella xaenura* (Altamaha Shiner) in Hard Labor Creek (AQ), approx. 0.4 mi E of site
- GA *Cyprinella xaenura* (Altamaha Shiner) in Robinson Creek (AQ), approx. 2.7 mi NE of site
- GA *Cyprinella xaenura* (Altamaha Shiner) in Apalachee River (AQ), approx. 1.1 mi SW of site
- GA *Cyprinella xaenura* (Altamaha Shiner) in Apalachee River (AQ), approx. 2.5 mi N of site
- GA *Cyprinella xaenura* (Altamaha Shiner) in Turkey Creek (AQ), approx. 0.9 mi NW of site
- GA *Cyprinella xaenura* (Altamaha Shiner) [Historic] in Jack's Creek (AQ), approx. 0.4 mi SE of site
- GA *Cypripedium acaule* (Pink Ladyslipper) (TR), on or in immediate vicinity of site**
- GA *Draba aprica* (Sun-loving Draba) (TR), approx. 1.4 mi N of site
- GA *Haliaeetus leucocephalus* (Bald Eagle) (TR), approx. 1.4 mi SE of site
- GA *Haliaeetus leucocephalus* (Bald Eagle) (TR), approx. 2.2 mi NE of site
- Hemidactylium scutatum* (Four-toed Salamander) (TR), approx. 1.6 mi SW of site
- Hemidactylium scutatum* (Four-toed Salamander) [Historic] (TR), approx. 1.4 mi NE of site
- US *Isoetes tegetiformans* (Mat-forming Quillwort) (TR), approx. 1.5 mi N of site
- Lampropeltis rhombomaculata* (Mole Kingsnake) (TR), on or in immediate vicinity of site**

- Lampropeltis rhombomaculata* (Mole Kingsnake) (TR), approx. 2.8 mi N of site
- Micropterus sp. 2 (Altamaha)* (Altamaha Bass) in Apalachee River (AQ), approx. 0.7 mi NE of site
- Micropterus sp. 2 (Altamaha)* (Altamaha Bass) in Hard Labor Creek (AQ), approx. 0.4 mi E of site
- Moxostoma sp. 4* (Brassy Jumprock) in Apalachee River (AQ), approx. 0.9 mi NE of site
- Moxostoma sp. 4* (Brassy Jumprock) in Hard Labor Creek (AQ), approx. 8.8 mi SW of site
- Moxostoma sp. 4* (Brassy Jumprock) [Historic] in Lake Sinclair of the Oconee River (AQ), approx. 11.5 mi S of site
- Perimyotis subflavus* (Tricolored Bat) (TR), approx. 0.2 mi N of site
- Perimyotis subflavus* (Tricolored Bat) (TR), approx. 2.3 mi W of site
- Perimyotis subflavus* (Tricolored Bat) (TR), approx. 2.6 mi NW of site
- Perimyotis subflavus* (Tricolored Bat) [Historic] (TR), approx. 2.3 mi NE of site
- US *Ptilimnium nodosum* (Harperella) [Extirpated] (TR), approx. 1.6 mi N of site
- Pyganodon gibbosa* (Inflated Floater) in Lake Oconee (AQ), approx. 2.2 mi E of site
- Pyganodon gibbosa* (Inflated Floater) in Lake Oconee (AQ), approx. 2.9 mi NE of site
- Pyganodon gibbosa* (Inflated Floater) in Lake Sinclair (AQ), approx. 12.4 mi S of site
- Pyganodon gibbosa* (Inflated Floater) in Lake Sinclair (AQ), approx. 3.1 mi SW of site
- Pyganodon gibbosa* (Inflated Floater) in Lake Oconee (AQ), approx. 3.0 mi N of site
- GA *Quercus oglethorpensis* (Oglethorpe Oak) [Extirpated] (TR), approx. 2.5 mi NE of site
- Tyto alba* (Barn owl) (TR), on or in immediate vicinity of site**
- Tyto alba* (Barn owl) (TR), on or in immediate vicinity of site**
- Bare rock/lichens, pd granite outcrop* (Granite Outcrop Rock/lichens) (TR), approx. 2.6 mi N of site
- Herbaceous veg., pd granite outcrop* (Granite Outcrop Herb Community) (TR), approx. 2.6 mi N of site
- Rocky bank/shoal, brownwater stream* (TR), approx. 0.8 mi NE of site
- Shrub/scrub veg., pd granite outcrop* (Granite Outcrop Shrub/scrub Community) (TR), approx. 2.6 mi N of site
- Conservation Easement/Covenant 2009007 [Georgia Land Trust] (TR), on or in immediate vicinity of site**
- Conservation Easement/Covenant 2009073 [Georgia Land Trust] (TR), on or in immediate vicinity of site**
- Conservation Easement/Covenant 2010007 [Southeast Regional Land Conservancy] (TR), approx. 1.7 mi SW of site
- Conservation Easement/Covenant 2012012 [Georgia Land Trust] (TR), on or in immediate vicinity of site**
- Conservation Easement/Covenant 2012108 [Southeastern Trust for Parks and Land] (TR), approx. 2.5 mi N of site
- Conservation Easement/Covenant 2012112 [Southeastern Trust for Parks and Land] (TR), approx. 2.5 mi NW of site
- Conservation Easement/Covenant 2013033 [Georgia Land Trust] (TR), approx. 2.2 mi SW of site
- Conservation Easement/Covenant 2014002 [Athens Land Trust] (TR), approx. 0.5 mi NW of site
- Apalachee River Holdings [Oconee River Land Trust] (TR), approx. 1.2 mi E of site

Athens Land Trust Easement [Athens Land Trust] (TR), approx. 0.2 mi W of site
 Athens Land Trust Easement [Athens Land Trust] (TR), approx. 0.5 mi SW of site
Athens Land Trust Easement [Athens Land Trust] (TR), on or in immediate vicinity of site
 Athens Land Trust easement [Athens Land Trust] (TR), approx. 2.6 mi SW of site
 Athens Land Trust easement [Athens Land Trust] (TR), approx. 2.9 mi NE of site
Athens Land Trust easement [Athens Land Trust] (TR), on or in immediate vicinity of site
 Atlantic Coast Conservancy easement [Atlantic Coast Conservancy] (TR), approx. 0.4 mi SW of site
Atlantic Coast Conservancy easement [Atlantic Coast Conservancy] (TR), on or in immediate vicinity of site
 B. F. GRANT WMA [Georgia Department of Natural Resources] (TR), approx. 2.8 mi SW of site
BATH [Oconee River Land Trust] (TR), on or in immediate vicinity of site
 Chattahoochee-Oconee National Forests [USDA FOREST SERVICE] (TR), approx. 0.6 mi NE of site
 Chattahoochee-Oconee National Forests [USDA FOREST SERVICE] (TR), approx. 1.9 mi SW of site
 Chattahoochee-Oconee National Forests [USDA FOREST SERVICE] (TR), approx. 2.1 mi E of site
 City of Monroe Greenspace I [City of Monroe] (TR), approx. 0.6 mi NE of site
 DOVE CREEK [Oconee River Land Trust] (TR), approx. 2.2 mi NW of site
 GALT easement [Georgia-Alabama Land Trust] (TR), approx. 1.5 mi NE of site
GLT easement [Georgia Land Trust] (TR), on or in immediate vicinity of site
 Heritage Park [Oconee County] (TR), approx. 1.8 mi NE of site
 Matthews Park [Walton County] (TR), approx. 0.3 mi SW of site
 Mitchell [Athens Land Trust] (TR), approx. 2.4 mi NE of site
 NALT easement [North American Land Trust] (TR), approx. 0.8 mi NE of site
 Nelson Park [Walton County] (TR), approx. 0.3 mi S of site
 OCONEE WMA [Georgia Department of Natural Resources] (TR), approx. 0.6 mi N of site
 OCONEE WMA [Georgia Department of Natural Resources] (TR), approx. 2.1 mi NE of site
Orion [OCONEE RIVER LAND TRUST] (TR), on or in immediate vicinity of site
 REDLANDS WMA [Georgia Department of Natural Resources] (TR), approx. 0.8 mi E of site
 REDLANDS WMA [Georgia Department of Natural Resources] (TR), approx. 2.8 mi NE of site
 Rock Eagle 4-H Center [Board of Regents] (TR), approx. 1.2 mi SW of site
 Sam Mitchell [Natural Resources Conservation Service] (TR), approx. 2.4 mi NE of site
 Greenspace program acquisition [county] (TR), approx. 0.6 mi NE of site
 Greenspace program acquisition [county] (TR), approx. 1.8 mi SW of site
 Restrictive covenant [U.S. Army Corps of Engineers] (TR), approx. 0.7 mi SW of site
 Bridge/Culvert Inspection (33.54589, -83.33879), Bats Present: No, Species: N/A (TR), approx. 1.1 mi E of site

Bridge/Culvert Inspection (33.55333, -83.40338), Bats Present: No, Species: N/A (TR), approx. 1.1 mi NW of site
Bridge/Culvert Inspection (33.55409, -83.36977), Bats Present: Yes, Species: *Perimyotis subflavus* (TR), approx. 0.2 mi N of site
Bridge/Culvert Inspection (33.5858, -83.4465), Bats Present: No, Species: N/A (TR), approx. 2.7 mi SW of site
Bridge/Culvert Inspection (33.5985, -83.4459), Bats Present: No, Species: N/A (TR), approx. 2.2 mi W of site
Bridge/Culvert Inspection (33.9027, -83.5229), Bats Present: No, Species: N/A (TR), approx. 2.1 mi NE of site
Lower Middle Oconee River (0307010103) [SWAP High Priority Watershed] (TR), on or in immediate vicinity of site
Hard Labor Creek (0307010109) [SWAP High Priority Watershed] (TR), on or in immediate vicinity of site

Recommendations:

Federally listed species have been documented within three miles or within the watershed(s) of the proposed project. To minimize potential impacts to federally listed species, we recommend consultation with the United States Fish and Wildlife Service. Please email GAES_Assistance@fws.gov for project consultation and survey recommendations.

Please be aware that state protected species have been documented near the proposed project. For information about these species, including survey recommendations, please visit our webpage at <http://georgiawildlife.com/conservation/species-of-concern#rare-locations>.

The following biologists can provide additional recommendations and assistance regarding the following groups:

Plants: Lisa Kruse (Lisa.Kruse@dnr.ga.gov)
Fishes: Bryant Bowen (Bryant.Bowen@dnr.ga.gov)
Crayfish & Mussels: Matt Rowe (Matthew.Rowe@dnr.ga.gov)
Reptiles & Amphibians: Daniel Sollenberger (Daniel.Sollenberger@dnr.ga.gov)
Mammals: Trina Morris (Katrina.Morris@dnr.ga.gov)
Birds: Nathan Klaus (Nathan.Klaus@dnr.ga.gov) or Tim Keyes (Tim.Keyes@dnr.ga.gov)
Terrestrial Invertebrates: Anna Yellin (Anna.Yellin@dnr.ga.gov)

Species listed above that have no “GA” or “US” status are considered Georgia species of concern. Locations of these species are tracked until enough information is gathered to determine if they should be added to the state list or if their populations do not warrant tracking. It is important to consider these species when planning projects. Please let us know if you have any questions regarding Georgia species of concern.

Please contact the following biologists for further coordination regarding on-site species, and provide this review letter and a project map when you initiate coordination:

- Lisa Kruse (Lisa.Kruse@dnr.ga.gov) regarding *Cypripedium acaule* (Pink Ladyslipper),

- Anna Yellin (Anna.Yellin@dnr.ga.gov regarding *Bombus fraternus* (Southern Plains Bumble Bee),
- Daniel Sollenberger (Daniel.Sollenberger@dnr.ga.gov) regarding *Lampropeltis rhombomaculata* (Mole Kingsnake), and
- Todd Schneider (Todd.Schneider@dnr.ga.gov) regarding *Tyto alba* (Barn owl).

For complete environmental reports, please ensure that surveys are conducted during the proper season. Recommended survey times for state listed species can be viewed on our webpage: <https://georgiawildlife.com/conservation/species-of-concern#rare-locations>.

Plant species that occupy vernal pools in granite outcrops are located within three miles of the proposed project. If no outcrops are found within the project area, these species are not likely to be impacted.

There is a record of a nesting bald eagle (*Haliaeetus leucocephalus*) within three miles of the proposed project site. Although bald eagles are no longer listed as federally endangered, this species is still protected by the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, and the Georgia Endangered Species Act. This legislation continues to protect bald eagles from potentially harmful human activities. For more information on how to prevent impacts to bald eagles, please review the National Bald Eagle Management Guidelines and other information located at: <https://www.fws.gov/birds/management/managed-species/eagle-management.php>.

Please note that the tricolored bat (*Perimyotis subflavus*) was proposed for listing under the Endangered Species Act (ESA) on September 14, 2022, by the United States Fish and Wildlife Service. A final listing determination is anticipated in 2024. We recommend consultation with the United States Fish and Wildlife Service for this species in anticipation of the species being listed as endangered under the ESA.

We have occurrences of terrestrial invertebrate species near the proposed project. In order to protect native plant species that support these insects, we recommend avoiding disturbance to areas of natural habitat to the greatest extent possible. We also recommend increasing the availability of native vegetation in landscaping to support native plants and animals after project completion. Please see our website for additional information about native landscaping for wildlife (<https://georgiawildlife.com/create-backyard-habitat>).

We have the following recommendations for the applicant to consider. If this project lies within the existing right-of-way and no additional right-of-way would be required, the proposed project is not likely to negatively impact rare species or habitats. However, streams and other habitats may still be impacted by land disturbance. We recommend that stringent erosion control practices are utilized during construction activities and that vegetation is re-established on disturbed areas as quickly as possible. Silt fences and other erosion control devices should be inspected and maintained until soil is stabilized by vegetation. Please use natural vegetation and grading techniques (e.g. vegetated swales, turn-offs, vegetated buffer strips) that will ensure that the road or right-of-way does not serve as a conduit for stormwater or pollutants into the watershed during or after construction. These measures will help protect water quality near the project site as well as in downstream areas. To protect aquatic habitats and water quality, we recommend that all

machinery be kept out of streams and wetlands during substation construction, as applicable. Further, we strongly advocate leaving vegetation intact within 100 feet of streams.

Please be aware that the type of erosion control material used during construction can impact wildlife. We strongly recommend using natural, biodegradable materials such as 'jute' or 'coir'. Mesh strands should be movable, as opposed to fixed. Use of plastic fencing frequently leads to wildlife entrapment and death.

If access roads are paved, we strongly recommend using a porous pavement that allows for stormwater infiltration rather than impervious materials that significantly increase runoff into the watershed. Place access roads carefully to provide for adequate parking and access. These measures will help protect water quality, protect sensitive habitats and native species, and provide for a more enjoyable recreational experience for the users.

We recommend that the use of pesticides, herbicides (including for right-of-way maintenance), or fertilizers be prohibited within 50 feet of streams.

Please note that element occurrences (EOs) are downstream from the project and therefore will be impacted by sediment or other possible pollutants released during construction activities. We request that erosion and sedimentation controls be used to the greatest extent possible during and after construction. These measures will help protect water quality near the proposed project as well as in downstream areas.

At a minimum, we recommend implementing best management practices (BMPs) endorsed by the State of Georgia for erosion, sediment, and stormwater control throughout the construction site. Please design the road or utility right-of-way (ROW) in such a way that streams do not serve as stormwater or sediment detention areas during project construction or operation (i.e., no scupper or open drains on bridges/arch spans; divert stormwater from the project away from the stream). Off-channel maintained detention ponds or diversion of stormwater across a wide slope are acceptable diversion methods. Locate staging areas and equipment maintenance areas at least 200 feet from stream banks to minimize the potential for wash water, petroleum products, or other contaminants from construction equipment entering the watershed.

The Avian Power Line Interaction Committee (APLIC) has developed guidelines for the construction and maintenance of power lines and substations. For all new power line construction, we suggest creating a voluntary Avian Protection Plan (APP). Previously constructed substations and power lines can be retrofitted with bird mortality prevention in mind. These measures can include increasing line visibility, insulating wires to cover exposed connections, and increasing the distance between wires to reduce the chance of electrocution. For more information, see the APLIC website at <http://www.aplic.org/>.

Culverts often prevent or reduce the frequency of fish movement in streams by creating hydraulic drops at the downstream end of the culvert and by creating a shallow, high velocity corridor within the culvert itself. Culverts are also problematic for fish passage because they typically lack the natural substrata that provide refugia from fast currents and predators during dispersal. These impacts are widely documented in the fishery literature and may isolate fish populations from

important feeding and breeding habitats upstream of road crossings. They may also prevent colonization of populations after local extinction events (e.g., a drought).

There are several alternatives to traditional box and pipe culverts that provide better passage for aquatic species. The Georgia DNR encourages the implementation of free-span bridges at all stream crossings. However, we recognize they are often cost-prohibitive and recommend bottomless culverts as the best alternative to free-span.

It is important that all culverts and free span bridges are designed to accommodate wildlife passage and local hydrological conditions, including rare flood events. We recommend that stream crossings follow the regulations and considerations described in Georgia's Stream Crossing Handbook (<https://www.fws.gov/southeast/pdf/georgia-stream-crossing-handbook.pdf>). More information about stream crossings is available on the US Fish and Wildlife Service website (https://fws.gov/athens/stream_crossing/).

This project occurs within a high priority watershed(s). As part of Georgia's State Wildlife Action Plan, high priority watersheds were identified to protect populations of high priority aquatic species, important coastal habitats, and migratory corridors for anadromous species. Please refer to Appendix F of Georgia's State Wildlife Action Plan to find out more specific information about the listed high priority watershed(s) (<https://georgiawildlife.com/wildlifeactionplan>).

Disclaimer:

Please keep in mind the limitations of our database. The data collected by the Wildlife Conservation Section comes from a variety of sources, including museum and herbarium records, literature, and reports from individuals and organizations, as well as field surveys by our staff biologists. In most cases the information is not the result of a recent on-site survey by our staff. Many areas of Georgia have never been surveyed thoroughly. Therefore, the Wildlife Conservation Section can only occasionally provide definitive information on the presence or absence of rare species on a given site. Our files are updated constantly as new information is received. **Thus, information provided by our program represents the existing data in our files at the time of the request and should not be considered a final statement on the species or area under consideration.**

If you know of populations of highest priority species that are not in our database, please fill out the appropriate data collection form and send it to our office. Forms can be obtained through our web site <https://georgiawildlife.com/conservation/species-of-concern#providing> or by contacting our office.

If I can be of further assistance, please let me know.

Sincerely,



Talia Levine
Wildlife Biologist II

Data Available on the Wildlife Conservation Section Website

- Georgia protected plant and animal species profiles are available on our website. These profiles cover basics such as species physical descriptions, preferred habitat, and life history, as well as threats, management recommendations, and conservation status. To view these profiles, visit: <http://georgiawildlife.com/conservation/species-of-concern#rare-locations>
- Rare species and natural community information can be viewed by Quarter Quad, County, and HUC 8 Watershed. To access this information, please visit our GA Rare Species and Natural Community Information page at: <http://georgiabiodiversity.org/>
- Downloadable files of rare species and natural community data by Quarter Quad and County are also available. These can be downloaded at: https://www.georgiabiodiversity.org/portal/additional_data_resources