

**SOUTHWESTERN ELECTRIC POWER COMPANY
HEMPSTEAD TRANSMISSION CORRIDOR ASSESSMENT**

Sensitive Wildlife and Vegetation Areas Along Route 2

Sensitive Area ID	Sensitive Area	Area (acres)	Description	Plan of Action
a	Degraded Blackland Prairie	30	Natural community area discovered by NHC on 9/27/06 (far east end of Route 2)	Verify with ADNH that spanning this area with towers will be acceptable

Notes:

a - a sensitive vegetation area

**SOUTHWESTERN ELECTRIC POWER COMPANY
HEMPSTEAD TRANSMISSION CORRIDOR ASSESSMENT**

Sensitive Wildlife and Vegetation Areas Along Route 3

Sensitive Area ID	Sensitive Area	Area (acres)	Description	Plan of Action
b	Bottomland Forest	120	High quality oxbow lake (Lake Vaughn) and bottomland forest area just west of Fulton	Call ADNH on how to manage this area during construction (barely goes through Route 3).

Notes:

b - sensitive vegetation area

**SOUTHWESTERN ELECTRIC POWER COMPANY
HEMPSTEAD TRANSMISSION CORRIDOR ASSESSMENT**

Threatened, Endangered Rare Species Along Route 1

ANHC Map ID	Species	Scientific Name	Listing	ANHC Description	Plan of Action
1 & 2	Durand's White Oak	<i>Quercus sinuata</i>	ST	Plant found in Nacotoch Ravine Natural Area on 9/8/98	Call AGFC for managing trees within this area along this route.
12	Quachita Rock Pocketbook	<i>Arkansas wheeleri</i>	LE	one live species of this mussel collected on opposite mouth of Hudson Creek on 1/10/03	Ask USFWS how to manage this mussel along this route.
12	Southern Mapleleaf	<i>Quadrula apiculata</i>	INV	one live species of this plant collected on opposite mouth of Hudson Creek on 12/11/2002	Not T&E species. Ask ADNHC how this mussel should be managed
17	Interior Least Tern	<i>Sterna antillarum athalissos</i>	LE	terns observed nesting in this area of Red River on July 25, 2003	Ask USFWS how far tower needs to be from ITL habitat.
18	Blue Sucker	<i>Cyprinotus elongatus</i>	INV	three fish individuals collected with a hoop net in June of 1997 at this location on Red River	Even though spanning the Red River, ask ADNHC how to manage this fish.
3	American Cupscale	<i>Sacciolepis striata</i>	INV	50+ plant species found at potential AEP site growing along wet stream banks at Bridge Creek	Incorporate BMP's into facility construction plans.

Notes:

- LE - Federally Listed as Endangered
- ST - State Listed as Threatened
- INV - currently being inventoried by the Natural Heritage Commission
- ANHC - Arkansas Natural Heritage Commission

SPECIAL NOTES: Info on Species Not Listed on ADNHC Map

- AR USFWS Question :** 1) American Burying Beetle - potential could occur along portions of Route 1 and 2. Verify that USFWS will help us decide what routes should be surveyed.
- 2) Bald eagle - no nests known along routes. What to do if nest is encountered during construction? Can we get a copy of the Bald Eagle Guidelines?
- 3) Quachita Rock Pocketbook - are the locations that were provided by the ADNHC sufficient? Any more reported occurrences?
- AR USFWS Question :** 1) Louisiana Black Bear does not appear to be a concern.
- 2) Interior Least Tern won't be a concern b/c we are addressing that issues w/ AR USFWS along the routes.
- 3) Bald eagle is located in Bowie Co. How do we address this issue for construction?

**SOUTHWESTERN ELECTRIC POWER COMPANY
HEMPSTEAD TRANSMISSION CORRIDOR ASSESSMENT**

Threatened, Endangered Rare Species Along Route 1

**SOUTHWESTERN ELECTRIC POWER COMPANY
HEMPSTEAD TRANSMISSION CORRIDOR ASSESSMENT**

Threatened, Endangered, Rare Species Along Route 2

ANHHC Map ID	Species	Scientific Name	Listing	Description	Plan of Action
11	Blue Sucker	<i>Cyprinotus elongatus</i>	INV	1 fish collected on 12/12/02 with gill net at Allen's Ferry on the Little River	Call ADNH to see how to manage this species while spanning the river.
10	Durand's White Oak	<i>Quercus sinuata</i>	ST	10-20 individual plants found in 2-3 acre area at this location (grass & palmetto understory)	Call AGFC to see how to manage this tree within Route 2.
3	American Cupscale	<i>Saccolepis striata</i>	INV	50+ plant species found at potential AEP site growing along wet stream banks at Bridge Creek	Incorporate BMP's into facility construction plans.

Notes:

ST - State Listed as Threatened

INV - currently being inventoried by the Natural Heritage Commission

ANHHC - Arkansas Natural Heritage Commission

SPECIAL NOTES: Info on Species Not Listed on ADNH Map

USFWS Questions : same as Route 1

Ar/ USFWS Questions : same as Route 1

**SOUTHWESTERN ELECTRIC POWER COMPANY
HEMPSTEAD TRANSMISSION CORRIDOR ASSESSMENT**

Threatened, Endangered, Rare Species Along Route 2

**SOUTHWESTERN ELECTRIC POWER COMPANY
HEMPSTEAD TRANSMISSION CORRIDOR ASSESSMENT**

Threatened, Endangered, Rare Species Along Route 3

ANH C Map ID	Species	Scientific Name	Listing	Description	Plan of Action
5	Arkansas Meadow Rue	<i>Thalictrum arkansanum</i>	ST	plant collected from this area on 4/26/05. Current area appears to be destroyed	Call AGFC to see how to manage this species in Route 3.
4	Red River Shiner	<i>Notropis bairdi</i>	INV	4 specimens collected at Fulton on the Miller/Hempstead County line on 8/18/40	call ANHC on how to manage this species when spanning the river.
4	Western Sand Darter	<i>Ammocrypta clara</i>	INV	5 specimens of this fish collected on the Red River at Fulton at unknown date	call ANHC on how to manage this species when spanning the river.

Notes:

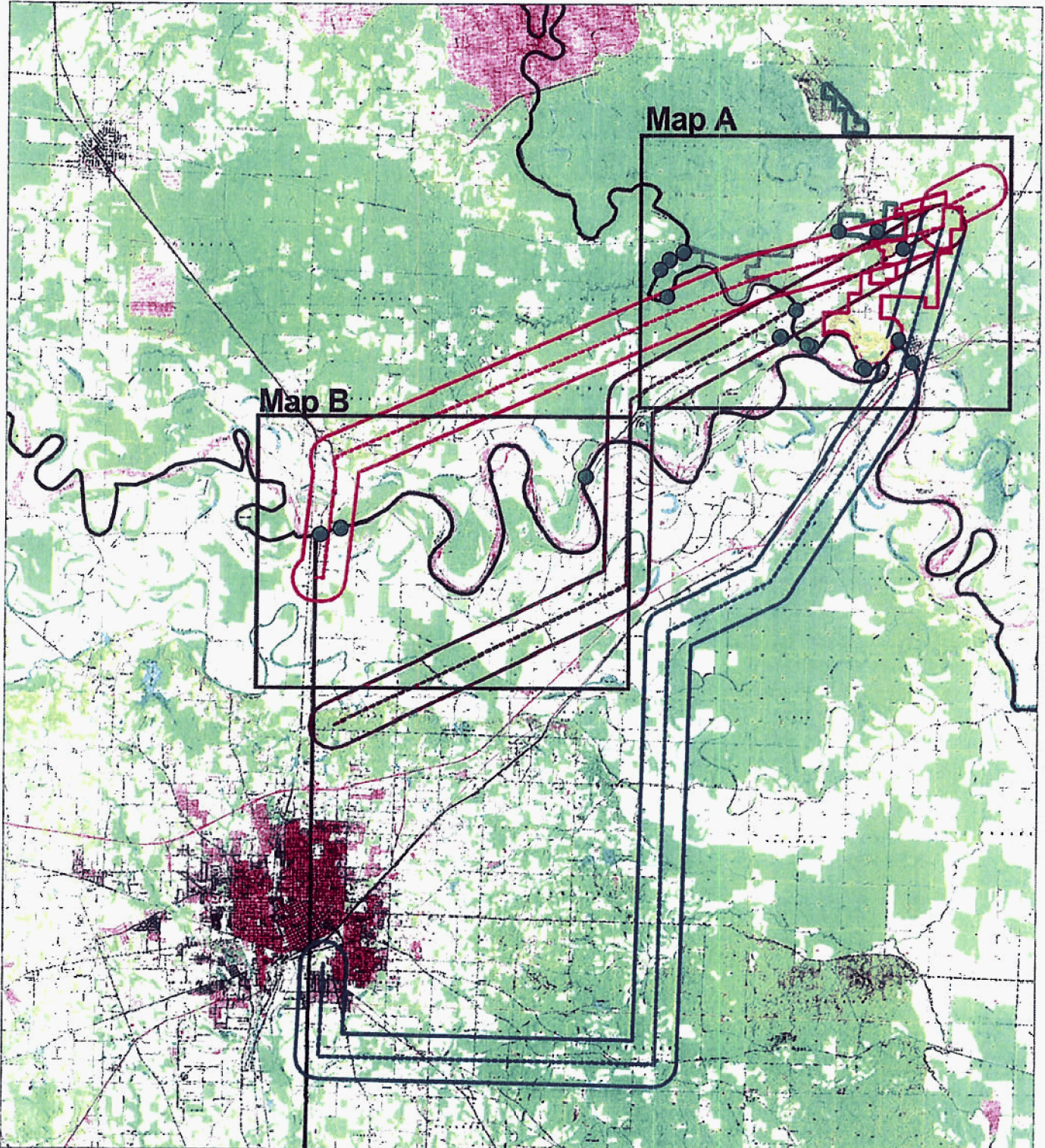
- ST - State Listed as Threatened
- INV - currently being inventoried by the Natural Heritage Commission
- ANH C - Arkansas Natural Heritage Commission

SPECIAL NOTES: Info on Species Not Listed on ADN H Map

- AR USFWS Questions : Bald Eagle - Same as Route 1
- Quachita Rock Pocketbook - Same as Route 1
- AR USFWS Questions : Same as Route 1

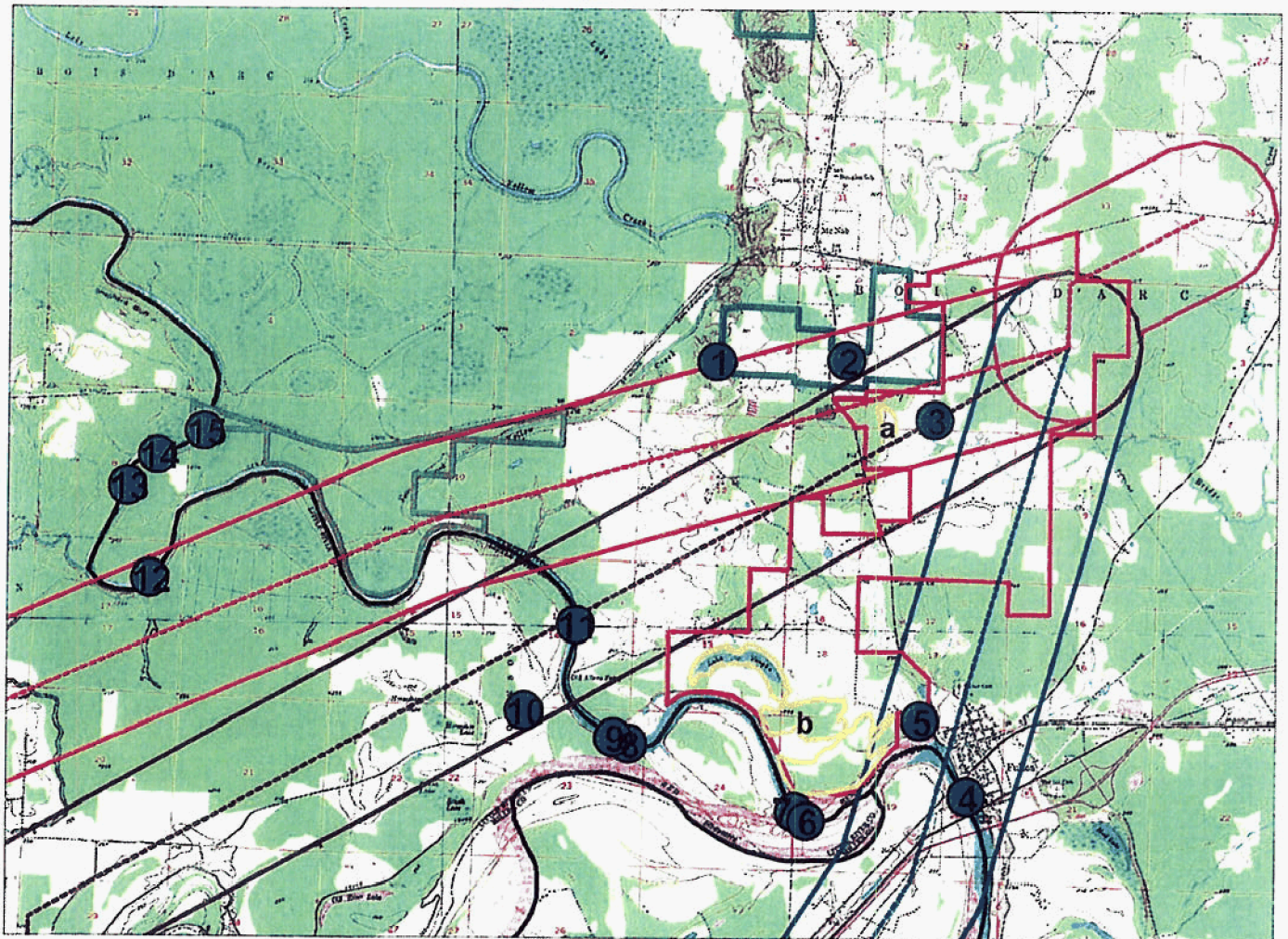
Arkansas Natural Heritage Commission
Department of Arkansas Heritage
Elements of Special Concern
Proposed Transmission Line Corridors
Overview Map

- Elements of Special Concern
- Natural Communities of Interest on Power Plant Site
- Transmission Line Corridors
 - 1
 - 2
 - 3
 - 4
- Proposed Coal-fired Electric Generating Plant Property
- Nacatoch Ravines Natural Area
- Little River WMA (AGFC)



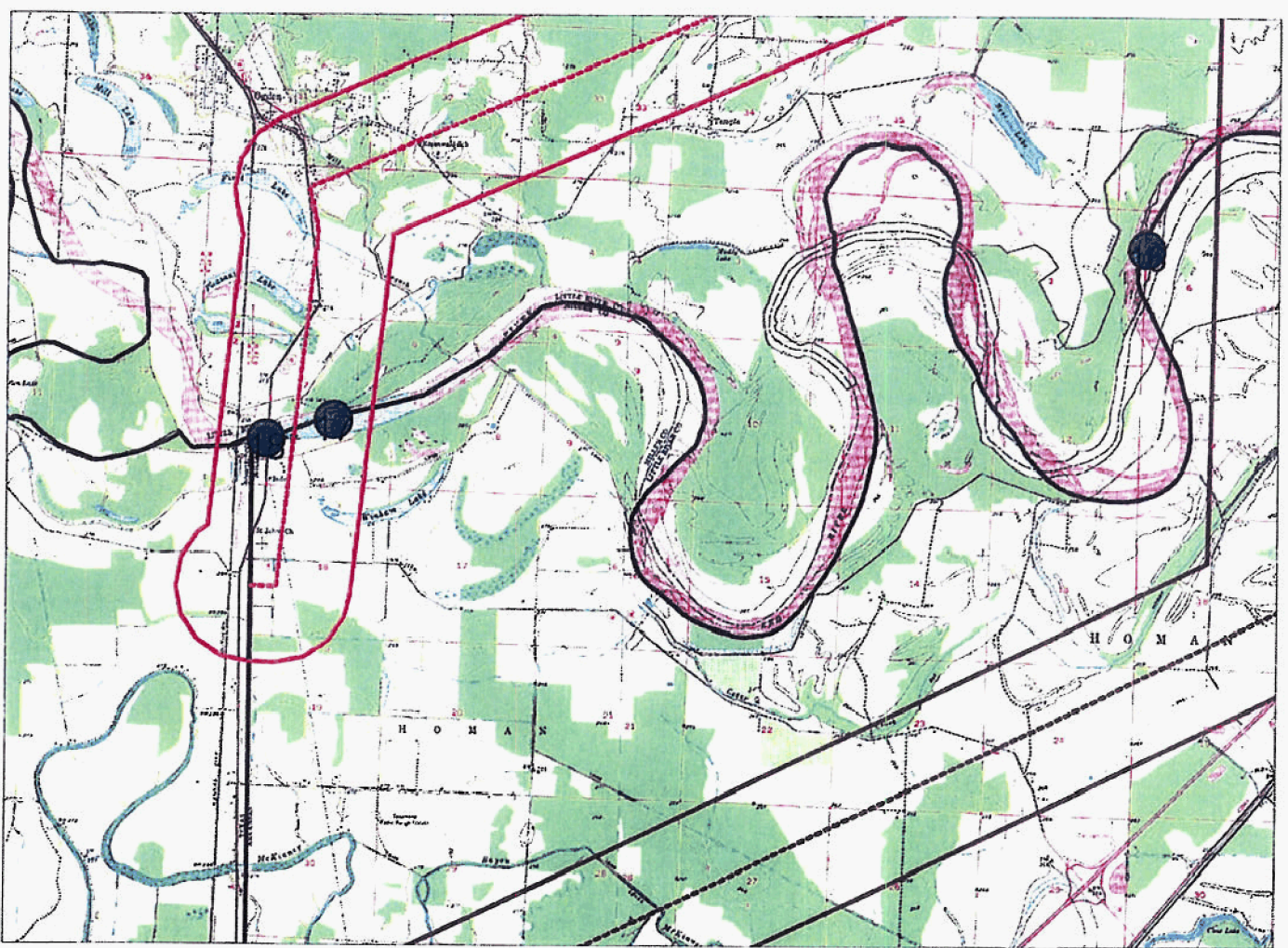
Arkansas Natural Heritage Commission
 Department of Arkansas Heritage
 Elements of Special Concern
 Proposed Transmission Line Corridors
 Map A

- Elements of Special Concern
- Natural Communities of Interest on Power Plant Site
 - a - Degraded Blackland Prairie V 2
 - b - Lake Vaughn, Bottomland Forest V 7
- Transmission Line Corridors
 - 1
 - 2
 - 3
 - 4
- Proposed Coal-fired Electric Generating Plant Property
- Nacatoch Ravines Natural Area
- Little River WMA (AGFC)



Arkansas Natural Heritage Commission
 Department of Arkansas Heritage
 Elements of Special Concern
 Proposed Transmission Line Corridors
 Map B

- Elements of Special Concern
- Natural Communities of Interest on Power Plant Site
 - a - Degraded Blackland Prairie
 - b - Lake Vaughn, Bottomland Forest
- Transmission Line Corridors
 - 1
 - 2
 - 3
 - 4
- Proposed Coal-fired Electric Generating Plant Property
- Nacatoch Ravines Natural Area
- Little River WMA (AGFC)





**The Department of
Arkansas
Heritage**

Mike Beebe
Governor

Cathie Mathews
Director

Arkansas Arts Council

Arkansas Natural Heritage
Commission

Delta Cultural Center

Historic Arkansas Museum

Mosaic Templars
Cultural Center

Old State House Museum



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March 26, 2007

Mr. Rob R. Reid
Senior Project Director/Vice President
PBS&J
18383 Preston Road, Suite 110
Dallas, Texas 75252

RE: Multi County - General
Section 106 Review - USDA-RD
AEP's Three Proposed Transmission Line Projects (PBS&J Projects
441829, 520842 & 520843)
AHPP Tracking No: 62308

Dear Mr. Reid:

My staff has reviewed your letter of February 23, 2007 in which you requested a records check for a large area in the vicinity of Texarkana. Regrettably, compiling this information for such a large area is beyond our current capability, as our office employs only a single individual to do this work. We maintain maps that show the locations of archeological sites and historic structures, but we maintain records only for structures in this office. The files on archeological sites are maintained by the Arkansas Archeological Survey in Fayetteville.

We would be happy to assist someone from your staff in completing this records check. Our office is open between the hours of 8:00 AM and 4:30 PM, Monday through Friday and you are welcome to come at your convenience. We also recommend a visit to the Arkansas Archeological Survey office in Fayetteville. The registrar is Ms. Lela Donat, who can be reached at (479) 575-3556. You should contact her to arrange a visit.

Thank you for the opportunity to comment on this undertaking. If you have any questions, please contact Steve Imhoff of my staff at (501) 324-9880.

Sincerely,

Ken Grunewald
Deputy State Historic Preservation Officer

cc: Mr. Robert Cast, Caddo Nation
Ms. Lela Donat, Arkansas Archeological Survey
Dr. Ann M. Early, Arkansas Archeological Survey



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Arkansas Natural Heritage
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Date: April 3, 2007
Subject: Proposed AEP Transmission Lines
Study Area
ANHC No.: P-CF..-07-033

Mr. Rob Reid
PBS&J
18383 Preston Road
Suite 110
Dallas, TX 75252

Dear Mr. Reid:

This responds to your letter of 28 February 2007 seeking agency concerns within the planning area for transmission lines to be constructed for American Electric Power's proposed coal-fired generation plant in Hempstead County, Arkansas. As per our communication with Kelli Boren of PBS&J staff, we are at this time providing general information for a refined study area that includes the transmission line corridors previously reviewed by this agency for URS Corporation, plus an expanded area to the north that includes the power plant site and the Little River Bottoms area.

Within the delineated study area, a total of 40 elements of special concern have been recorded (roughly 75 individual occurrences). This includes three species listed as endangered or threatened by the U.S. Fish and Wildlife Service, 31 plants and animals of state concern, five high quality examples of natural communities, and colonial bird nesting sites. Please refer to the annotated Hempstead, Little River, and Miller County Element Lists. A legend is enclosed to help you interpret the codes used on this list.

Nacatoch Ravines Natural Area is also recorded within the study area. A map depicting the boundaries of the Natural Area is enclosed for your reference as well as an area description taken from our 2006 Annual Report. This area is co-owned with The Nature Conservancy and is also considered an Arkansas Game and Fish Commission Wildlife Management Area (WMA). Little River Bottoms WMA and the northern tip of Bois d'Arc WMA also fall within the study area. The Arkansas Game and Fish Commission should be able to provide more information on these areas.

It is also of note that Grassy Lake and the Little River Bottoms area have been recognized as possessing areas of high natural quality and have been evaluated as potential National Natural Landmarks. A copy of a 1986 Little River Bottoms account that was included in a study entitled "Potential Natural Landmarks of the Western Gulf Coastal Plain" is enclosed for your reference.

As the study corridors are refined you may want to check with us again to determine the occurrence locations of sensitive elements within the defined corridors. For more information on how to request a site specific search of our database, please refer to our website:

<http://naturalheritage.com/program/data-requests.asp>

The opportunity to comment is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Cindy Osborne".

Cindy Osborne
Data Manager

Enclosures: Legend

Hempstead, Little River, Miller County Element Lists (annotated)
Locator and Boundary Maps for Nacatoch Ravines NA
NNL Account for Little River Bottoms

LEGEND

STATUS CODES

FEDERAL STATUS CODES

C	=	Candidate species. The U.S. Fish and Wildlife Service has enough scientific information to warrant proposing this species for listing as endangered or threatened under the Endangered Species Act.
LE	=	Listed Endangered; the U.S. Fish and Wildlife Service has listed this species as endangered under the Endangered Species Act.
LT	=	Listed Threatened; the U.S. Fish and Wildlife Service has listed this species as threatened under the Endangered Species Act.
-PD	=	Proposed for Delisting; the U.S. Fish and Wildlife Service has proposed that this species be removed from the list of Endangered or Threatened Species.
PE	=	Proposed Endangered; the U.S. Fish and Wildlife Service has proposed this species for listing as endangered.
PT	=	Proposed Threatened; the U.S. Fish and Wildlife Service has proposed this species for listing as threatened.
T/SA E/SA	=	Threatened (or Endangered) because of similarity of appearance.

STATE STATUS CODES

INV	=	Inventory Element; The Arkansas Natural Heritage Commission is currently conducting active inventory work on these elements. Available data suggests these elements are of conservation concern. These elements may include outstanding examples of Natural Communities, colonial bird nesting sites, outstanding scenic and geologic features as well as plants and animals, which, according to current information, may be rare, peripheral, or of an undetermined status in the state. The ANHC is gathering detailed location information on these elements.
WAT	=	Watch List Species; The Arkansas Natural Heritage Commission is not conducting active inventory work on these species, however, available information suggests they may be of conservation concern. The ANHC is gathering general information on status and trends of these elements. An "****" indicates the status of the species will be changed to "INV" if the species is verified as occurring in the state (this typically means the agency has received a verified breeding record for the species).
MON	=	Monitored Species; The Arkansas Natural Heritage Commission is currently monitoring information on these species. These species do not have conservation concerns at present. They may be new species to the state, or species on which additional information is needed. The ANHC is gathering detailed location information on these elements.
SE	=	State Endangered; the Arkansas Natural Heritage Commission applies this term to native plant taxa which are in danger of being extirpated from the state.
ST	=	State Threatened; The Arkansas Natural Heritage Commission applies this term to native plant taxa which are believed likely to become endangered in Arkansas in the foreseeable future, based on current inventory information.

DEFINITION OF RANKS

Global Ranks

G1	=	Critically imperiled globally. At a very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.
G2	=	Imperiled globally. At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.
G3	=	Vulnerable globally. At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.
G4	=	Apparently secure globally. Uncommon but not rare; some cause for long-term concern due to declines or other factors.
G5	=	Secure globally. Common, widespread and abundant.
GH	=	Of historical occurrence, possibly extinct globally. Missing; known from only historical occurrences, but still some hope of rediscovery.
GU	=	Unrankable. Currently unrankable due to lack of information or due to substantially conflicting information about status or trends.

10/18/2006

Arkansas Natural Heritage Commission
Department of Arkansas Heritage
Inventory Research Program
Little River County

Scientific Name	Common Name	Federal Status	State Status	Global Rank	State Rank
Animals-Invertebrates					
* <i>Arkansia wheeleri</i>	Ouachita Rock Pocketbook	LE	INV	G1	S1
<i>Lampsilis abrupta</i>	Pink Mucket	LE	INV	G2	S2
* <i>Lampsilis satura</i>	Sandbank Pocketbook	-	INV	G2	S2
<i>Lasmigona costata</i>	Flutedshell	-	INV	G5	S3
<i>Nicrophorus americanus</i>	American Burying Beetle	LE	INV	G2G3	S1
<i>Obovaria jacksoniana</i>	Southern Hickorynut	-	INV	G2	S2
<i>Obovaria olivaria</i>	Hickorynut	-	INV	G4	S3
<i>Pleurobema rubrum</i>	Pyramid Pigtoe	-	INV	G2	S2
<i>Ptychobranthus occidentalis</i>	Ouachita Kidneyshell	-	INV	G3G4	S3
* <i>Quadrula apiculata</i>	Southern Mapleleaf	-	INV	G5	S2
<i>Quadrula cylindrica</i>	Rabbitsfoot	-	INV	G3	S2
* <i>Quadrula metanevra</i>	Monkeyface	-	INV	G4	S3S4
Animals-Vertebrates					
• <i>Cycleptus elongatus</i>	Blue Sucker	-	INV	G3G4	S2
* <i>Haliaeetus leucocephalus</i>	Bald Eagle	LT-PD	INV	G5	S2B,S4N
* <i>Hiodon alosoides</i>	Goldeye	-	INV	G5	S2?
<i>Notropis atrocaudalis</i>	Blackspot Shiner	-	INV	G4	S3
<i>Percina phoxocephala</i>	Slenderhead Darter	-	INV	G5	S2
<i>Pteronotropis hubbsi</i>	Bluehead Shiner	-	INV	G3	S3
* <i>Sterna antillarum athalassos</i>	Interior Least Tern	LE	INV	G4T2Q	S2B
<i>Tyrannus verticalis</i>	Western Kingbird	-	INV	G5	S1B,S1N
Plants-Vascular					
<i>Agalinis homalantha</i>	San Antonio false-foxglove	-	INV	G5	S1
<i>Allium drummondii</i>	Drummond's wild onion	-	INV	G5	S1
* <i>Amorpha paniculata</i>	panicled indigo bush	-	ST	G2G3	S1
<i>Astragalus crassicaarpus</i> var. <i>crassicaarpus</i>	a ground plum	-	INV	G5T5	S2
<i>Astragalus nuttallianus</i>	Nuttall's milkvetch	-	INV	G5	S1
<i>Bouteloua rigidiseta</i>	Texas grama	-	SE	G5	S1
<i>Carex microdonta</i>	a caric sedge	-	INV	G4	S2S3
<i>Carex planostachys</i>	a caric sedge	-	INV	G5	S1
<i>Condalia hookeri</i>	capul negro	-	INV	G5	S1
<i>Convolvulus equitans</i>	Texas bindweed	-	INV	G5	S1
<i>Dalea compacta</i> var. <i>compacta</i>	a prairie clover	-	INV	G5T4	S2
<i>Dalea compacta</i> var. <i>pubescens</i>	a prairie clover	-	INV	G5T5	SH
<i>Diaperia prolifera</i>	rabbit tobacco	-	INV	G5	S1S3
<i>Eleocharis wolfii</i>	Wolf's spike rush	-	INV	G3G4	S2
<i>Engelmannia peristenia</i>	Engelmann's daisy	-	INV	G5	S1
<i>Eriogonum annuum</i>	a buckwheat	-	INV	G5	S1
<i>Evolvulus nuttallianus</i>	Nuttall's dwarf morning glory	-	INV	G5	S3
<i>Fuirena simplex</i> var. <i>aristulata</i>	umbrella-grass	-	INV	G5TNR	SU
<i>Hexalectris spicata</i>	crested coralroot	-	INV	G5	S2
<i>Indigofera miniata</i> var. <i>leptosepala</i>	scarlet pea	-	ST	G5T4Q	S2
<i>Juniperus ashei</i>	Ashe's juniper	-	INV	G5	S3
<i>Lesquerella gracilis</i> ssp. <i>gracilis</i>	a bladderpod	-	INV	G5T4	S1

Little River (cont.)

Scientific Name	Common Name	Federal Status	State Status	Global Rank	State Rank
<i>Lithospermum incisum</i>	fringed puccoon	-	INV	G5	S2S3
<i>Machaeranthera pinnatifida</i>	lacy tansy-aster	-	INV	G5	SU
<i>Mitreola petiolata</i>	lax hompod	-	INV	G5	S3
<i>Nemastylis geminiflora</i>	celestial lily	-	INV	G4	S3
<i>Oenothera spachiana</i>	an evening primrose	-	INV	G5	S1
<i>Penstemon cobaea</i>	showy beard-tongue	-	INV	G4	S3
<i>Podostemum ceratophyllum</i>	riverweed	-	INV	G5	S3
<i>Quercus laurifolia</i>	laurel oak	-	INV	G5	S2S3
* <i>Quercus sinuata</i>	Durand's white oak	-	ST	G4G5	S2
<i>Rhus trilobata</i> var. <i>trilobata</i>	skunkbrush sumac	-	INV	G5T5	S1
<i>Rhynchospora caduca</i>	falling beakrush	-	INV	G5	S2S3
<i>Rhynchospora colorata</i>	white top sedge	-	SE	G5	S1
<i>Rudbeckia maxima</i>	giant coneflower	-	INV	G4?	S3
<i>Ruellia humilis</i> var. <i>depauperata</i>	a wild petunia	-	INV	G5T3T4Q	S1
<i>Solidago auriculata</i>	clasping goldenrod	-	INV	G4	S2
<i>Sophora affinis</i>	Eve's necklace	-	INV	G4	S2S3
<i>Stenosiphon linifolius</i>	false gaura	-	ST	G5	S1
<i>Thalictrum arkansanum</i>	Arkansas meadow rue	-	ST	G2Q	S2
<i>Zephyranthes chlorosolen</i>	rain lily	-	INV	G5	S1S2
Special Elements-Natural Communities					
<i>Blackland prairie</i>		-	INV	GNR	S1
<i>Chalk woodland</i>		-	INV	GNR	SNR
* <i>Lowland pine-oak forest</i>		-	INV	GNR	S1
<i>Overcup oak forest</i>		-	INV	GNR	S2
Special Elements-Other					
* <i>Colonial nesting site</i>	water birds	-	INV	GNR	SNR

* - These elements of special concern have been recorded within the delineated study area (as refined on 26 March 2007) for the proposed AEP Transmission Line Projects.

10/19/2006

Arkansas Natural Heritage Commission
Department of Arkansas Heritage
Inventory Research Program
Hempstead County

Scientific Name	Common Name	Federal Status	State Status	Global Rank	State Rank
Animals-Invertebrates					
* <i>Arkansia wheeleri</i>	Ouachita Rock Pocketbook	LE	INV	G1	S1
<i>Cicindela hirticollis</i>	Beach-dune Tiger Beetle	-	INV	G5	S2S3
<i>Hopleris planatus</i>	Aquatic Beetle	-	INV	GNR	SNR
* <i>Lampsilis satura</i>	Sandbank Pocketbook	-	INV	G2	S2
<i>Lucanus elephus</i>	Giant Stag Beetle	-	INV	G3G5	S2
<i>Microstylum morosum</i>	giant prairie robberfly	-	INV	G3G4	S1
<i>Mydas brunneus</i>	Golden Mydas Fly	-	INV	GNR	S1
<i>Nicrophorus americanus</i>	American Burying Beetle	LE	INV	G2G3	S1
* <i>Quadrula apiculata</i>	Southern Mapleleaf	-	INV	G5	S2
* <i>Quadrula metanevra</i>	Monkeyface	-	INV	G4	S3S4
<i>Speyeria diana</i>	Diana	-	INV	G3G4	S2S3
<i>Tetraopes texanus</i>	A Red Milkweed Beetle	-	INV	GNR	S1S2
<i>Unio merus tetralasmus</i>	Pondhorn	-	INV	G5	S2
Animals-Vertebrates					
* <i>Ammocrypta clara</i>	Western Sand Darter	-	INV	G3	S2?
<i>Corynorhinus rafinesquii</i>	Rafinesque's big-eared bat	-	INV	G3G4	S3
* <i>Cycleptus elongatus</i>	Blue Sucker	-	INV	G3G4	S2
<i>Egretta tricolor</i>	Tricolored Heron	-	INV	G5	S3B,S3N
<i>Erismyza sucetta</i>	Lake Chubsucker	-	INV	G5	S2?
<i>Gallinula chloropus</i>	Common Moorhen	-	INV	G5	S1B,S2N
* <i>Haliaeetus leucocephalus</i>	Bald Eagle	LT-PD	INV	G5	S2B,S4N
* <i>Hiodon alosoides</i>	Goldeye	-	INV	G5	S2?
* <i>Nerodia cyclopion</i>	Mississippi Green Water Snake	-	INV	G5	S3
<i>Notiosorex crawfordi</i>	Crawford's gray shrew	-	INV	G5	S2
* <i>Notropis bairdi</i>	Red River Shiner	-	INV	G4	SH
* <i>Plethodon serratus</i>	Southern Redback Salamander	-	INV	G5	S3
* <i>Porphyrio martinica</i>	Purple Gallinule	-	INV	G5	S1B
* <i>Regina rigida sinicola</i>	Gulf Crayfish Snake	-	INV	G5T5	S3
<i>Reithrodontomys humulis</i>	eastern harvest mouse	-	INV	G5	S2
<i>Scaphiopus hurterii</i>	Hurter's Spadefoot	-	INV	G5	S2
* <i>Sterna antillarum athalassos</i>	Interior Least Tern	LE	INV	G4T2Q	S2B
Plants-Vascular					
<i>Agalinis auriculata</i>	earleaf false-foxglove	-	INV	G3	S1
<i>Allium drummondii</i>	Drummond's wild onion	-	INV	G5	S1
<i>Allium stellatum</i>	glade onion	-	INV	G5	S3
<i>Astragalus crassicaeris</i> var. <i>crassicaeris</i>	a ground plum	-	INV	G5T5	S2
* <i>Carex comosa</i>	a caric sedge	-	INV	G5	S1S2
<i>Carex leptalea</i> ssp. <i>harperi</i>	threadstem caric sedge	-	INV	G5T4T5	S2S3
<i>Carex microdonta</i>	a caric sedge	-	INV	G4	S2S3
<i>Castanea pumila</i> var. <i>ozarkensis</i>	Ozark chinquapin	-	INV	G5T3	S3S4
* <i>Chamaelirium luteum</i>	devil's bit	-	INV	G5	S3
* <i>Cypripedium kentuckiense</i>	Kentucky lady's-slipper	-	INV	G3	S3
<i>Delphinium carolinianum</i> ssp. <i>virescens</i>	Carolina larkspur	-	INV	G5T5	S2
<i>Diaperia prolifera</i>	rabbit tobacco	-	INV	G5	S1S3

Hempstead County (cont.)

Scientific Name	Common Name	Federal Status	State Status	Global Rank	State Rank
<i>Didiplis diandra</i>	water purslane	-	INV	G5	S1S3
* <i>Echinodorus berteroi</i>	upright burhead	-	INV	G5	S1S3
* <i>Habenaria repens</i>	water-spider orchid	-	INV	G5	S2
<i>Helianthemum bicknellii</i>	frostweed	-	INV	G5	SH
* <i>Lithospermum tuberosum</i>	a pucoon	-	INV	G4	S2
<i>Nemastylis geminiflora</i>	celestial lily	-	INV	G4	S3
<i>Penstemon cobaea</i>	showy beard-tongue	-	INV	G4	S3
* <i>Pycnanthemum virginianum</i>	Virginia mountain mint	-	INV	G5	S1S2
* <i>Quercus arkansana</i>	Arkansas oak	-	INV	G3	S3
* <i>Quercus laurifolia</i>	laurel oak	-	INV	G5	S2S3
* <i>Quercus sinuata</i>	Durand's white oak	-	ST	G4G5	S2
* <i>Ranunculus flabellaris</i>	yellow water crowfoot	-	INV	G5	S3
* <i>Ranunculus longirostris</i>	white water crowfoot	-	INV	G5	S2S3
<i>Rhynchospora cephalantha</i>	capitate beakrush	-	INV	G5	SH
<i>Rudbeckia maxima</i>	giant coneflower	-	INV	G4?	S3
* <i>Sacciolepis striata</i>	American cupscale	-	INV	G5	S2S3
* <i>Schoenoplectus californicus</i>	California bulrush	-	INV	G5	S1S2
<i>Scleria pauciflora</i>	fewflower nutsedge	-	INV	G5	S3
* <i>Solidago auriculata</i>	clasping goldenrod	-	INV	G4	S2
<i>Solidago delicatula</i>	a goldenrod	-	INV	G5TNR	S1
<i>Sophora affinis</i>	Eve's necklace	-	INV	G4	S2S3
<i>Stenosiphon linifolius</i>	false gaura	-	ST	G5	S1
* <i>Thalictrum arkansanum</i>	Arkansas meadow rue	-	ST	G2Q	S2
<i>Tillandsia usneoides</i>	Spanish moss	-	INV	G5	S3

Special Elements-Natural Communities

* <i>Back swamp</i>		-	INV	GNR	SNR
<i>Blackland prairie</i>		-	INV	GNR	S1
* <i>Cypress swamp</i>		-	INV	GNR	S3
* <i>Sugarberry-elm-ash forest</i>		-	INV	GNR	SNR
* <i>Willow oak forest</i>		-	INV	GNR	S2

Special Elements-Other

* <i>Colonial nesting site</i>	water birds	-	INV	GNR	SNR
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* - These elements of special concern have been recorded within the delineated study area (as refined on 26 March 2007) for the proposed AEP Transmission Line Projects.

10/18/2006

Arkansas Natural Heritage Commission
Department of Arkansas Heritage
Inventory Research Program
Miller County

Scientific Name	Common Name	Federal Status	State Status	Global Rank	State Rank
Animals-Invertebrates					
<i>Faxonella blairi</i>	A Crayfish	-	INV	G2	S1
<i>Quadrula apiculata</i>	Southern Mapleleaf	-	INV	G5	S2
<i>Unio merus declivis</i>	Tapered Pondhorn	-	INV	G5	S2
<i>Unio merus tetralasmus</i>	Pondhorn	-	INV	G5	S2
Animals-Vertebrates					
* <i>Ammocrypta clara</i>	Western Sand Darter	-	INV	G3	S2?
<i>Atractosteus spatula</i>	Alligator Gar	-	INV	G3G4	S2?
* <i>Cycleptus elongatus</i>	Blue Sucker	-	INV	G3G4	S2
<i>Etheostoma parvipinne</i>	Goldstripe Darter	-	INV	G4G5	S2
<i>Hiodon alosoides</i>	Goldeye	-	INV	G5	S2?
<i>Hybognathus placitus</i>	Plains Minnow	-	INV	G4	SX
<i>Nerodia cyclopion</i>	Mississippi Green Water Snake	-	INV	G5	S3
<i>Notropis atrocaudalis</i>	Blackspot Shiner	-	INV	G4	S3
* <i>Notropis bairdi</i>	Red River Shiner	-	INV	G4	SH
<i>Polyodon spathula</i>	Paddlefish	-	INV	G4	S2?
<i>Reithrodontomys humulis</i>	eastern harvest mouse	-	INV	G5	S2
<i>Scaphiopus hurterii</i>	Hurter's Spadefoot	-	INV	G5	S2
* <i>Sterna antillarum athalassos</i>	Interior Least Tern	LE	INV	G4T2Q	S2B
Plants-Vascular					
<i>Agalinis homalantha</i>	San Antonio false-foxglove	-	INV	G5	S1
<i>Aletris aurea</i>	golden colicroot	-	INV	G5	S1S2
<i>Alophia drummondii</i>	purple pleat-leaf	-	INV	G4	S2
<i>Aristida lanosa</i>	woolly threeawn	-	INV	G5	S2
<i>Asimina parviflora</i>	dwarf pawpaw	-	INV	G5	S2S3
<i>Astragalus leptocarpus</i>	slimpod milkvetch	-	INV	G5	S2
<i>Astragalus soxmaniorum</i>	Soxman's milkvetch	-	INV	G3	S2
<i>Berlandiera x betonicifolia</i>	green eyes	-	INV	G4G5	S1
<i>Bouteloua hirsuta</i>	hairy grama	-	SE	G5	S1
<i>Bulbostylis ciliatifolia</i>	a hairsedge	-	INV	G5	S1
<i>Carex decomposita</i>	epiphytic caric sedge	-	INV	G3	S2
<i>Crataegus brachyacantha</i>	blueberry hawthorn	-	INV	G4	S2
<i>Dalea phleoides var. microphylla</i>	little-leaved prairie clover	-	ST	G4T4	S1
<i>Dalea villosa var. grisea</i>	silky prairie clover	-	SE	G5T4	S1
<i>Delphinium carolinianum ssp. vimineum</i>	Carolina larkspur	-	INV	G5T5	S2
<i>Echinacea sanguinea</i>	red coneflower	-	ST	G3	S2S3
<i>Engelmannia peristenia</i>	Engelmann's daisy	-	INV	G5	S1
<i>Eryngium integrifolium</i>	blue-flowered eryngo	-	INV	G5	S2
<i>Fuirena bushii</i>	Bush's umbrella-grass	-	INV	G5	S3
<i>Geranium texanum</i>	Texas cranesbill	-	INV	G4	SU
<i>Lycopodiella appressa</i>	appressed bog club-moss	-	INV	G5	S3
<i>Matelea cynanchoides</i>	milkweed vine	-	SE	G4G5	S1
<i>Mitreola sessilifolia</i>	swamp hornpod	-	INV	G4G5	S2
<i>Nyssa biflora</i>	swamp black gum	-	INV	G5	S1S3
<i>Oenothera heterophylla ssp. orientalis</i>	an evening primrose	-	INV	G4T1T2	S1S2

Miller County (cont.)

Scientific Name	Common Name	Federal Status	State Status	Global Rank	State Rank
<i>Oenothera rhombipetala</i>	an evening primrose	-	INV	G4G5	S2
<i>Pediomelum digitatum</i>	palm-leaved scurf-pea	-	ST	G5	S1
<i>Pediomelum hypogaeum</i> var. <i>subulatum</i>	buried breadroot	-	SE	G5T4	S1
<i>Persea borbonia</i>	red bay	-	SE	G5	SH
<i>Prunus gracilis</i>	sand plum	-	INV	G4G5	S1
<i>Quercus arkansana</i>	Arkansas oak	-	INV	G3	S3
<i>Rhynchospora caduca</i>	falling beakrush	-	INV	G5	S2S3
<i>Rhynchospora gracilentia</i>	slender beakrush	-	INV	G5	S2
<i>Rhynchospora rariflora</i>	fewflower beakrush	-	ST	G5	S1S2
<i>Selaginella arenicola</i> ssp. <i>riddellii</i>	Riddell's spike-moss	-	INV	G4T4	S3
<i>Sophora affinis</i>	Eve's necklace	-	INV	G4	S2S3
<i>Spiranthes odorata</i>	fragrant ladies'-tresses	-	INV	G5	S1
<i>Stenanthium gramineum</i>	featherbells	-	INV	G4G5	S3
<i>Streptanthus hyacinthoides</i>	a twistflower	-	ST	G4	S2
<i>Tetragonotheca ludoviciana</i>	Louisiana squarehead	-	SE	G4	S1
<i>Thalia dealbata</i>	powdery thalia	-	INV	G4	S3
<i>Thalictrum arkansanum</i>	Arkansas meadow rue	-	ST	G2Q	S2
<i>Tillandsia usneoides</i>	Spanish moss	-	INV	G5	S3
<i>Tradescantia reverchonii</i>	Reverchon's spiderwort	-	INV	G4	S3
<i>Tragia smallii</i>	Small's noseburn	-	INV	G4?	S1
<i>Vicia ludoviciana</i> ssp. <i>leavenworthii</i>	deer pea vetch	-	INV	G5T5	S1S2

Special Elements-Natural Communities

<i>Forested canebrake</i>		-	INV	GNR	S1
<i>Lowland meander scar lake</i>		-	INV	GNR	SNR
<i>Lowland pine-oak forest</i>		-	INV	GNR	S1
<i>Sandhill woodland</i>		-	INV	GNR	S2
<i>Shrub swamp</i>		-	INV	GNR	S3

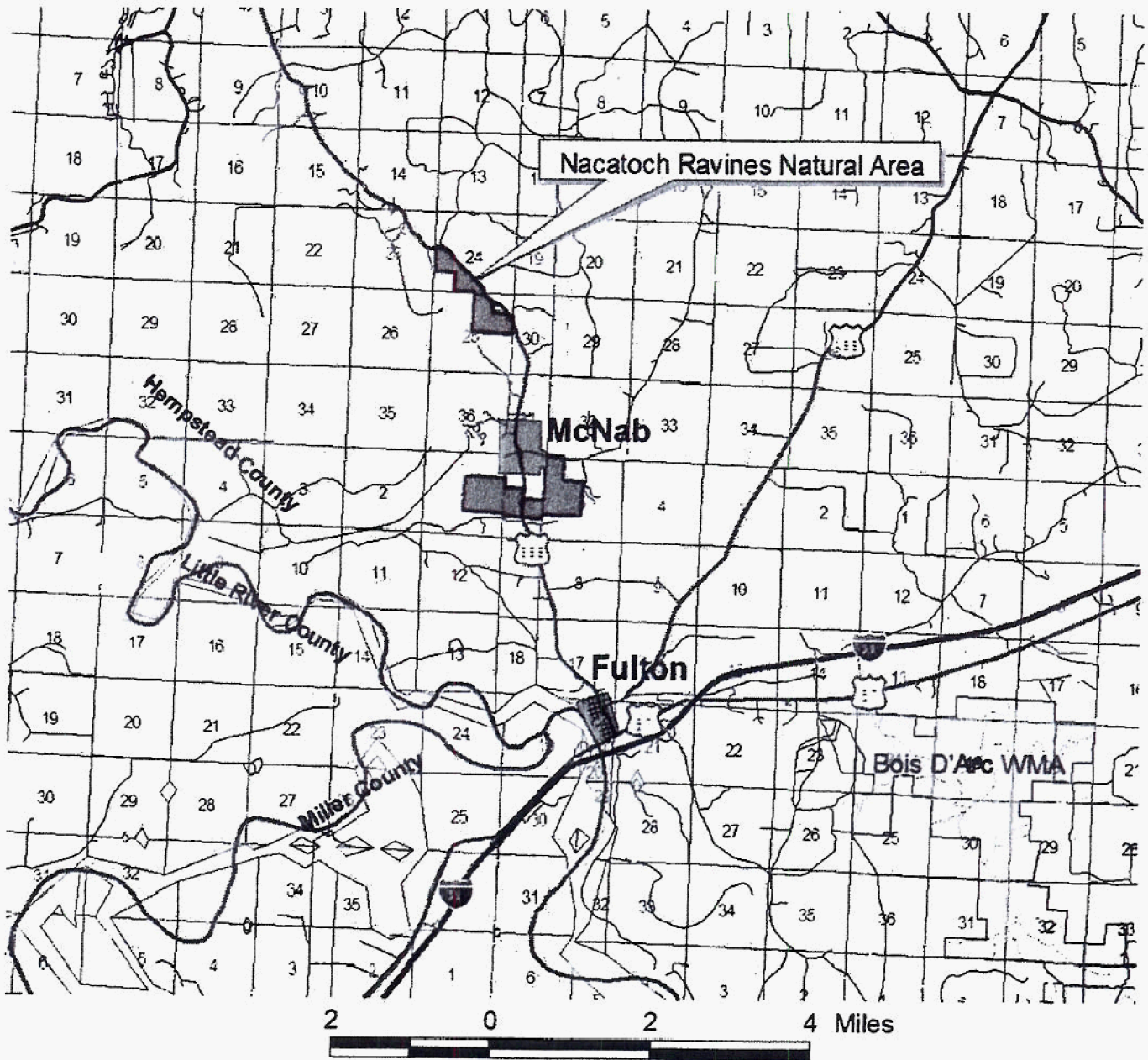
Special Elements-Other

<i>Colonial nesting site</i>	swallows & swifts	-	INV	GNR	SNR
<i>Colonial nesting site</i>	water birds	-	INV	GNR	SNR

* - These elements of special concern have been recorded within the delineated study area (as refined on 26 March 2007) for the proposed AEP Transmission Line Projects.

9/18/2006

Arkansas Natural Heritage Commission
Department of Arkansas Heritage
Nacatoch Ravines Natural Area



Nacatoch Ravines Natural Area
County: Hempstead Date Added To System: 1989 Acreage: 635.125
Directions: From Interstate 30 take exit 18 at Fulton, travel west on U.S. Highway 67 for 1 mile to State Highway 355. Turn right and travel north approximately 3 miles to southern tract. Continue north on State Highway 355 for approximately 2.5 miles to northern tract.



A SURVEY OF POTENTIAL NATIONAL NATURAL LANDMARKS
OF THE
WEST GULF COASTAL PLAIN SUBREGION: BIOTIC THEMES

Project Co-ordinator
David D. Diamond
Texas Natural Heritage Program
General Land Office
Stephen F. Austin Building
Austin, Texas 78701

Ian Butler
Oklahoma Natural Heritage Program

Nancy J. Craig
Louisiana Natural Heritage Program

Thomas L. Foti
Arkansas Natural Heritage Program

and
Susan P. Rust
Texas Natural Heritage Program

July 1986

LITTLE RIVER BOTTOMS

Location and Size: Hempstead County, Arkansas
 USGS Quad - Red Bluff, McNab
 T12SR27W and T13SR27W, 5P
 11,500 ac (4660 ha)
 Just west of McNab

Ownership: Private

Description: This is a very large and diverse area which includes a variety of bottomland vegetation types, portions of two bottomland streams, oxbow lakes and backswamps, and even some high-quality upland forest, which is extremely rare in the northern West Gulf Coastal Plain. The area includes the 3,000 acre (1215 ha) Grassy Lake area, which has previously been recommended for landmark status by Holz and Baker (1982) and by G.S. Waggoner (1975). It also has been evaluated as a potential landmark by Dale and Huffman (n.d.) who determined it to be "well qualified for landmark status."

Each of these previous studies has focused narrowly on the Grassy Lake Baldcypress-Tupelo swamp which, with its overall undisturbed condition, variety of aquatic and riparian communities, and diversity of animal life, is the premier ecological feature of the area. Nevertheless, inspection shows that a far larger area adjacent to Grassy Lake also is likely to be of national significance. Inspection from a light plane has revealed lakes that appear to be as natural as Grassy Lake itself, though not as extensive. Visits to the western part of the area have documented a forest that has been selectively logged in the past but is reasonably mature and representative of the natural vegetation of the region. Field inspection of the northeastern edge of the area documented a mature upland Oak-Hickory forest on calcareous sands. Aerial photo interpretation shows the entire outlined area to be similar in quality to those parts that have been visited in the field.

It is likely that all or a large part of the outlined area, if thoroughly and exhaustively evaluated, will prove to be of national significance. Of course, the Grassy Lake area itself requires no further evaluation: it is a natural area of national significance which is potentially very valuable as a scientific and educational resource.

Land Use: Outdoor recreation; timber management

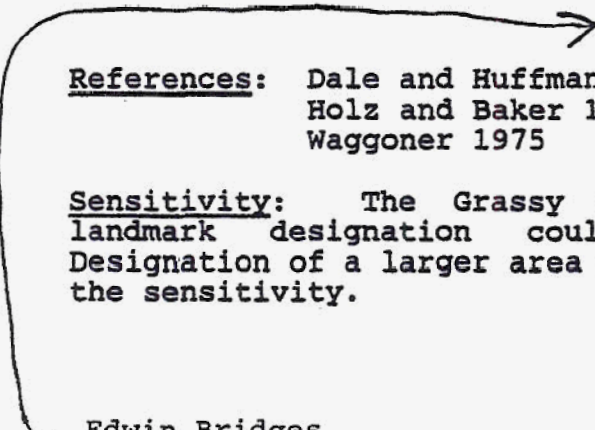
Dangers to Integrity: Protection Priority B/C - modification of flooding regime by management of water levels at Millwood dam upstream, introduction of exotic species (White Amur), timber management, and water level control in the bottomlands are potential problems.

Data Sources: Files of Arkansas Natural Heritage Commission
 Field trips and flights

Aerial photo interpretation by a specialist

Other Knowledgeable Persons: Lance Peacock
Arkansas Nature Conservancy
Little Rock

Tom Clark
Hendrix College
Conway, Arkansas

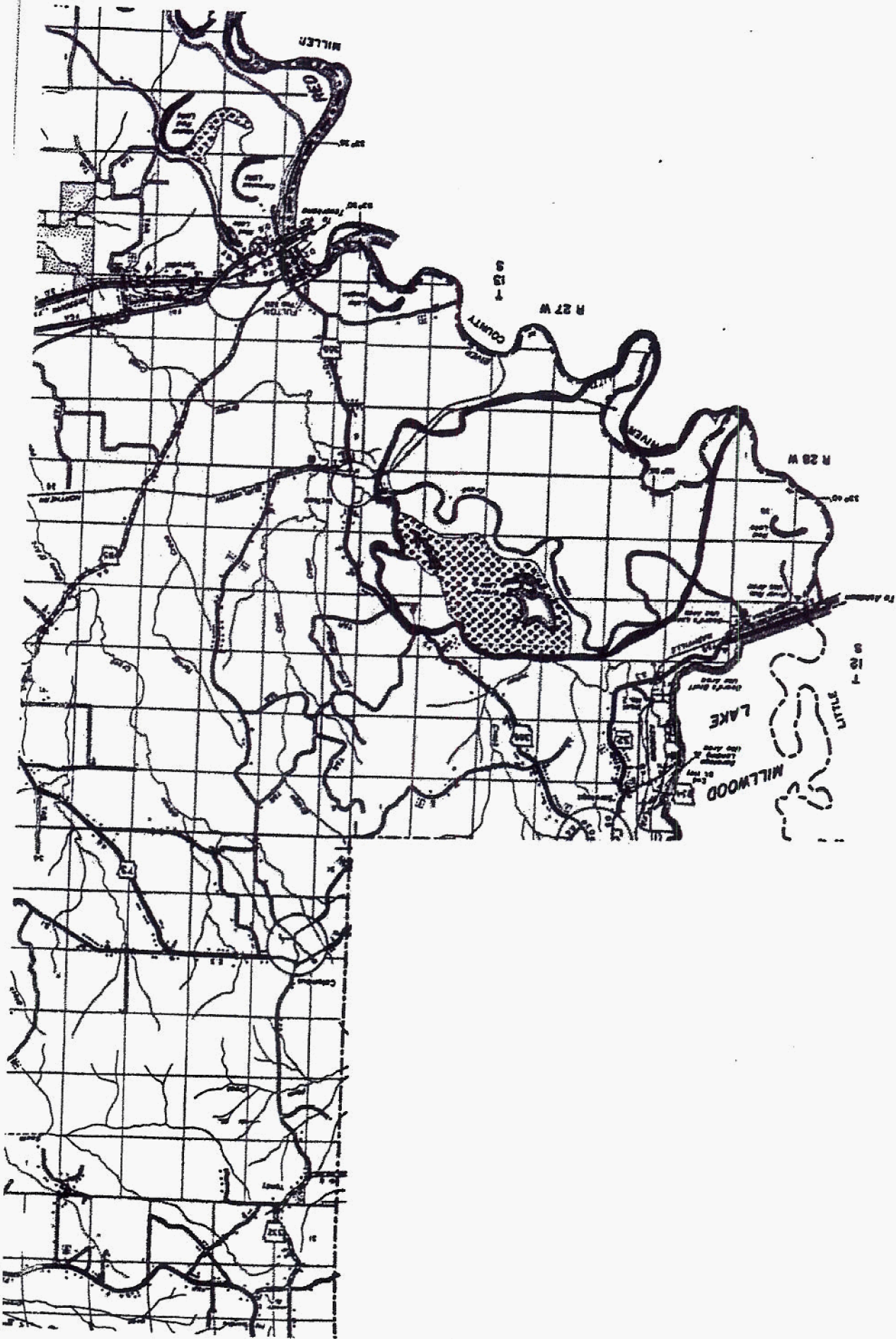


References: Dale and Huffman undated
Holz and Baker 1982
Waggoner 1975

Sensitivity: The Grassy Lake area is extremely sensitive; landmark designation could lead to adverse consequences. Designation of a larger area under a different name might reduce the sensitivity.

Edwin Bridges
1781 Spyglass Dr., #141
Austin, TX 78746

Steve Orzell
Texas Natural Heritage Program
GLO, S.F. Austin Bldg.
Austin, TX 78701



Stone, Amanda M

From: Boren, Kelli D
Sent: Wednesday, April 04, 2007 1:33 PM
To: Stone, Amanda M; Ademski, Thomas J
Subject: Fw: SWEPCO Transmission line review-Miller County

Attachments: Millerco.pdf



Millerco.pdf (22 KB)

----- Original Message -----

From: Cindy Osborne <Cindy@arkansasheritage.org>
To: Boren, Kelli D
Sent: Wed Apr 04 13:15:06 2007
Subject: SWEPCO Transmission line review-Miller County

Kelli,

For some reason, the annotation on the first Miller County List I sent did not show-up. Please replace the first list with this list. I apologize for the mistakes, I'm afraid things are a little crazy around here this week.

Cindy

Cindy Osborne

Data Manager/Environmental Review Coordinator

Arkansas Natural Heritage Commission

1500 Tower Building

323 Center Street

Little Rock, AR 72201

Phone: 501-324-9762

Fax: 501-324-9618

e-mail: cindy@arkansasheritage.org

Stone, Amanda M

From: Boren, Kelli D
Sent: Wednesday, April 04, 2007 1:32 PM
To: Stone, Amanda M; Ademski, Thomas J
Subject: Fw: SWEPCO Transmission line review - Legend

Attachments: LEGEND.pdf



LEGEND.pdf (8 KB)

----- Original Message -----

From: Cindy Osborne <Cindy@arkansasheritage.org>
To: Boren, Kelli D
Sent: Wed Apr 04 13:02:41 2007
Subject: SWEPCO Transmission line review - Legend

Kelli,

Here is a legend, I apologize, but I neglected to attach the legend to my previous e-mail.

Cindy Osborne

Data Manager/Environmental Review Coordinator

Arkansas Natural Heritage Commission

1500 Tower Building

323 Center Street

Little Rock, AR 72201

Phone: 501-324-9762

Fax: 501-324-9618

e-mail: cindy@arkansasheritage.org

Stone, Amanda M

From: Boren, Kelli D
Sent: Wednesday, April 04, 2007 1:31 PM
To: Stone, Amanda M; Ademski, Thomas J
Subject: Fw: SWEPCO Transmission line review

Attachments: nacatochravines_quad.jpg; ANHC-letter-TransStudyArea.pdf; HempsteadCo.pdf; LEGEND.pdf; LittleRiverCo.pdf; MillerCo.pdf; nacatochravines_locator.jpg



nacatochravines_q ANHC-letter-TransS HempsteadCo.pdf LEGEND.pdf (8 KB) LittleRiverCo.pdf MillerCo.pdf (22 KB) nacatochravines_lo
uad.jpg (503 ... tudyArea.pdf... (22 KB) (21 KB) cator.jpg (4...

I just

received three emails from ANHC. I will send them to you guys.

Tommy,

I have not opened these so I am not sure how much information they contain but if they have sites identified start putting them on the constraints map. Rob and I may try to call you later to discuss.

Thanks,

Kelli

----- Original Message -----

From: Cindy Osborne <Cindy@arkansasheritage.org>
To: Boren, Kelli D
Sent: Wed Apr 04 12:59:26 2007
Subject: RE: SWEPCO Transmission line review

Kelli,

Attached are ANHC comments on PBS&J's letter of 23 February. Since you changed the level of information you were seeking we handled it as an opportunity to review, so no charges were incurred. The following files are attached:

ANHC-letter-TransStudyArea.pdf - ANHC comments

HempsteadCo.pdf - an annotated Hempstead County Element List

LittleRiverCo.pdf - an annotated Little River County Element List

MillerCo.pdf - an annotated Miller County Element List

Nacatochravines_locator.jpg - A county locator map with the boundaries of Nacatoch Ravines NA

Nacatochravines_quad.jpg - A quadmap with the boundaries of Nacatoch Ravines NA

The letter references a copy of a 1986 National Natural Landmark account for Little River Bottoms. I do not currently have this document available electronically and our scanner is broken. It will be included in the hard copy that will be sent to you by USPS.

Please feel free to contact me if you have questions or need additional information.

Sincerely,

Cindy Osborne

Data Manager/Environmental Review Coordinator

Arkansas Natural Heritage Commission

1500 Tower Building

323 Center Street

Little Rock, AR 72201

Phone: 501-324-9762

Fax: 501-324-9618

e-mail: cindy@arkansasheritage.org

From: Boren, Kelli D [<mailto:KDBoren@pbsj.com>]
Sent: Monday, April 02, 2007 9:53 AM
To: Cindy Osborne
Subject: RE: SWEPCO Transmission line review

That would be great if you could provide the annotated lists for the study area. Thanks,

Kelli Boren

Project Manager

PBS&J

18383 Preston Road, Suite 110

Dallas, TX 75252

Phone: 972-588-3132

Email: kdboren@pbsj.com

From: Cindy Osborne [<mailto:Cindy@arkansasheritage.org>]
Sent: Monday, April 02, 2007 9:39 AM
To: Boren, Kelli D
Subject: RE: SWEPCO Transmission line review

Kelli,

For some reason, I only today received the voice mail that you left last Friday. I received the files and was able to use them. Our county element lists are available on our web site either by using our Rare Elements Search Engine: <http://naturalheritage.com/program/element-search/> or you may print them from our Annual Report: <http://naturalheritage.com/resources/report/> . If you need me to annotate the lists so that you know which elements are within the search area you defined, I should be able to do that relatively quickly, and could provide them to you via e-mail. Please let me know if you would like to receive the annotated lists.

Sincerely,

Cindy

Cindy Osborne

Data Manager/Environmental Review Coordinator

Arkansas Natural Heritage Commission

1500 Tower Building

323 Center Street

Little Rock, AR 72201

Phone: 501-324-9762

Fax: 501-324-9618

e-mail: cindy@arkansasheritage.org

From: Boren, Kelli D [<mailto:KDBoren@pbsj.com>]
Sent: Monday, March 26, 2007 12:42 PM
To: Cindy Osborne
Subject: FW: SWEPCO Transmission line review

We have merges the URS search and our search area. Anything that you did not look at in the search for URS we need information on. If you have any questions or need additional information let me know. Thanks for your assistance in this matter.

Kelli Boren

Project Manager

PBS&J

18383 Preston Road, Suite 110

Dallas, TX 75252

Phone: 972-588-3132

Email: kdboren@pbsj.com

From: McGuire, Mark A
Sent: Monday, March 26, 2007 10:59 AM
To: Boren, Kelli D
Subject: RE: SWEPCO Transmission line review

Here you go.

From: Boren, Kelli D
Sent: Monday, March 26, 2007 10:22 AM
To: McGuire, Mark A
Subject: FW: SWEPCO Transmission line review

Mark,

Here are the files! Thanks,

Kelli Boren

Project Manager

PBS&J

18383 Preston Road, Suite 110

Dallas, TX 75252

Phone: 972-588-3132

Email: kdboren@pbsj.com

From: Cindy Osborne [mailto:Cindy@arkansasheritage.org]
Sent: Monday, March 26, 2007 10:17 AM
To: Boren, Kelli D
Subject: SWEPCO Transmission line review

Kelli,

Thanks for sending the new shapefile. I was able to open it. However, I'm a little confused after reviewing it. I don't understand what area you would like searched. I have attached the ArcView shapefile for the corridors that were searched for URS in 2006. Perhaps this shapefile could be modified to include the additional area you would like searched for the transmission line review.

Thanks,

Cindy

Cindy Osborne

Data Manager/Environmental Review Coordinator

Arkansas Natural Heritage Commission

1500 Tower Building

323 Center Street

Little Rock, AR 72201

Phone: 501-324-9762

Fax: 501-324-9618

e-mail: cindy@arkansasheritage.org

From: Boren, Kelli D [<mailto:KDBoren@pbsj.com>]
Sent: Monday, March 26, 2007 8.38 AM
To: Cindy Osborne
Cc: Lyter, David C
Subject: RE:

Try this one.

Kelli Boren

Project Manager

PBS&J

18383 Preston Road, Suite 110

Dallas, TX 75252

Phone: 972-588-3132

Email: kdboren@pbsj.com

From: Cindy Osborne [mailto:Cindy@arkansasheritage.org]
Sent: Monday, March 26, 2007 8:17 AM
To: Boren, Kelli D
Subject: RE:

Kelli,

I've only just now had the opportunity to look at the files you sent. Unfortunately, we are still using ArcView 3.2 and I am not able to open the file you sent. Would it be possible to receive the file in a format readable by ArcView 3.2?

Thanks,

Cindy

Cindy Osborne
Data Manager/Environmental Review Coordinator
Arkansas Natural Heritage Commission
1500 Tower Building
323 Center Street
Little Rock, AR 72201
Phone: 501-324-9762
Fax: 501-324-9618
e-mail: cindy@arkansasheritage.org

From: Boren, Kelli D [mailto:KDBoren@pbsj.com]
Sent: Tuesday, March 20, 2007 9:18 AM
To: Cindy Osborne
Subject:

Cindy,

The attached file is state plane NAD 83 Arkansas south U.S. feet. The areas to the north and west of what you previously reviewed are what we are requesting additional information on to meet AEP's immediate needs. Give me a call if you have questions or if this doesn't work.

We are hopeful that we can supply you with more specific corridors for your review of the

rest of our study area by the end of next week.

Thank you for your assistance.

Kelli Boren

Project Manager

PBS&J

18383 Preston Road, Suite 110

Dallas, TX 75252

Phone: 972-588-3132

Email: kdboren@pbsj.com



The Department of Arkansas Heritage

Mike Beebe
Governor

Cathie Matthews
Director

Arkansas Arts Council

Arkansas Historic
Preservation Program

Delta Cultural Center

Historic Arkansas Museum

Mosaic Templars
Cultural Center

Old State House Museum



Arkansas Natural Heritage Commission

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fax: (501) 324-9618

tdd: (501) 324-9811

e-mail:

arkansas@naturalheritage.org

website:

www.naturalheritage.com

An Equal Opportunity Employer



Date: July 10, 2007

Subject: Proposed SEP Transmission Line Alternatives

Little River, Hempstead, and Miller Counties, AR

ANHC No.: P-CF..-07-087

Ms. Kelli Boren
PBS&J
18383 Preston Road, Suite 110
Dallas, TX 75252

Dear Ms. Boren:

Staff members of the Arkansas Natural Heritage Commission have reviewed our files for records indicating the occurrence of rare plants and animals, outstanding natural communities, natural or scenic rivers, or other elements of special concern within a .25 mile corridor (either side) of the proposed transmission lines or within waterbodies one mile upstream or downstream of transmission line crossings. The results of this review are provided electronically as an ArcView shapefile. Documentation describing the shapefile is enclosed for your reference.

Thirteen species of conservation concern have been recorded within the search area:

Ammocrypta clara, western sand darter – State Concern
Arkansia wheeleri, Ouachita rock pocketbook – Federal Concern
(endangered)
Cycleptus elongatus, blue sucker – State Concern
Hiodon alosoides, goldeye – State Concern
Lampsilis satura, sandbank pocketbook – State Concern
Notropis bairdi, Red River shiner – State Concern
Quadrula apiculata, southern mapleleaf – State Concern
Quadrula metanevra, monkeyface – State Concern
Sacciolepis striata, American cupscale – State Concern
Sophora affinis, Eve's necklace – State Concern
Sterna antillarum athalassos, Interior Least Tern – Federal Concern
(endangered)
Uniomerus tetralasmus, pondhorn – State Concern

Most of these elements are associated with stream or waterbody crossings. No elements have been recorded immediately within any of the study corridors.

The southern tract of Nacatoch Ravines Natural Area is adjacent to the power plant site. Transmission line corridors have been mapped both to the north and south of the area. A shapefile of the natural area boundaries is provided for your reference. Should any consideration be given to crossing the natural area with a transmission line, coordination with this agency would be necessary.

The following general guidelines are offered when considering transmission line placement:

- Where feasible, the transmission line should share existing rights-of-way and be routed to avoid natural habitats to the extent possible. Efforts should be made to avoid bisecting areas of mature forest. Such fragmentation can have detrimental effects on forest interior bird species, and introduce exotic, invasive species into an area.
- Use of best management practices at all stream crossing should be employed and monitored to reduce siltation and erosion. Disturbance and removal of riparian vegetation should be limited to the extent practical.
- Use of herbicides for transmission line maintenance should be avoided, except where needed to control exotic species.
- Native species or non-persistent annual species should be used to revegetate work areas when needed. Use of aggressive, exotic species should be avoided.
- Impacts to wetlands should be avoided where possible. Unavoidable impacts should be mitigated.

A list of elements known to occur within a one and a five mile radius of the transmission line routes is enclosed for your reference. Represented on this list are elements for which we have records in the database. A legend is enclosed to help you interpret the codes used on this list.

Please keep in mind that the project area may contain important natural features of which we are unaware. Staff members of the Arkansas Natural Heritage Commission have not conducted a field survey of the study site. Our review is based on data available to the program at the time of the request. It should not be regarded as a final statement on the elements or areas under consideration. Because our files are updated constantly, you may want to check with us again at a later time.

Thank you for consulting us. It has been a pleasure to work with you on this study.

Sincerely,



Cindy Osborne
Data Manager/Environmental Review Coordinator

Enclosures: ArcView shapefiles
Shapefile documentation
Legend
Element List (1 and 5 mile radius)
Invoice

From: Cindy Osborne [mailto:Cindy@arkansasheritage.org]
Sent: Wednesday, July 11, 2007 8:26 AM
To: Boren, Kelli D
Cc: Terri Bannister
Subject: Proposed AEP Transmission Line Alternative (ANHC No.: P-CF..-07-087)

Kelli,

In response to your request for information on elements of special concern within American Electric Power's proposed transmission corridors in the Texarkana area please find the following files attached:

ANHC-letter.pdf – ANHC's response letter
ANHCDATA – ArcView point data shapefiles for elements of special concern in the study area
ANHCNAS – ArcView polygon file with the boundaries of Nacatoch Ravines NA
Documentation-ANHCDATA.pdf – Explanatory information for the ANHCDATA shapefile
Documentation-Natural_Areas.pdf – Explanatory information for the ANHCNAS shapefile
Element-List.pdf - A list of elements known to occur within a one and five mile radius of the transmission line corridors
Legend.pdf – A legend to help interpret the codes used on the Element list.
Invoice.pdf – An invoice for data sharing fees

This material will not be sent in hard copy unless requested. I would appreciate receiving an e-mail from you confirming receipt of the data. I will be out of the office until Monday, July 16. If you have problems with the files or need assistance before I return, you may contact my Assistant Data Manager, Terri Bannister at 501-324-9617.

Sincerely,

Cindy Osborne
Data Manager/Environmental Review Coordinator
Arkansas Natural Heritage Commission
1500 Tower Building
323 Center Street
Little Rock, AR 72201
Phone: 501-324-9762
Fax: 501-324-9618
e-mail: cindy@arkansasheritage.org

ARKANSAS STATE HIGHWAY
AND
TRANSPORTATION DEPARTMENT

Dan Flowers
Director
Phone (501) 569-2000 Fax (501) 569-2400



P.O. Box 2261
Little Rock, Arkansas 72203-2261
WWW.ARKANSASHIGHWAYS.COM

March 27, 2007

Mr. Rob R. Reid, Vice President
Senior Project Director
PBS&J
18383 Preston Road, Suite 110
Dallas, TX 75252

Dear Mr. Reid:

Reference is made to your request for information regarding the potential impacts of the proposed transmission lines in southwest Arkansas and northeast Texas on the facilities and planned facilities of the Arkansas State Highway and Transportation Department.

The proposed transmission lines should have minimal impact upon the Department's existing highway network, but would require permits to cross any highway right of way and must be coordinated with the Department's District 3 Engineer Don Donaldson. His mailing address is P.O. Box 490, Hope, Arkansas 71802-0490.

A substantial highway project planned for the Texarkana area is the relocation of Highway 71 on the east side of Texarkana that will eventually become part of Interstate 49. Enclosed is a map and executive summary of the Environmental Impact Statement (EIS) for the selected alignment for this future interstate highway. The EIS for this project was developed by PBS&J and the project manager was Tracy Hill.

Most of the Department's other highway improvements are related to the existing highway network and therefore would also be subject to the normal permitting process. Enclosed is a map illustrating the highway projects programmed and/or under study within your project study area.

Please contact me if you have any questions or need additional information.

Sincerely,

Scott E. Bennett
Assistant Chief Engineer-Planning

Enclosures

c: Environmental
District 3



The Nature Conservancy
Arkansas Field Office
601 North University Avenue
Little Rock, Arkansas 72205

tel [501] 663.6699
fax [501] 663.8332
nature.org

April 27, 2007

Rob R. Reid
PBS&J
18383 Preston Road, Suite 110
Dallas, Texas 75252

To Whom It May Concern:

On February 23, 2007 The Nature Conservancy of Arkansas was contacted by Rob Reid of PBS&J requesting information to assist in determining environmental effects from possible construction of AEP transmission lines near Texarkana, Arkansas. The Nature Conservancy of Arkansas geographical information system (GIS) lab reviewed the map provided by PBS&J of the proposed AEP transmission lines and the project study area. The hardcopy map was then georeferenced and a spatial data set was created by heads-up digitizing the map. The Nature Conservancy then utilized the geographical information system software to overlay the spatial data derived from PBS&J of the proposed AEP transmission lines and The Nature Conservancy current portfolio area boundaries.

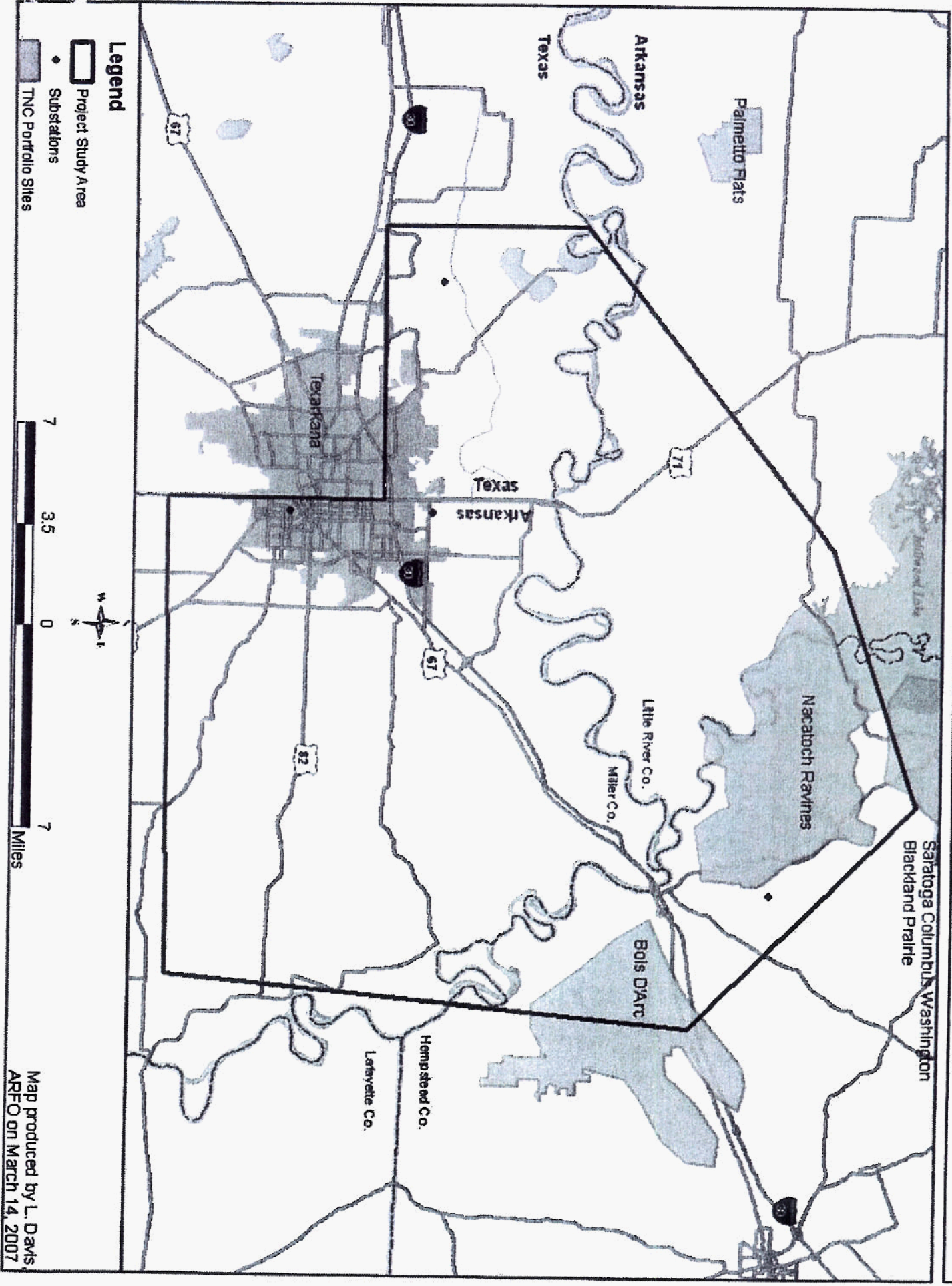
Please find the attachment containing a map that displays The Nature Conservancy current portfolio of priority sites in proximity to the proposed AEP transmission line potential project near Texarkana, Arkansas. The Nature Conservancy and partners identifies a portfolio of high priority sites in each ecoregion—places that collectively capture the biological diversity of the region. The Nature Conservancy and partners focus the conservation activity in these high priority sites. Based on the current information provided by PBS&J and current Nature Conservancy portfolio site boundaries the attached map displays areas of significant spatial overlap between the two subject locations and should warrant environmental concern. The Nature Conservancy requests that transmission lines not go through the subject portfolio site boundaries to minimize possible threats to these areas of significant biodiversity.

If you have further assistance or questions concerning the map produced or The Nature Conservancy of Arkansas conservation activities and priorities please contact Lane Patterson at 501-614-5094.

Sincerely,

Scott Simon
State Director
The Nature Conservancy of Arkansas

Proposed AEP Transmission Lines Project Study Area



Map produced by L. Davis,
ARFO on March 14, 2007



An employee-owned company

May 16, 2007

Mr. Scott Simon
State Director
The Nature Conservancy of Arkansas
601 North University Avenue
Little Rock, Arkansas 72205

RE: Proposed AEP Transmission Lines Near Texarkana, Arkansas

Dear Mr. Simon:

We appreciate receipt of your letter and map dated April 27, 2007 (copies attached) responding to our request for information related to the study area for transmission lines proposed by AEP in the vicinity of Texarkana, Arkansas. Your letter and attached map present two broad areas referred to as "portfolio site boundaries" and labeled as "Nacatoch Ravines" and "Bois d'Arc" on the map attached to your letter.

PBS&J and AEP have been investigating the subject study area to identify environmental and land use constraints to be considered in the delineation and evaluation of alternative transmission line routes. Attached is a copy of a portion of our draft constraints map (excluding sensitive species locations and archaeological site information). Based on property ownership maps and web sites, including your organization's web site, we have identified lands owned by the state in the Nacatoch Ravines Natural Area, Little River and Bois d'Arc Wildlife Management Areas, and by The Nature Conservancy of Arkansas in the Oak Ravines Area (see attached PBS&J map). We would appreciate your review of this information to determine if we have excluded any properties owned by your organization in the study area. Any additions/revisions can be hand noted on the map and returned to my attention. Because your broad "portfolio site boundaries" include land in private ownership (including land owned by AEP) and land that has been impacted/developed (cropland, U.S./state highways, railroads, pipelines, transmission lines, residences, etc.), we would appreciate receiving location information on specific properties that The Nature Conservancy of Arkansas has under conservation easement or otherwise has under some control within the subject study area. These properties can also be marked by hand on the enclosed PBS&J map and returned to my attention.

Mr. Scott Simon
May 16, 2007
Page 2

Because of AEP's project schedule and in an effort to reduce potential environmental impacts resulting from the proposed transmission lines, we would appreciate receiving the additional information from you as soon as reasonably possible. Upon your request, we will keep any information provided as "confidential". Please do not hesitate to call me at (512) 342-3370 if you or your staff have any questions or wish to discuss our request.

Sincerely,



Rob R. Reid
Vice President
Sr. Project Director

Attachments

C: George W. Carpenter - AEP

Rob R. Reid
Vice President
Sr. Project Director
6504 Bridge Point Parkway, Suite 200
Austin, Texas 78730

RE: Proposed AEP Transmission Lines Near Texarkana, Arkansas


Dear Mr. Reid:

The Nature Conservancy of Arkansas (TNC) received your letter dated May 16, 2007 requesting specification of lands owned by TNC, encumbered with a conservation easement, or state/federal lands that were not denoted on the map you included as an attachment. We appreciate you requesting this additional information as part of the permitting process and working to reduce potential environmental impacts that will result from the installation of the proposed transmission lines.

As outlined in a letter addressed to you from Scott Simon dated April 27, 2007 (see attached), TNC and partner agencies have identified areas of high conservation priority termed portfolio sites. These places area are not always obvious or contiguous but collectively they represent an ecological system that is valuable to the State of Arkansas. TNC and partners focus conservation action in these priority areas because they contain rare plant communities or can be restored through land management practices such as prescribed fire and ecological timber thinning. These areas are large to capture not only the biological communities but the interactions that are required to perpetuate the system and maintain or increase biodiversity into the future.

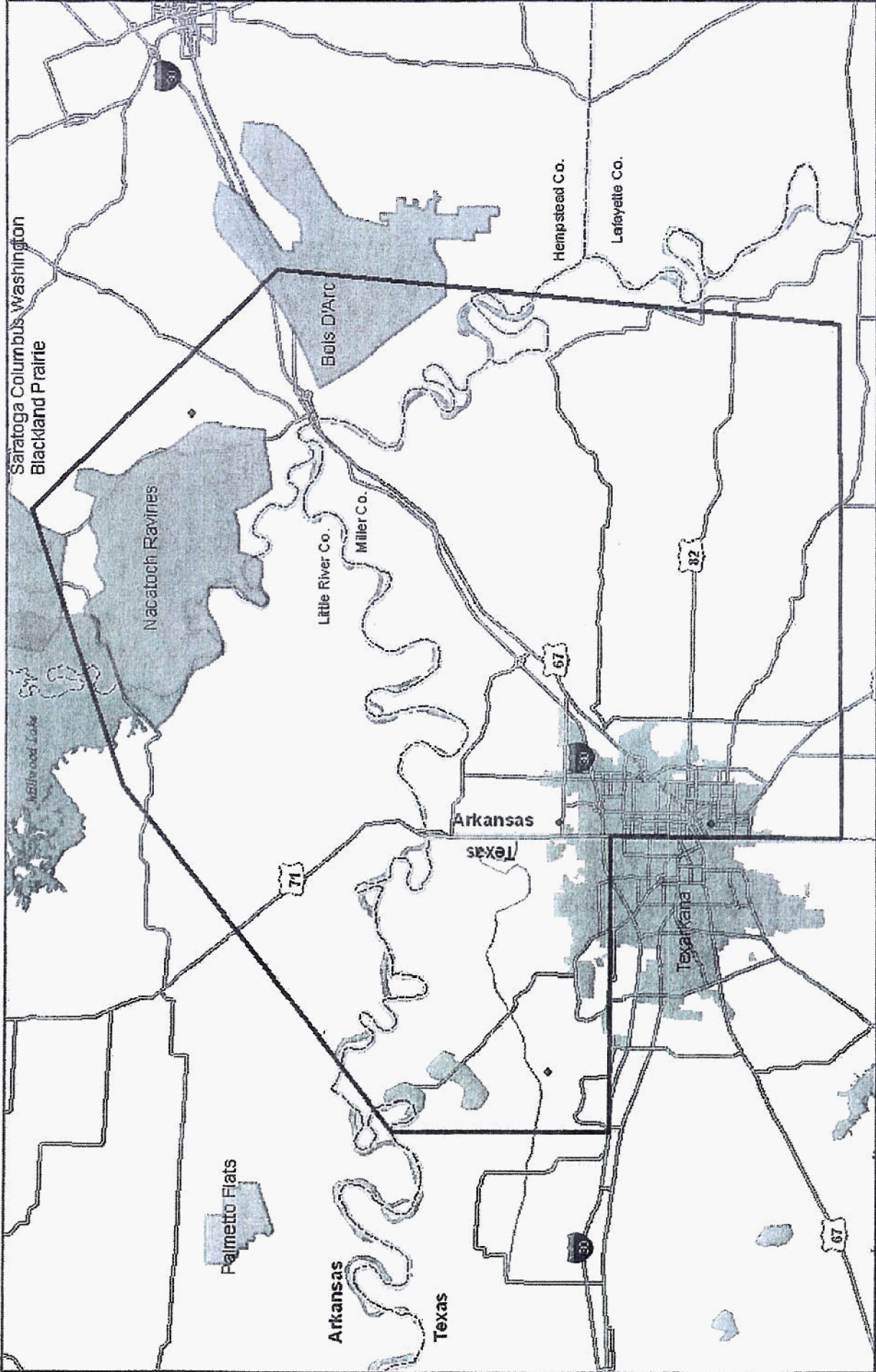
The Nature Conservancy requests that the transmission lines not go through the subject portfolio site boundaries to minimize possible threats to these areas of significant biodiversity.

Sincerely,


Roger W. Mangham
Director of Conservation Programs
The Nature Conservancy of Arkansas

Cc: Scott Simon - TNC
Doug Zollner - TNC

Proposed AEP Transmission Lines Project Study Area



Legend

- Project Study Area
- Substations
- TNC Portfolio Sites



7 3.5 0 7 Miles



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1500 Museum Road, Suite 105

Conway, Arkansas 7203

Tel.: 501/513-4470 Fax: 501/513-4480

IN REPLY REFER TO:

September 7, 2006

Charles Andrews
URS Corporation
3010 LBJ Freeway
Suite 1300
Dallas, TX 75234

Dear Mr. Andrews:

The Fish and Wildlife Service has reviewed the supplemental information supplied in your e-mail dated August 14, 2006, regarding the proposed coal-fired electric generating plant in Hempstead County, AR. Our comments are submitted in accordance with the Endangered Species Act (87 Stat. 884, as amended 16 U.S.C. 1531 et seq.).

After reviewing the information provided by your office, we have determined that there are no adverse affects anticipated for the federally listed Ouachita Rock Pocketbook (*Arkansia wheeleri*). However, our records indicate that your project area is also in the immediate vicinity of a nesting colony of Interior Least Terns (*Sterna antillarum athalassos*), a federally listed endangered species.

Enclosed with this letter is a list of guidelines that we have established to ensure no adverse affects to Interior Least Terns or their nesting habitat. If these guidelines are incorporated in the operating policies of the plant during and after construction, the Service finds that there should be no adverse affect and no further consultation will be necessary. Enclosed with these guidelines, there is also a map outlining the buffer zone as described in guideline #2. If this or any other guidelines can not be met, further consultation with the Service will be necessary.

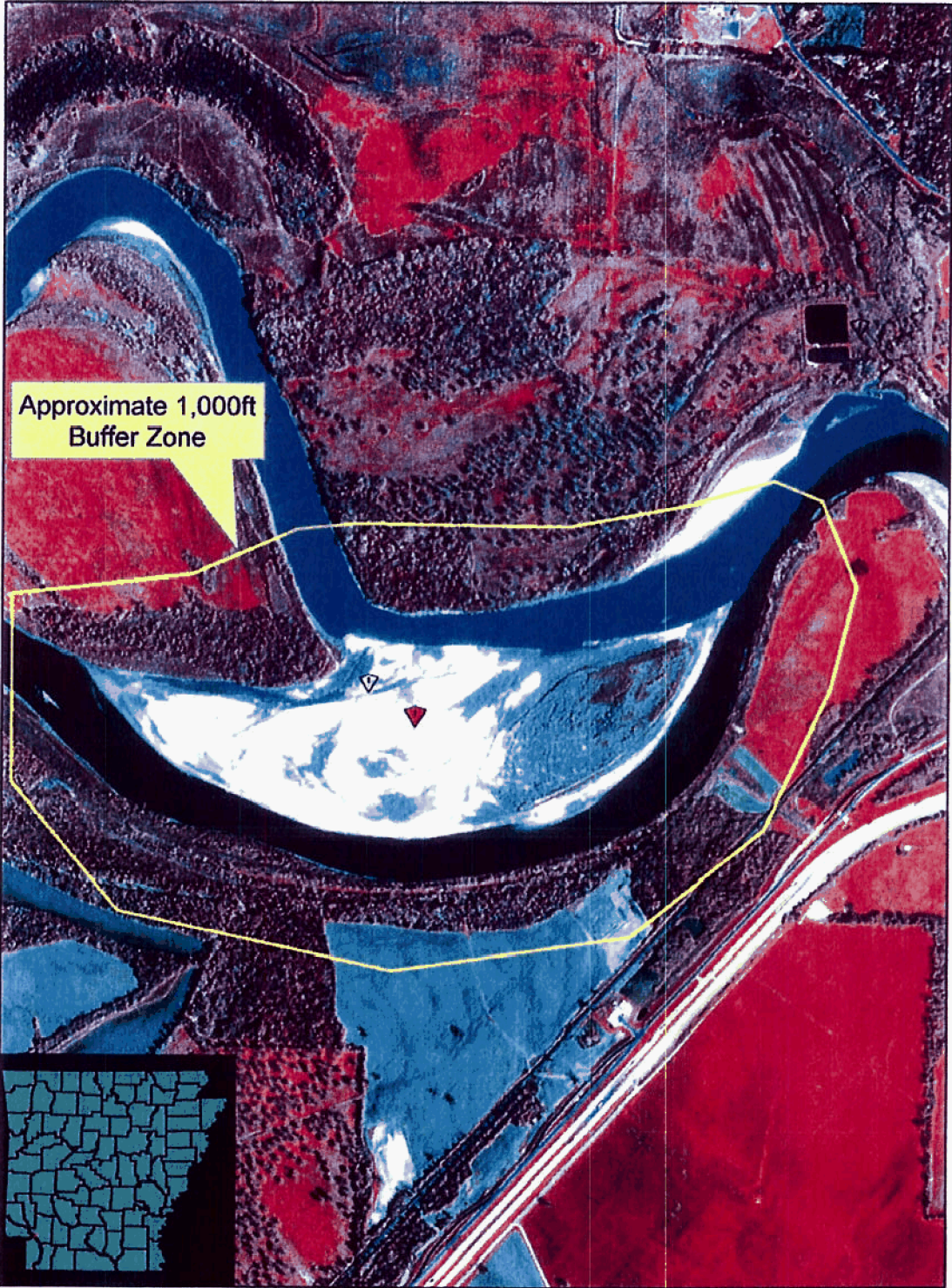
Please feel free to contact us with any questions you may have, and we appreciate your interest in the conservation of endangered species. If you have any questions, please call Lindsey Lewis at (501) 513-4489.

Sincerely,

Margaret Harney
Acting Field Supervisor

Interior Least Tern Guidelines Necessary for a No Affect Determination

1. The critical nesting period for the Interior Least Tern is between 15 May and 1 August. Nesting may extend beyond these dates depending on river stage elevations. If surveys reveal Least Tern breeding activity within one-half mile of a proposed activity during this time period, no activity should proceed unless otherwise approved by the Service.
2. No activities should take place closer than 1,000 feet of the shoreline of a nesting colony location. The Service should be contacted for further consultation if activities are to proceed within 1,000 feet of the shoreline of a nesting colony location (see Map). Limited construction outside of the active nesting season may not affect Least Tern. Detailed project/activity description, designs, and construction date information is necessary for a determination.
3. Employees and/or contractors should be instructed that under no circumstances (other than emergencies) are they permitted on a nesting island during the aforementioned time period as stated above or until after the young have fledged.
4. If, in the process of conducting work, an Interior Least Tern colony is discovered at another location in the vicinity, the above restrictions apply to that colony as well. The Service should be contacted for consultation and to determine if further action would have any affect.
5. Further consultation may be necessary and should be requested if any of these criteria can not be met to ensure no affect.





IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

110 South Amity Road, Suite 300
Conway, Arkansas 72032
Tel.: 501 513-4470 Fax: 501 513-4480

March 26, 2007

Kelli Boren
PBS&J
18383 Preston Road, Ste. 110
Dallas, TX 75252

Dear Ms. Boren:

The U. S. Fish and Wildlife Service (Service) received a request on February 23, 2007, for information regarding federally threatened and endangered species in Hempstead, Little River, and Miller counties, Arkansas. PBS&J is representing American Electric Power, who plans to construct a coal-fired generating plant in Hempstead County and four transmission lines through the above mentioned counties including Bowie County, Texas. For information regarding federally listed species in Bowie County, Texas, please contact the nearest Service Ecological Services Field Office in Texas. Our comments are provided in accordance with the Endangered Species Act (87 Stat. 84, as amended: 16 U.S.C. 1531 et seq.), Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c), and Fish and Wildlife Coordination Act (48 Stat. 401, as amended; U.S.C.661 et seq.).

Four federally threatened or endangered species (American Burying Beetle, Bald Eagle, Interior Least Tern, and Ouachita Rock Pocketbook) occur or potentially occur within the proposed project study area. We are unable to provide exact locations (or shapefiles) for these species due to our data sharing agreement with Arkansas Natural Heritage Commission. However, the Service would like to provide the following information on each species to help facilitate the federal action agency's effect determination and assist in minimizing potential impacts to these species.

American Burying Beetle (ABB)

ABB is documented from western Little River County. The following habitats are considered unsuitable for this species and require no further consultation on the ABB:

1. Soil that is greater than 70 percent sand;
2. Soil that is greater than 70 percent clay;
3. Land where greater than 80 percent of the soil surface is comprised of rock;
4. Land where greater than 80 percent of the subsurface soil structure within the top four inches is comprised of rock;

5. Land that has already been developed and no longer exhibits topsoil or leaf litter;
6. Land that is tilled on at least an annual basis;
7. Land that meets the U.S. Army Corps of Engineers definition of wetland. (However, projects developed in this type of habitat will need to be reviewed by the Corps to ensure compliance with section 404 of the Clean Water Act.);
8. Pine plantations planned for mechanical treatment where stocking density is 750 or more trees per acre (little sunlight to forest floor); and
9. Shortleaf pine or shortleaf pine-hardwood forest stands with 110 or greater overstory basal area and more than 700 stems per acre occupying midstory and understory positions.

Service protocols regarding surveying, baiting away, and trapping and relocation are enclosed for your information. If ABB presence is assumed, no ABB survey is required. However, formal consultation with the Service may be required in addition to baiting away or trapping and relocation if presence is assumed. If you decide to conduct an ABB survey and absence is documented within the project area, the project may proceed without further consultation upon receiving concurrence from the Service (note: surveys are only good for one year). The Service is willing to conduct site visits of the transmission lines to help identify areas requiring surveys and limit unnecessary surveys.

Bald Eagle

Arkansas Game and Fish Commission records indicate three Bald Eagle nests within the proposed project area, but new or undocumented Bald Eagle nests also may occur in the project area. The enclosed draft Bald Eagle guidelines are based on several decades of behavioral observations, science, and conservation measures to avoid or minimize adverse impacts to Bald Eagles. Adherence to the guidelines and consultation with the Service should a nest be located will satisfy obligations under section 7 of the ESA and help avoid potential violations of the ESA, Bald and Golden Eagle Protection Act, and Migratory Bird Treaty Act.

Two primary causes of raptor mortality are electrocutions and collisions with power lines. Strong precautionary measures to protect raptors by raptor-proofing the power lines is recommended. All power lines should be built to protect raptors and other migratory birds, including Bald Eagles, from accidental electrocution using methods detailed by the Avian Power Line Interaction Committee (2006). CFR 7 Part 1724.52 allows for deviations from construction standards for raptor protection provided that structures are designed and constructed in accordance with the Avian Power Line Interaction Committee (2006).

Interior Least Tern

Numerous Interior Least Tern nesting areas exist on sand bars along the Red River. Care should be taken to avoid “harassment” of nesting terns during construction activities that coincide with nesting season (May 15 through August 1). No activities should occur within 1,000 feet of the shoreline of a nesting colony without further consultation with the Service.

Ouachita Rock Pocketbook

The Ouachita Rock Pocketbook occurs at numerous sites in the Little River between Millwood Lake Dam and the confluence with the Red River. Potential impacts associated with this project include increased sedimentation at stream crossings; potential mortality and habitat degradation associated with bank stabilization (rip-rapping) at stream crossings; and increased pesticide concentrations in streams associated with vegetation control on transmission lines.

The federal action agency permitting or licensing the project or parts thereof is responsible for making effect determinations (i.e., no effect; may affect, not likely to adversely affect, may affect, likely to adversely affect) for each federally listed species that occurs or potentially occurs within the proposed project area. Please use this letter to ensure that all potentially affected parties are informed. Service concurrence and further consultation is required on “may affect” determinations.

Projects of this size and complexity usually require placing fill in wetlands and/or waters of the U.S. In either case, a section 404 permit may be required from the U.S. Army Corps of Engineers; therefore, we recommend that you contact the appropriate district(s) for further assistance. In addition to the aforementioned effects determination, the Corps will be responsible for ensuring “no net loss” of aquatic habitat functions and values. Mitigation in the form of avoidance, minimization, and compensation by providing substitute habitat through restoration, creation, enhancement, and/or preservation will likely be required and should be addressed in the section 404 application to expedite the process. The Service will review and provide comments on the permit(s) and/or related consultation when requested to do so by the Corps. We recommend early planning, coordination, and consultation to streamline the process to be efficient and timely with the development of your project.

We thank you for your interest in the conservation of threatened and endangered species. Please call Chris Davidson, 501-513-4481, if you have any questions.

Sincerely,



Melvin Tobin
Team Leader

cc: Arkansas Game and Fish Commission



Natural Resources Conservation Service
Room 3416, Federal Building
700 West Capitol Avenue
Little Rock, Arkansas 72201

July 25, 2007

PBS&J
ATTN: Mr. Rob R. Reid
Suite 110
18383 Preston Road
Dallas, Texas 75252

Dear Mr. Reid:

The Natural Resources Conservation Service (NRCS) has reviewed maps detailing American Electric Power's (AEP) proposed transmission lines in the area surrounding Texarkana, Arkansas. Through this review, we determined that the proposed right-of-way will cross several Wetlands Reserve Program (WRP) easements.

We realize that you might have been in contact with the owners of these properties and received consent from these individuals to proceed with the planned right-of-way. However, the easement held by the United States prevents such activity from being completed without the consent of the United States and the United States has no authority to consent to such a request. Landowners retain only five property interests under the terms of the WRP Warranty Easement Deed. These interests include:

1. Title. Record title, along with the Landowner's right to convey, transfer, and otherwise alienate title to these reserved rights.
2. Quiet Enjoyment. The right of quiet enjoyment of the rights reserved on the easement area.
3. Control of Access. The right to prevent trespass and control access by the general public.
4. Recreational Uses. The right to undeveloped recreational uses, including hunting and fishing, and including leasing of such rights for economic gain, pursuant to applicable State and Federal regulations that may be in effect at the time.
5. Subsurface Resources. The right to oil, gas, minerals, and geothermal resources underlying the easement area, provided that any drilling or mining activities are to be located outside the boundaries of the easement area.

PBS&J
Page 2

Furthermore, the United States has purchased all other rights and does not have the authority to sell any of these rights. The United States also has limited rights to modify the WRP easement, but these modifications are only allowed if they enhance the wetlands values of the conservation easement (16 U.S.C. §3837). NRCS is bound to follow its own policy set forth in 7 C.F.R. § 1467.12 which requires the NRCS National Office approval. As you can see, the owners of these properties do not have the right to enter into an agreement with AEP that would allow a power line right-of-way to pass through their property. For this reason, we request that AEP adjust the planned right-of-way to avoid these WRP easements.

These wetlands are a key component of the president's "No Net Loss Goal" for wetlands in the United States and we would like to see them preserved in their current state. If you would like to discuss this issue, or any other issue pertaining to the proposed transmission lines, feel free to contact Andrew James, Arkansas WRP Coordinator at (501) 301-3114.

Sincerely,

/s/ Jim Caudle

JIM CAUDLE
Assistant State Conservationist for Programs

cc:

Laurie Peterson, United States Department of Agriculture, Office of General Counsel, Room 3201, Federal Building, 700 West Capitol Avenue, Little Rock, Arkansas 72201

Tony Puga, National Wetlands Reserve Program Manager, 14th and Independence Avenue, SW, Room 6819-S, Washington, D.C. 20250

Boren, Kelli D

From: James, Andrew - Little Rock, AR [Andrew.James@ar.usda.gov]
Sent: Wednesday, August 08, 2007 10:17 AM
To: Boren, Kelli D
Cc: Voeller, Molly - Little Rock, AR
Subject: FW: DRAFT Policy Circular for Infrastructure Projects

Attachments: DRAFT_EDP_Infrastructure_Guidance_Circular_Crane_6_18_07.doc



DRAFT_EDP_Infras
tructure_Guida...

Kelli,

As of today, there are no WRP applications in Little River or Miller counties that have been accepted for funding. There are several applications in those counties, but they have not been accepted for funding, meaning there is no threat of a new easement closing in the next 6 months or so. I can not release any specific information on those applications. It might be possible to get this information through a "Freedom of Information Act" request. Molly Voeller (501-301-3133) is in charge of "FOIA" requests in Arkansas. Her e-mail address is molly.voeller@ar.usda.gov. if you would like to discuss the "FOIA" process with her.

Let me know if you have any questions.

Thanks,

Andrew James
Arkansas Easement Programs Coordinator
USDA/NRCS

-----Original Message-----

From: James, Andrew - Little Rock, AR
Sent: Wednesday, August 01, 2007 8:09 AM
To: 'rrreid@pbsj.com'
Subject: FW: DRAFT Policy Circular for Infrastructure Projects

Mr. Reid,

Please find the attached draft guidance on easement infrastructure. Although it is labeled draft, the e-mail below instructed us to begin implementing it. If you have any questions, please let me know.

At present, we have no new WRP applications in Hempstead County. We only have the Patrick Shultz application that he mentioned. I am not allowed to release the map of the Shultz application because he is not "in" the program. If he accepts our easement offer and the easement closes, I will then be able to release the easement map. At this point, the only way you can get information on his application is to contact him.

If you have any questions, please feel free to contact me any time.

Thanks,

Andrew James
Arkansas Easement Programs Coordinator
USDA/NRCS

Hi Folks -

I have attached the DRAFT Circular for policy on dealing with proposed infrastructure projects that may impact our easements. These types of projects include municipal water

supply pipelines, natural gas pipelines, oil pipelines, overhead transmission lines, wind farms, etc.

The concept for this policy has been reviewed with and approved by the Chief. This is being provided to you as a heads up and for comment. We will review on tomorrow's teleconference. You may begin to implement the concepts in this policy now as proposals come in. Any changes will be minor. We will let you know as soon as the official version is signed.

Tony Puga
National WRP Manager
NRCS
Washington, D.C.
202-720-1067

Easement Programs Division

Policy Regarding Infrastructure Projects on Easement Lands

Purpose

To provide instructions to NRCS State Offices when a public infrastructure project is being considered which will impact a Wetlands Reserve Program (WRP), Farm & Ranchland Protection Program (FRPP), Grassland Reserve Program (GRP), or Healthy Forest Reserve Program easement.

Background

NRCS has acquired interest in lands through various easement programs to restore, improve and protect conservation values for public benefits. As NRCS increases the acreage enrolled in its easement programs the number of requests to allow certain public infrastructure projects such as pipelines, overhead electrical transmission lines, airport expansions, wind generation farms, and road improvement projects increases. With the exception of federal transportation projects, NRCS easement lands are not subject to condemnation through eminent domain proceedings.

The right to grant an easement for a public infrastructure project to cross an NRCS easement resides with the fee title landowner. However, NRCS has the authority to restrict projects from and on easement lands. The terms of the individual easements differ depending on the specific program requirements, the rights retained by the landowner, and any applicable restoration agreements made with NRCS. As the easement holder, NRCS has the responsibility to ensure that the lands within these easements support the intended conservation purposes for which they were purchased.

NRCS does not have statutory authority to simply allow these projects to be installed. To allow a project to be installed requires NRCS to modify the easement or warranty deed to subordinate the rights of the United States. WRP is the only program with the flexibility to modify or terminate easements.

Policy Guidance

NRCS shall respond to proposed infrastructure projects immediately in order to protect the interests of the United States. Early involvement through the National Environmental Policy Act (NEPA) is essential.

- The first response to any infrastructure project request is that the project avoid impacting NRCS easement land
- If the applicant proves to the satisfaction to NRCS that avoidance is not possible, then NRCS will consider project requests on a case by case basis using the following requirements:
 - (1) Determine if a modification to the easement can be made and is consistent with the appropriate program authority
 - (2) Minimize onsite damages during construction
 - (3) Restore impacted areas, including potential mitigation by providing additional restored acreage developed for each specific case

-
- If an easement property cannot be avoided, NRCS will fulfill its NEPA responsibilities by becoming a “cooperating agency” in the permitting agency’s Environmental Impact Statement and NEPA process for the purpose of evaluating the impacts and needed mitigations to any affected easements

Process

- National Headquarters (NHQ), through its contact with the appropriate permitting agency (Federal Energy Regulatory Commission (FERC), Department of State, Department of Energy (DOE) or Federal Aviation Administration (FAA)) will notify State Conservationists of new projects and proposed infrastructure routes
- In cooperation with the permitting agency, States will ascertain whether proposed infrastructure routes will impact existing easements, and advise National Headquarters of any projects that may be impacted
- When the proposed infrastructure lies entirely within the boundaries of a single state, the State Conservationist or their designee should serve as the agency point of contact (POC). When the proposed infrastructure crosses multiple states, NHQ will coordinate with the state with the most impacted easements to serve as the agency point of contact. The point of contact is responsible for the following:
 - (1) Maintaining close communications with all affected parties including the landowner
 - (2) Communicating agency needs and concerns to the project lead agency
 - (3) Coordinating requests for information, assessments and comments from NRCS
 - (4) Serving as the Responsible Federal Official (RFO) for NEPA compliance
- Technical NEPA assistance is available from NRCS Service Centers
- For any proposed project, the POC will request planning documents and conduct the initial assessment during the scoping or pre Draft Environmental Impact Statement (DEIS) stage
- If significant impacts are determined during scoping, the responsible NRCS POC notifies the permitting agency or public works agency of the conflict and requests alteration of the proposed route or project to avoid impacts. Only WRP easements can be modified or terminated in limited circumstances, and any consideration by NRCS to modify or terminate a WRP easement will trigger NEPA and possibly Endangered Species Act (ESA) compliance
 - (1) If the project proponent indicates that avoidance is not possible and NEPA is being undertaken by the permitting federal agency, NRCS will request cooperating status. The RFO should consult with NHQ
 - (2) The environmental analysis will be used by NRCS to decide whether
 - (a) to modify or terminate a WRP easement
 - (b) what mitigation/compensation will be required by the public works agency
 - (c) to document the NRCS decision in a Record of Decision (ROD) prior to drafting subordination agreements