

Conservation Plan

ComEd L13304 Transmission Line Rebuild Project

Whiteside County, Illinois

Prepared for:

Commonwealth Edison Company
One Lincoln Center
Oakbrook Terrace, IL 60181

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Illinois Department of Natural Resources CONSERVATION PLAN

(Application for an Incidental Take Authorization)
Per 520 ILCS 10/5.5 and 17 Ill. Adm. Code 1080

150-day minimum required for public review, biological and legal analysis, and permitting

PROJECT APPLICANT: **Commonwealth Edison (ComEd)**

PROJECT NAME: **ComEd L13304 Transmission Line Rebuild Project**

COUNTY: **Whiteside**

AREA OF IMPACT (acreage): **6.070 acres total (0.017 permanent and 6.053 temporary)**

1. Likely Impacts

A. Area to be Affected

Commonwealth Edison (ComEd) is proposing to rebuild an existing 138-kilovolt (kV) transmission line, L13304, in Whiteside County, Illinois (Project; Figure 1). The line originates at a new switchyard being constructed just north of Jersey Road and extends north along existing ComEd right-of-way (ROW) approximately 11.2 miles to ComEd's Rock Falls TSS133 Substation located approximately 1.4 miles north of Interstate 88 (I-88) (Figure 1). Specifically, the Project is located in Township 19N, Range 7E, Sections 1, 12, 13, and 24; Township 20N, R7E, Sections 1-2, 12-13, 24-25, and 36; and, Township 21N, R7E, Section 35 (Figure 1).

The action area for this Conservation Plan is defined as the area within the existing L13304 ROW between Jersey Road and I-88 (Figure 1), as well as a temporary off-ROW access road east of the new switchyard (Figures 2 and 3). The temporary access road is approximately 1,600 feet long, 20 feet wide, and follows a property line. The action area is approximately 141.6 acres in size, of which approximately 126.2 (89.1%) is used to produce row crops (Homer et al. 2015). BHE is constructing a new switchyard within an agricultural field immediately north of Jersey Road and south of the Hahnman Sand Prairie Nature Preserve (Figures 2 and 3). Construction of the switchyard is not included in the action area for the Project.

Two locations within the action area have been identified as environmentally sensitive areas for which this Conservation Plan seeks incidental take authorization for three state-listed species:

- Area 1 includes the ROW from Hahnman Road south to the north boundary of the Hahnman Sand Prairie Nature Preserve (Figure 3). The existing ROW at this location passes through portions of the Hahnman Sand Prairie INAI site, and other areas of sand prairie habitat. The sand prairie community in this location provides suitable habitat for three of the listed species covered by this plan. An off-ROW access road will be used to completely avoid the Hahnman Sand Prairie Nature Preserve. No work within the nature preserve is planned and no impacts are anticipated; therefore, the nature preserve is not included herein for take coverage.
- Area 2 includes the ROW from Star Road south approximately one-half mile (Figure 3). Soil survey data indicates the existing ROW extends through an area mapped as loamy sand. Given the mapped soil data, this area likely provides suitable soil conditions for two of the listed species covered by this plan, though the presence of these species at this location is unknown.

Appendix A includes a table summary indicating ownership or control of the affected properties in Areas 1 and 2. ComEd has easement agreements for the transmission line ROW with each of the landowners. The terms of the individual easements vary. Approximately one quarter mile of existing easement within Area 1 is being amended for additional ROW width between structures 190 and 191A (Figure 3). ComEd is working with the landowner to expand the existing easement by up to an additional 40 feet (20 feet on either side of the existing ROW) to accommodate “wire blowout” needed for the larger poles (Figure 3). The amended easement is anticipated to be available by the end of June 2018. Notice will be provided to the Illinois Department of Natural Resources (IDNR or Department) when the amended easement has been signed.

B. Biological Data on Affected Species

This Conservation Plan has been prepared in accordance with the Illinois Endangered Species Protection Act (520 ILCS 10/5.5 and 17 Ill. Adm. Code 1080) in support of an Incidental Take Authorization (ITA) application to the IDNR. The purpose of this Conservation Plan is to review the proposed Project in sufficient detail to determine to what extent the proposed action may result in “incidental take” of the following state-listed species:

- Ornate box turtle (*Terrapene ornata*) –Threatened
- Plains hog-nosed snake (*Heterodon nasicus*) –Threatened
- Regal fritillary (*Speyeria idalia*) – Threatened

A desktop and field habitat assessment were performed for portions of the action area. Prior to the field investigation, several data sources were consulted to identify areas of suitable habitat for each of the three state-listed species included in this Conservation Plan. These data sources included:

- USGS 1:24,000 Scale Topographic Maps (Figure 1)
- Recent aerial photography (Figure 2)
- Natural Resources Conservation Service (NRCS) soils data for Whiteside County, Illinois (Figures 3 and 4)

A site visit was made to the Wahl property on December 15, 2017 to confirm the presence of suitable habitat for the three state-listed species within the existing ROW. The site visit was limited to the Hahnman Sand Prairie Nature Preserve. Given the predominance of agricultural fields north of Hahnman Road, no additional site visits were made within the remaining portions of the action area (Figure 2). Furthermore, given that existing information from the IDNR, as well as personal communication with the Illinois Nature Preserves Commission (INPC) and landowner regarding species presence, species specific surveys for the listed species were not conducted as part of the habitat assessment or for preparation of the Conservation Plan. Additional pre-construction habitat characterization and habitat assessment work within Areas 1 and 2 is planned to start in June 2018.

i. Ornate Box Turtle

Species Description

Ornate box turtles are small terrestrial turtles with a high-domed, round or oval carapace with a dark brown color and yellow lines on each scale that radiate downward and forward. The strongly hinged plastron is similarly marked and may be closed completely. Males may be distinguished from females by the presence of an inwardly facing first toe on the hind legs, a concave plastron, and red eyes (Ernst and Lovich 2009).

The turtles are diurnal and their daily activity cycle, as described by Ernst and Lovich (2009), consists of emerging from their night burrow (or form) and basking for a short time before beginning to forage. The turtles eat insects such as beetles, caterpillars, and grasshoppers which account for approximately 90% of their diet, as well as a variety of plants and berries (Ernst and Lovich 2009). Typically, foraging stops by late morning and the turtles seek shelter in day burrows or other shady spots, where they remain until mid-to late afternoon when they begin to forage again. Legler (1960) found the home range of an individual

turtle to be approximately two ha (5 ac). Females lay one or more clutches of eggs in May through June and abandon their nests to let the eggs incubate for approximately 80-90 days. Hatchlings emerge in the fall or may overwinter depending on conditions. In mid- to late October, the ornate box turtle burrows two to three feet into the ground to overwinter. They remain in their overwintering burrow until they emerge in late April or early May.

Species Status in the Project Area

The IDNR indicates records of the ornate box turtle are known from Whiteside County, Illinois (EcoCAT ID#1805151; IDNR 2010) and the INPC indicates this species is known to occur within and adjacent to the Hahnman Sand Prairie Nature Preserve (INPC, personal communication).

Habitat Requirements

Ornate box turtles are primarily a prairie species, but also inhabit pastures, open woodland areas, and agricultural fields. Ornate box turtles are restricted to areas with soils that allow for easy burrowing. Legler (1960) reported that ornate box turtles prefer bare, well-drained, sloping areas protected from erosion by upslope clumps of rocks or sod for nesting. Preferred sites are locations well suited to basking and burrowing, as well as being protected from the wind (Ernst and Lovich 2009).

Habitat Assessment

The extent of suitable ornate box turtle habitat within the action area was based on the following assumptions that ornate box turtles:

1. Are restricted to areas of nearly pure sand.
2. Use open canopy habitats and do not regularly utilize closed canopy forest or wetlands.
3. Prefer non-cropped grassland habitat over actively cropped areas despite the fact they may use actively cropped farmland at times throughout the year.

Based on the desktop analysis of NRCS soil survey data, aerial photos, and landcover, as well as observations from the field site visit, it was determined that approximately 20.6 acres of sandy soil habitat occur within the action area (Figure 4). Approximately 0.3 acre are mapped as sand, and approximately 20.3 acres are mapped as loamy sand (Figure 4). Small portions of the action area that contain sandy soils within disturbed crop lands were not considered suitable. Though not pure sands, the mapped loamy sands combined with the presence of a grassland community in Area 1 provide suitable habitat conditions for the ornate box turtle (Figure 3). Though the woodland community present immediately adjacent to the existing ROW south of Star Road in Area 2 (Figure 3) is unsuitable for ornate box turtles, the mapped soil type at this location combined with the lack of woodland within the existing ROW, suggests suitable habitat for this species may be present within the action area at this location.

ii. Plains Hog-nosed Snake

Species Description

The plains hog-nosed snake is a medium sized, stout bodied snake up to 24 inches in total length. It has a grayish brown or light olive green back covered with 35-40 dark blotches. A sharply upturned scale at the tip of the nose is used for digging and burrowing. The belly is white to yellowish, and it is predominantly black on the underside of the tail. The scales are keeled, and the anal plate is divided. A diagonal bar lying between the eyes extends downward behind each eye to the corner of the mouth.

The snakes mate in the spring. In July they lay a clutch of eight to ten eggs which then hatch in August or September. The plains hog-nosed snake feeds on toads and other amphibians, reptiles and their eggs, birds, and small mammals (Phillips et al. 1999; Ernst and Ernst 2003). When frightened, the snake will widen its neck, hiss, and sometimes strike, then roll onto its back and feign death.

Species Status in the Project Area

The IDNR indicates at least one occurrence record for this species is known from Whiteside County (EcoCAT ID#1805151; IDNR 2010). The INPC indicates this species is known to occur within the Hahnaman Sand Prairie Nature Preserve (INPC, personal communication).

Habitat Requirements

The plains hog-nosed snake is a prairie or savanna species, preferring grasslands with well drained sandy or gravelly soils for burrowing (Ernst and Ernst 2003). In Illinois, it is most often observed crossing sandy roads within or near brushy or weedy sand prairie remnants (Phillips et al, 1999).

Habitat Assessment

Sand prairie habitat within the Hahnaman Sand Prairie Nature Preserve and adjacent sand prairie habitat within the existing ROW in Area 1 provides suitable habitat for the plains hog-nosed snake (Figure 3). Mapped sandy soils are also present on non-cropped land from Star Road to approximately one-half mile south in Area 2 (Figure 3), which may also provide suitable habitat for the plains hog-nosed snake. Cropped areas within the action area are unsuitable for the plain hog-nosed snake. Based on this species' habitat requirements, suitable Plains hog-nosed snake habitat overlaps entirely with the ornate box turtle habitat described above.

iii. Regal Fritillary

Species Description

The regal fritillary is a large butterfly with a wingspan of 2.7 to 4.2 inches. The forewing dorsal is orange with black marks; the margins are black with small white markings at the edge. The hind wing dorsal is black with a row of postmedian white spots. The submarginal row has orange spots in the male and white spots in the female.

The regal fritillary has one brood, with flight records from mid-June through mid-September. Adult males emerge in mid-June, with females typically emerging several days to perhaps two weeks later. Males exhibit a meandering, but energetic flight behavior in their search for receptive females. Their flight is from two to five feet above the ground. In contrast to males, which by some account make up 80 to 90 percent of the population, females spend more time in a perching or feeding behavior. After mating, females lay their eggs – as many as 2,000 – on a variety of surfaces, including a wide variety of non-host plants, dead leaves, and pebbles (Vaughan and Shepherd 2005). This level of fecundity in the number of eggs and the wide, random dispersal of the individual eggs throughout the landscape is unusual among Lepidoptera.

Although the caterpillars hatch in late summer, they do not feed on their host plants, Bird's-foot violet (*Viola pedata*), prairie violet (*V. pedatifida*), arrowleaf violet (*V. sagittata*), and other violets, until the following spring. Winter is spent under leaves and in leaf litter on the ground. Adult nectar sources include milkweeds (*Asclepias* sp.), thistles (*Cirsium* sp.), blazing stars (*Liatris* sp.), butterfly weed (*Asclepias tuberosa*), red clover (*Trifolium pretense*), alfalfa (*Medicago sativa*), ironweed (*Vernonia* sp.), pale-purple coneflower (*Echinacea pallida*), and mountain mint (*Pycnanthemum* sp.) (NatureServe 2016). In Illinois, regals have been observed using the Eurasian species, Johnny-jump-up (*Viola tricolor*) (Wisconsin DNR 2011).

Species Status in the Project Area

Populations of this species are extremely localized throughout the landscape and occur in a small number of sites in Illinois. Historically the regal fritillary has been recorded in more than two dozen counties in Illinois, but in the last decade observations have been confined to just fifteen counties, including Whiteside County (NatureServe 2016). This species is known to occur within the Hahnaman Sand Prairie Nature Preserve (EcoCAT ID#1805151; INPC, personal communication).

Habitat Requirements

The regal fritillary is adapted to several habitats ranging from drier sand prairies, old field grasslands, meadows, and railroad rights-of-way to more hydric sites like mesic prairies and marshy or boggy areas with grasslands (NatureServe 2016). The species is able to disperse to other suitable habitats at considerable distances. Frequently, the butterflies are found near woodlands in these same areas. Although it tolerates

a variety of landscapes, three conditions are mandatory for regal fritillary's continued existence including 1) the presence of its host plants (i.e. violet species), 2) nectar sources for the adults, and 3) large site size (e.g. >100 acres; the greater the size of the site, the greater likelihood of continued viability of the species). Some research (Swengel 2001) indicates even highly degraded areas can hold sizeable regal fritillary populations, provided the above conditions are met.

Habitat Assessment

Sand prairie habitat within the Hahnman Sand Prairie Nature Preserve and adjacent sand prairie habitat within the existing ROW in Area 1 between Jersey Road and Hahnman Road provides potentially suitable habitat for the regal fritillary (Figure 3). Walking surveys to identify concentrations of host plants (violets) along the existing ROW in this area will be conducted during the 2018 growing season to confirm habitat suitability. No suitable habitat for the regal fritillary is located north of Hahnman Road given the predominance of agricultural lands used to produce row crops.

C. Description of Project Activities

i. Practices to be Used

Project Description

ComEd is the sole owner and operator of the existing L13304 Transmission Line, and will be responsible for all reconstruction, operation, and maintenance activities for the Project. The Project consists of removing 104 wooden H-frame structures and installing 111 self-supporting steel monopole structures. No new structures will be installed in the Hahnman Sand Prairie Nature Preserve. The conductors of the existing single circuit line and H-frame structures will be completely removed and recycled. New conductors will replace the existing circuit and additional conductors will be added, resulting in a double circuit on the new steel monopoles. Installation of conductors will occur from the ground with pull pads on the ROW. The height of the new structures will range from approximately 100 -125 feet.

In general, construction access will be along the ROW and directly from public roads. In some cases where constraints prevent direct access from public roads, access from outside the ROW may be required from adjacent landowners. Because this is an existing transmission line and ROW, most trees and shrubs have been previously cleared; however, some vegetation clearing will be necessary prior to installing temporary construction matting. The ROW will be maintained free of tall growing vegetation throughout the operational life of the line. Temporary construction matting will be installed to provide access through wetlands or other unstable soil areas where needed prior to construction access. Construction matting may consist of timber, composite, or hybrid timber mats and will be installed with rubber-tired mat trucks, forwarders, forklifts, or skid loaders. Mat access roads will be approximately 14-foot wide and mat work platforms at each structure (if necessary) may be as large as 100 feet by 100 feet.

Upon establishing safe and efficient access along the ROW, the existing conductors will be removed from the H-frame structures and recycled. Next, the existing wooden H-frame structures will be removed from the ground and their holes will be backfilled. The new monopole steel structures will require reinforced concrete caisson foundations. In general, the excavated holes for each foundation will range from five to eight feet in diameter and 20 to 35 feet in depth, or greater, depending on soil conditions. Transmission line structures are typically transported to the site in two or three pieces, assembled at the structure location, and then erected onto the foundation. Equipment utilized for this operation typically includes cranes and bucket trucks. Once all structures within a wire pull segment are set, the wires are pulled and clipped into place. This procedure requires access to each structure with a bucket truck. Wire set-up areas containing reel trailers, wire pullers, and related equipment are located at each end of the wire pull.

Site restoration and revegetation will be based on the degree of disturbance caused by construction activities and the ecological setting of each site. Where soil disturbance occurs in environmentally sensitive areas, erosion control best management practices will be installed, maintained, and monitored until the area is revegetated.

ii. Timeline of Activities

Because the Project is a rebuild of an existing line it needs to be carefully coordinated and scheduled around allowable electric outages. The Project is scheduled to begin in July 2018 and is expected to be complete by April 2019. Activities within environmentally sensitive Areas 1 and 2 will be completed between late August/early September and December 2018. The following schedule is planned:

Pre-construction

- June 2018 – Prior to obtaining the ITA and initiating construction, a habitat characterization and plant survey of the right-of-way and work area will be completed within environmentally sensitive Areas 1 and 2.

Construction and Restoration

- July to August 2018 – Prior to obtaining the ITA, construction in areas outside of the environmentally sensitive areas will begin (i.e. in areas without suitable habitat for the three state-listed species).
- Late August / Early September 2018 – Anticipate obtaining the ITA and beginning construction in environmentally sensitive Areas 1 and 2. The first task will be to implement the species minimization measures.
- December 2018 – Construction and site restoration will be complete in environmentally sensitive Areas 1 and 2.
- April 2019 – Construction and site restoration will be complete throughout the entire project.

Post-construction

- June 2019 – A habitat characterization and plant survey of the right-of-way and work area will be completed within the environmentally sensitive areas. In addition, post-construction species specific surveys for each of the three state-listed species will occur at the same time.

iii. Permitting Reviews

ComEd will comply with all federal, state, and local regulations. No other environmental permitting reviews are required for the Project (e.g. US Fish and Wildlife Service biological opinion or US Army Corps of Engineers wetland review).

D. Adverse Effects on Listed Species

Direct effects are those effects that are caused by the action and occur at the same time and place. Indirect effects are those effects caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable.

i. Ornate Box Turtle

Direct Effects

Direct mortality of the ornate box turtle may occur from several project construction activities including vehicle and equipment access within suitable habitat, and below-ground work within suitable habitat, such as foundation drilling and minor grading around foundation locations. Individual turtles or eggs could be accidentally crushed and killed if they are struck by a vehicle or dug up during ground disturbing activities.

Up to 6.053 acres of suitable ornate box turtle habitat will be temporarily impacted by the Project from the installation of construction matting for access and work pads (Table 1). All areas of temporary disturbance will be restored to pre-construction conditions once construction is complete. In addition, the construction of 15 new poles will permanently impact approximately 0.017 acre of suitable ornate box turtle habitat.

Indirect Effects

No indirect effects to the ornate box turtle are anticipated as a result of the Project. Construction matting will be removed prior to the next ornate box turtle active season, and all areas of temporary disturbance will be restored to pre-construction conditions once construction is complete.

ii. Plains Hog-nosed Snake

Given the similarities in habitat requirements between the two species, the direct and indirect effects to the plains hog-nosed snake are anticipated to be the same as those outlined for the ornate box turtle above.

iii. Regal FritillaryDirect Effects

Direct impacts to this species may occur from several project construction activities including vehicle and equipment access within suitable habitat, installation of construction mats in suitable habitat, and ground disturbing activities, such as foundation drilling and minor grading around foundation locations. Adult butterflies in flight could be accidentally struck and killed by a vehicle. In addition, eggs and larvae could be crushed by passing vehicles, crushed by the installation of construction mats, or dug up during ground disturbing activities.

Up to 3.760 acres of potential regal fritillary habitat will be temporarily impacted by the Project from the installation of construction matting for access and work pads (Table 1). All areas of temporary disturbance will be restored to pre-construction conditions once construction is complete. In addition, the construction of nine new poles will permanently impact approximately 0.010 acre of suitable regal fritillary habitat. These activities could result in mortality to regal fritillary eggs or larvae that may be present in the leaf litter.

Indirect Effects

No indirect effects to the regal fritillary are anticipated to result from the Project. All areas of temporary disturbance will be restored to pre-construction conditions once construction is complete and host plants, if present, are expected to reestablish during the 2019 growing season.

Table 1. Summary of impacts in Environmentally Sensitive Areas 1 and 2 for ComEd’s L13304 Transmission Line Rebuild project in Whiteside County, IL.

| Species and Affected Habitat | Environmentally Sensitive Area | | Total |
|--|---|---|--------------|
| | Area 1: Hahnman Road to south | Area 2: Star Road to south | |
| Species | Ornate Box Turtle Plains Hog-nosed Snake Regal Fritillary | Ornate Box Turtle Plains Hog-nosed Snake | --- |
| New Structure IDs | 190-197 | 231-236 | --- |
| Suitable Habitat (acres) | 13.278 | 6.760 | 20.038 |
| Number of New Structures | 9 | 6 | 15 |
| Permanent Impact from New Structures (acres) (# new structures x 50.3 sq. ft.) / 43,560 sq. ft. | 0.010 | 0.007 | 0.017 |
| H-Frame Wood Pole IDs | 192-197 | 231-236 | --- |
| Number of H-Frame Wood Poles Removed | 12 | 12 | 24 |
| Habitat Replacement from Removal of H-Frame Poles (acres) (# H-frame wood poles x 7.1 sq. ft.) / 43,560 sq. ft. | 0.002 | 0.002 | 0.004 |
| Linear Distance of Matted Construction Access Road (feet) | 5,270 | 2,850 | 8,120 |
| Temporary Impact from Matted Construction Access Road (acres) (linear feet x 14 ft. width) / 43,450 sq. ft. | 1.694 | 0.916 | 2.610 |
| Temporary Impact from Matted Work Pads (acres) (# new structures x 10,000 sq. ft.) / 43,560 sq. ft. | 2.066 | 1.377 | 3.444 |
| Total Permanent Impacts (acres) | 0.008 | 0.005 | 0.013 |
| Total Temporary Impacts (acres) | 3.760 | 2.293 | 6.053 |

2. Minimization Measures, Mitigation, and Funding

A. Number of Individuals Taken and Amount of Habitat Affected

Occurrence records within or near the environmentally sensitive areas exist for each of the three state-listed species. The amount of suitable habitat affected was minimized by avoiding portions of the action area. Furthermore, take of individuals and suitable habitat will be minimized through a number of conservation measures as outlined below. Despite these best efforts, the number of individuals for each of the three state-listed species that could be impacted or taken as a result of Project activities is anticipated to range from one to five per species. Acreages of permanent and temporary suitable habitat impacted are summarized in Table 1.

B. Plans for Management of the Area

Areas affected by Project activities will be restored to pre-construction conditions thereby re-establishing suitable habitat within the ROW for the three state-listed species. It is anticipated that individual landowners will manage the habitat within the ROW similarly to their adjacent lands. ComEd will install permanent “Environmentally Sensitive Area” signs within the ROW to alert maintenance crews.

C. Measures to Avoid, Minimize, and Mitigate Effects

Conservation measures that will be implemented by ComEd to avoid, minimize, and mitigate potential impacts to the listed species covered by this Conservation Plan, as well as Hahnaman Sand Prairie Nature Preserve are summarized below.

i. Measures to Avoid Effects

- No physical impacts to the Hahnaman Sand Prairie Nature Preserve will occur as a result of the Project. No placement of temporary matting, construction of permanent structures, access, or on-the-ground activity will occur within the boundaries of the preserve.
- Permanent “Environmentally Sensitive Area” signs will be installed within the ROW at the north and south boundaries of the Hahnaman Sand Prairie Nature Preserve to alert construction and maintenance crews of the sensitive nature of the site and to keep out with equipment.

ii. Measures to Minimize Effects

- Construction activities will be initiated in September while the ornate box turtle and plains hog-nosed snake are still active, and prior to them beginning their overwintering periods. This will allow for the installation of reptile exclusion fence along the ROW, visual encounter searches within the exclusion areas, and removal of individuals to outside of the exclusion and construction work areas.
- An onsite Biological Monitor will be present during all work conducted within the environmentally sensitive areas (Figure 3). The Biological Monitor will have field experience with the listed reptile species and their habitat, and possess a valid Endangered Species Permit or similar authorization for capturing, handling, and removing the ornate box turtle and plains hog-nosed snake. While onsite, the Biological Monitor will monitor the installation of reptile exclusion fence, the placement of construction matting, ground disturbance activities, excavation of pole foundations, and passage of vehicles and equipment. The Biological Monitor will coordinate as necessary with the IDNR in the event of an observation or “incidental take” of a listed reptile species.
- During the turtle and snake active period, reptile exclusion fence (i.e. silt fence) will be installed along the existing ROW within the two environmentally sensitive areas (Figure 3) to exclude

turtles, snakes, and other animals from the construction area. The exclusion fence will completely enclose the construction work areas and have temporary gates (e.g. movable hay bales or silt fence) at the entry/exit points or be installed with turn-back wings at each end facing away from the construction area. The exclusion fence will be buried at least six inches in the ground, staked, and maintained in an upright position throughout the duration of the project. The exclusion fencing will be opened and closed at the end of each workday as needed to allow passage of equipment and crews.

- Prior to installation of the reptile exclusion fence, the Biological Monitor will conduct a visual encounter search within the action area immediately ahead of the fence installation crew to locate reptiles and relocate them outside of the construction work area.
- After reptile exclusion fencing is installed, new, clean construction matting will be installed along the existing ROW through each of the environmentally sensitive areas to minimize soil compaction. In addition, the temporary mat roads will be used to connect the work areas and concentrate vehicle and equipment traffic to designated roads. Use of mat roads will reduce the risk of direct vehicle mortality by providing a relatively flat, smooth surface that is easily searchable for the listed reptiles, prior to vehicle or equipment passage. If access or work is required in a non-matted area, the Biological Monitor will sweep the area prior to accessing.
- The Biological Monitor will conduct visual encounter searches for listed reptiles ahead of the mat installation and during the active period on days when construction activities are occurring. All reptiles discovered will be recorded, photographed, and relocated outside of the construction work area. Construction in areas designated as suitable habitat for the listed reptile species will not take place until the Biological Monitor have cleared the area.
- All reptile exclusion fence and construction matting will be removed from the environmentally sensitive areas upon completion of all construction and restoration activities, and prior to the beginning of the reptiles' next active period.
- Species fact sheets for the ornate box turtle, plains hog-nosed snake, and regal fritillary will be drafted with information on their identification, habitat requirements, active and inactive periods, and general life histories. The fact sheets will be provided to construction personnel for reference and reviewed periodically at daily tailgate meetings to inform the crews of the possible presence of the listed species in the action area. Crews will be asked to watch out for and report any listed species observations to the Biological Monitor.
- During the summer of 2018, plant surveys will be performed within the environmentally sensitive area on the Wahl property to identify concentrations of host plants (i.e. violet species) for the regal fritillary. Areas with the highest concentrations of host plants within the ROW will be GPS located so they can be marked and avoided as much as possible during mat installation and construction activities. Given that construction is proposed in late 2018, and all areas temporarily impacted by the Project will be revegetated prior to the next active season, no significant loss of eggs, or egg laying habitat is expected to occur. Physical impacts to concentrations of the host plants will be avoided to the extent possible to minimize effects to larvae that may be present from the 2018 active season.
- During species active periods, speed limits of construction vehicles traveling on access roads will be limited to 12 mph or less to reduce the potential for accidental collision with the listed species. The speed limit will allow drivers to scan the mats to avoid turtles and snakes, and will reduce the likelihood of striking the regal fritillary since the species can evade slow-moving vehicles.
- All existing wooden H-frame structures within the environmentally sensitive areas will be removed. A total of 15 H-frame structures with two poles each will have their holes filled, returned to grade, and restored to match surrounding habitat conditions. Each wooden pole is assumed to be three feet in diameter and when removed will replace approximately 7.1 square feet of habitat. Removal of 30 wooden poles will replace approximately 212 square feet (0.004 acre) habitat.
- Upon completion of the Project, a summary report of relocated reptiles will be provided to the

IDNR. Similarly, any listed reptiles accidentally killed (i.e. taken) during work or found on site throughout will be recorded (approximate age, possible cause of death), photographed, and reported to the IDNR at the conclusion of the Project.

- Upon completion of the Project, all areas of temporary disturbance will be restored to pre-construction conditions. Surface soils will be tilled and/or raked to reduce soil compaction. If the native seed bank does not reestablish, areas of disturbance within the environmentally sensitive areas will be reseeded with a mix of native grasses and forbs including bird's-foot violet (*Viola pedata*), the preferred host plant of regal fritillary larvae.

iii. Mitigation

In addition to the avoidance and minimization measures to be implemented as summarized above, ComEd will provide compensatory mitigation in the form of a monetary contribution to the Illinois Wildlife Preservation Fund (the "Fund"). The contribution will be equally split among the three species to support conservation, research, and/or habitat improvements that will contribute to each species continued survival and recovery in Illinois. ComEd will contribute \$600.00 to the Fund to offset the Project's permanent impacts to suitable habitat per the IDNR's proposed mitigation ratio. Further, in addition to restoring all temporary impacts after construction, ComEd will voluntarily contribute an additional \$46,900.00 to the Fund to offset the effects of the Project's temporary impacts to suitable habitat.

D. Monitoring

A full time onsite Biological Monitor will be present during all work conducted within the environmentally sensitive areas (Figure 3). The Biological Monitor will conduct visual encounter searches for listed species ahead of the mat installation and during the species' active periods on days when construction activities are occurring. A monthly monitoring report of construction activities and listed species observations will be submitted to IDNR for all work occurring within the environmentally sensitive areas.

In addition, a habitat characterization, botanical survey, and species-specific surveys will be conducted within the environmentally sensitive areas before and after construction. The goal of the pre- and post-construction surveys completed during the 2018 and 2019 growing seasons, will be to document vegetation reestablishment within the environmentally sensitive areas where work occurs and to document species detections. A final report will summarize the survey results and be provided to the IDNR.

E. Adaptive Management Practices

Adaptive management is a process that will allow ComEd to adjust its actions to reflect new information or changing conditions to reach a goal, in this case, minimization of take and conservation of the ornate box turtle, plains hog-nosed snake, and regal fritillary. ComEd will use adaptive management processes to minimize take related to the L13304 Transmission Line Rebuild Project.

Specific adaptive management measures include:

- An onsite Biological Monitor will be present during all work conducted within the environmentally sensitive areas (Figure 3). By conducting monitoring during construction, ComEd will be able to quickly react to unforeseen circumstances that may occur.
- If changed or unforeseen circumstances arise that reduce the effectiveness of the minimization measures described in this Conservation Plan, ComEd will coordinate with the IDNR to determine if additional measures are warranted.
- If turtles or snakes are injured as a result of Project activities, ComEd will immediately stop work, contact the Biological Monitor, and coordinate directly with IDNR. Arrangements will be made to take the individual to a licensed wildlife rehabilitator.

F. Funding to Support Minimization and Mitigation

Funding for the implementation of the conservation measures outlined in this conservation plan has been dedicated as part of ComEd's overall budget for the L13304 Transmission Line Rebuild Project.

3. Alternative Actions

A. Preferred Alternative

The Preferred Alternative is summarized above within the Project Description listed under 1) Likely Impacts, C) Description of Project Activities, i) Practices to be Used.

B. No Action Alternative

The purpose of the Project is to improve system reliability and accommodate additional electrical capacity being added to the grid by two new renewable wind energy developments nearby. Under the No Action Alternative, L13304 would not be reconstructed and the demands for power transmission to the grid would not be met. Impacts associated with the Project would not occur. The No Action Alternative would not satisfy the project purpose and need; therefore, ComEd rejected this alternative and continued to develop action alternatives that would satisfy the purpose and need in a manner that would result in minimal environmental impacts.

C. Potential Reroute Alternatives

Avoiding negative natural resource and community impacts is a priority for ComEd. Alternatives to reroute the existing L13304 ROW such that it would have been removed from the Hahnman Prairie Nature Preserve and existing suitable habitat were considered. However, removing and rerouting the existing line would have resulted in environmental impacts similar to the proposed action because the existing line would still need to be removed from the area. In addition, new ROW easements would need to be identified, negotiated, and acquired. Rerouting this portion of the line would have increased the overall length of the line, increased the overall cost, and resulted in new environmental and landowner impacts. As a result, these alternatives were not fully developed.

4. Likelihood of Survival of Listed Species

A. Ornate Box Turtle

Take of the ornate box turtle is estimated to range from one to five individuals, but is not anticipated to reduce the survival or recovery of the species, the biotic community of which it is a part, or the habitat essential to its existence for the following reasons:

- Approximately 23.2 acres of suitable ornate box turtle habitat is present within the action area for the Project. A total of 17.1 acres will be avoided, 3.2 acres of which is within the Hahnman Sand Prairie Nature Preserve.
- Up to 6.1 acres of suitable ornate box turtle habitat will be impacted by the Project:
 - The construction of 15 new poles will permanently impact approximately 0.017 acres of suitable habitat for the ornate box turtle within the action area; however, 0.004 acres will be replaced by the removal of the existing wooden H-frame structures resulting in a net loss of only 0.013 acres of habitat.
 - Up to 6.053 acres of suitable ornate box turtle habitat will be temporarily impacted by the Project from the installation of construction matting for access and work pads. All areas of temporary disturbance will be restored to pre-construction conditions once construction is complete.

- A Biological Monitor will be onsite to implement and oversee conservation measures to avoid and/or minimize direct effects to the species within the environmentally sensitive areas, most notably measures to locate and remove turtles from the construction work area. Furthermore, much of the work will be conducted during the species' inactive period when they will be at less risk of direct impacts.
- Construction and maintenance personnel will be informed of the possible presence of turtles in the construction work area and will be asked to avoid and report all observed turtles to the Biological Monitor.
- Portions of the funds contributed to the Illinois Wildlife Preservation Fund as compensatory mitigation for the Project will support conservation, research, and/or habitat improvements for the ornate box turtle in Illinois.

B. Plains Hog-nosed Snake

Take of the plains hog-nosed snake is estimated to range from one to five individuals, but is not anticipated to reduce the survival or recovery of the species, the biotic community of which it is a part, or the habitat essential to its existence for the same reasons outlined in the section above for the ornate box turtle.

C. Regal Fritillary

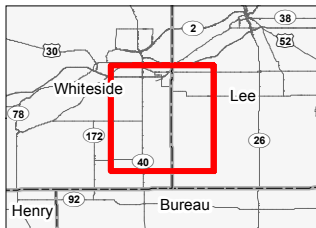
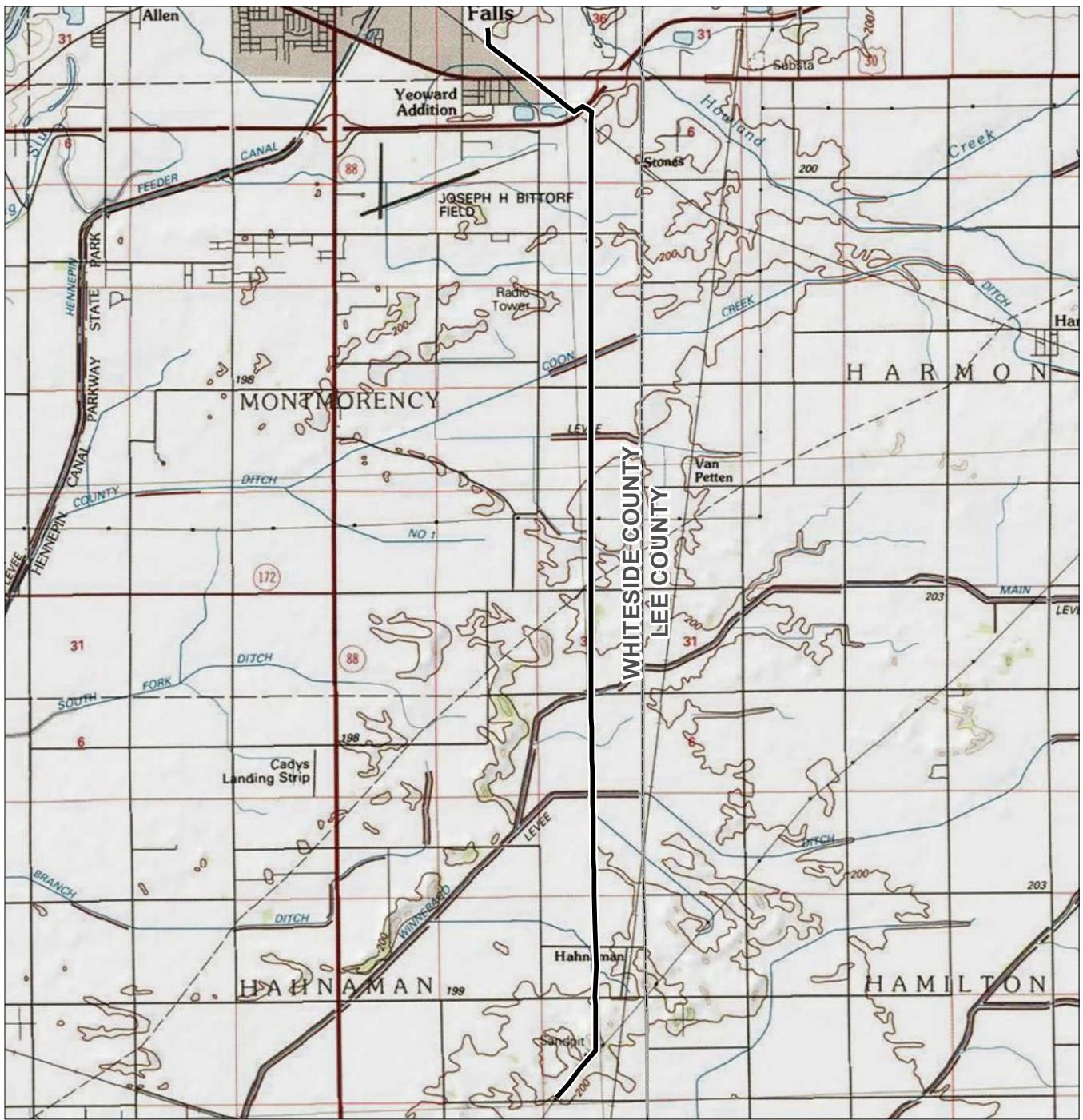
Take of the regal fritillary is estimated to range from one to five individuals, but is not anticipated to reduce the survival or recovery of the species, the biotic community of which it is a part, or the habitat essential to its existence for the following reasons:

- Approximately 16.4 acres of suitable regal fritillary habitat is present within the action area for the Project. A total of 12.7 acres will be avoided, 3.2 acres of which is within the Hahnman Sand Prairie Nature Preserve.
- Up to 3.8 acres of suitable Regal Fritillary habitat will be impacted by the Project:
 - The construction of nine poles will permanently impact approximately 0.010 acres of suitable habitat for the regal fritillary within the action area; however, 0.002 acres will be replaced by the removal of the existing wooden H-frame structures resulting in a net loss of only 0.008 acres of habitat.
 - Up to 3.760 acres of suitable Regal Fritillary habitat will be temporarily impacted by the Project from the installation of construction matting for access and work pads. All areas of temporary disturbance will be restored to pre-construction conditions once construction is complete.
- Given the presence of suitable habitat, there is potential for the installation of construction matting to result in mortality to regal fritillary larvae that may be present in the leaf litter; however, host plant surveys will be conducted in summer 2018 to identify concentrations of host plants for this species. Areas with the highest concentration of these plants will be avoided to the maximum extent possible during construction.
- Conservation measures will be implemented in environmentally sensitive areas to avoid and/or minimize effects to the species, specifically the identification and avoidance of their host plant species. Avoiding the host plant species will minimize impacts to eggs and larvae that may be in the leaf litter. Further, much of the work will be conducted during the species' inactive period (non-flight season) when the adults will be less likely to be at risk of direct impacts.
- Portions of the funds contributed to the Illinois Wildlife Preservation Fund as compensatory mitigation for the Project will support conservation, research, and/or habitat improvements for the regal fritillary in Illinois.

5. References

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Figures

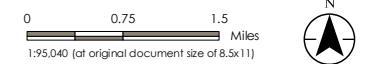


Legend
 L13304 Centerline

Figure No. **1**
 Title **Project Overview**

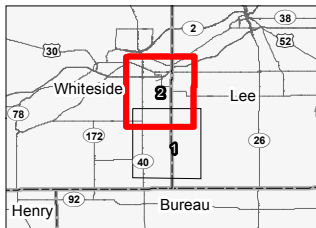
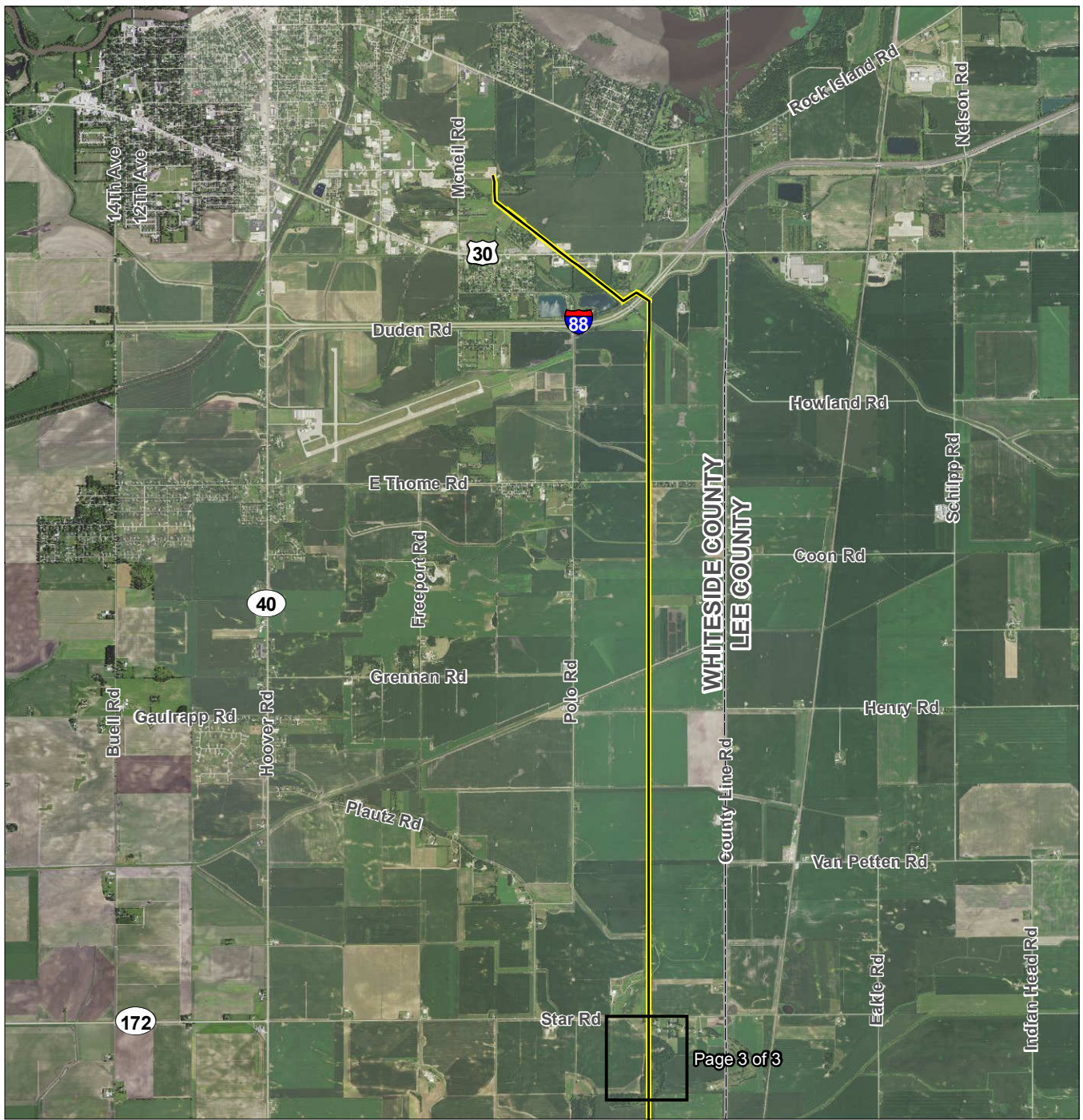
Client/Project
 ComEd
 L13304 Rebuild

Project Location
 Whiteside Co., IL
 Prepared by mmp on 2018-04-02
 Technical Review by bl on 2018-04-03
 Independent Review by bb on 2018-04-23



Notes
 1. Coordinate System: NAD 1983 StatePlane Wisconsin South FIPS 4803 Feet
 2. Data Sources Include: Stantec, ComEd, NADS
 3. Background: USGS Topographic Quadrangle

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- Legend**
- L13304 Centerline
 - Action Area
 - Illinois Nature Preserves Commission Site (Dec 2017)
 - Figure 3 Page Extents

Notes

1. Coordinate System: NAD 1983 StatePlane Illinois West FIPS 1202 Feet
2. Data Sources Include: Stantec, ComEd, NADS
3. Orthophotography: 2017 NAP

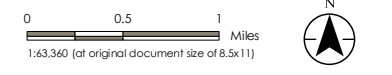
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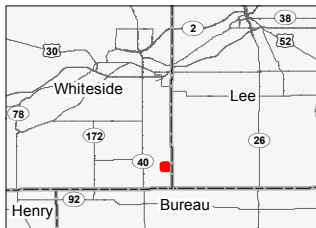
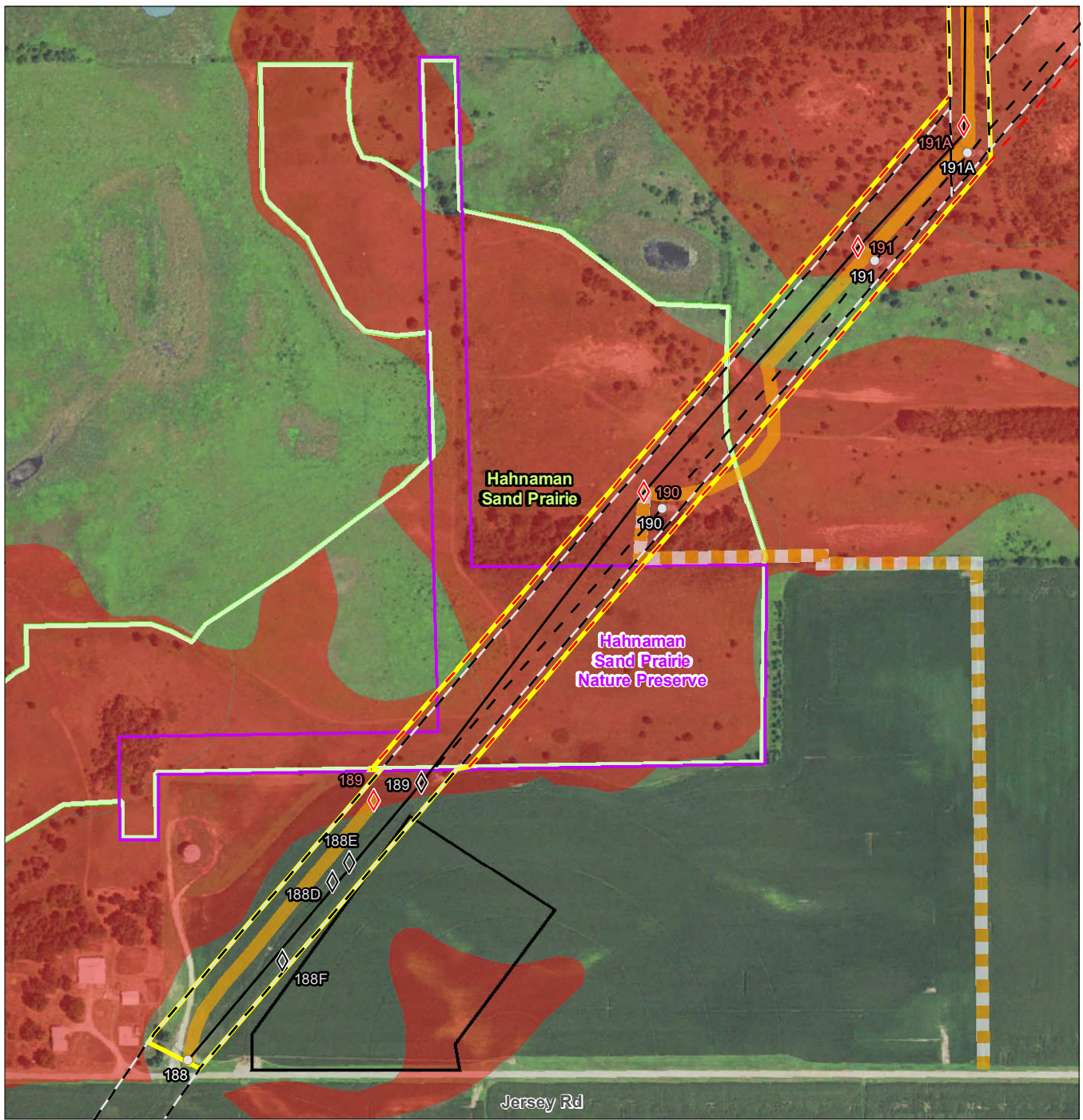
Figure No. **2**
 Title **Action Area**

Client/Project
 ComEd
 L13304 Rebuild

Project Location
 Whiteside Co., IL

193705979
 Prepared by mmp on 2018-04-02
 Technical Review by bl on 2018-04-03
 Independent Review by bb on 2018-04-23





Notes
 1. Coordinate System: NAD 1983 StatePlane Illinois West FIPS 1202 Feet
 2. Data Sources Include: Stantec, ComEd, NRCS, NADS
 3. Orthophotography: 2017 NADP

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- Legend**
- Action Area
 - L13304 & L18702 Rebuild Centerline
 - L15508 Centerline
 - Existing Lattice Tower Structure
 - Existing Wood Pole Structure to be Removed
 - Existing Steel Monopole Structure (Installed Spring 2018)
 - New Steel Monopole Structure
 - Existing Easement
 - Proposed Easement
 - Temporary Matted Access Road
 - Temporary Access
 - Switchyard Approximate Site Boundary
 - Illinois Nature Preserves Commission Site (Dec 2017)
 - Illinois Natural Areas Inventory Site (Dec 2017)
 - NRCS Soil Survey Data
 - Surface Texture
 - Fine Sand
 - Loamy Sand
 - Sand

Figure No. **3**
 Title: **Environmentally Sensitive Areas**

Client/Project
 ComEd
 L13304 Rebuild

Project Location
 Whiteside Co., IL

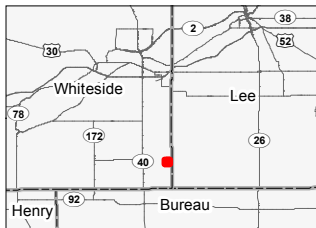
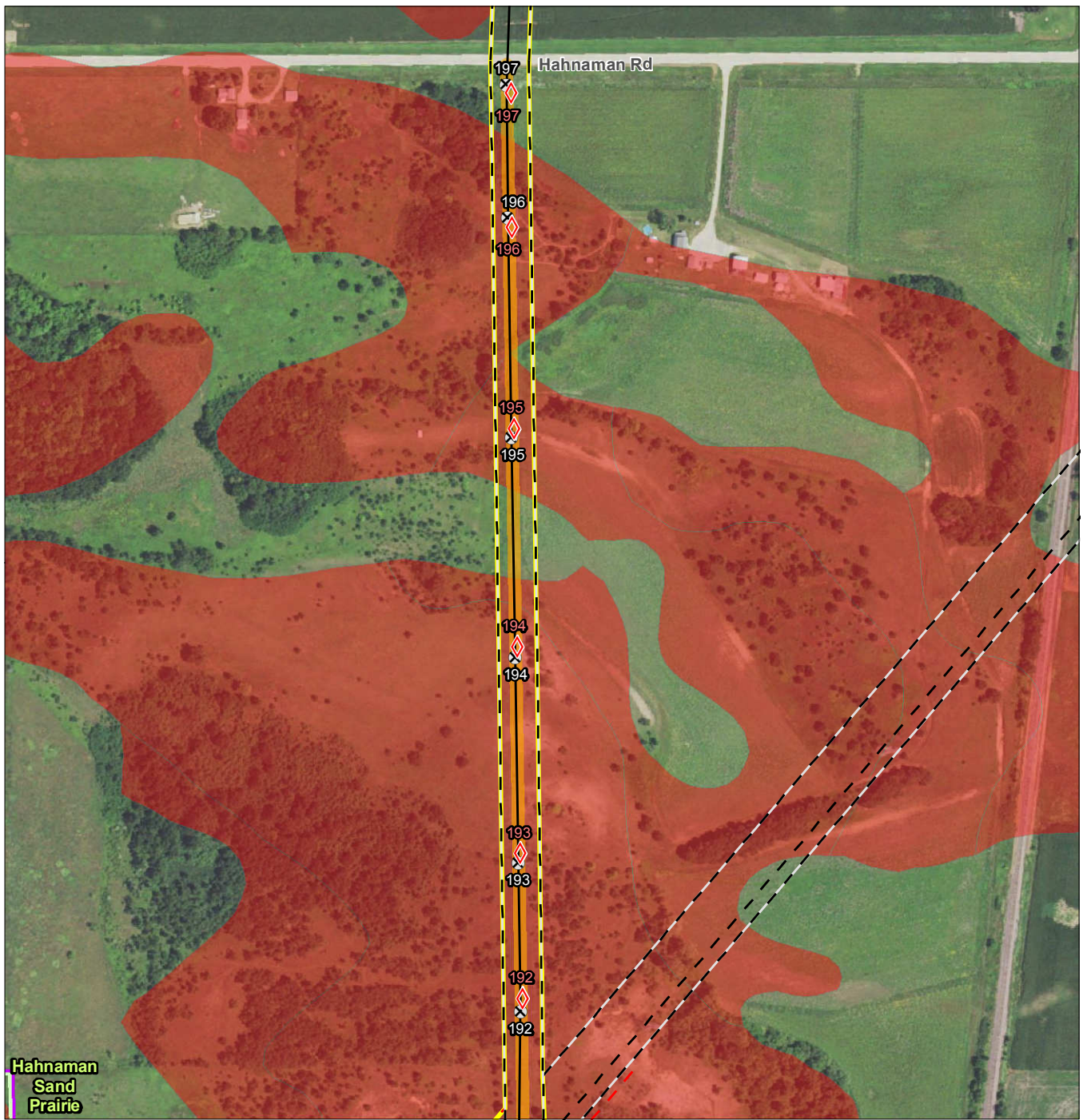
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 Prepared by mmp on 2018-04-02
 Technical Review by bl on 2018-04-03
 Independent Review by bb on 2018-04-23

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Page 1 of 3



Notes
 1. Coordinate System: NAD 1983 StatePlane Illinois West FIPS 1202 Feet
 2. Data Sources Include: Stantec, ComEd, NRCS, NADS
 3. Orthophotography: 2017 NAPP

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- Legend**
- Action Area
 - L13304 & L18702 Rebuild Centerline
 - L15508 Centerline
 - Existing Lattice Tower Structure
 - Existing Wood Pole Structure to be Removed
 - Existing Steel Monopole Structure (Installed Spring 2018)
 - New Steel Monopole Structure
 - Existing Easement
 - Proposed Easement
 - Temporary Matted Access Road
 - Temporary Access
 - Switchyard Approximate Site Boundary
 - Illinois Nature Preserves Commission Site (Dec 2017)
 - Illinois Natural Areas Inventory Site (Dec 2017)
 - NRCS Soil Survey Data
 - Surface Texture
 - Fine Sand
 - Loamy Sand
 - Sand

Figure No. **3**
 Title: **Environmentally Sensitive Areas**

Client/Project: ComEd
 L13304 Rebuild

Project Location: Whiteside Co., IL

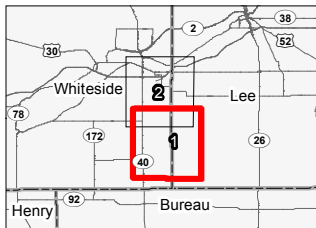
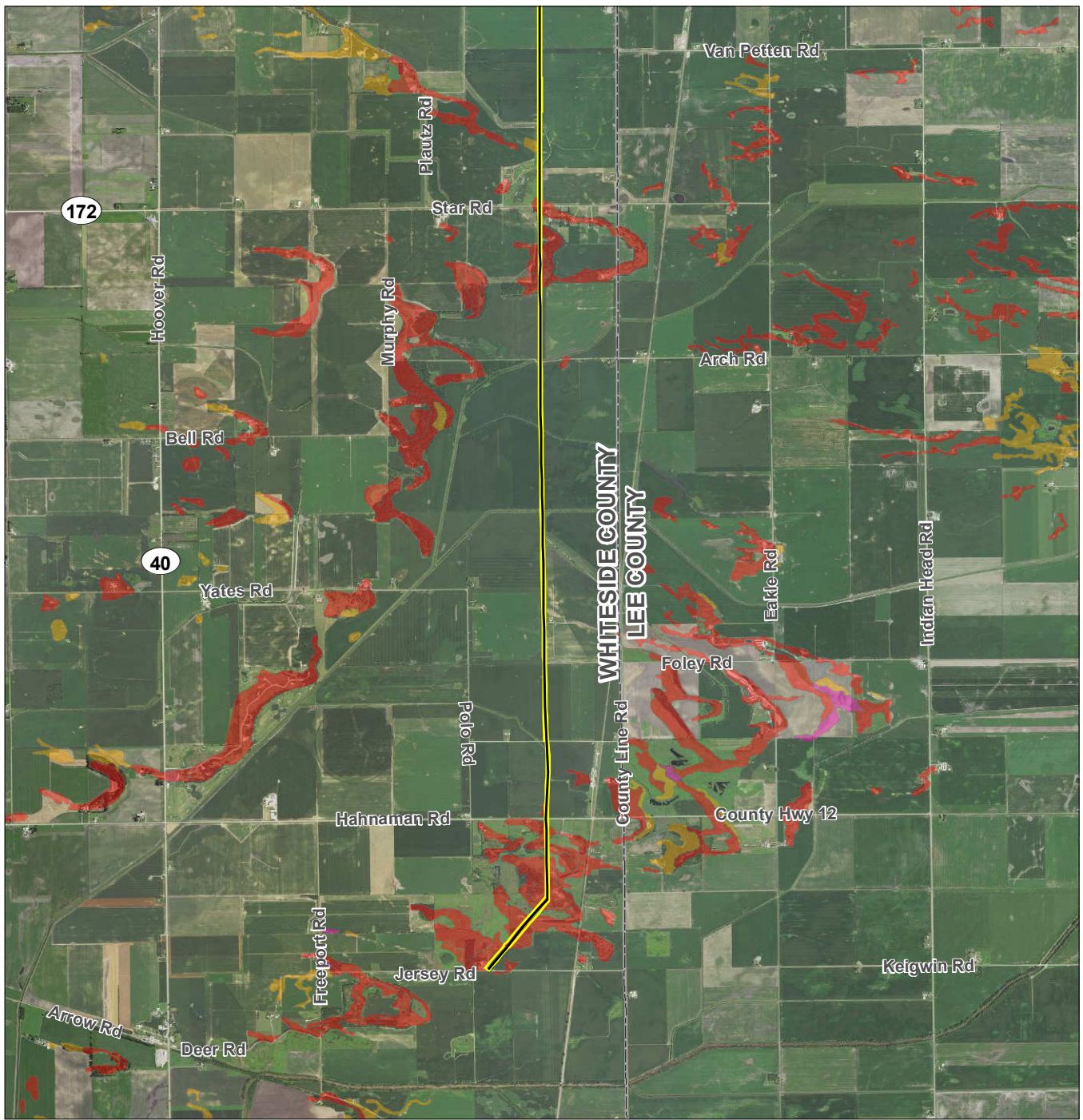
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 Technical Review by bl on 2018-04-03
 Independent Review by bb on 2018-04-23

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Page 2 of 3



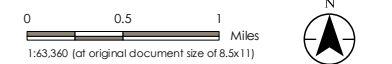
- Legend**
- L13304 Centerline
 - Action Area
 - NRCS Soil Survey Data**
 - Surface Texture**
 - Fine Sand
 - Loamy Sand
 - Sand

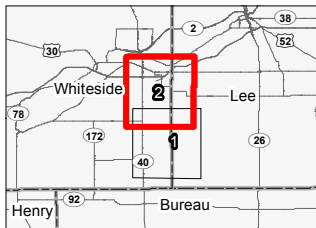
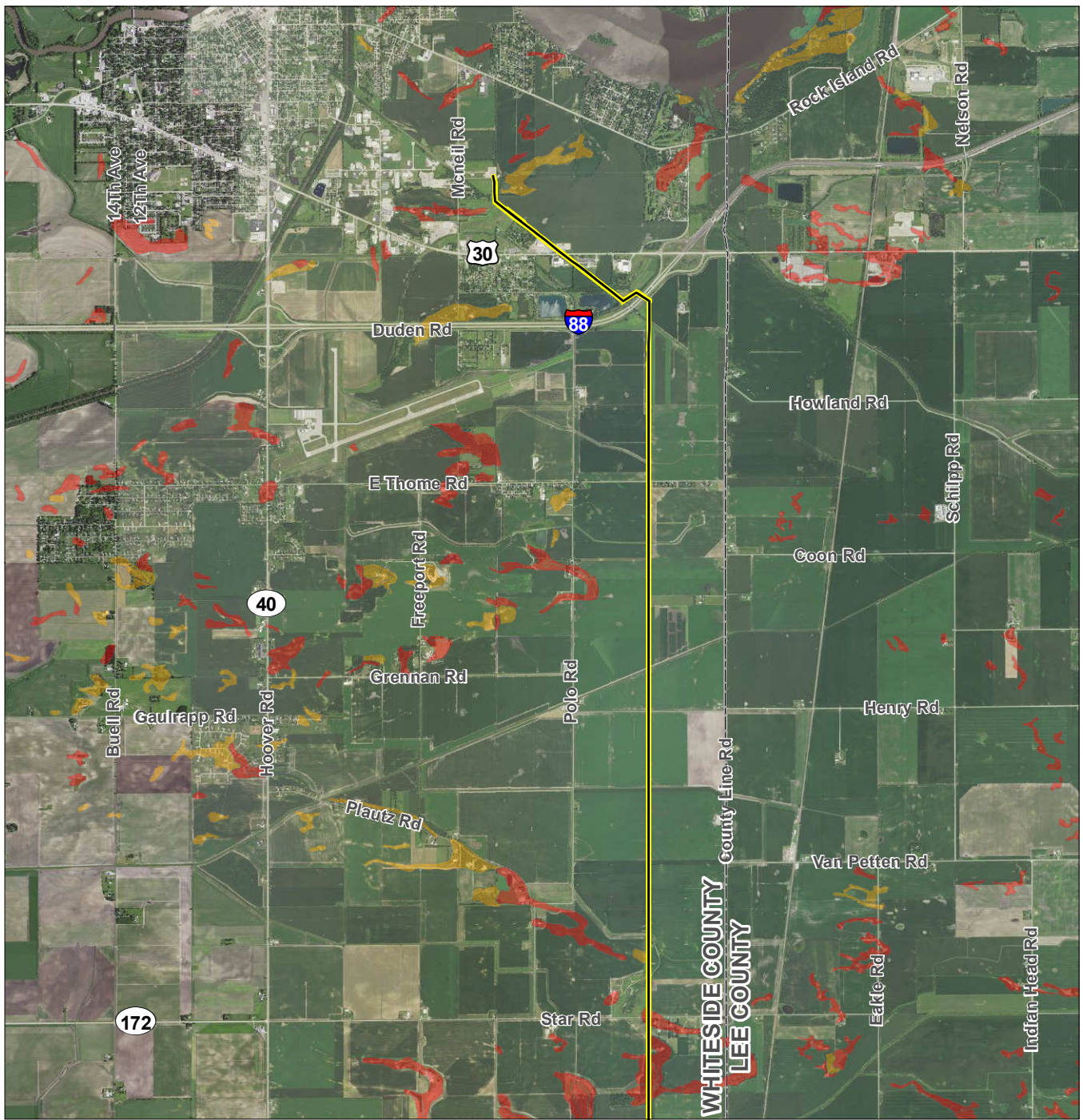
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2. Data Sources Include: Stantec, ComEd, NRCS, NADS
3. Orthophotography: 2017 NAP

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Figure No. **4**
 Title **NRCS Soil Survey Data Mapped Sandy Soils**
 Client/Project **ComEd L13304 Rebuild**
 Project Location **Whiteside Co., IL**
 Prepared by mmp on 2018-04-02
 Technical Review by bl on 2018-04-03
 Independent Review by bb on 2018-04-23





- Legend**
- L13304 Centerline
 - Action Area
 - NRCS Soil Survey Data**
 - Surface Texture**
 - Fine Sand
 - Loamy Sand
 - Sand

Notes

1. Coordinate System: NAD 1983 StatePlane Illinois West FIPS 1202 Feet
2. Data Sources Include: Stantec, ComEd, NRCS, NADS
3. Orthophotography: 2017 NAP

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Figure No. **4**

Title
**NRCS Soil Survey Data
Mapped Sandy Soils**

Client/Project
ComEd
L13304 Rebuild

Project Location
Whiteside Co., IL

193705979
Prepared by mmp on 2018-04-02
Technical Review by bl on 2018-04-03
Independent Review by bb on 2018-04-23

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Page 2 of 2

Appendix A: Land Ownership or Control

Appendix A. Summary of landowner or control within Environmentally Sensitive Areas 1 and 2 for ComEd's L13304 Transmission Line Rebuild project in Whiteside County, IL.

| Parcel ID | Owner Name | Street Address | City, State, Zip Code |
|---|--------------------------------|-----------------------------|------------------------|
| Environmentally Sensitive Area 1: Hahnaman Road to South | | | |
| 23-24-200-008 | Michael W and Michelle A Smith | 31589 Hahnaman Rd | Deer Grove, IL 61243 |
| 23-24-100-004 | Gregory S & Elizabeth A Wahl | 27131 R ST | Sterling, IL 61081 |
| 23-24-200-006 | Gregory S & Elizabeth A Wahl | 27131 R ST | Sterling, IL 61081 |
| 23-24-400-004 | Gregory S & Elizabeth A Wahl | 27131 R ST | Sterling, IL 61081 |
| 23-24-300-002 | Gregory S & Elizabeth A Wahl | 27131 R ST | Sterling, IL 61081 |
| 23-24-300-013 ¹ | Walnut Ridge Wind LLC | 666 Grand Ave, Suite 500 | Des Moines, IA 50309 |
| 23-24-400-002 ¹ | John D Hostetler <i>et al.</i> | 1431 Highway 92 | Tampico, IL 61283 |
| Environmentally Sensitive Area 2: Star Road to South | | | |
| 17-36-100-001 | John P & Wendy L Parker | 31479 Star Rd | Rock Falls, IL 61071 |
| 17-36-200-001 | Richard D Atchison | 31505 Star Rd | Rock Falls, IL 61071 |
| 17-36-100-005 | Gregory L Schmitt | 202 Riverside Dr | Prophetstown, IL 61277 |
| 17-36-200-014 | Billy & Kimberly Bryant | 31621 Star Rd | Rock Falls, IL 61071 |
| 17-36-100-006 | Wayne R Schmitt | 30788 Plautz Rd | Rock Falls, IL 61071 |
| 17-36-200-022 | Mark C Wahl Trustee | C/O Zoeller Ag Services Inc | Sterling, IL 61081 |
| 17-36-200-023 | Mark C Wahl Trustee | C/O Zoeller Ag Services Inc | Sterling, IL 61081 |
| 17-36-400-001 | Mark C Wahl Trustee | C/O Zoeller Ag Services Inc | Sterling, IL 61081 |
| 17-36-300-002 | Timothy R & Veronica L Schmitt | 216 Van Petten Rd | Harmon, IL 61042 |

¹ Off ROW access through parcel.

Appendix B. Implementing Agreement

Implementing Agreement

Conservation Plan for Ornate Box Turtle, Plain's Hog-nosed Snake, and Regal Fritillary

ComEd's L13304 Transmission Line Rebuild Project Whiteside County, IL

The Illinois Department of Natural Resources (IDNR) is responsible for the review of this Conservation Plan and for subsequent issuance of the Incidental Take Authorization (ITA). Upon approval of the Conservation Plan and issuance of the ITA, Commonwealth Edison (ComEd) will be responsible for meeting the terms and conditions of the ITA and will allocate sufficient personnel and resources to ensure the effective implementation of the plan. ComEd will oversee all avoidance, minimization, and monitoring efforts identified within the Conservation Plan. Furthermore, ComEd will be responsible for planning, contract execution, and construction supervision for the entire project.

ComEd will implement this Conservation Plan in coordination with the IDNR. The Conservation Plan Coordinator will be responsible for the plan's implementation, planning, and coordination with IDNR as specified in the plan as required in the ITA. The Lead Biologists will be responsible for coordinating and overseeing any onsite work that requires knowledge, skills, and expertise related to the listed species. The ComEd Project Manager will be Officer of Record for this Conservation Plan and Implementing Agreement and bears the corporate responsibility for compliance with the terms and conditions of the ITA.

The following schedule is planned for construction activities, monitoring, and progress reports to be provided to the IDNR:

Pre-construction

- **June 2018** – Prior to obtaining the ITA and initiating construction, a habitat characterization and plant survey of the right-of-way and work area will be completed within the environmentally sensitive areas.

Construction and Restoration:

- **July to August 2018** – Prior to obtaining the ITA, construction in areas outside of the environmental sensitive areas will begin (i.e. areas without suitable habitat for the three state-listed species occurs).
- **Late August / Early September 2018** – Anticipate obtaining the ITA and beginning construction in the environmentally sensitive areas. The first task will be to implement the avoidance measures, including the installation of reptile exclusion fence and temporary construction matting for access. A biological monitor will be present to search for listed species throughout their active periods. A monthly monitoring report of construction activities and listed species observations will be submitted to IDNR for all work occurring within the environmentally sensitive areas.
- **December 2018** – Construction will be completed, reptile exclusion fence and construction matting will be removed, and site restoration will be completed within the environmentally sensitive areas.

Post-construction

- **June 2019** – Species surveys, a habitat characterization, and a plant survey of the right-of-way and work area will be completed within the environmental sensitive areas. Results of the pre- and post-construction surveys will be compiled in a summary report for submittal to the IDNR.

ComEd hereby certifies that it has authority and funding to complete this project and to implement all proposed conservation measures included in this Conservation Plan for the three state-listed species

covered by the Incidental Take Authorization. ComEd is in charge of this project and assures that all applicable federal, state, and local laws will be adhered to during the completion of the project. No federal authorizations for taking of listed species are needed or have been issued for this project.

The following Conservation Plan Coordinator has been identified:

Sara Race
Senior Environmental Compliance Specialist
Environmental Services Department
Commonwealth Edison Company
Two Lincoln Center, 7th Floor
Oakbrook Terrace, IL 60181
(630) 437-2565
sara.race@comed.com

The following Lead Biologists have been identified:

Brian Bub, CWB
Associate Wildlife Biologist
Stantec Consulting Services Inc.
209 Commerce Parkway
Cottage Grove, WI 53527
(608) 839-2037
brian.bub@stantec.com

Stacey Parks
Senior Scientist
Stantec Consulting Services Inc.
2300 Swan Lake Boulevard, Suite 202
Independence, IA 50644
(319) 334-3755
stacey.parks@stantec.com

The ComEd Project Manager is:

Paul Klyachman
Sr. Project Manager
Commonwealth Edison Company
One Lincoln Center
Oakbrook Terrace, IL 60181
(630) 437-2441
paul.klyachman@comed.com

As the ComEd Sr. Project Manager, I, Paul Klyachman, am responsible for the implementation of this Conservation Plan and the terms and conditions of the ITA.

Signature:  Date: 6/13/18
Paul Klyachman, Sr. Project Manager