

From: [Proulx, Lindsay I](#)
To: [GAES Assistance, FW4](#)
Cc: [Brinkman, Bob](#); [Adcock, Courtney](#); [Hubbard, Josh](#); [Roberts, Suzanne](#); [craig.jones@opc.com](#); [Kwiatkowski, Claire E](#); [Snell, Kenneth J](#); [DeMell, Mike J](#)
Subject: RE: [EXTERNAL] Project Code: 2024-0086428 Monroe Co. Request for Informal Consultation
Date: Monday, April 21, 2025 1:23:08 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image008.png](#)
[image009.png](#)

WARNING: This email originated from outside of the organization. The actual sender is Lindsay.Proulx@terracon.com.
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Hi Michele,

Thank you for your response and coordination. The survey for fringed campion and relict trillium will be completed prior to the end of this month, April 2025. The survey for Ocmulgee skullcap will be completed late June through July 2025.

Please let me know if those windows are in alignment with your expectations.

Thank you,

Lindsay Proulx

Staff Scientist | Environmental Planning



2201 Rowland Ave | Savannah, Georgia 31404
D (912) 200-9107 | F (912) 629-4001 | M (315) 854-5650
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From: GAES Assistance, FW4 <gaes_assistance@fws.gov>
Sent: Thursday, April 17, 2025 9:53 AM
To: Proulx, Lindsay I <Lindsay.Proulx@terracon.com>; DeMell, Mike J <Mike.DeMell@terracon.com>
Cc: Brinkman, Bob <bob.brinkman@opc.com>; Adcock, Courtney <courtney.adcock@opc.com>; Hubbard, Josh <josh.hubbard@opc.com>; Roberts, Suzanne <suzanne.roberts@opc.com>; craig.jones@opc.com; Kwiatkowski, Claire E <CLAIRE.E.KWIATKOWSKI@Sargentlundy.com>; Snell, Kenneth J <KENNETH.J.SNELL@sargentlundy.com>
Subject: Re: [EXTERNAL] Project Code: 2024-0086428 Monroe Co. Request for Informal Consultation

Hello Lindsay,

Thank you for providing our office an updated plant survey area and survey method based on our discussion for the three plant species (fringed campion, Ocmulgee skullcap, and relict trillium). We approve the updated "Proposed Protected Plant Investigation Area Exhibit" and the proposed transect survey method. Can you confirm when the surveys will be conducted for the three species?

Thank you for your coordination with our office,
Michele Elmore

Georgia Ecological Services

U.S. Fish and Wildlife Service

Main Office: 706-208-7524

Web: <https://www.fws.gov/office/georgia-ecological-services>

Our mission is to work with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people.

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From: Proulx, Lindsay I <Lindsay.Proulx@terracon.com>

Sent: Friday, April 4, 2025 4:43 PM

To: GAES Assistance, FW4 <gaes_assistance@fws.gov>; DeMell, Mike J <Mike.DeMell@terracon.com>

Cc: Brinkman, Bob <bob.brinkman@opc.com>; Adcock, Courtney <courtney.adcock@opc.com>; Hubbard, Josh <josh.hubbard@opc.com>; Roberts, Suzanne <suzanne.roberts@opc.com>; craig.jones@opc.com <craig.jones@opc.com>; Kwiatkowski, Claire E <CLAIRE.E.KWIATKOWSKI@Sargentlundy.com>; Snell, Kenneth J <KENNETH.J.SNELL@sargentlundy.com>

Subject: RE: [EXTERNAL] Project Code: 2024-0086428 Monroe Co. Request for Informal Consultation

Good afternoon Eric,

We appreciate the opportunity to have a call with you earlier this week.

We acknowledge your outstanding questions regarding a proposed stream discharge location and volume of potential discharge, however, these considerations have yet to be finalized and thus we will need to circle back with you in that regard. We do wish to make one point of clarification, which is that no stream water is proposed to be withdrawn. Additionally, the source of the water to the plant will be the Monroe County water supply.

At this time, we offer you an updated "Proposed Protected Plant Investigation Area Exhibit" for your consideration. This Exhibit 12 supersedes the exhibit included in the initially transmitted USFWS Request for Informal Consultation Package. Please find both items [here](#).

We have spoken with Ms. Michele Elmore regarding the three (3) protected plant species with potentially suitable habitat and understand that she will be assisting you with the evaluation of this proposed project. During our conversation with Ms. Elmore, she advised that we expand the area proposed for protected plant survey coverage. As is shown in the attached, updated Exhibit 12, we now propose to investigate a +/- 141.76-acre area ("Proposed Protected Plant Investigation Area") within the "USFWS/ESA Review Area".

Please note that due to lack of a USFWS approved species-specific plant survey protocol for the three (3) subject plant species, we have modeled our proposed survey methodology in accordance with the Georgia Department of Transportation's (GDOT) "State of Georgia Protected Species Habitat & Presence/Absence Survey Methodologies Manual," "General Protected Plant Species Survey (Phase 2 Survey)" methodology. According to this methodology, plant surveys should be conducted with at least two (2) people walking parallel line transects that are spaced 16-33 feet apart. The protocol states that transects should be spaced closer when surveying for "small" species, and therefore we propose to space transects 20 feet apart.

The +/- 141.76-acre Proposed Protected Plant Investigation Area has been estimated using aerial imagery, knowledge of the USFWS/ESA Review Area from prior field work efforts, and verbal confirmation from Ms. Elmore. During the field investigations, we will assess habitat suitability for each of the three (3) species throughout the Proposed Protected Plant Investigation Area. Line-transect surveying will be conducted within areas deemed suitable. Areas deemed unsuitable will not be line-transect surveyed.

In advance, we appreciate your consideration of this updated "Proposed Protected Plant Investigation Area Exhibit". We ask that you provide written approval of the proposed species-specific transect survey methodology for the three (3) listed plant species: fringed campion, Ocmulgee skullcap, and relict trillium.

Please do not hesitate to contact us if you have any questions.

Lindsay Proulx

Staff Scientist | Environmental Planning



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From: GAES Assistance, FW4 <gaes_assistance@fws.gov>
Sent: Monday, March 31, 2025 9:27 AM
To: Proulx, Lindsay I <Lindsay.Proulx@terracon.com>; DeMell, Mike J <Mike.DeMell@terracon.com>
Cc: Brinkman, Bob <bob.brinkman@opc.com>; Adcock, Courtney <courtney.adcock@opc.com>; Hubbard, Josh <josh.hubbard@opc.com>; Roberts, Suzanne <suzanne.roberts@opc.com>; craig.jones@opc.com; Kwiatkowski, Claire E <CLAIRE.E.KWIATKOWSKI@Sargentlundy.com>; Snell, Kenneth J <KENNETH.J.SNELL@sargentlundy.com>
Subject: Re: [EXTERNAL] Project Code: 2024-0086428 Monroe Co. Request for Informal Consultation

Good morning Lindsay,

My apologies, I was out of the office on Friday running a conference/meeting. I have some availability this week including anytime this morning or 3-5 today, any time tomorrow except 10-11, any time Wednesday, or Thursday 3-5. Thanks.

-Eric

Eric F. Bauer, PhD
Fish and Wildlife Biologist
Georgia Ecological Services
U.S. Fish and Wildlife Service
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From: Proulx, Lindsay I <Lindsay.Proulx@terracon.com>
Sent: Friday, March 28, 2025 10:29 AM
To: GAES Assistance, FW4 <gaes_assistance@fws.gov>; DeMell, Mike J <Mike.DeMell@terracon.com>
Cc: Brinkman, Bob <bob.brinkman@opc.com>; Adcock, Courtney <courtney.adcock@opc.com>; Hubbard, Josh <josh.hubbard@opc.com>; Roberts, Suzanne <suzanne.roberts@opc.com>; craig.jones@opc.com <craig.jones@opc.com>; Kwiatkowski, Claire E <CLAIRE.E.KWIATKOWSKI@Sargentlundy.com>; Snell, Kenneth J <KENNETH.J.SNELL@sargentlundy.com>
Subject: RE: [EXTERNAL] Project Code: 2024-0086428 Monroe Co. Request for Informal Consultation

Good morning Eric,

Thank you for the response. Would you be available for a call with me and Mike DeMell today, either between 11-11:45AM or sometime after 1:15PM?

Thanks,

Lindsay Proulx
Staff Scientist I Environmental Planning



2201 Rowland Ave I Savannah, Georgia 31404



From: GAES Assistance, FW4 <gaes_assistance@fws.gov>

Sent: Thursday, March 27, 2025 9:07 AM

To: Proulx, Lindsay I <Lindsay.Proulx@terracon.com>

Cc: DeMell, Mike J <Mike.DeMell@terracon.com>; Brinkman, Bob <bob.brinkman@opc.com>; Adcock, Courtney <courtney.adcock@opc.com>; Hubbard, Josh <josh.hubbard@opc.com>; Roberts, Suzanne <suzanne.roberts@opc.com>; craig.jones@opc.com; Kwiatkowski, Claire E <CLAIRE.E.KWIATKOWSKI@Sargentlundy.com>; Snell, Kenneth J <KENNETH.J.SNELL@sargentlundy.com>

Subject: Re: [EXTERNAL] Project Code: 2024-0086428 Monroe Co. Request for Informal Consultation

Good morning Lindsay,

Can you provide me with information on how/where this facility will access water for the steam component of the project and if and where discharge of water would occur, and the quantities involved? These effects also must be considered for a project like this.

Also, just a heads up in case the lead federal agency RUS needs to coordinate with the Federal Energy Regulatory Commission, we are also reviewing a natural gas pipeline expansion that appears to be related to this project is proposed to cut through Critical Habitat for the Ocmulgee skullcap which is just a little to the southeast of this project.

Thanks in advance.

-Eric

Eric F. Bauer, PhD

Fish and Wildlife Biologist

Georgia Ecological Services

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Main Office: 706-208-7524

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From: Proulx, Lindsay I <Lindsay.Proulx@terracon.com>

Sent: Monday, March 24, 2025 5:48 PM

To: GAES Assistance, FW4 <gaes_assistance@fws.gov>

Cc: DeMell, Mike J <Mike.DeMell@terracon.com>; Brinkman, Bob <bob.brinkman@opc.com>; Adcock, Courtney <courtney.adcock@opc.com>; Hubbard, Josh <josh.hubbard@opc.com>; Roberts, Suzanne <suzanne.roberts@opc.com>; craig.jones@opc.com <craig.jones@opc.com>; Kwiatkowski, Claire E <CLAIRE.E.KWIATKOWSKI@Sargentlundy.com>; Snell, Kenneth J <KENNETH.J.SNELL@sargentlundy.com>

Subject: [EXTERNAL] Project Code: 2024-0086428 Monroe Co. Request for Informal Consultation

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good afternoon,

We are submitting the linked: [USFWS Request for Informal Consultation](#) package detailing a request to initiate informal consultation on behalf of Oglethorpe Power Company (OPC) for the Proposed Smarr Combined Cycle Energy Facility located in Forsyth, Monroe County, Georgia. This request for informal consultation follows the completion of a Threatened & Endangered Species Habitat Assessment, which is described in further detail in the package.

At your earliest convenience, please review the linked materials and provide a response to the below items:

- Concurrence with a “No Effect” determination for the whooping crane due to lack of potentially suitable habitat.
- Concurrence with a “No Jeopardy” finding for the monarch butterfly. Additional information, if applicable, about the anticipated effects determination for the monarch butterfly once the rule to list the species under the ESA is finalized, and any information on prospective requirements.
- Concurrence with a “No Jeopardy” finding for the tricolored bat. Concurrence with a “May Affect, Not Likely to Adversely Affect” finding for the tricolored bat once the rule to list the species under the ESA is finalized, if the project proponent adheres to anticipated tree clearing restriction periods.
- Approval of the proposed species-specific transect survey methodology for three (3) listed plant species: the fringed campion, Ocmulgee skullcap, and relict trillium. Concurrence with anticipated “No Effect” findings for the species if no individuals are detected.

Due to the time-of-year constraints associated with the completion of protected plant surveys, we respectfully request an expedited response, if possible.

Thank you,

Lindsay Proulx

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