HANSON
Engineering | Planning | Allied Services

Hanson Professional Services Inc.
13801 Riverport Drive, Suite 300
St. Louis, Missouri 63043
(314) 770-0467
Fax: (314) 770-0428

www.hanson-inc.com

February 26, 2014

Keith Shank
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, Illinois 62702-1271

Re: Conservation Plan / Incidental Take Authorization Submittal
Ameren Sidney-SW Campus 138kV Line Rebuild
Champaign County, Illinois
EcoCat Review #1405795

Dear Mr. Shank:

On behalf of Ameren, Hanson Professional Services Inc. (Hanson) is submitting the following Conservation Plan Incidental Take Authorization Submittal per Eco Cat Review #1405795 for the Sidney-SW Campus 138kV Line Rebuild being proposed by Ameren in Champaign County, Illinois.

Thank you for your time and attention regarding this project. Please contact me at 314-942-5287 (jsunley@hanson-inc.com) or Kenny Lynn with Ameren at 314-554-2978 (KLynn@ameren.com) if you have questions or need additional information.

Sincerely,

HANSON PROFESSIONAL SERVICES INC.

Jennifer A. Sunley
Biologist

Attachments

cc: Kenny Lynn - Ameren

CONSERVATION PLAN
INCIDENTAL TAKE AUTHORIZATION SUBMITTAL

Franklin's Ground Squirrel (*Spermophilus franklinii*)
Ameren Sidney-SW Campus 138kV Line Rebuild
Champaign County, Illinois
EcoCat Review #1405795

The following Conservation Plan (CP) was developed for the state-listed Franklin's Ground Squirrel (*Spermophilus franklinii*) (FGS) in accordance with Title 17 of the Illinois Administrative Code, Chapter I, Part 1080.10 Incidental Taking of Endangered or Threatened Species: Conservation plan. This CP will be implemented for the Sidney-SW Campus 138kV Line Rebuild being proposed by Ameren in Champaign County, Illinois. The purpose of the project is to replace 16 existing wooden utility poles with 12 more reliable steel shaft poles with concrete foundations. The steel structures are needed to improve and upgrade the Ameren system in order to gain capacity and maintain reliable electric service. The project is scheduled for construction in spring 2014.

The Illinois Department of Natural Resources (IDNR) reviewed the project in accordance with the *Illinois Endangered Species Protection Ac*t [520 ILCS 30/17], and Title 17 Illinois Administration Code Part 1075. In a letter dated January 22, 2014, IDNR recommended Ameren seek an Incidental Take Authorization for the project segment between Curtis Road to the south and Windsor Road to the north (Attachment A).

CONSERVATION PLAN

1.0 DESCRIPTION OF IMPACT

1.1 Project Location

The project is located in Section 25, Township 19 North and Range 8 East in Champaign County, Illinois. The project location is a utility corridor bordered by Windsor Road to the north, Curtis Road to the south, US Highway 45 to the west and an active rail line (Canadian National) to the east. The project area is about 1 mile long and 70 feet wide. The approximate center of the project is located at latitude 40.074862 and longitude -88.247844. The location can be seen on the USGS map in Attachment B.

1.2 Biological Data

In Illinois, FGS prefer habitats comprised of relatively tall grasses, dense vegetation and mid-grass prairies. The FGS avoids open, mowed and grazed areas as well as shrubby and woodland areas. The FGS often create burrows in elevated landscape features such as railroad and roadway embankments. Their burrows are fairly deep and well drained in order to be insulated from heat and cold and may have multiple entrance holes. Even during the spring and summer months, the FGS spend a majority of their time in burrows.

The FGS typically hibernate from September to April with a body temperature just a few degrees above freezing. They breed soon after coming out of hibernation and have single yearly litters of 6-9 pups around early June. FGS eat insects, green plants, seeds, fruit, amphibians, bird eggs, young birds and mammals. Their principal predators are the red-tail hawk, red fox, badger, coyote, striped skunk, mink and long-tail weasel. Their home range is

typically 1.5 to 3 acres. At adolescence, male juveniles disperse for an unknown distance. In the wild, life expectancy is about 4 to 5 years for females and 1 to 2 years for males. FGS are known to occur in the northern two-thirds of Illinois. The southern limit of the FGS in Illinois seems to correspond with the Shelbyville glacial moraine. Also, the largest known colony of FGS in Illinois is located at the Barnhart Rising Prairie; hence the overall impact of the proposed project on the local FGS population is minimal and will be recovered in less than one reproductive cycle.

1.3 Activities That May Impact FGS

Construction activities will occur within the 1-mile corridor between Windsor Road to the north, Curtis Road to the south shown on the enclosed figure. Ameren will replace 16 existing wooden poles with 12 more reliable steel shaft poles with concrete foundations in order to increase capacity. The project will require installing single-shaft galvanized steel pole structures that will typically range in height from 60 to 80 feet. Activities that may affect the FGS include drilling, spoil handling, form/pouring concrete and pole/line work. Once construction is completed disturbed areas will restored to original condition and seeded with a native prairie seed mix.

1.4 Anticipated Adverse Impacts on FGS

Since the FGS spends a significant portion of the year in hibernation, installation of the steel poles and concrete foundations may cause burrow disturbance during construction. Construction noise and vibration may also cause temporary disturbance to the FGS. The construction activities could result in an estimated death or injury up to two (2) individuals within the construction corridor. This could include individuals in underground burrows within the drilling locations or individuals could be run over by heavy construction equipment. The intent of this Conservation Plan is to avoid direct impacts to the extent practicable and to greatly minimize indirect impacts that cannot be avoided.

2.0 MEASURES TO AVOID, MINIMIZE AND MITIGATE IMPACTS

2.1 Avoidance and Minimization

The existing Ameren easement for the project corridor is one mile long by 70 feet wide. A field survey was conducted on October 30, 2013 of the project corridor by a Hanson biologist and Mr. Chris Young, a local FGS expert (Attachment C). The survey was conducted using visual screening of the ground surface to locate the signature ground burrows of the FGS. Five of the nine observed burrows within the project corridor met the typical composition of FGS burrows. Two of the burrows were approximately 8 to 10 feet from the construction limits for the new steel poles (Poles 163 and 164). Most of the observed burrows appeared to be remnants and no burrows were observed within individual pole locations.

To avoid and minimize disturbance of FGS and habitat:

1. At least two weeks prior to the start of construction exclusionary silt fencing will be installed along the edge of the construction work. The fencing will be inspected daily during construction.
2. Traps will be placed within exclusionary fencing until construction begins. Any squirrels captured will be documented and relocated to nearby suitable habitat by qualified personnel. A report of the trapping and relocation efforts prior to construction will be provided to IDNR.

3. Construction equipment will enter the project area from US Highway 45 perpendicular to the pole locations. Construction access, ground disturbance and equipment storage will be kept to within 50 feet around each pole location to minimize the total disturbance area.
4. On-site personnel will receive training prior to the start of construction regarding FGS identification, regulations protecting the FGS and a telephone contact list if FGS are encountered during construction.
5. The construction activity timeline at each pole location will be minimized to the greatest extent possible, typically 2 to 3 days for each pole.

2.2 Monitoring and Management

During construction, the construction manager or designee will be on-site daily and ensure all tasks described above are completed prior to and during construction. The construction manager and/or designee will conduct daily monitoring to ensure exclusionary fencing is in place and other tasks are followed appropriately. Ameren will report any FGS found within the project corridor to the IDNR.

2.3 Post Construction Mitigation

During the October 2013 field survey, the project corridor between Windsor and Curtis Roads was observed to be undergoing fairly rapid succession towards shrubland, which is not conducive habitat for FGS survival. The succession of the area to shrubland could be the reason remnant burrows were observed, indicating the FGS population is already moving away from the area.

Following construction completion Ameren will restore the disturbed areas to pre-construction conditions. All non-impervious areas within the 1-mile corridor will be seeded with a native Illinois prairie seed mix.

2.4 Adaptive and Long Term Management Plan

If new information is discovered prior to or during construction that may impact the effectiveness of this plan, Ameren will alter the plan appropriately. Ameren will report to IDNR with a description of the changed circumstances or new information and propose modifications to the plan.

Construction activities and ground disturbance will be reduced to 2 to 3 days per pole location to minimize disturbance activities. Following construction completion, Ameren intends restore the 1-mile corridor to pre-construction condition by seeding area with a native Illinois prepare seed mix. Seeding the 1-mile project corridor will return the areas to pre-construction conditions.

2.5 Funding Verification

The proposed utility line rebuild will be privately funded by Ameren. Ameren will fully incorporated the Conservation Plan into its construction plans and training programs and has secured the funds necessary for its implementation as part of the overall project budget.

3.0 ALTERNATIVE ANALYSIS

In planning the utility line rebuild project, Ameren sought to develop an alternative that avoids and minimizes FGS impacts to the greatest extent possible while meeting the purpose and need of the project. The preferred alternative described in the above sections minimizes FGS impacts to the greatest extent possible while meeting the project need to replace 16 existing wooden poles with 12 more reliable steel shaft poles with concrete foundations. The more reliable steel structures are needed to improve and upgrade the Ameren system in order to increase capacity and maintain reliable electric service.

A no-build alternative was considered during the project planning. The no action alternative would require leaving the 16 wooded poles in place. The existing wooded poles are too small to handle the upgrade in the electric services and would compromise Ameren's ability to provide reliable electric service. Since the no-build alternative does not meet the purpose and need of the project it was eliminated as a viable alternative.

4.0 CONTINUED SPECIES VIABILITY

By implementing the avoidance and minimization techniques described above, the Ameren Sidney-SW Campus 138kV Line Rebuild will have minimal direct impacts on FGS individuals or their habitat. The highest potential for injury is at pole locations 162 and 163 where potential burrows were observed 8 to 10 feet from the construction limits. Following construction completion, the 1-mile project corridor will be restored to pre-construction conditions. Any impact that occurs in accordance with the requested incidental take permit will be limited to an estimated 2 individuals that cannot be trapped and relocated. Since FGS typically have litters of 6 to 9 pups per year any adverse impact to individual FGS will be made up in less than one-year via typical reproduction rates.

With the implementation of this Conservation Plan, incidental taking of FGS in connection with the proposed utility line rebuild will not reduce the likelihood of the survival or recovery of the FGS in the wild within the State of Illinois, the biotic community of which the FGS is a part of, or the habitat essential to the FGS existence in Illinois, since they can be found in other locations in Illinois.

5.0 IMPLEMENTING AGREEMENT

In order to ensure compliance with the conditions described in the Incidental Take Authorization for the FGS on the Ameren Sidney-SW Campus 138kV Line Rebuild, Ameren agrees to implement the measures described in the Conservation Plan.

Ameren will implement the following actions:

- Conduct a mandatory education program for construction personnel. The program will include FGS identification, legal responsibility and establishment of a telephone contact list. This action will be completed prior to the start of construction.
- Install exclusionary silt fencing and squirrel traps along the edge of the construction work. Any squirrels captured will be documented and relocated to nearby suitable habitat by qualified personnel. A report of the trapping and relocation efforts prior to construction will be provided to IDNR. Fencing will be monitored daily during construction by the construction manager.

- Construction equipment will enter the project area from US Highway 45 perpendicular to each pole location to minimize land disturbance.
- Construction time at each pole site will be minimized to the greatest extent possible.
- Following construction completion the 1-mile project corridor will be seeded with a native Illinois prepare seed mix.

Signed _____ Dated _____

REFERENCES

17 Illinois Administrative Code Section 1080.10

Haberman, C.G and E.D. Fleharty. 1971. *Natural History notes on Franklin's Ground Squirrel in Boone County, Nebraska*. Transactions of the Kansas Academy of Science 74:76-80.

Krohne, D.T. and P. Schramm. 1994. *Hibernation and Life History of the Franklin's Ground Squirrel (Spermophilus franklinii) in a Restored Prairie*. Proceedings of the Thirteenth North American Priarie Conference. R.G. Wickett et al. eds Windsor, Ontario Canada.

Ostroff, A.C. and E.J Flink. 2003. *Mammalian species: Spermophilus franklinii*. American Society of Mammalogists 724: pp 1-5.

Wood, F.E. 1910. A Study of Mammals of Champaign County, Illinois. Bulletin of the Illinois State Laboratory of Natural History. 8:501-503.

ATTACHMENT A

IDNR LETTER DATED JANUARY 22, 2014

Illinois Department of
Natural Resources
One Natural Resources Way Springfield, Illinois 62702-1271
www.dnr.illinois.gov

Pat Quinn, Governor
Marc Miller, Director

January 22, 2014

Mr. Kenneth Lynn, Consulting Env. Scientist
Ameren Corp.
1901Choutou
St. Louis, MO 63103

RE: Sidney-SW Campus138-kV Line Rebuild, Champaign County
Endangered Species Consultation Program
EcoCAT Review #1405795

Dear Mr. Lynn:

The Department has evaluated the proposed action in accordance with the *Illinois Endangered Species Protection Act* [520 ILCS 10/11], the *Illinois Natural Areas Preservation Act* [525 ILCS 30/17], and Title 17 *Illinois Administrative Code* Part 1075.

Credible evidence strongly indicates a colony of the state-listed threatened **Franklin's Ground Squirrel**, *Spermophilus (Poliocitellus) franklinii*, is present in the project segment between Curtis and Windsor Roads. It is the Department's opinion it will be extremely difficult, if not impossible, to complete the proposed action without a prohibited taking, as that term is statutorily defined, of the Franklin's Ground Squirrel. *Therefore the Department recommends Ameren seek an Incidental Take Authorization from the Department pursuant to Part 1080 of its Administrative Rules.*

The Franklin's Ground Squirrel spends a significant portion of the year in hibernation, only becoming active in late April or early May, and returning to hibernation as early as late August or the first few weeks of September. Disturbance of a burrow during the hibernation period is likely to result in the death of the resident Ground Squirrel. However, because this animal spends the majority of its active time period underground and retreats underground when threatened, burrow disturbance during the active period is also likely to result in the death or injury of the resident Ground Squirrel unless the animal is first trapped and removed. (Capture also constitutes prohibited taking if done without the required authorization from the Department.)

Ameren may propose any Conservation Plan it believes meets the objectives of the statute. Because Part 1080 imposes minimum procedural requirements before the Department may authorize Incidental Take, prompt submission of a complete Conservation Plan will facilitate completion of this project in 2014.

Consultation on the part of the Department is closed, unless Ameren desires additional information or advice related to this proposal.

This consultation is valid for two years unless new information becomes available which was not previously considered; or the proposed action is modified; or additional species, essential habitats, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resource review primarily reflects the information existing in the Illinois Natural Heritage Database at the time of this consultation, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments.

If additional protected resources are encountered during the project's implementation, the applicant must comply with the applicable statutes and regulations. Also, note that closing consultation does not imply IDNR's authorization or endorsement of the proposed action. Please contact me if you have questions regarding this review.

Sincerely,

Keith M. Shank
Impact Assessment Section
Division of Ecosystems and Environment
keith.shank@illinois.gov
(217) 785-5500

cc: Jenny Skufca, IDNR-Office of Resource Conservation

EcoCAT
Ecological Compliance Assessment Tool

ILLINOIS DEPARTMENT OF NATURAL RESOURCES

Applicant: Ameren Corporation
Contact: Kenneth Lynn
Address: 1901 CHouteau
St. Louis, MO 63103

IDNR Project Number: 1405795
Date: 11/05/2013

Project: Sidney-SW Campus 138kv Line Rebuild
Address: North of Savoy, Savoy

Description: Existing line between Curtis Road and Windsor Road on east side of US Hwy 45 (west side of RR tracks)to be rebuilt. 16 existing wooden poles to be replaced by 12 steel structures. Project to commence in February or March, 2014. Expected completion April, 2014.

Natural Resource Review Results

Consultation for Endangered Species Protection and Natural Areas Preservation (Part 1075)

The Illinois Natural Heritage Database shows the following protected resources may be in the vicinity of the project location:

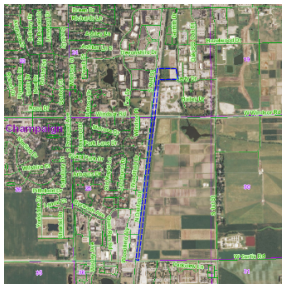
Franklin's Ground Squirrel *(Spermophilus franklinii)*
Franklin's Ground Squirrel *(Spermophilus franklinii)*

An IDNR staff member will evaluate this information and contact you within 30 days to request additional information or to terminate consultation if adverse effects are unlikely.

Location
The applicant is responsible for the accuracy of the location submitted for the project.

County: Champaign

Township, Range, Section:
19N, 8E, 24
19N, 8E, 25



IL Department of Natural Resources Contact
Keith Shank
217-785-5500
Division of Ecosystems & Environment

Local or State Government Jurisdiction
IL Commerce Commission

Disclaimer

The Illinois Natural Heritage Database cannot provide a conclusive statement on the presence, absence, or condition of natural resources in Illinois. This review reflects the information existing in the Database at the time of this inquiry, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, compliance with applicable statutes and regulations is required.

Terms of Use

By using this website, you acknowledge that you have read and agree to these terms. These terms may be revised by IDNR as necessary. If you continue to use the EcoCAT application after we post changes to these terms, it will mean that you accept such changes. If at any time you do not accept the Terms of Use, you may not continue to use the website.

1. The IDNR EcoCAT website was developed so that units of local government, state agencies and the public could request information or begin natural resource consultations on-line for the Illinois Endangered Species Protection Act, Illinois Natural Areas Preservation Act, and Illinois Interagency Wetland Policy Act. EcoCAT uses databases, Geographic Information System mapping, and a set of programmed decision rules to determine if proposed actions are in the vicinity of protected natural resources. By indicating your agreement to the Terms of Use for this application, you warrant that you will not use this web site for any other purpose.

2. Unauthorized attempts to upload, download, or change information on this website are strictly prohibited and may be punishable under the Computer Fraud and Abuse Act of 1986 and/or the National Information Infrastructure Protection Act.

3. IDNR reserves the right to enhance, modify, alter, or suspend the website at any time without notice, or to terminate or restrict access.

Security

EcoCAT operates on a state of Illinois computer system. We may use software to monitor traffic and to identify unauthorized attempts to upload, download, or change information, to cause harm or otherwise to damage this site. Unauthorized attempts to upload, download, or change information on this server is strictly prohibited by law.

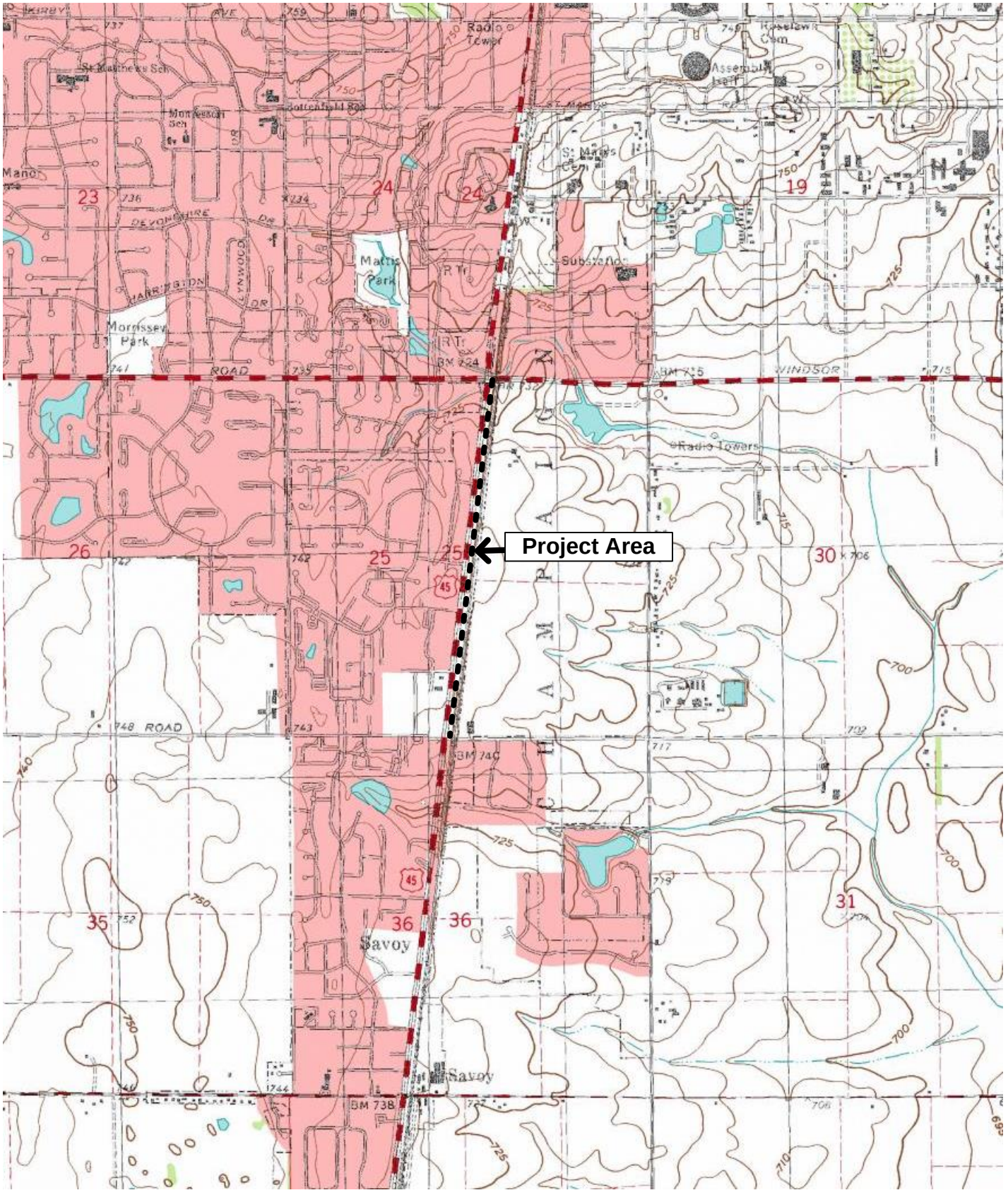
Unauthorized use, tampering with or modification of this system, including supporting hardware or software, may subject the violator to criminal and civil penalties. In the event of unauthorized intrusion, all relevant information regarding possible violation of law may be provided to law enforcement officials.

Privacy

EcoCAT generates a public record subject to disclosure under the Freedom of Information Act. Otherwise, IDNR uses the information submitted to EcoCAT solely for internal tracking purposes.

ATTACHMENT B

LOCATION MAP



© Copyright Hanson Professional Services Inc. 2014

Source: USGS Geospatial Data Gateway Champaign County, Illinois USGS 7.5 minute Quadrangle Map

-N-

HANSON
HANSON PROFESSIONAL SERVICES INC.

USGS Topographic Map

Sidney-SW Campus 13kV Line Rebuild
Ameren
Champaign County, Illinois

JOB NO. 13E0034B

ATTACHMENT C

FIELD SURVEY DATED OCTOBER 30, 2013

HANSON

MEMORANDUM

TO:	Kenny Lynn - Ameren
FROM:	Kevin Seals
DATE:	October 31, 2013
SUBJECT:	Franklin's Ground Squirrel Survey at Sydney - SW Campus, Champaign, Illinois

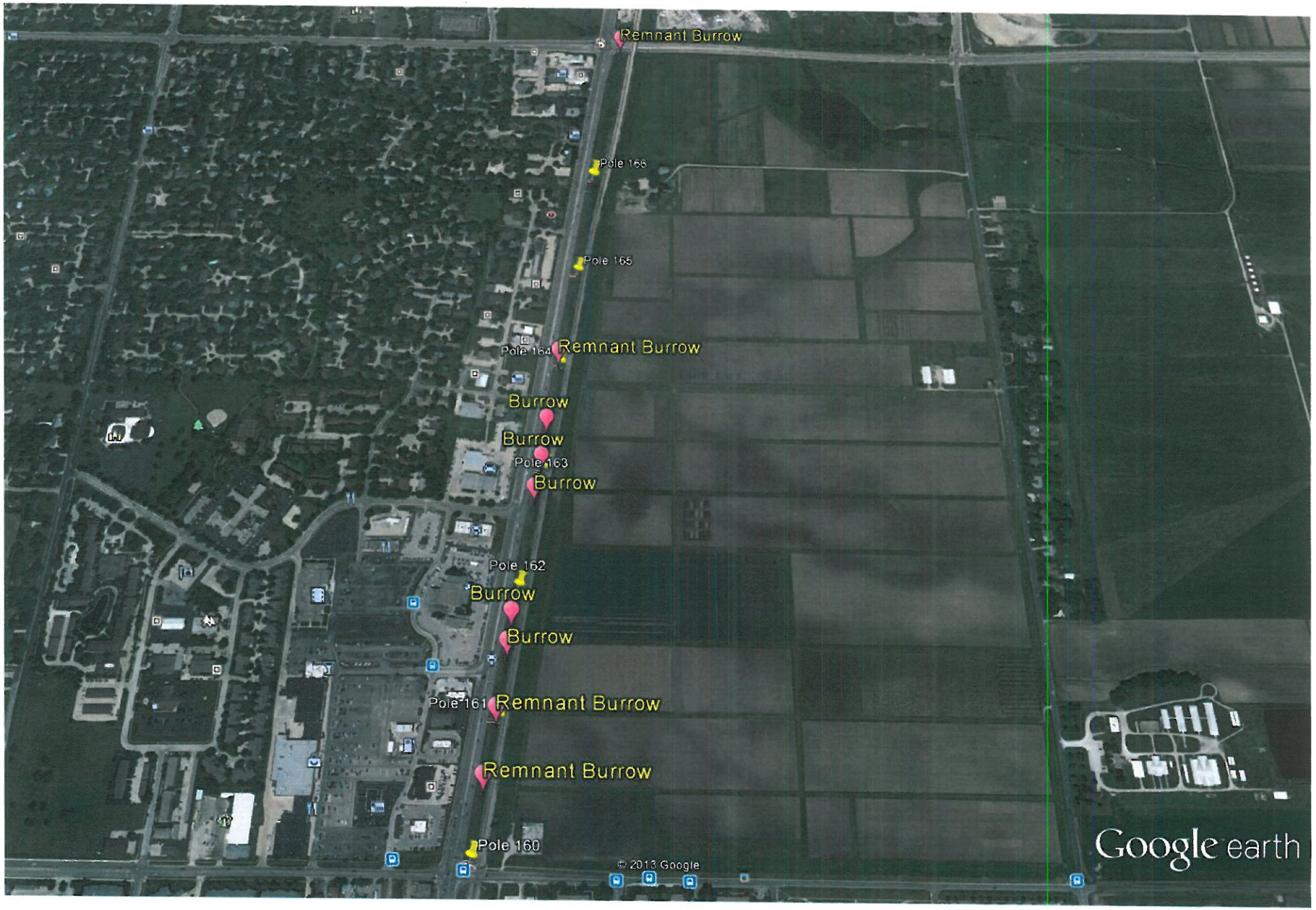
A field survey for the state-endangered Franklin's ground squirrel was conducted on October 30, 2013 by Hanson Professional Services Inc. (Kevin Seals) and Mr. Chris Young, a local expert on Franklin's ground squirrels. The survey was conducted for the Ameren Sidney - SW Campus transmission pole replacement project along a previously known location for Franklin's ground squirrels, as reported by the Illinois Department of Natural Resources. This location is located along the east side of U.S. Rt. 45 (North Dunlap Street) within the right-of-way of the Illinois Department of Transportation and the west right-of-way of the Canadian National Railroad. The survey was limited to the section between Windsor Road to the north and Curtis Road to the south. The weather during the survey was foggy with light rain and a high temperature of around 65 degrees.

During the morning, the survey crew was accompanied by Mr. Kenny Lynn of Ameren. The survey was conducted using visual screening of the ground surface to locate the signature ground burrows of the Franklin's ground squirrel. The entire corridor from Curtis Road to Windsor Road was surveyed. More specifically, an area about 15 ft. wide was throroughly searched from the edge of the pavement of U.S. Rt. 45, east to the railroad right-of-way, centered around the staked location for soil borings of the new pole foundations. This area was surveyed more intensively to verify the presence or absence of ground squirrel burrows for the disturbance that may be caused by a drill rig during soil borings and the future disturbance caused by foundations and tower placement for the new transmission line. It is assumed that all disturbance will be perpendicular from U.S. Rt. 45 to each of the seven new pole locations. Brightly colored, red pin flags were placed at all of the potential burrow locations identified.

About nine (9) burrow locations were identified during the survey. Most of the burrows (seven) were located between proposed Poles 161 and 164. One previously used, or remnant burrow, was located between proposed Poles 160 and 161, and along Windsor Road at the north end of the project. The remnant burrows appeared larger than the typical Franklin's ground squirrel signature burrow, and may be ground hog burrows. However, these burrow openings may have been enlarged due to predation by a larger mammal such as a coyote. Five (5) of the nine (9) identified burrows met the typical composition of Franklin's ground squirrel burrows and their associated preferred habitat comprised of primarily brome grass. These locations were near and between proposed Poles 162 and163. See the attached maps for more detail.

Of the seven (7) proposed locations for soil borings and new pole foundations, Poles 160-166, only two (2) pole locations had any evidence of burrow activity in close proximity to the construction limits. Proposed pole locations 163 and 164 each had burrow activity on the south side of the staked locations for borings. Pole 163 exhibited an active burrow about 10 ft to the southwest of the staked location, see attached photograph. Pole 164 exhibited a remnant burrow about eight (8) ft south of the staked location. Ground disturbance and future construction activity should remain to the north of these locations as much as practicable to avoid any injury to ground squirrels. Proposed Pole 163 has the closest possible impact to an active burrow and precautionary measures should be taken for avoidance of this area.

Franklin's ground squirrels are currently in hibernation for the winter and will not emerge until late April. The habitat of this project area is undergoing fairly rapid succession towards shrubland, which is not conducive for the Franklin's ground squirrel's survival. Some of the remnant burrows may be a result of this succession, as they may have moved elsewhere. Future burning or mowing of the woody vegetation along this prairie would likely maintain the preferred habitat for the Franklin's ground squirrel.



Google earth

feet 3000

km 1

Google earth

feet 300

meters 100

Google earth

feet 300

meters 100

Google earth

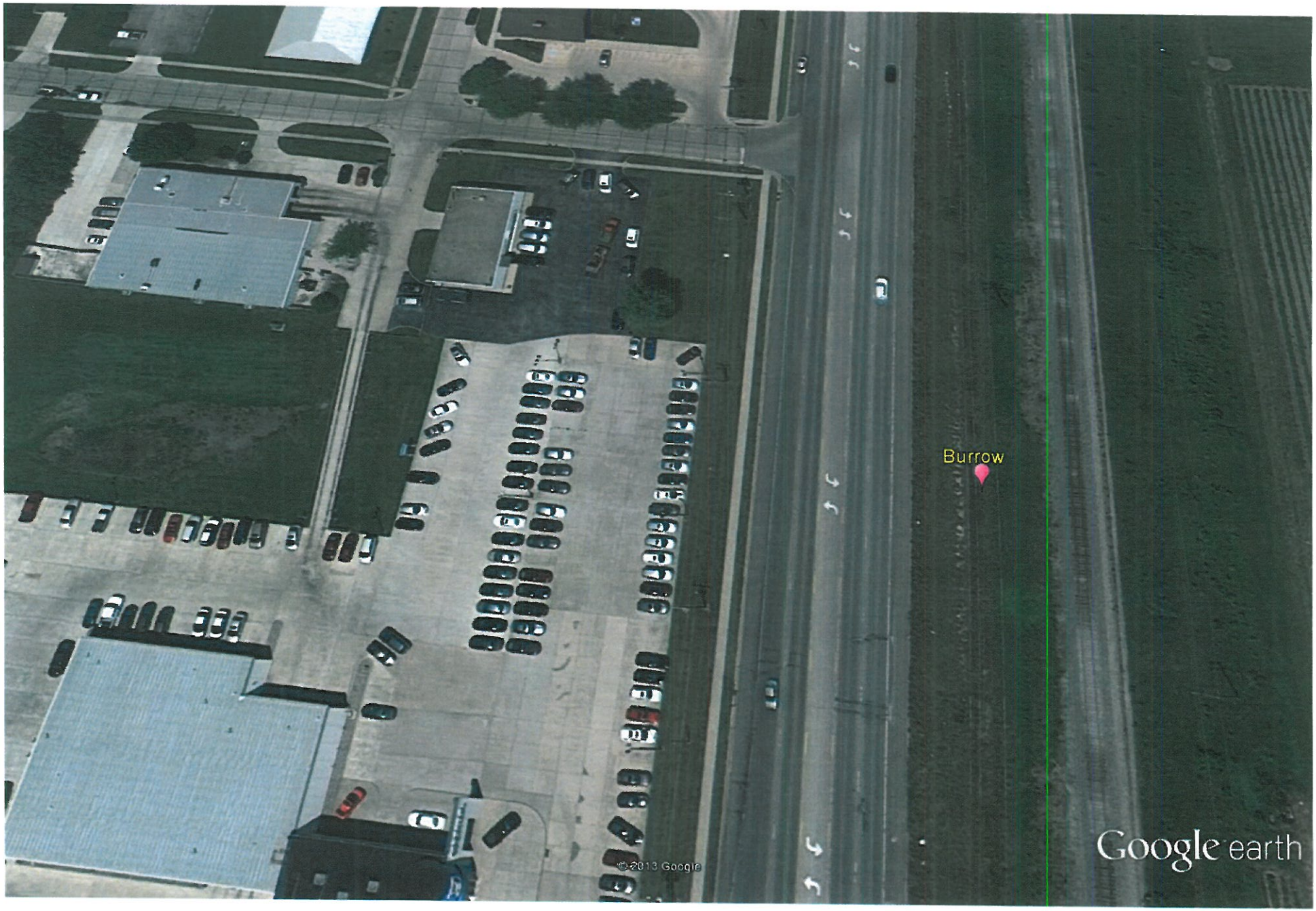
feet 300

meters 100

Google earth

feet 300

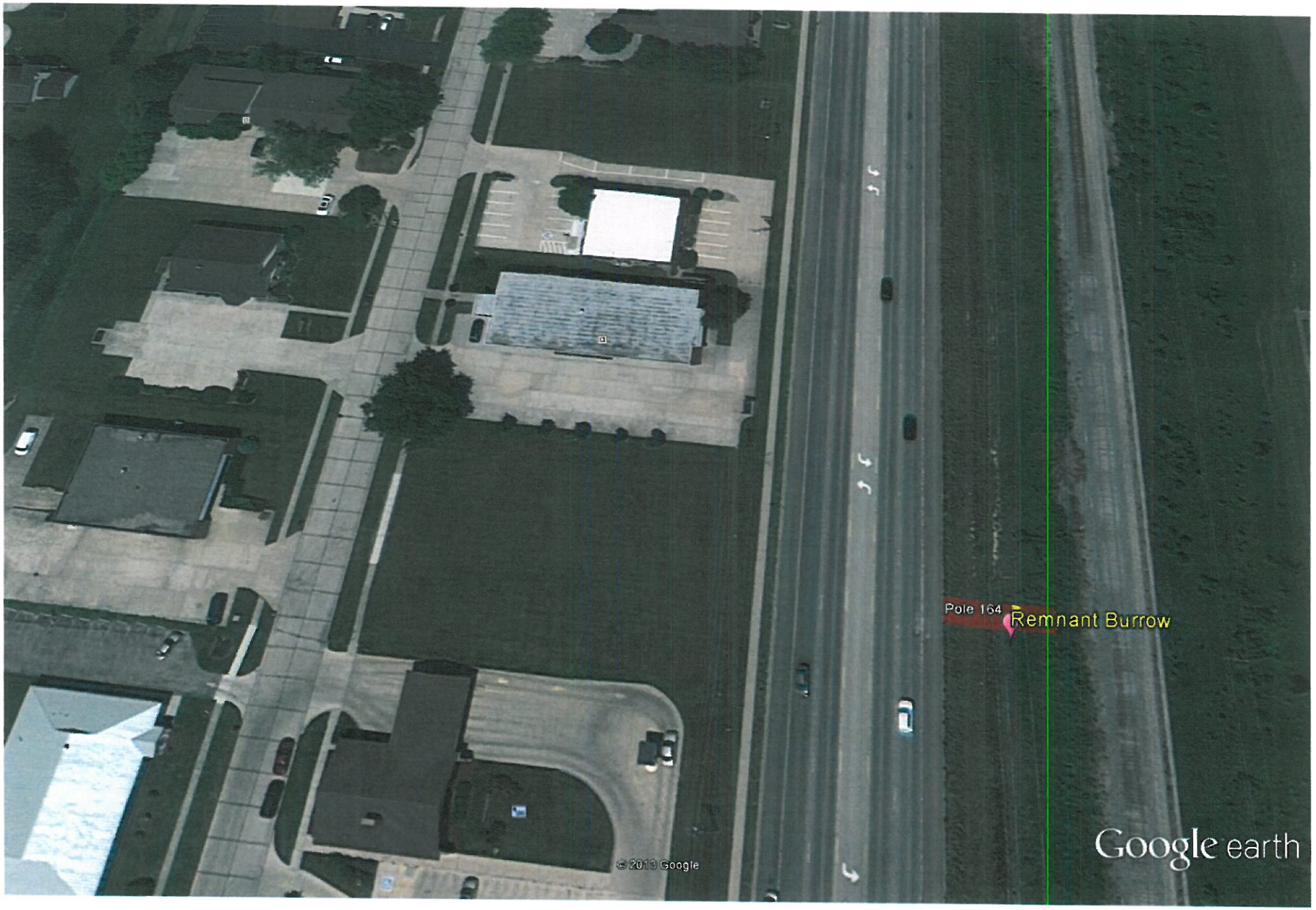
meters 100



Google earth

feet 300

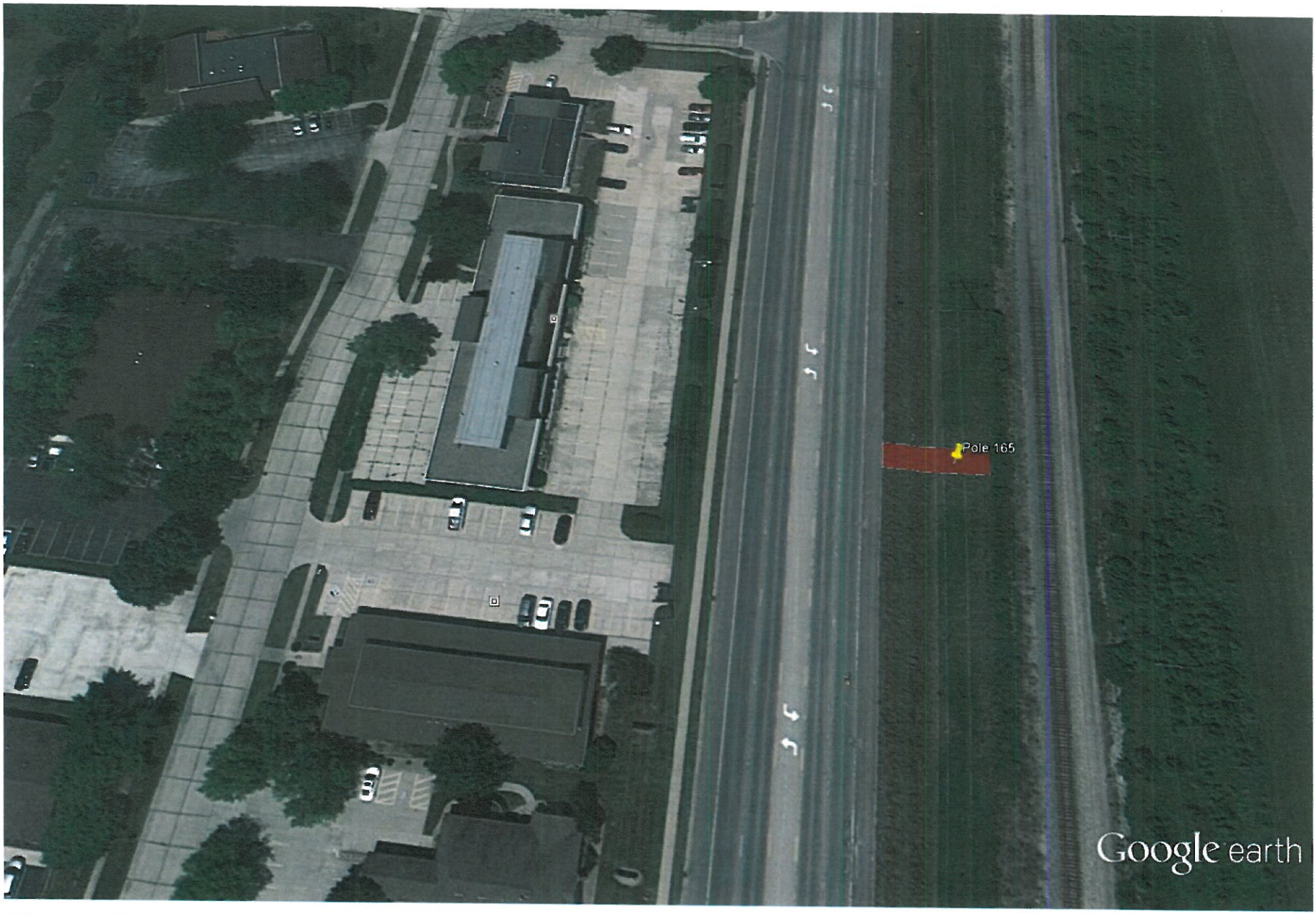
meters 100



Google earth

feet 300

meters 100



Google earth

feet 300

meters 100

Google earth

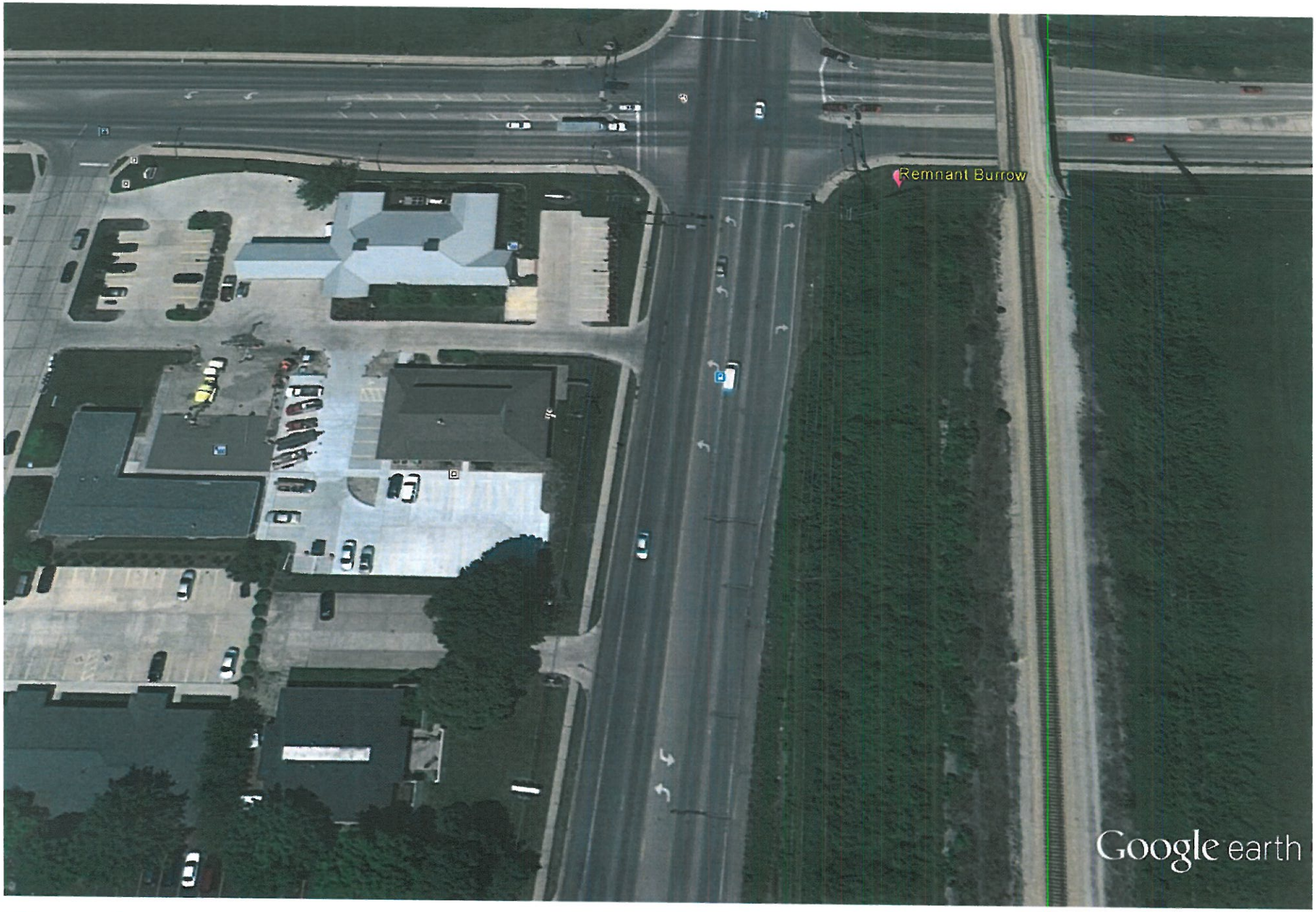
feet 300

meters 100

Google earth

feet 300

meters 100



Google earth

feet 300

meters 100

Google earth

feet 100
meters 30

Google earth

feet 100
meters 30

RED BISON
PRAIRIE CORRIDOR
MANAGED BY
RED BISON
U of I YMCA