Atkins, Lou (MRC)

From: MRC - jpa Permits
Sent: Tuesday, October 17, 2017 3:17 AM
To: Atkins, Lou (MRC)
Subject: FW: Biological Opinion - Atlantic Coast Pipeline/Supply Header Project
Attachments: 20171016_letter_Service to FERC_ACP SHP biological opinion SIGNED.PDF

ADDITIONAL INFO
REVISION

RECEIVED
OCT 17 2017
MARINE RESOURCES
COMMISSION

From: Owen, Randy (MRC)
Sent: Monday, October 16, 2017 6:38 PM
To: MRC - jpa Permits <jpa.permits@mrc.virginia.gov>
Subject: FW: Biological Opinion - Atlantic Coast Pipeline/Supply Header Project

Addn'l Info 15-1353

From: Spencer Trichell [mailto:Spencer.Trichell@dominionenergy.com]
Sent: Monday, October 16, 2017 4:57 PM
To: 'Dailey, Samantha J CIV USARMY CESAW (US)' <Samantha.J.Dailey@usace.army.mil>; Gibson, Steven W CIV USARMY CENAO (US) <Steven.W.Gibson@usace.army.mil>; Greer, Emily C CIV USARMY CESAW (US) <Emily.C.Greer@usace.army.mil>; 'Kube, Peter R CIV USARMY CENAO (US)' <Peter.R.Kube@usace.army.mil>; Shaffer, Joshua D CIV USARMY CELRP (US) <Joshua.D.Shaffer@usace.army.mil>; Adam Fannin (adam.e.fannin@usace.army.mil) <adam.e.fannin@usace.army.mil>; Gibby, Jean B CIV USARMY CESAW (US) <Jean.B.Gibby@usace.army.mil>
Cc: Golden, James (DEQ) <James.Golden@deq.virginia.gov>; nancy.j.dickson@wv.gov; 'jennifer.burdette@ncdenr.gov' <jennifer.burdette@ncdenr.gov>; 'karen.higgins@ncdenr.gov' <karen.higgins@ncdenr.gov>; Richard B Gangle <richard.b.gangle@dominionenergy.com>; 'Wade Hammer' <Wade.Hammer@erm.com>; 'Linda Morrison' <lmorr@fedmarksolutions.com>; Owen, Randy (MRC) <Randy.Owen@mrc.virginia.gov>
Subject: Biological Opinion - Atlantic Coast Pipeline/Supply Header Project

All, USFWS has completed the biological opinion for ACP and SHP. A copy is attached for your records.

Regards,

Spencer

From: Troy Andersen [mailto:troy_andersen@fws.gov]
Sent: Monday, October 16, 2017 4:45 PM
To: david.swearingen@ferc.gov
Cc: William.T.Walker@usace.army.mil; Cindy Schulz; erika_vaughan@ios.doi.gov; Kevin Bowman; John Schmidt; Tom Augspurger; Lora Lattanzi; kkarriker@fs.fed.us; Adams, Jennifer - FS; shannon.deaton@ncwildlife.org; Tignor, Keith (VDACS); Ewing, Amy (DGIF); Hypes, Rene (DCR); Brown, Clifford L; Spencer Trichell (Services - 6); Thomas Wittig; Bryan Kluever; tabing@fs.fed.us
Subject: [External] Biological Opinion - Atlantic Coast Pipeline/Supply Header Project

Mr. Swearingen:

Subject document is attached. Let me know if you have any questions.

V/R
Troy

ADDITIONAL INFO
REVISION

Endangered Species/Conservation Planning Assistance Supervisor
USFWS - Virginia Field Office
Phone: 804-824-2428
Visit us at: http://www.fws.gov/northeast/virginiafield/

CONFIDENTIALITY NOTICE: This electronic message contains information which may be legally confidential and or privileged and does not in any case represent a firm ENERGY COMMODITY bid or offer relating thereto which binds the sender without an additional express written confirmation to that effect. The information is intended solely for the individual or entity named above and access by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this information is prohibited and may be unlawful. If you have received this electronic transmission in error, please reply immediately to the sender that you have received the message in error, and delete it. Thank you.

ADDITIONAL INFO
REVISION

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Virginia Field Office
6669 Short Lane
Gloucester, VA 23061

October 16, 2017

Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, D.C. 20426

Attn: David Swearingen, Branch Chief

Re: Atlantic Coast Pipeline, LLC, Atlantic Coast Pipeline; Dominion Energy Transmission, Inc., Supply Header Project; Docket Numbers CP15-554-000, CP15-554-001, CP15-555-000; Project #05E2VA00-2016-F-1219, #05E2WV00-2014-F-0832, #05E2PA00-2016-TA-0960, #04EN2000-2017-I-0738

Dear Ms. Bose:

This document transmits the U.S. Fish and Wildlife Service's (Service) biological opinion (Opinion) based on our review of the referenced project and its effects on the federally listed species in Table 1 in accordance with Section 7 of the Endangered Species Act (16 U.S.C. 1531-1544, 87 Stat. 884), as amended (ESA).

Table 1. Species considered in this Opinion.

Species Common Name	Species Scientific Name	ESA Status	State	FERC Action
Small whorled pogonia (SWP)	*Isotria medeoloides*	threatened	WV	Atlantic Coast Pipeline (ACP)
Running Buffalo clover (RBC)	*Trifolium stoloniferum*	endangered	WV	ACP
Roanoke logperch (RLP)	*Percina rex*	endangered	VA	ACP
Clubshell	*Pleurobema clava*	endangered	WV	ACP
Rusty patched bumble bee (RPBB)	*Bombus affinis*	endangered	VA	ACP
Madison Cave isopod (MCI)	*Antrolana lira*	threatened	VA	ACP
Indiana bat (Ibat)	*Myotis sodalis*	endangered	VA, WV	ACP (VA, WV); Supply Header Project

ADDITIONAL INFO
REVISION

				(SHP) (WV)
Northern long-eared bat (NLEB)	*Myotis septentrionalis*	threatened	WV	ACP

Your July 21, 2017 request for formal consultation was received on July 21, 2017.

This Opinion is based on information provided in the July 2017 Final Environmental Impact Statement (FEIS) (Federal Energy Regulatory Commission [FERC] 2017), telephone conversations, field surveys/investigations, and other sources of information. The consultation history is located in Appendix A. Because the project traverses 4 states under the geographic jurisdiction of the 4 Service Field Offices in Raleigh, North Carolina (NC), State College, Pennsylvania (PA), Gloucester, Virginia (VA), and Elkins, West Virginia (WV), each maintain their geographic portion of the administrative record in their respective Field Office.

FERC, under Section 7 of the Natural Gas Act, is required to consider, as part of its decision to authorize interstate gas facilities, all factors bearing on the public convenience and necessity. This includes any "nonjurisdictional" facilities that do not come under the jurisdiction of FERC but may be integral to the project objective. Nonjurisdictional facilities that lie outside the footprint of jurisdictional facilities were not included in the analysis of impacts to federally listed species provided to the Service by FERC. Therefore, any effects to and take of listed species associated with nonjurisdictional facilities may not be covered in this Opinion. The nonjurisdictional facilities associated with this project are summarized in table 2.8-1 of the FEIS and further discussed in Section 4.13 (FERC 2017).

BIOLOGICAL OPINION

DESCRIPTION OF PROPOSED ACTION

As defined in the ESA Section 7 regulations (50 CFR 402.02), "action" means "all activities or programs of any kind authorized, funded, or carried out, in whole or in part, by federal agencies in the United States or upon the high seas." The "action area" is defined as "all areas to be affected directly or indirectly by the federal action and not merely the immediate area involved in the action."

Atlantic Coast Pipeline, LLC (Atlantic) and Dominion Energy Transmission, Inc. (DETI) have requested the FERC authorize the construction and operation of a total of 642.0 miles of natural gas transmission pipeline and associated facilities in PA, WV, VA, and NC (Figure 1).

The following is a summary of the proposed action and a detailed description can be found in FERC's ACP and SHP FEIS, July 2017 (FERC 2017).

Proposed Facilities – ACP will be located in WV, VA, and NC (Figure 2). As proposed, this project includes 2 mainline pipeline facilities and 3 pipeline laterals consisting of 519.7 miles of new 42- and 36-inch (in) diameter natural gas pipeline and 84.8 miles of 20- and 16-in diameter natural gas pipeline. Additional components include 3 new compressor stations, 9 metering and regulation (M&R) stations, 41 valves, and 8 sets of pig launchers/receivers. ACP will deliver up to 1.5 billion cubic feet per day (Bcf/d) to customers in WV, VA, and NC.

ADDITIONAL INFO
REVISION

SHP will be located in PA and WV (Figure 3). As proposed, this project includes 37.5 miles of new 30-in diameter natural gas pipeline, modifications to 4 existing compressor stations, 1 M&R station, 6 valves, and 2 sets of pig launchers/receivers. DETI also proposes to abandon 2 existing gathering compressor units and build 2 new ones at an existing compression station. SHP will deliver up to 1.5 Bcf/d to various customers including Atlantic.

A brief description of the 6 types of above-ground facilities proposed to be installed is included below. Additional details describing the facilities are included in Section 2.1.2 of the FEIS (FERC 2017).

- Compressor stations – utilize engines to maintain pressure within the pipeline to deliver the contracted volumes of natural gas to specific points at specific pressures. Designed to attenuate noise and allow for operation and maintenance (O&M) activities.
- M&R stations – measure the volume of gas removed from or added to a pipeline system at receipt and delivery interconnects. Consist of a small graveled area with a small building(s) that enclose the measurement equipment.
- Valves – consist of a small system of aboveground and underground piping and valves that control the flow of gas within the pipeline and can also be used to vacate, or blow-off, the gas within a pipeline segment, if necessary.
- Pig launchers and receivers – facilities where internal pipeline cleaning and inspection tools, referred to as "pigs", can be inserted or retrieved from the pipeline. Generally consist of a segment of aboveground piping, 20-30 feet (ft) in length, which ties into the mainline pipeline facilities below the ground surface.
- Cathodic protection systems – systems that help prevent corrosion of underground pipeline facilities. Typically include a small, aboveground transformer-rectifier unit and an associated anode ground bed located underground.
- Communication towers and antennas – provide wireless communications necessary to operate monitoring and control systems.

RECEIVED
OCT 17 2017
MARINE RESOURCES
COMMISSION

ADDITIONAL INFO
REVISION

Figure 1. ACP and SHP project overview.

RECEIVED
OCT 17 2017
MARINE RESOURCES COMMISSION
ADDITIONAL INFO

Figure 2. ACP project overview.

RECEIVED
OCT 17 2017
MARINE RESOURCES
COMMISSION

ADDITIONAL INFO
REVISION

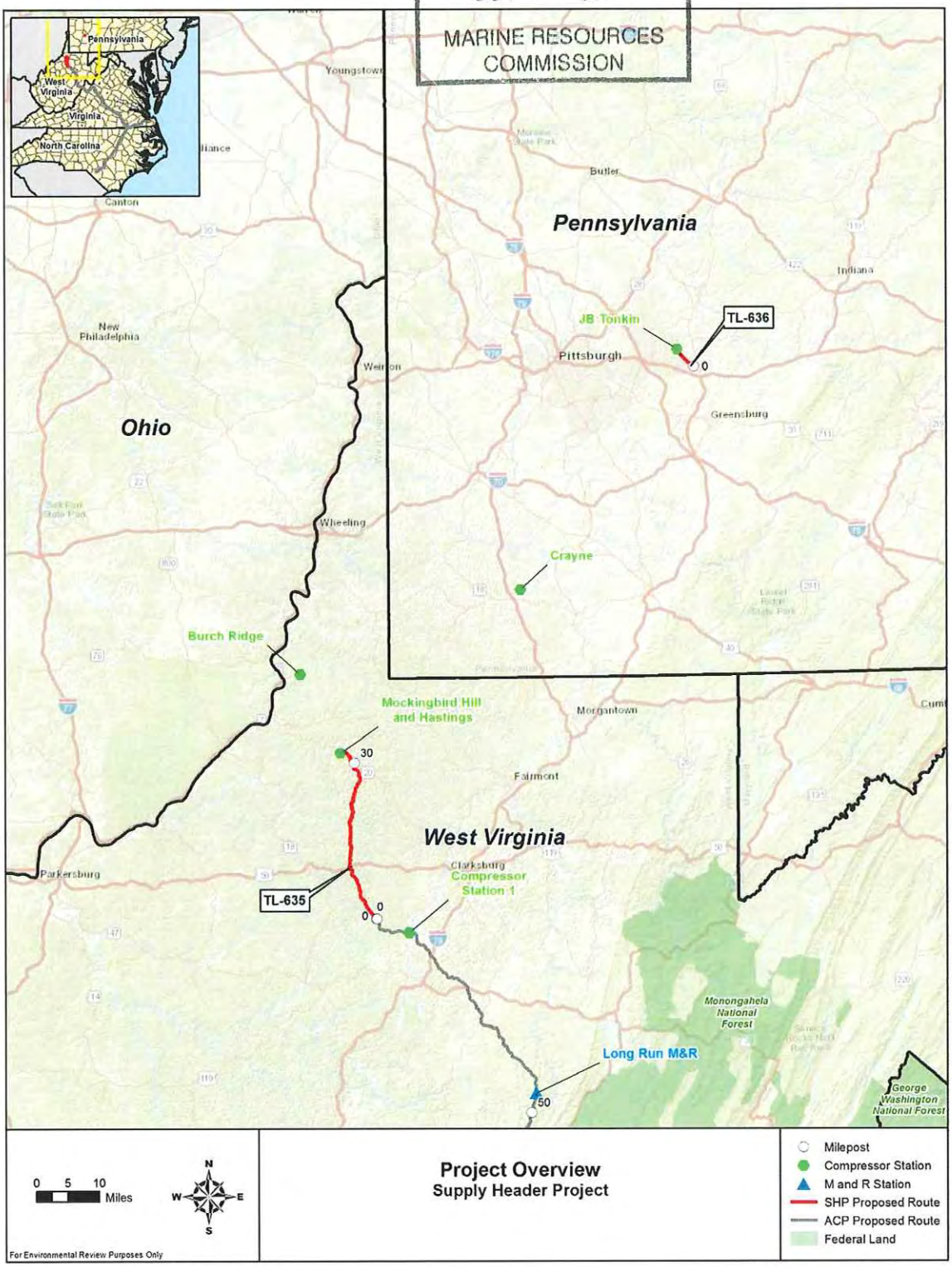

Figure 3. SHP project overview.

Land Requirements – Collectively, construction of ACP and SHP will disturb 11,775.9 acres of land. Following construction, 4,929.6 acres will be maintained for O&M of the project facilities. The remaining 6,846.3 acres of land disturbed by ACP and SHP will be restored and allowed to revert to former use. A brief description of the 4 types of land requirements is included below. Additional details describing the land requirements are included in Section 2.2 of the FEIS (FERC 2017).

- Pipeline right-of-way (ROW) – Atlantic and DETI will use a variety of ROW configurations to construct and operate the pipeline facilities. Section 2.2.1 and table 2.1.1-1 of the FEIS provide specific details (FERC 2017). The construction ROW consists of 2 portions, the temporary construction ROW and the permanent ROW. Temporary construction ROW will be restored or will revert to former use while permanent ROW will be maintained and utilized for O&M purposes.
- Additional temporary workspace (ATWS) – additional space required in particular areas necessary to complete construction of the pipeline. Examples include, but are not limited to, certain pipe bend locations, truck turnarounds or equipment passing lanes, and construction constraint areas that require special construction techniques such as horizontal directional drill (HDD) entry and exit locations.
- Pipe/contractor yards (CY) and staging areas – used for equipment, pipe sections, and construction material and supply storage, as well as temporary field offices, parking, and pipe preparation and preassembly staging areas.
- Access roads – necessary to gain access to the construction ROW and aboveground facilities. Many of the proposed access roads are existing roads that can accommodate construction traffic without modification.

Construction Procedures – Atlantic and DETI will design, construct, operate, and maintain their respective pipelines and facilities in accordance with U.S. DOT regulations under 49 CFR 192 and other applicable federal and state/commonwealth requirements. Atlantic and DETI will comply with siting and maintenance requirements under 18 CFR 380.15 and implement various forms of mitigations as defined in 40 CFR 1508.20. They will adopt FERC's general construction, restoration, and operational mitigation measures as outlined in FERC's Upland Erosion Control Revegetation and Maintenance Plan (FERC 2013a) and Wetland and Waterbody Construction and Mitigation Procedures (FERC 2013b). Specific mitigation plans for National Forest lands have been determined in consultation with the U.S. Forest Service (USFS). Construction plans for both projects include some modifications to FERC's procedures and more details can be found in FEIS section 2.3.1.1 (FERC 2017).

A brief description of the 9 types of typical construction procedures associated with the project is included below. Additional details describing the typical construction procedures are included in Section 2.3.2 of the FEIS (FERC 2017). Construction at any single point along the pipelines could last from 6 to 12 weeks or longer. The complete proposed construction schedule can be found in FEIS section 2.4 and FEIS Table 2.4-1 (FERC 2017).

- Surveying and staking – marking of the limits of construction ROW, centerline, ATWS, other approved work areas, and environmentally sensitive areas using temporary flagging or tape.
- Clearing and grading – removal of trees, shrubs, brush, roots, and large rocks from the construction work area and leveling of the construction ROW to allow for operation of

construction equipment.

- Trenching – digging of pipeline trench by removal of soil and rock by rotary trenching machine, track-mounted excavator, or similar equipment. Tractor-mounted mechanical rippers, hydraulic hoe rams, rock trenchers, or blasting may be used to fracture rock prior to removal.
- Rock removal and blasting – where bedrock cannot be fractured by mechanical equipment, blasting will be required following a project-specific *Blasting Plan* (http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14395436). Typical blasting methods include mass rock blasting, production blasting, and trench blasting.
- Pipe stringing, bending, welding, and coating – transportation of pipe segments to CY or work areas and bending of pipes to fit contours of the trench. Pipeline segments are aligned and welded together. Welds are inspected and coated with epoxy or other protective coating.
- Lowering-in and backfilling – lowering of pipe using side-boom tractors and backfill of trench with suitable excavated material. In rocky areas, protective materials may be placed in trench to protect pipe. Trench breakers (stacked sandbags or polyurethane foam) will be placed in trench prior to backfilling to prevent subsurface water movement along pipeline.
- Internal pipe cleaning and hydrostatic testing – cleaning of pipe to remove dirt, water, or other debris and hydrostatic testing to ensure that the system is capable of withstanding the operating pressure for which is it designed.
- Commissioning – verifying that equipment has been properly installed and working, verifying that controls and communication systems are functioning, and confirming that the pipeline is ready for service. As a final step, the pipeline will be purged of air and loaded with natural gas.
- Cleanup and restoration – grading and restoration of all work areas to pre-construction contours and natural drainage patterns as closely as possible.

Specialized construction methods for crossing under sensitive resources such as agricultural lands, roads, foreign utilities, residential areas, waterbodies, wetlands, and other sensitive environmental resources will be employed. A brief description of the specialized construction methods is included below. Additional details describing the specialized construction methods are included in Section 2.3.3 of the FEIS (FERC 2017).

- Waterbody crossings –
    - Wet open-cut construction method – trench excavation, pipeline installation, and backfilling in a waterbody without controlling or diverting streamflow.
    - Flume construction method – diversion of streamflow through flume pipes and placement of dam structures to exclude water flow from trench area.
    - Dam and pump construction method – diversion of stream flow using pumps and hoses and placement of dam structures to exclude water flow from trench area.
    - Cofferdam method – installation of a temporary diversion structure from 1 bank of the waterbody to the approximate midpoint of the waterbody crossing to isolate that section of the stream from the rest of the waterbody, creating discrete dry sections around which water flows unimpeded.
- Trenchless methods –
    - Conventional bore method – bore pits are excavated on both sides of the sensitive

ADDITIONAL INFO
REVISION

resource, boring machines are used to excavate a tunnel between the bore pits, and a pre-fabricated pipe is pushed through the borehole without affecting the surface of the resource.
  - HDD construction method – drilling of a hole under a sensitive resource and installation of a pre-fabricated pipe segment through the hole. A pilot hole is first drilled and then enlarged using several passes of successively larger reaming tools. Drilling mud composed of 65% water and 30% bentonite clay is required to lubricate the drills.
  - Direct pipe method – excavation and hole boring is performed with a navigable microtunneling machine and a cutterhead while simultaneously installing the pipe using a pipe thruster.
- Wetland crossings – construction ROW through wetlands are typically 75 ft wide with ATWS located in upland areas a minimum of 50 ft from wetland edge, unless granted site-specific approval for a reduced setback. Sediment barriers such as silt fence and staked straw bales will be utilized during clearing and construction. The push-pull technique, conventional bore, and HDD methods may be used to install pipes.
- Karst sensitive areas – crossing of karst sensitive areas will follow the project-specific construction, restoration, and mitigation methods outlined in the *Karst Mitigation Plan* included in Appendix I of the FEIS (FERC 2017).
- Steep slopes – temporary and permanent controls measures such as trench breakers, trench plugs, silt fencing, erosion control matting, and hydro-mulching will be put in place to minimize erosion and sedimentation. In steepest area, techniques such as "winching" and two-tone construction methods may be employed.
- Residential construction – implement measures to minimize construction-related impacts on all residences and other structures located within 50 ft of the construction ROW following site-specific *Residential Construction Plans* included in Appendix J1 of the FEIS (FERC 2017).
- Agricultural areas – a maximum 12-in of topsoil in actively cultivated and rotated croplands, pastures, and hayfields and in other areas at the specific request of the landowners or land management agency will be segregated during construction and replaced to the upper soil layer during backfill. Any disrupted irrigation and drainage systems will be permanently repaired.
- Road, railroad, and trail crossings – railroads and roads where traffic cannot be detoured will generally be crossed by boring beneath the road or railroad. Most gravel and dirt roads, driveways, and roads in areas with a high water table, as well as most USFS system trails, will be crossed by open-cut method, which will require temporary closure of the road or trail and establishment of detours.
- Foreign utilities – buried utilities will be identified and flagged using One-Call systems prior to ground-disturbing activities.
- Winter construction – specialized construction methods or procedures will be utilized to protect resources during the winter season as described in the *Winter Construction Plan* (http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14475037).

Environmental Inspection, Compliance Monitoring, and Post-Approval Variances – Atlantic and DETI have developed procedures for environmental inspection, compliance monitoring, and post-approval variances. A brief description of the procedures is included below. Additional

ADDITIONAL INFO
REVISION

details describing the procedures are included in Section 2.3.3 of the FEIS (FERC 2017).

- Coordination and Training – copies of all applicable environmental permits, construction drawings, and specifications will be provided to construction contractors. Contractors will attend an environmental training program tailored to the proposed projects and their construction requirements.
- Environmental Inspection – trained environmental inspectors (EIs) will be employed to ensure that construction complies with construction and mitigation procedures imposed by FERC and other regulatory agencies. EIs will have the authority to stop activities that violate conditions of the FERC certificate, other permits, or landowner requirements, and have authority to order the appropriate corrective actions.
- FERC Compliance Monitoring – in additions to EIs, a third-party compliance monitoring program will be funded to provide daily environmental monitoring services during construction. Other federal, state/commonwealth, and local agencies may also monitor the project to the extent determined necessary by the agency.
- USFS Compliance Monitoring – USFS will monitor implementation of ACP to assure that the terms and conditions of the Special Use Permit are carried out during and after construction.
- Post-Approval Variance Process – a "variance request" will be submitted to FERC in the event that minor route realignment or other workspace refinements are required subsequent to project approval. FERC will take the lead on evaluating the request and coordinating with any appropriate land-managing agencies for approval or denial.
- Post-Construction Monitoring – follow-up inspections of all disturbed uplands areas will be conducted, at a minimum after the first and second growing seasons to determine the success of restoration, and inspections will continue monitoring areas until revegetation thresholds are met, temporary erosion control devices are removed, and restoration deemed complete.

Operation and Maintenance – ACP and SHP pipelines and aboveground facilities will be operated and maintained in accordance with U.S. DOT regulations in 49 CFR 192, FERC's guidance at 18 CFR 380.15, the USFS Special Use Permit, and the maintenance provisions of the FERC Plan (https://www.ferc.gov/industries/gas/enviro/plan.pdf) and Procedures (https://www.ferc.gov/industries/gas/enviro/procedures.pdf). A brief description of the O&M details is included below. Additional details describing O&M are included in Section 2.6 of the FEIS (FERC 2017).

- Pipeline Facility O&M – an O&M plan and an emergency plan will be established that includes procedures to minimize the hazards in a natural gas pipeline emergency. Regular patrols, inspection, and repair of the pipeline will be conducted.
- Aboveground Facility O&M – new and modified compressor stations will be operated and maintained in accordance with Pipeline and Hazardous Materials Safety Administration requirements and standard procedures. Standard operations at compressor stations include such activities as the calibration, maintenance, and inspection of equipment, as well as periodic checking of safety and emergency equipment and cathodic protection systems.

Future Plans and Abandonment – ACP Foundation Shippers have a right to request an increase in contracted capacity by participation in an Optional Expansion or Second Expansion. Any

ADDITIONAL INFO
REVISION

future increase in capacity or expansion would require additional environmental review and FERC authorization. If at some point in the future, any of the approved project facilities are proposed to be abandoned, Atlantic and/or DETI would have to seek specific authorization from FERC for that action and the public will have the opportunity to comments on the applicant's abandonment proposal.

Conservation Measures – Conservation measures proposed as part of the action (measures that will avoid, minimize, and mitigate effects of the proposed action on the species and/or benefit the species as a whole) are referred to as avoidance and minimization measures (AMMs) in this Opinion. AMMs are provided in the FEIS (FERC 2017) and discussed, as applicable, in Appendix B.

Action Area

The action area is defined (50 CFR 402.02) as "all areas to be affected directly or indirectly by the federal action and not merely the immediate area involved in the action." The Service has determined that the action area for this project is all lands in PA, WV, VA, and NC affected directly or indirectly by the project's components described in Description of Proposed Action.

STATUS OF THE SPECIES

Per the ESA Section 7 regulations (50 CFR 402.14(g)(2)), it is the Service's responsibility to "evaluate the current status of the listed species or critical habitat."

To assess the current status of the species, it is helpful to understand the species' conservation needs which are generally described in terms of reproduction, numbers, and distribution (RND). The Service frequently characterizes RND for a given species via the conservation principles of resiliency (ability of species/populations to withstand stochastic events – numbers, growth rates), redundancy (ability of a species to withstand catastrophic events – number of populations and their distribution), and representation (variation/ability of a species to adapt to changing conditions) (collectively known as the three Rs).

Small whorled pogonia – As described in Service (2008) the SWP conservation needs include "resolving data gaps and assessing the conservation potential for populations on private lands." Currently, as a whole, the rangewide status of the species is stable (Service 2008). From 1985-2007, population numbers in WV remained low but stable (Service 2008). The primary factors influencing the status include risks posed by land development; however these activities are diffuse across the species' range and do not constitute an acute threat to SWP survival and recovery (Service 2008). For a more detailed account of the species description, life history, population dynamics, threats, and conservation needs, refer to: https://ecos.fws.gov/ecp0/profile/speciesProfile.action?spcode=Q1XL.

Running Buffalo clover – As described in Service (2011), the RBC conservation needs include assessing "direct and indirect human impacts that lead to habitat loss, alteration, significant degradation such as development, and the introduction of non-native invasive species." Currently, as a whole, the rangewide status of the species is stable or improving. In WV,

ADDITIONAL INFO
REVISION

populations are improving (Service 2011). The primary factors influencing the status include risks posed by "habitat destruction, habitat succession, and invasive plant competition" (Service 2011). In WV, "invasive species such as multiflora rose (*Rosa multiflora)* and Japanese stiltgrass (*Microstegium vimineum*), a lack of protection from heavy trail use, and shading are severe threats to populations." Small population size and climate change continue to be threats as well (Service 2011). For a more detailed account of the species description, life history, population dynamics, threats, and conservation needs, refer to: https://ecos.fws.gov/ecp0/profile/speciesProfile.action?spcode=Q2RE.

Roanoke logperch – As described in Service (2007), the RLP conservation needs include solving data gaps that limit an accurate assessment of population abundance, maintaining the health and vigor of present populations by addressing sediment loading at the watershed level and preserving ecological processes, increasing connectivity of populations by identifying and eliminating barriers, and preventing and reducing the risk of catastrophic extirpation from toxic spills. Currently, as a whole, the rangewide status of the species is improving, although the geographic range remains small. The populations in VA seem to be stable or increasing (Service 2007). The primary factors influencing the status include risks posed by large dams and reservoirs, small dams and barriers, watershed urbanization, agricultural and silvicultural activities, channelization, roads, toxic spills, riparian/woody debris loss, and water withdrawals (Service 2007). For a more detailed account of the species description, life history, population dynamics, threats, and conservation needs, refer to: https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=E01G.

Clubshell – As described in Service (2008), the clubshell conservation needs include assessing habitat loss, susceptibility to land use changes, and reproductive success. Currently, as a whole, the rangewide status of the species is declining. In the Kanawha River system of WV the species appears to be stable (successfully reproducing). However, in the Monongahela River system of WV, the species is in "severe decline" (Service 2008). The primary factors influencing the status include risks posed by water quality degradation and alterations, instream activities, exploration and extraction of coal, oil, and natural gas, even at a distance from clubshell populations, and development near streams and adjacent uplands (Service 2008). For a more detailed account of the species description, life history, population dynamics, threats, and conservation needs, refer to: https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=F01D.

Rusty patched bumble bee – As described in Service (2016), the RPBB conservation needs include assessing resiliency to environmental variation, perturbations affecting habitat size and quality, and population size. Currently, as a whole, the rangewide status of the species is declining (82 FR 3186-3209). The primary factors influencing the status include risks posed by "pathogens, pesticides, habitat loss and degradation, small population dynamics, and climate change" (82 FR 3186-3209). For a more detailed account of the species description, life history, population dynamics, threats, and conservation needs, refer to: https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=I0WI.

Madison Cave isopod – As described in Service (2011), the MCI conservation needs include assessing "thermal and chemical pollution from urban development and agricultural runoff, physical pollution, and human disturbance (cave vandalism and visitation)." Currently, as a

ADDITIONAL INFO
REVISION

whole, the rangewide status of the species appears to be stable (Service 2011). The primary factors influencing the status include risks posed by habitat degradation from altering streams, isolation of populations from physical barriers, shifts in subterranean sediment associated with development, and groundwater contamination (Service 2011). For a more detailed account of the species description, life history, population dynamics, threats, and conservation needs, refer to: https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=K008.

Indiana bat – As described in Service (2016), the Ibat conservation needs include assessing and offsetting adverse impacts to the species and promoting recovery. Currently, as a whole, the rangewide status of the species is declining (Service 2016) and the degree of threat to the continued existence of the species is high (Service 2009). The primary factors influencing the status of the species include risks posed by White-Nose Syndrome (WNS), habitat loss and degradation, forest fragmentation, winter disturbance, environmental contaminants, climate change, and collisions with manmade objects (Service 2009, 2016). For a more detailed account of the species description, life history, population dynamics, threats, and conservation needs, refer to: https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=A000.

Northern long-eared bat – The NLEB conservation needs include protecting and reducing disturbance of hibernacula, summer roosts, and the buffer zone known as "WNS zone" (81 FR 1900-1922). Currently, as a whole, the rangewide status of the species is declining (81 FR 1900-1922). The primary factors influencing the status include risks posed by WNS, tree removal, disturbance around roosts during the summer months, and disturbance at the entrance and interior of hibernacula. "This includes the physical or other alteration of the hibernaculum's entrance or environment when bats are not present if the result of the activity will impair essential behavioral patterns" (81 FR 1900-1922). For a more detailed account of the species description, life history, population dynamics, threats, and conservation needs, refer to: https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=A0JE.

STATUS OF CRITICAL HABITAT

No critical habitat has been designated for SWP, RBC, RLP, clubshell, RPBB, MCI, or NLEB.

Critical habitat for Ibat has been designated at Hellhole Cave, Pendleton County, WV; however, this action does not affect that area.

ENVIRONMENTAL BASELINE

Regulations implementing the ESA (50 CFR 402.02) define the environmental baseline as the past and present impacts of all federal, state, or private actions and other human activities in the action area. Also included in the environmental baseline are the anticipated and/or ongoing impacts of all proposed federal projects in the action area that have undergone Section 7 consultation, and the impacts of state and private actions which are contemporaneous with the consultation in progress.

Status of the Species within the Action Area

ADDITIONAL INFO
REVISION

Small whorled pogonia – Two new SWP colonies were found within the action area during 2016 plant surveys (Allstar Ecology 2016a, 2016b; Vanasse Hangen Brustlin, Inc. [VHB] 2016a, 2016b, 2017; Environmental Resource Management [ERM] 2017). One colony is located in the Seneca State Forest, WV (Seneca colony) and 1 colony is located in the Monongahela National Forest (MNF), WV (MNF colony).

The Seneca colony in Pocahontas County, WV, is located 70 ft downslope from the construction ROW (Allstar Ecology 2016a, 2016b; ERM 2017; VHB 2017). Ten stems were observed above an alluvial bench on a hillside in an oak-pine forest. Three of the stems were flowering. This colony is characterized by a relatively dense understory, larger light gaps, and a higher frequency of coarse woody debris compared to the MNF colony. During a 2017 pre-construction survey, 24 stems were observed (VHB 2017). This colony has the potential to meet the definition of a self-sustaining, viable population (i.e., geometric mean of 20 emergent stems, of which at least 25% are flowering stems, over a 10-year period) (Service 1992). The colony is approximately 550 ft from the nearest trail and 1,000 ft from the nearest road. No invasive plants are present near this colony, thus no invasive species control plan has been established by the WV Division of Natural Resources (WVDNR) (C. Brown, WVDNR, email to J. Stanhope, Service, September 15, 2017).

The MNF colony in Pocahontas County, WV, is located approximately 221 ft downslope of the construction ROW (Allstar Ecology 2016a, 2016b; ERM 2017; VHB 2017). Three stems were observed mid-slope on a south-facing hillside dominated by an oak-hickory-heath community, characterized by presence of dappled sunlight, low-density understory, and some coarse woody debris. The colony is on a MNF parcel "landlocked" by private landowners and thus inaccessible by the general public (K. Karriker, USFS, email to E. Stout, Service, August 11, 2017). The USFS is not conducting invasive species control in this area, because, until recently, they did not have invasive plant inventory data for that parcel (K. Karriker, USFS, email to J. Stanhope, Service, September 26, 2017). Plant surveys identified invasive Japanese stiltgrass and Japanese barberry (*Berberis thunbergii*) in the general vicinity.

For the Seneca colony, maintenance of existing roads by the WV Department of Transportation and maintenance of trails and adjacent areas by WVDNR likely reduces suitability of SWP habitat due to vegetation management, soil compaction, vehicle operation, foot traffic, and chemical contamination. The close proximity of trails and roads to the Seneca colony provides for easy public access to the colony and resulting foot traffic. Collection by orchid enthusiasts and vandalism continues to be a threat for both Seneca and MNF colonies. SWP plants were illegally removed from MNF in Randolph County, WV in 2016. Herbivory by white-tailed deer (*Odocoileus virginianus*) or other mammals and invertebrates occurs throughout the range of SWP (Service 1992). In 2017, 1 plant from the MNF colony appeared to have been browsed and only the stem was observed (VHB 2017). Herbivory of SWP or an obvious white-tailed deer browse line in the forest area has not been observed near the Seneca colony (C. Brown, WVDNR, email to J. Stanhope, Service, September 19, 2017).

Running Buffalo clover – Survey efforts completed in 2015, 2016, and 2017 (AllStar Ecology 2015, 2016, 2017) documented 27 RBC occurrences (Table 2) on private land in Randolph and Pocahontas Counties, WV, within the action area. Most occurrences were documented in areas with intermittent soil disturbance, such as former logging roads and off-road vehicle (ORV) trails

ADDITIONAL INFO
REVISION

under primarily closed-canopy mixed-hardwood forest with filtered sunlight. All occurrences were within, or in close proximity to, limestone geology of the Mississippian age.

Delineating RBC populations from occurrences is difficult and involves distinguishing and mapping discrete occurrences. For the purposes of our analysis, the 27 occurrences were delineated as 6 populations (Table 2). The populations were delineated based on distance of the occurrences from one another and habitat connectivity between the occurrences.

Table 2. RBC populations and occurrences within action area. Population number 3 and 4 are not included because they are not affected by the proposed action. Data on rooted crowns in the limits of disturbance obtained from ERM (2017).

Population Number	County	Size of Occurrence (acres)	Total Rooted Crowns	Number of Rooted Crowns in Limits of Disturbance
1	Randolph	0.0354	159	108
2	Randolph	0.7143	4,722	3,055
2	Randolph	0.0014	15	15
2	Randolph	0.0051	31	31
5	Pocahontas	0.0015	6	6
5	Pocahontas	0.0020	34	34
5	Pocahontas	0.1104	447	167
5	Pocahontas	0.0022	26	26
5	Pocahontas	0.0006	39	39
6	Pocahontas	0.0140	118	118
6	Pocahontas	0.0589	24	17
6	Pocahontas	0.0004	10	10
6	Pocahontas	0.0144	60	60
7	Pocahontas	0.0007	7	7
7	Pocahontas	0.0004	7	7
7	Pocahontas	0.0124	85	85
7	Pocahontas	0.0009	30	30
7	Pocahontas	0.0013	17	17
7	Pocahontas	0.0069	108	108
7	Pocahontas	0.020	291	3

7	Pocahontas	0.0161	610	220
7	Pocahontas	0.0014	47	47
7	Pocahontas	0.0021	53	53
7	Pocahontas	0.0005	26	26
7	Pocahontas	0.3484	3,313	1,233
8	Pocahontas	0.0012	220	220
8	Pocahontas	0.0024	10	10

All RBC occurrences are on private land and we are not aware of specific activities that have occurred that benefit or adversely affect the species. However, because most occurrences of RBC are located on or near old logging roads or trails, they have likely received some type of occasional disturbance. For example, beneficial effects may have occurred at some RBC occurrences as a result of occasional foot traffic or ORV use by landowners. Conversely, adverse effects may have occurred from higher frequencies of ORV travel during a shortened time period or heavy equipment use of old logging roads during land management or timbering operations.

Roanoke logperch – Presence/absence surveys for RLP were not conducted for the proposed action. RLP presence is assumed where suitable habitat was identified within potential habitat and in areas known to support RLP. Genetic analysis (Roberts et al. 2013) of RLP indicated a dispersal extent of up to 80 river kilometers (km) and the authors recommended monitoring and recovery efforts should target entire catchment areas. The following waterbody crossings were categorized as suitable habitat identified by desk-top analysis or in-situ assessment: Butterwood Creek (milepost [(MP]) 253.7) and Sturgeon Creek (MP 272). The following waterbody crossings were categorized as known to support RLP-presence assumed: Nottoway River 1 (MP 260.7) and Waqua Creek (MP 267.4).

Butterwood Creek crossing, Dinwiddie County, VA, is a tributary to the Nottoway River and was not assessed for RLP habitat suitability due to access restrictions. The construction ROW is 26 meters (m) wide at this crossing. We assume the wetted width is the same as the other tributary crossings, 8 m. The Lahey and Angermeier (2007) model infer this segment is not occupied by RLP due to stream order and Shreve link values. However, the VA Department of Game and Inland Fisheries (VDGIF 2005) model and Anderson (2016) model identify this crossing as potential RLP habitat and RLP presence is assumed. RLP occurrences are documented 17-22 km downstream of the crossing (VA Fish and Wildlife Information Service 2017). Lahey and Angermeier (2006) hypothesized RLP in Nottoway River tributaries are likely sparsely distributed at low densities. We expect numbers in this tributary are comparable to RLP numbers reported in other tributaries of the Nottoway River. Waqua Creek is the only tributary crossed for this project that has applicable RLP survey information, details of which are discussed below.

Sturgeon Creek crossing, Brunswick County, VA, is a tributary to the Nottoway River and

ADDITIONAL INFO
REVISION

contains suitable RLP habitat based on the in-situ assessment (Environmental Solutions & Innovations, Inc. [ESI] 2017). Sturgeon Creek is a perennial, low gradient stream at the crossing. The substrate is composed of 20% gravel, 10% clay, 10% cobble, and 60% sand. The stream morphology is characterized as 50% run, 20% riffle, and 30% pool habitats. Average and maximum depths measured 0.4 m and 1.3 m, respectively (ESI 2016, 2017). The construction ROW is 38 m wide at this crossing, the wetted width is 8 m. The Anderson (2016) model identifies this crossing as potential RLP habitat. RLP occurrences are documented 9.7-10.5 km downstream of the crossing (VA Fish and Wildlife Information Service 2017). We expect numbers in this tributary are comparable to RLP numbers reported in other tributaries of the Nottoway River. Waqua Creek is the only tributary crossed for this project that has applicable RLP survey information, details of which are discussed below.

Nottoway River 1 crossing, Dinwiddie and Brunswick Counties, VA, is known to support RLP. Therefore, RLP presence is assumed and habitat suitability was not assessed. The construction ROW is 38 m wide at this crossing, the wetted width is 22 m. The Anderson (2016) model identifies this crossing as potential RLP habitat. Documented RLP occurrences are 0.8 km downstream of the crossing (VA Fish and Wildlife Information Service 2017). During 2016 and 2017 mussel surveys, RLP were found in the area of direct impact from the proposed pipeline crossing and downstream of the proposed pipeline crossing (ESI 2017). Twelve RLP were observed during the July 2017 mussel survey of this crossing (S. Trichell, Dominion Energy Services, email to T. Andersen and S. Hoskin, Service, August 25, 2017). Mussel surveys were conducted 200 m upstream and 800 m downstream of the proposed crossing, the same distance instream sedimentation is expected to travel. We used this survey information to estimate the total number of RLP present at this crossing. We added a correction factor since mark-recapture data indicates that only about 10% of RLP are actually detected during surveys (P. Angermeier, U.S. Geological Survey VA Cooperative Fish and Wildlife Research Unit, email to Service, February 2, 2012). To incorporate the detectability correction factor we multiplied the 12 RLP found in the action area by 10 and estimate that approximately 120 RLP occur within the Nottoway River at this crossing.

Waqua Creek crossing, Brunswick, VA, is a tributary to the Nottoway River and known to support RLP. Therefore, RLP presence is assumed and habitat suitability was not assessed. The construction ROW is 27.4 m wide at this crossing, the wetted width is 8 m. Waqua Creek is a low gradient stream and substrates are composed of 15% gravel, 5% silt, and 80% sand. Stream morphology is characterized as 70% run and 30% pool habitats. Average and maximum depths measure 0.49 and 2.0 m, respectively (ESI 2016, 2017). The Anderson (2016) model identifies this crossing as potential RLP habitat. One RLP was documented on July 12, 2012, 3.7 km downstream of the crossing (Roberts and Angermeier 2012). To incorporate the detectability correction factor we multiplied the 1 RLP found in a reach of similar length to the action area by 10 and estimate that approximately 10 RLP occur within Waqua Creek at this crossing.

As stated earlier, we expect Butterwood and Sturgeon Creeks support the same density of RLP as Waqua Creek. Ten RLP are estimated to occur at the Waqua Creek crossing; therefore an estimated 10 RLP are expected to occur at each of the Butterwood and Sturgeon Creek crossings. An estimated 120 RLP are expected to occur at Nottoway River 1. A total of 150 RLP are expected to occur in the action area.

ADDITIONAL Data
DIVISION

In the Anderson (2016) model, RLP potential habitat covers approximately 2,552 km in VA and NC, of which 497.753 km are in the Nottoway River basin. The proposed project crosses 4 waterbodies (Butterwood Creek, Sturgeon Creek, Nottoway River 1, and Waqua Creek) known or with potential to support RLP. The proposed action has the potential to impact 1,000 m (200 m above and 800 m below a crossing) plus the construction ROW at each crossing or a total of 4,130 m in VA. The action area represents approximately 0.80% of the total RLP potential habitat in the Nottoway River basin and 0.16% of the total RLP potential habitat in NC and VA.

RLP decline in the action area is primarily the result of destruction and modification of habitat and fragmentation of the species range. Primary causes of RLP habitat degradation include chemical spills, non-point runoff, channelization, impoundments, impediments, and siltation; and the Nottoway River and tributaries were added to VA's impaired waters list in 2014.

Clubshell – In 1995, 168 clubshell were documented at a site downstream of the I-79 Bridge over Hackers Creek in Lewis County, WV. In 2004, WVDNR visited this location to establish a long-term clubshell monitoring location and found 18 live clubshell. During this visit, a "hazmat" boom was found along the bank of Hackers Creek under the I-79 Bridge indicating a spill had occurred (WVDNR 2004). Additionally, a spring that appeared to be high in iron was located between the proposed monitoring site and the I-79 Bridge. As a result, the long-term monitoring site was relocated further upstream in Hackers Creek at the Life's Run Bridge (County Route 14) in Lewis County, WV, where a population of 38 clubshell occurred. The 18 clubshell from the downstream area were relocated to this upstream site because it was determined to be safer for the species (WVDNR 2004).

Data from the long-term monitoring site (the Hackers Creek population) has been collected every 5 years. The 2009 and 2014 monitoring events documented a continued decline and no recruitment (29 individuals in 2009; 19 individuals in 2014) (WVDNR 2009, 2014). The Hackers Creek population is the only extant clubshell population in the Monongahela River drainage (WVDNR 2004). Continued declines in the number of individuals have raised concerns that the population may be in peril (WVDNR 2014). Surveys for clubshell were conducted in Hackers Creek in Lewis County, WV, in 2015 (ESI 2016) approximately 3.2 miles upstream of the long-term monitoring site. This survey effort did not document clubshell.

Approximately 6.4 miles of construction ROW and 11.9 miles of access roads from MP 14.7 to MP 21.1 are proposed in the upstream drainage area of the Hackers Creek 12-digit hydrologic unit code (HUC-12) watershed. The construction ROW and access roads in this area total approximately 151.28 acres, of which 149 acres are forested. Six tributaries of Hackers Creek are proposed to be crossed within this HUC-12; the closest is 1.23 miles upstream from the Hackers Creek clubshell population and the furthest is 6.25 miles upstream from the Hackers Creek clubshell population.

Threats leading to the decline of the Hackers Creek population include a high sediment load suspected to result from mining, gas well construction, highway runoff, and agricultural practices (WVDNR 2014). The action area is currently affected by traditional oil and gas drilling activities and newer oil and gas activities that involve water withdrawals and horizontally fracked

BIBLIOTHECAL INFO
DIVISION

Marcellus shale wells. Water withdrawals have been suspected of affecting aquatic life during low flow conditions by causing more fluctuation in water levels which sometimes leads to the dewatering of mussel beds. Additionally, sedimentation and erosion from the supporting infrastructure for Marcellus shale gas developments are impacting streams in this area. Bank stability, often a result of land use practices, has resulted in excessive sedimentation that may reduce suitable habitat for the clubshell and can smother individuals, causing death. Excessive suspended sediments can impair feeding processes, leading to acute short-term or chronic long-term stress. Both excessive sedimentation and excessive suspended sediments can lead to reduced mussel populations (Ellis 1931, 1936; Houp 1993; Box and Mossa 1999; Anderson and Kreeger 2010).

Rusty patched bumble bee – The action area in NC is not within the historical range of RPBB. Within the action area in WV there are historical records of RPBB in Randolph County in the 1990s and in Lewis, Pocahontas, and Upshur Counties prior to 1980. Prior to the mid-1990s, RPBB was widespread and considered common throughout its historical range, which included Lewis, Pocahontas, Randolph, and Upshur Counties. In 2017, a RPBB was collected in Mineral County, WV, which is outside the action area.

Within the action area in VA, there are no historical records for RPBB in Augusta, Bath, and Highland Counties. Prior to the mid-1990s, RPBB was widespread and considered common throughout its historical range, which included Augusta, Bath, Highland, and Nelson Counties. There is a record of 1 RPBB collected from Nelson County in 1976. There is 1 documented occurrence in VA from 2014, in Fauquier County, which is outside the action area.

An entomology survey documented a RPBB on June 6, 2017 (S. Throndson, ERM, email to S. Hoskin, Service, June 8, 2017) in Bath County, VA (Figure 4). A single worker bee foraging on a rhododendron (*Rhododendron catawbiense*) within the George Washington National Forest (GWNF) along Forest Road 124 (Project access road 36-014-AR2) was captured for identification and then released. The capture site is located approximately 1.6 km from the construction ROW (MP 93.7). One hour of additional sampling in the area surrounding the capture location was completed and no additional RPBBs were found. The magnitude of RPBB population losses and range contractions to date (82 FR 3186-3208) has greatly reduced the likelihood that the species is present elsewhere in the action area. Therefore, comprehensive RPBB surveys were not conducted throughout the action area in VA.

We assume the RPBB is most likely to occur in the 653-hectare (ha) high potential zone (HPZ) (Figure 4), which was modeled based on the single 2017 RPBB location and the species' potential ability to disperse across the landscape (Service 2017). The HPZ is primarily forested, with a few openings that may be characterized as field or meadow. Forested areas are characterized by oak (*Quercus* spp.) dominated overstory, with understory coverage of 30-50% rhododendron (*Rhododendron* spp.), mountain laurel (*Kalmia latifolia*), blueberry (*Vaccinium* spp.) and flowering forbs, and few non-native plants (ACP 2017, VDCR-DNH [VA Department of Conservation and Recreation-Division of Natural Heritage] 2017). Small openings have been created throughout the forested area by gypsy moth (*Lymantria dispar dispar*) caterpillar and wind damage. These openings provide opportunities for sub-canopy flowering shrubs and forbs to develop.

ADDITIONAL INFO
REVISION

Although it is unknown where the colony nest associated with the single observed RPBB is located, suitable habitat for nest sites and overwintering queens is located within the HPZ. The colony nest associated with the single observed RPBB may be located anywhere within the 0.8 km foraging distance of the observation location (Osborne et al. 1999, Knight et al. 2005, Wolf and Moritz 2008, Service 2017). There are 201 ha (area of a circle with radius of 0.8 km) of suitable habitat for nesting within 0.8 km of the observed location.

Due to the rarity of the species in VA and uncertainty associated with some RPBB life history requirements, there is uncertainty regarding habitat use and distribution of the species during certain life stages and time periods. As a result, the following assumptions, based on the best available information, have been made about RPBB distribution and habitat use for this Opinion:

- RPBB activity (foraging, nesting, overwintering queens) is concentrated in the HPZ.
- Floral resources of sufficient quality for RPBB foraging are found throughout the HPZ and are concentrated in patches where canopy openings have been created, and these patches are evenly distributed throughout the HPZ.
- Average foraging distance for an individual RPBB is 0.8 km from a nest site (Service 2017).
- The RPBB observed in June 2017 is part of a colony consisting of 100 to 1,000 workers (Service 2016).
- The RPBB observed in June 2017 represents at least 1 colony, which is part of at least 1 population.
- Maximum dispersal distance for new queens in fall is 1 to 10 km (Service 2016) (Figure 4).
- Overwintering queens are likely to be in proximity to spring ephemerals and may be found near woodland edges or in wooded areas with canopy openings that provide light to the forest floor in the spring.
- Approximately 6-8 new foundress queens are produced at the end of summer (Goulson 2010).
- Status of colony and population in the HPZ is unknown at this time because while the presence of a worker bee signifies the existence of a colony, we have no accurate way to assess the status of the local population.
- Density of colonies in the HPZ is estimated to be approximately 14 nests per 100 ha (Dreier et al. 2014). A density of 0.14 nests/ha is among the lowest of 10 estimates of nest density found in a variety of landscape settings for the buff-tailed bumblebee (*Bombus terrestris*), a close relative of the RPBB (Chapman et al. 2003 [as cited in Charman et al. 2010], Darvill et al. 2004, Knight et al. 2005, Kraus et al. 2009, Wolf et al. 2012, Dreier et al. 2014, Wood et al. 2015). The buff-tailed bumble bee is common and abundant compared to the RPBB, but a nest density of 0.14/ha in suitable habitat is reasonable because:
    - the nest density estimates available in the literature for the buff-tailed bumble bee are for landscapes, whereas we are assuming a nest density of 0.14/ha in suitable habitat where nests would be concentrated;
    - the mean of the 10 nest density estimates made for the buff-tailed bumble bee was 34/ha, with a high of 88/ha; and,
    - it is lower than the nest density (19/ha) found for the precipitously declining great

ADDITIONAL INFO
REVISION

yellow bumblebee *(B. distinguendus)*, whose nests "remain thinly distributed even in current strongholds" (Charman et al. 2010). Like the RPBB, this species relies "on the continued presence of flower-rich, unimproved grassland that provides floral resources throughout the colony cycle (June to September) and contains, or is close to, suitable sites for nesting, mating and hibernation" (Charman et al. 2010).

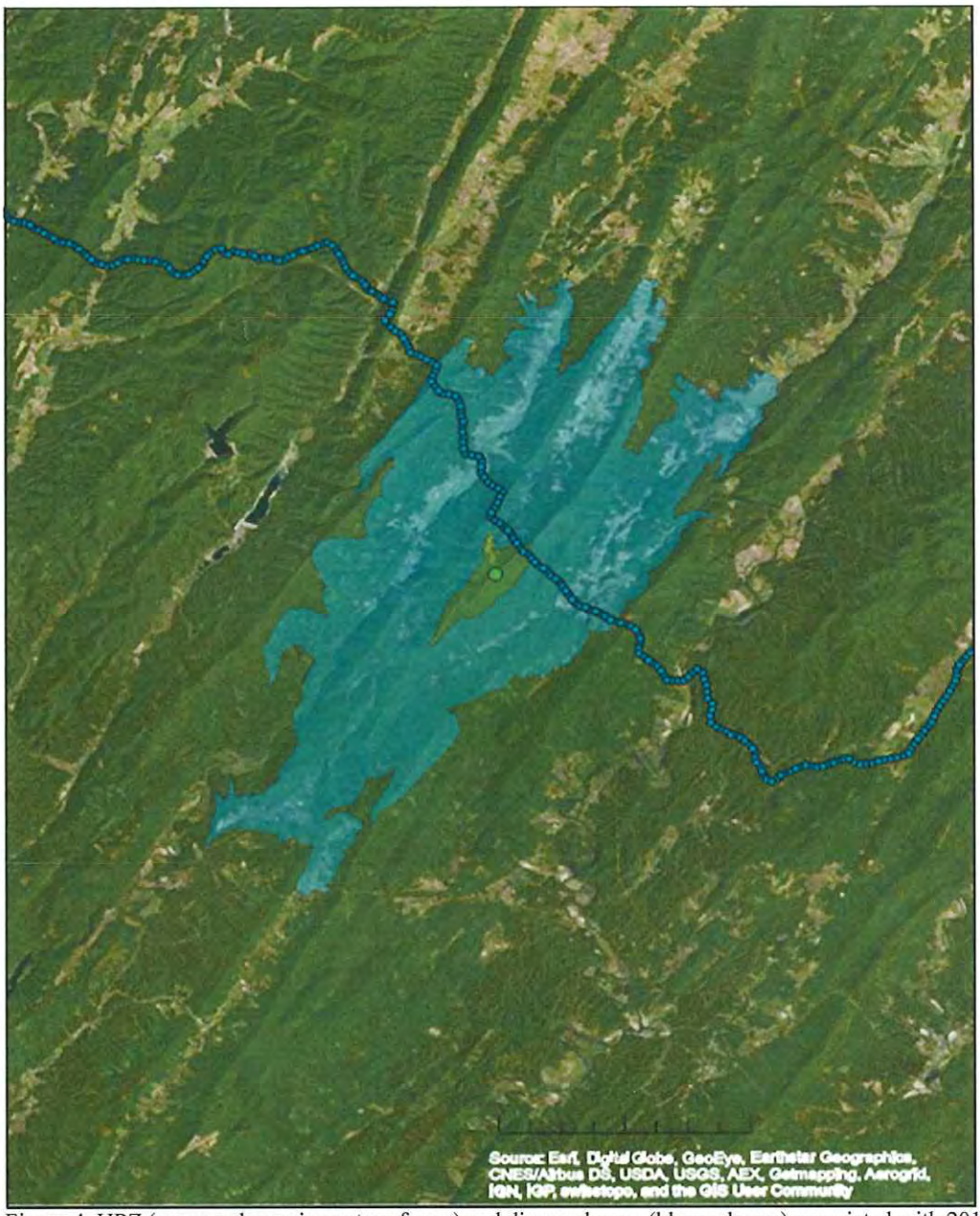

Figure 4. HPZ (green polygon in center of map) and dispersal zone (blue polygon) associated with 2017 RPBB location (green dot) in GWNF. The construction ROW (dark blue circles) bisects the tops of the HPZ.

ADDITIONAL INFO
REVIEW

RPBB in the HPZ are affected by existing actions associated with forest management at GWNF. Current activities in the HPZ are use of the access road by pedestrians and occasional vehicle use by 1 private landowner who rarely uses the road to access his property. No timber sales have occurred in the HPZ in recent years.

Climate change effects on RPBB are summarized from the species final listing rule (82 FR 3186-3209), "Global climate change is broadly accepted as one of the most significant risks to biodiversity worldwide; however, specific impacts of climate change on pollinators are not well understood. The changes in climate likely to have the greatest effects on bumble bees include: increased drought, increased flooding, increased storm events, increased temperature and precipitations, early snow melt, late frost, and increased variability in temperatures and precipitation. These climate changes may lead to decreased resource availability (due to mismatches in temporal and spatial co-occurrences, such as availability of floral resources early in the flight period), decreased availability of nesting habitat (due to changes in rodent populations or increased flooding or storms), increased stress from overheating (due to higher temperatures), and increased pressures from pathogens and nonnative species, (Goulson et al. 2015, p. 4; Goulson 2016, pers. comm.; Kerr et al. 2015, pp. 178–179; Potts et al. 2010, p. 351; Cameron et al. 2011a, pp. 35–37; Williams and Osborne 2009, p. 371)."

Madison Cave isopod – The presence or abundance of MCI in the action area cannot be accurately determined due to lack of effective survey protocols, access to subterranean habitat, and knowledge of subsurface connectivity. We believe the species may occur throughout the phreatic karst waters in the vicinity of the proposed project based on the MCI potential habitat model (Orndorff and Hobson 2007), which is based on the geologic layer in which MCI have been found. MCI potential habitat covers approximately 266,822 surface acres in Augusta County, VA. The construction ROW, access roads, and ATWS cross approximately 25 linear miles, covering approximately 1,974 surface acres (approximately 0.74%) of MCI potential habitat in Augusta County.

The construction ROW centerline and ATWS cross Cochran's Cave (MP 139.8 -140.4), a privately owned site identified as a VDCR-DNH Conservation Site, a shallow depression in Augusta County, VA, which includes the vertical entrance to Cochran's Cave No. 3 (GeoConcepts Engineering, Inc. 2017b). VDCR-DNH Conservation Site designation is their tool for representing key areas of the landscape worthy of protection and stewardship action. The construction ROW and ATWS cover 11.2 surface acres of MCI potential habitat in the Cochran's Cave Conservation Site. While surveys of this site have not documented MCI, the site is within MCI potential habitat (Orndorff and Hobson 2007) and MCI presence should be assumed based on its location and a phreatic upwelling stream at the site (W. Orndorff, VDCR-DNH, email to S. Hoskin, Service, August 11, 2017). Cochran's Cave is surrounded by agricultural fields interspersed with some forested land and it is likely some pesticides and sediments have entered the phreatic water in runoff from the agricultural fields.

Five sinkholes ranked "high risk potential" were found within the action area in MCI potential habitat (GeoConcepts Engineering, Inc. 2017a). Features assigned a "high risk potential" possessed a combination of 2 or more of the ranking criteria: 1) located on or immediately adjacent to the proposed construction trench; 2) presence of an open "throat" leading into the

ADDITIONAL INFO
NOVEMBER

subsurface; 3) drainage characteristics (i.e., presence of a clear-cut drainage path leading into the structure); or 4) evidence of active soil raveling, tension cracks, or collapse. The sinkholes range from 0.6 to 6.6 miles from the Cochran's Cave Conservation Site.

While we do not know the subsurface connectivity between the sinkholes and the Cochran's Cave Conservation Site, the sinkholes are in MCI potential habitat and we assume some connectivity exists. As with Cochran's Cave, the area around the sinkholes is a mixture of agriculture and forest. The sinkholes provide a conduit for sediments and contaminants to MCI habitat and we expect they contribute to degradation of MCI habitat in this area.

Indiana bat – The action area crosses the Ibat Appalachian Mountain Recovery Unit (RU) (Service 2007), encompassing 2,015.992 acres of the RU in VA and 2,431.99 acres of the RU in WV (Table 3). The Appalachian Mountain RU covers 8,762,586 acres in VA and 15,506,210 acres in WV. The action area crosses 0.023% of the Appalachian Mountain RU in VA and 0.016% in WV. The construction ROW is approximately 159 miles in WV and VA. The Service (2017a) estimates the 2017 Ibat population is 425 in VA and 1,076 in WV; these numbers indicate an 8.4% decline in VA and a 54.7% decline in WV since the 2015 census. The action area is within 4 categories of Ibat habitat: suitable unoccupied summer habitat in VA and WV; known use summer habitat in WV; unknown use spring staging/fall swarming habitat within WV, and known use spring staging/fall swarming habitat in VA and WV.

Suitable unoccupied summer habitat is defined as forested/wooded habitats in an Ibat RU in which survey results per the level of effort outlined in the Range-wide Indiana bat Summer Survey Guidelines (Service 2017b) suggest probable absence during the summer months. As of the date of this Opinion, Ibats have been acoustically detected at 17 sites along the proposed pipeline route, 13 in VA and 4 in WV. Follow up mist-net surveys per the level of effort outlined in Phase 2/Step 4 of the Range-wide Indiana bat Summer Survey Guidelines did not capture Ibats (ERM 2017a, 2017b, 2017c). Surveys are pending at 4 acoustic sites in VA; none are pending in WV (M. Voth, ERM, email to S. Hoskin, Service, September 8, 2017). Approximately 1,589.992 acres in VA and 1,685.39 acres in WV (83.6 miles in total) proposed for clearing are classified as suitable unoccupied summer habitat (Table 3).

Known use summer habitat is defined as areas within: a 5-mile radius (home range) of a pregnant female or juvenile capture or within 2.5 miles of a known roost tree. None occurs in VA (Table 3). Approximately 8.54 miles of construction ROW and 6.38 miles of access roads, a total of 144.1 acres, will be cleared within known use summer habitat in WV (Table 3). Potential roost tree surveys in known use summer habitat in WV documented 2,888 potential roost trees, of which 329 were potential primary trees and 2,595 were potential secondary trees (ERM 2017d). Primary roost trees are more likely to support a maternity colony of Ibats than secondary trees. Approximately 11.9 acres remain to be surveyed in WV for potential roost trees in known use summer habitat.

Unknown use spring staging/fall swarming habitat is defined as areas within a 5-mile radius of a potentially suitable hibernaculum that have not been surveyed. Potential hibernaculum surveys are complete in VA and Phase 1 and 2 potential surveys per the Service Guidance (Service 2015) did not document new Ibat hibernacula in VA (ERM 2017e) (Table 3). Phase 2 surveys have not

ADDITIONAL INFO
REVISION

been completed for 4 sites in WV. Approximately 178.1 acres proposed for clearing remain to be surveyed for potential hibernacula in WV (Table 3).

Table 3. Ibat habitat (in acres) proposed to be cleared.

Habitat Category	VA	WV	Total
Suitable unoccupied summer habitat	1,589.992	1,685.39	3,275.382
Known use summer habitat	0	144.1	144.1
Unknown use spring staging/fall swarming habitat	0	178.1	178.1
Known use spring staging/fall swarming habitat	426	424.4	850.4
Appalachian Mountain RU	2,015.992	2,431.99	4,447.982

Known use spring staging/fall swarming habitat is defined as areas within: a 5-mile radius of priority 3 and 4 hibernacula or a 10-mile radius of priority 1 and 2 hibernacula. The action area is within 5 miles of 12 known Ibat hibernacula, 5 in VA and 7 in WV (Table 4). Population estimates for the 12 Ibat hibernacula from the 2016/2017 winter surveys range from 0-73 bats (Service 2017a). The most recent Ibat counts in each hibernaculum (A. King, Service, email to S. Hoskin, Service, August 30, 2017 and C. Stihler, WVDNR, email to S. Hoskin, Service, September 6, 2017) are in Table 4. Some hibernacula have not had a documented occurrence since the 1990s. Of the known hibernacula within 5 miles of the action area, Ibats were documented in 3 (Breathing, Clarks, and Starr Chapel Caves) during the 2017 winter counts. The proposed action will clear known use spring staging/fall swarming habitat, 426 acres in VA and WNS424.4 acres in WV (Table 3).

Table 4. Known Ibat hibernacula within 5 miles of the action area[a].

County, State	Hibernaculum Name	Approximate Distance (miles) to ATWS	Hibernaculum Priority Number[c]	WNS Status (date)	Ibat Population Estimate (date)
Randolph, WV	Gooseberry Cave	1.6 (CY[b])	4	Suspect (2014)	15 max (1990-1999)
Randolph, WV	Fortlick Cave	2.5 (CY)	3	Confirmed (2012)	16 (2016)
Randolph, WV	Stewart Run Cave	4.9 (CY)	3	Suspect (2014)	55 (2009)
Pocahontas, WV	Dreen Cave	0.7 (AR[b])	4	Suspect (2013)	1 (2015)
Randolph, WV	Falling Spring Cave	<0.1 (AR)	4	Confirmed (2011)	44 (2009)
Randolph, WV	Simmons-Mingo Cave	0.3	4	Suspect (2014)	17 max (1990-1999)

ADDITIONAL INFO
REVISION

Pocahontas, WV	Cass Cave	4.4	4	Suspect (2014)	2 max (1980-1989)
Bath, VA	Starr Chapel Cave	2.0 (AR)	3	Suspect (2010)	46 (2017)
Bath, VA	Mountain Grove Cave	3.4 (CY)	4	Suspect (2014)	2 (2000)
Bath, VA	Breathing Cave	2.3 (AR)	3	Confirmed (2009)	20 (2017)
Bath, VA	Clarks' Cave	3.1 (AR)	3	Suspect (2011)	73 (2017)
Bath, VA	Witheros Cave	4.7	4	Suspect (2011)	5 (2015)

[a]There are no known Ibat hibernacula within 5 miles of SHP.
[b]CY – contractor yard, AR – access road.
[c]Priority 1 is highest priority and most essential to recovery of the species. Priority 4 is least important to recovery (Service 2007).

The abundance of Ibats rangewide has declined approximately 20% due to the effects of WNS since its onset in 2006 (https://www.fws.gov/midwest/endangered/mammals/inba/pdf/2017IBatPopEstimate5July2017.pdf). WNS was first detected in VA and WV during the 2008/2009 winter hibernacula surveys (Stihler 2012, Powers et al. 2015). VA and WV hibernacula surveys indicate Ibat populations have decreased at least 95% since the discovery of WNS (https://www.fws.gov/midwest/endangered/mammals/inba/pdf/2017IBatPopEstimate5July2017.pdf).

Northern long-eared bat – This Opinion is for effects to the NLEB not addressed by the January 5, 2016 programmatic biological opinion implementing the final 4(d) rule (https://www.fws.gov/midwest/endangered/mammals/nleb/pdf/BOnlebFinal4d.pdf).

There are 4 known hibernacula in the action area: Simmons-Mingo Cave, PH-S018, PH-S007/PH-S008, and PH-S019. Thirty-one NLEBs were captured at Simmons-Mingo Cave, Randolph County, WV, and NLEBs were detected at PH-S018, Randolph County, WV, PH-S007/PH-S008 and PH-S019, Pocahontas County, WV (FERC 2017).

WNS was detected in WV in 2009 at Trout Cave, Pendleton County. Since that time, WNS has been confirmed in all areas of WV where NLEB hibernacula are known to occur (Stihler 2012).

EFFECTS OF THE ACTION

Direct effects are the direct or immediate effects of the project on the species, its habitat, or designated/proposed critical habitat. Indirect effects are defined as those that are caused by the proposed action and are later in time, but still are reasonably certain to occur (50 CFR 402.02). An interrelated activity is an activity that is part of the proposed action and depends on the proposed action for its justification. An interdependent activity is an activity that has no independent utility apart from the action under consultation. Direct and indirect effects of the

proposed action along with the effects of interrelated/interdependent activities are all considered together as the "effects of the action."

To standardize the effects analysis, the proposed action was divided into discrete actions described as subactivities. Defining subactivities allows for easier interpretation and consideration of complex activities. The project subactivities are defined in the species effects tables (Appendix B Tables 1-8).

Small whorled pogonia – The potential effects of the proposed action are described in Appendix B Table 1. The project subactivities unlikely to result in any impacts to SWP are described in Appendix B Table 1; no effect (NE) subactivities. For those subactivities of the proposed action that are determined to result in NE to SWP, there will be no further discussion in this Opinion.

The project subactivities that may affect, but are not likely to adversely affect (NLAA), the SWP are described in Appendix B Table 1; NLAA subactivities. For those subactivities of the proposed action that are determined NLAA SWP, there will be no further discussion in this Opinion.

There are other subactivities of the project that are likely to adversely affect (LAA) SWP (Appendix B Table 1; LAA subactivities). For some components of the proposed action that may affect SWP, AMMs have been incorporated to ameliorate those effects and those are also noted in Appendix B Table 1. These subactivities are LAA SWP by altering and degrading its habitat or physically impacting individual plants.

These subactivities in the construction ROW will affect 17.0% and 12.7%, respectively, of the Seneca and MNF colonies' upslope drainage areas. The subactivities during O&M will occur in 17.0% and 1.1%, respectively, of the Seneca and MNF colonies' upslope drainage areas. The ground disturbing and vegetation clearing/management subactivities proposed in the upslope drainage areas of the 2 SWP colonies will result in soil compaction and vegetation removal in the construction ROW, which will increase surface water flow and downslope erosion rates and alter surface and subsurface hydrology in the watershed of the colonies, causing changes in evapotranspiration rates and soil moisture downslope of the construction ROW near the colonies. Some of these subactivities will also redistribute and loosen soils in the construction ROW, which will cause sedimentation downslope towards the colonies. These stressors will affect both the mycorrhizal fungi relied on by SWP and individual SWP, decreasing SWP fitness and reproductive success and possibly killing individual plants. Depending on the degree of surface water runoff and sedimentation, SWP habitat may be degraded and individual stems may be buried. Blasting will also loosen large rocks, which could fall and crush SWP.

During construction and restoration, methods described in the Upland Erosion Control Plan and Restoration and Rehabilitation Plan and onsite AMMs (e.g., temporary diversion channels and berms in the SWP Conservation Plan) are expected to minimize effects through surface water erosion control and restoration of graded areas; however diversion of surface water flow away from the colonies will alter hydrology in the watershed and soil moisture, causing decreased fitness and reproductive success and possibly death of individual stems.

The vegetation clearing, management, and trimming subactivities in the construction ROW that remove and thin mid- and over-story canopy trees will alter SWP habitat by increasing direct and ambient light. ERM (2017) conducted qualitative analyses of the potential changes to light regime near each colony as a result of tree removal in the construction ROW using 3D computer modeling. For the Seneca colony, the simulations indicated significant increases in ambient and direct light on the ground and surrounding area during summer, spring, and fall days, although not quantified. For the MNF colony, the simulations indicated changes in ambient light on the ground and surrounding area during early morning on summer and fall days. This light analysis was conducted before the proposed pipeline route was moved 108 ft further from the MNF colony, but we continue to anticipate changes in light in the surrounding area due to close proximity (221 ft) of the construction ROW.

Increased light availability may increase SWP flowering and population size (Dibble et al. 1997; Dibble 2000a, 2000b; Brumback et al. 2011; McCormick et al. 2015). However, increased light availability above an unknown threshold is anticipated to degrade SWP habitat by increasing soil temperature, drying soils, and changing evapotranspiration rates, which will cause decreased fitness and reproductive success and possibly death of individual stems. Increased light levels will also facilitate germination and development of other herbaceous and/or woody species, including invasive species, which could compete with SWP. Significant changes to the sunlight regime and potential competition due to increased vegetation are likely to cause decreased fitness and reproductive success and possibly death of SWP individuals.

Methods described in the Non-Native Invasive Plant Species Management Plan (FERC 2017) will minimize effects due to invasive species in the construction ROW and access roads, but will not address herbaceous and invasive vegetation growing outside of the construction ROW and near the SWP colonies due to increased light. The SWP Conservation Plan includes temporary AMMs to monitor the population status of the SWP colonies annually for 10 years post-construction and to minimize effects from invasive species outside of the construction ROW and near the SWP colonies for 3 years (e.g., before, during, and 1 year after construction) (VHB 2017). The SWP Conservation Plan also includes planting native tree seedlings for 200 ft along the construction ROW edge to the west of the pipeline (e.g., farther away from the colony) to ameliorate for changes in sunlight regime and monitoring light levels in the colony for 3 years (e.g., before, during, and 1 year after construction) (VHB 2017). Approximately 20-30 years after planting, canopy trees (e.g., white oak [*Quercus alba*] and eastern white pine [*Pinus strobus*] found at the Seneca colony) are expected to provide some mid-story shade (Burns et al. 1990), which would contribute to partially restoring the SWP habitat.

Running Buffalo clover – The potential effects of the proposed action are described in Appendix B Table 2. The project subactivities unlikely to result in any impacts to RBC are described in Appendix B Table 2; NE subactivities. For those subactivities of the proposed action that are determined to result in NE to RBC, there will be no further discussion in this Opinion.

The project subactivities that may affect, but are NLAA, the RBC are described in Appendix B Table 2; NLAA subactivities. For those subactivities of the proposed action that are determined NLAA RBC, there will be no further discussion in this Opinion.

There are other subactivities of the project that are LAA RBC (Appendix B Table 2; LAA subactivities). For some components of the proposed action that may affect RBC, AMMs have been incorporated to ameliorate those effects and those are also noted in Appendix B Table 2. These subactivities are LAA RBC by physically impacting individual plants and/or altering or degrading its habitat. There are approximately 5.1 acres of RBC within 150 ft of the construction ROW centerline and 0.8 acres of RBC will be affected and killed (FERC 2017).

Ground disturbance subactivities related to grading, grubbing, increased foot and vehicle traffic, vegetation clearing and disposal, and trenching (Appendix B Table 2) for access roads and the construction ROW will kill RBC plants and seeds from some occurrences in 5 populations and all occurrences in 1 population (Table 2). Conducting these activities in wet conditions will increase soil compaction, which may restrict seed germination preventing reestablishment of RBC in the temporary construction ROW post-construction. The placement of fill and gravel will cause permanent habitat loss in all permanently maintained areas, preventing populations from re-establishing post-construction.

Burning for vegetation disposal (Appendix B Table 2) is expected to kill RBC because much of the plant structure is above ground and plants exposed to fire are likely to be killed. Additionally, topsoil containing RBC plant material and seed source is likely to be submerged in ash piles, restricting further plant growth and recolonization. We expect RBC plants and seeds within occurrences in 5 populations and all occurrences in 1 population exposed to fire and/or submerged in ash piles to be killed within the footprint of burns conducted for vegetation disposal.

Tree clearing and tree trimming subactivities (Appendix B Table 2) will remove all canopy cover over the construction ROW and significantly reduce canopy cover over access roads. While RBC is a disturbance dependent species and some level of tree removal may be beneficial (Madarish and Schuler 2002), the proposed clearing will create too much sunlight for RBC, which prefers partial to filtered sunlight. Burkhart et al. (2013) found that plots which received direct sun for most of the day did not allow RBC to persist. Increased sunlight from openings in the canopy may also increase competition from other native and invasive plant species. Invasive species are one of the primary factors influencing the status of RBC. Seed from invasive species may outcompete RBC, limiting the ability of RBC to germinate, thrive, and produce seeds.

Cleared construction ROW and improved access roads will facilitate ORV traffic and increase white-tailed deer herbivory. AMMs (installation of barriers) will minimize ORV traffic along the ROW; however, ORV traffic on access roads will not be prohibited. ORV traffic on improved access roads and the construction ROW will exceed disturbance frequencies tolerated by RBC and prevent re-establishment of RBC in some of these disturbed areas. New travel corridors are expected to increase ease of access to RBC populations by white-tailed deer, and the resulting herbivory will kill some RBC and lower reproductive output of other RBC.

Roanoke logperch – The potential effects of the proposed action are described in Appendix B Table 3. The project subactivities unlikely to result in any impacts to RLP are described in Appendix B Table 3; NE subactivities. For those subactivities of the proposed action that are determined to result in NE to RLP, there will be no further discussion in this Opinion.

The project subactivities that may affect, but are NLAA, the RLP are described in Appendix B Table 3; NLAA subactivities. For those subactivities of the proposed action that are determined NLAA RLP, there will be no further discussion in this Opinion.

There are other subactivities of the project that are LAA RLP (Appendix B Table 3; LAA subactivities). For some components of the proposed action that are anticipated to affect RLP, AMMs have been incorporated to ameliorate those effects and those are also noted in Appendix B Table 3. These subactivities are anticipated to stun, entrain, or crush RLP, or result in habitat degradation and loss due to dewatering and placement of cofferdams, placement of temporary work bridges with a center support, and/or altering water quality.

Installation and dewatering of cofferdams is anticipated to injure or kill some RLP by crushing individuals during placement of cofferdams and through stranding or entrainment as cofferdams are dewatered. Installation of the bridge center supports is likely to injure or kill a small number of RLP by crushing individuals during placement. Installation of the bridge center support is expected to disrupt breeding activities of the RLP in the work zone because supports will be installed during the RLP breeding season. We expect a range of impacts, from delaying breeding until a suitable location is found to inhibiting breeding because all suitable breeding grounds in the area have been disturbed. As a result, we anticipate that a few subsequent offspring will be smaller than their counterparts and therefore more vulnerable to predation resulting in injury or death. Inhibited breeding is expected to result in the loss of genetic contribution from those adults for the breeding season.

Temporary loss of instream habitat will occur at stream crossings that use dam and pump, cofferdams and bridge center supports. Additionally cofferdam placement/removal, installation of bridge center supports, and other instream activities will temporarily re-suspend sediments and increase turbidity. We expect the RLP in the work zone will avoid these areas until the instream structures are removed and turbidity returns to baseline levels. If instream work occurs during spawning, RLP will be unable to successfully spawn in these areas. If work occurs after completion of spawning, crushing or removal of a small percent of eggs is likely.

Adjacent upland ground-disturbing activities, such as tree clearing, grading constructing/improving access roads, and pipe stringing, are likely to introduce sediment into RLP habitat. Moderately silted and high turbidity areas will be unusable to most RLP for foraging and spawning in the immediate vicinity of the crossing. Heavy siltation is anticipated to result in a loss of prey items. If instream work occurs during spawning, a reasonable worst case scenario is a majority of RLP in the work zone will be unable to successfully spawn in these areas. If work occurs after completion of spawning, crushing or removal of a small percent of eggs is likely.

If blasting is needed for any crossings, a small number of RLP in the immediate blast area are likely be killed and the RLP in the vicinity will be temporarily stunned and/or permanently injured; some of the RLP will recover, while a small percentage of RLP will have internal injuries and die.

While implementation of AMMs (VA Fish Relocation Plan, Appendix K, and Restoration and Rehabilitation Plan, Appendix F, of the FEIS [FERC 2017]) should significantly reduce the likelihood of mortality or injury from stream crossings, which include placement of cofferdams, these effects are still anticipated. Additionally, streambank vegetation removal is likely to alter a small portion of RLP habitat. Loss of streambank vegetation is expected to result in increased water temperatures, which can lower dissolved oxygen levels, and changes in light regime in small areas. Changes in water temperature and light regime are anticipated to shift the RLP prey base to species that are more tolerant to light and lower dissolved oxygen and make the habitat less suitable for the RLP themselves. For work along existing ROW, riparian vegetation will be replanted. New alignments will result in permanent removal of riparian vegetation. These changes are anticipated to decreased fitness of a small portion of RLP individuals by shifting their diet and potentially decreasing the dissolved oxygen levels in small patches of the waterbodies.

Clubshell – The potential effects of the proposed action are described in Appendix B Table 4. The project subactivities unlikely to result in any impacts to clubshell are described in Appendix B Table 4; NE subactivities. For those subactivities of the proposed action that are determined to result in NE to clubshell, there will be no further discussion in this Opinion.

The project subactivities that may affect, but are NLAA, the clubshell are described in Appendix B Table 4; NLAA subactivities. For those subactivities of the proposed action that are determined NLAA clubshell, there will be no further discussion in this Opinion.

There are other subactivities of the project that are LAA clubshell (Appendix B Table 4; LAA subactivities). For some components of the proposed action that may affect clubshell, AMMs have been incorporated to ameliorate those effects and those are also noted in Appendix B Table 4.

Subactivities that are LAA clubshell result from increased sediment loads to Hackers Creek upstream of the Hackers Creek clubshell population. Approximately 6.4 miles of construction ROW and 11.9 miles of access roads from MP 14.7 to MP 21.1 are proposed in the upstream drainage area of the Hackers Creek HUC-12 watershed. The construction ROW and access roads in this area total approximately 151.28 acres, of which 149 acres are forested. Six tributaries of Hackers Creek are proposed to be crossed within this HUC-12; the closest is 1.23 miles upstream from the Hackers Creek clubshell population and the furthest is 6.25 miles upstream from the Hackers Creek clubshell population. Sedimentation will affect clubshell and degrade/alter clubshell habitat.

Mussels close their valves during periods of heavy siltation to avoid irritation and clogging of feeding structures (Loar et al. 1980). Mussel gills can become overwhelmed with excessive suspended sediment, causing a mussel to either reduce its water and food intake rate or close altogether. The stream crossings and access roads are expected to result in sedimentation and increased turbidity causing impaired feeding, resulting in reduced physiological function; depressed rates of growth, reproduction, and recruitment. We expect this will result in the death of a few individual clubshell.

Sedimentation may permanently alter and degrade habitat through siltation such that conditions are no longer favorable for clubshell. These effects will persist until high flows flush settled sediment downstream. Excessive siltation also degrades water and substrate quality. High levels of suspended sediments will reduce dissolved oxygen levels in the water, while heavy sediment deposition will fill interstitial spaces in the substrates, both of which can suffocate mussels particularly if sufficient accumulation occurs (Ellis 1936, Marking and Bills 1980).

Construction will occur during months of highest precipitation and flow rates in WV (S. Throndson, ERM, email to E. Stout, Service, September 13, 2017). Large releases of sediment may occur during storm events. Much of the sediment released from disturbed areas during storm events is expected to be transported downstream, temporarily elevating suspended solids, with those solids not washed out of the action area settling in pools. It is difficult to determine what level of excess sedimentation will be generated by the project, how far downstream sedimentation will occur, or how long these effects will persist. Factors such as storm intensity, stream channel morphology, flow rates during and post construction, and effectiveness of sediment and erosion control measures, can affect the duration and severity of instream sedimentation.

We anticipate these changes in habitat will further impair feeding, resulting in sublethal effects on growth and reproduction or starvation with long-term exposure. As a result of decreased water quality, and degraded and altered habitat we anticipate that most of the clubshell will experience impaired feeding. When high flows continue to flush sediment downstream, we expect that within 6 months post-construction the habitat will begin to return to pre-construction condition. At that time, the remaining mussels will be able to feed in an unimpaired manner. However, the population will remain below pre-construction numbers.

The implementation of AMMs (e.g., erosion and sedimentation control measures along workspace edges, and temporary equipment crossings) may ameliorate some of the sedimentation effects. However, due to the magnitude of anticipated disturbance, not all sediment will be prevented from entering waterways. As a result, we expect habitat degradation and loss will occur and some individual clubshell will experience impaired feeding while others may suffocate and die.

Rusty patched bumble bee – The potential effects of the proposed action are described in Appendix B Table 5. The project subactivities unlikely to result in any impacts to RPBB are described in Appendix B Table 5; NE subactivities. For those subactivities of the proposed action that are determined to result in NE to RPBB, there will be no further discussion in this Opinion.

The project subactivities that may affect, but are NLAA, the RPBB are described in Appendix B Table 5; NLAA subactivities. For those subactivities of the proposed action that are determined NLAA RPBB, there will be no further discussion in this Opinion.

There are other subactivities of the project that are LAA RPBB (Appendix B Table 5; LAA subactivities). For some components of the proposed action that may affect RPBB, AMMs have been incorporated to ameliorate those effects and those are also noted in Appendix B Table 5.

Within the HPZ, these subactivities may crush individuals, crush a colony, expose RPBBs to noise/vibration, and render habitat temporarily and permanently unsuitable.

Ground disturbance associated with the construction ROW is proposed to occur during the active foraging season for RPBB workers. RPBB workers are expected to be crushed by machinery during vegetation removal and construction, which will affect the ability of the workers to provide sufficient resources to the colony, resulting in reduced survival of individual workers and reduced reproductive capacity of the queen. Machinery is also expected to crush any colonies present within the action area in the HPZ.

Construction ROW activities, and restoration and maintenance activities on the access road and construction ROW may expose RPBBs to noise/vibration, causing individuals to expend additional energy to seek out alternate foraging and nesting areas, which may reduce survival and reproduction.

In the HPZ (653 ha) the proposed action (7.3 ha) is expected to include permanent (access road widening and permanent ROW) and temporary (temporary construction ROW and ATWS) habitat loss. Soil compaction during road construction may affect the ability of queens to excavate an overwintering site and may reduce the ability of rodents to excavate burrows, which reduces the ability of colonies to find appropriate nest locations, resulting in reduced reproduction. Floral resources will be removed from the entire 7.3 ha, with permanent loss within the expanded road surface and temporary loss within the construction ROW and ATWS These floral resources include concentrations of spring ephemerals (ACP 2017, VDCR-DNH 2017) potentially used by queens after overwintering and loss of these resources will result in reduced survival and reproduction of queens. Loss of floral resources is expected to temporarily displace all RPBBs the following active season, and displaced RPBBs are expected to move to suitable habitat in the surrounding area, which will result in reduced reproduction.

Herbaceous floral resources will re-establish within 1 growing season adjacent to the new access road alignment. Flowering shrubs are likely to take 8-10 years to re-establish. As floral resources are re-established post-construction, introduction and spread of invasive plant species and use of fertilizer are expected to reduce the diversity of native floral resources, limiting the suitability of restored habitat for RPBB.

Madison Cave isopod – The potential effects of the proposed action are described in Appendix B Table 6. The project subactivities unlikely to result in any impacts to MCI are described in Appendix B Table 6; NE subactivities. For those subactivities of the proposed action that are determined to result in NE to MCI, there will be no further discussion in this Opinion.

The project subactivities that may affect, but are NLAA, the MCI are described in Appendix B Table 6; NLAA subactivities. For those subactivities of the proposed action that are determined NLAA MCI, there will be no further discussion in this Opinion.

There are other subactivities of the project that are LAA MCI (Appendix B Table 6; LAA subactivities). For some components of the proposed action that are anticipated to affect MCI, AMMs have been incorporated to ameliorate those effects and those are also noted in Appendix

B Table 6. Details of the AMMs are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I and page 4-300 of the FEIS (FERC 2017). These subactivities are expected to crush or introduce sediment that smothers MCI, or collapse or fill subsurface features and/or alter subsurface water quality and/or quantity resulting in habitat degradation, fragmentation, and loss.

There are a total of 896.7 surface acres within 0.5 mile of the construction ROW centerline and ATWS. We anticipate ground disturbing activities such as, digging, trenching, blasting, grading, constructing/improving access roads, culvert installation, and wetland crossings may introduce sediment into the subsurface areas, which could smother MCI up to 0.5 mile from the construction site. Trenching or blasting is also likely to loosen subsurface rocks, which could fall and crush MCI. Grading redistributes and loosens soil making it more prone to erosion. Depending on the amount and speed of the erosion event, MCI will either avoid a particular area until the sediment is settled or be smothered. Any MCI present in the zones of impact will likely be crushed or smothered.

Loosened subsurface rocks from trenching or blasting are expected to disrupt the subsurface water flow and alter MCI travel corridors. The fractured nature of the geology in the area generally provides numerous travel corridors, which reduces the likelihood that a blocked corridor will completely isolate an individual; however, MCI will need to expend additional energy to find an alternate route. Additionally, trenching or blasting is anticipated to intercept a subsurface void, creating a direct conduit for soil and sediment to enter into the subsurface habitat. Depending on the degree of sedimentation, habitat will be degraded or lost. These changes will render habitat temporarily or permanently unsuitable for use by the MCI and are likely to prevent movements among or between populations.

Indiana bat – The potential effects of the proposed action are described in Appendix B Table 7. We did not reach a NE determination for Ibat for any of the subactivities.

The project subactivities that may affect, but are NLAA, the Ibat are described in Appendix B Table 7; NLAA subactivities. For those subactivities of the proposed action that are determined NLAA Ibat, there will be no further discussion in this Opinion.

There are other subactivities of the project that are LAA Ibat (Appendix B Table 7; LAA subactivities). For some components of the proposed action that are likely to affect Ibats, AMMs have been incorporated to ameliorate those effects and those are also noted in Appendix B Table 7. These subactivities will temporarily or permanently remove a total of 4,448 acres of suitable habitat in the Ibat Appalachian Mountain RU. The amount of tree removal proposed in suitable unoccupied summer habitat is 3,275.382 acres (Table 3). The amount of tree removal proposed in known use summer habitat is 144.1 acres (Table 3), which includes over 9 miles of construction ROW centerline and 1.94 miles of access roads; a TOYR (trees will be removed between November 15 and March 31 in WV and November 16 and April 14 in VA, when Ibats will not be present) will be implemented in known use summer habitat. The amount of tree removal in unknown use spring staging/fall swarming is 178.1 acres (Table 3); we are assuming Ibat presence in unknown use spring staging/fall swarming habitat, and a TOYR (trees will be removed between November 15 and March 31, when Ibats will not be present) will be

implemented in unknown use spring staging/fall swarming habitat. The amount of tree removal in known use spring staging/fall swarming habitat is 850.4 acres (Table 3); a TOYR (trees will be removed between November 15 and March 31, when Ibats will not be present) will be implemented in known use spring staging/fall swarming habitat.

We expect direct effects to Ibats from tree clearing will not occur in suitable unoccupied summer habitat. However, indirect effects may occur to a small number of Ibats searching for potential roosting sites and those traveling through the area. Approximately 3,275 acres (83.6 miles) of suitable unoccupied summer habitat in VA and WV will be cleared. We do not anticipate tree clearing will impact current Ibat home ranges due to the negative survey results; however, the cleared areas will not be suitable summer habitat available for future use. Ibat home ranges vary in size from 205.1-827.8 acres (Menzel et al. 2005, Sparks et al. 2005, Watrous et al. 2006, Kniowski and Gehrt 2014, Jachowski et al. 2014). The 3,275 acres of suitable unoccupied summer habitat to be cleared represents 4-16 home ranges that will be removed from future use if tree clearing were to occur in large blocks. The proposed action is linear and therefore tree clearing is not anticipated to remove entire potential home ranges rather, sections of potential home ranges. Worst case scenario is potential home ranges will be centered along the 83.6 miles of the construction ROW every 5 miles, affecting 17 potential home ranges. This is not a reasonable scenario for several reasons. First, the construction ROW goes through previously cleared areas. Depending on the level of previous clearing, the center of the construction ROW may not be ideal because there is too much solar exposure, too much noise, or not enough cover from predators. Second, forest cover in the counties in action area is 55-86% (https://www.fia.fs.fed.us/tools-data/), which provides ample area to establish new home ranges.

It is likely that tree clearing will affect a part of a potential home range, which is a fraction of the potential habitat in WV and VA. We anticipate some of the areas that will be cleared are currently used as a travel corridor between hibernacula and roost trees. The construction ROW will go through a mix of previously fragmented areas and unfragmented areas. Likely Ibats would not have used previously cleared areas as travel corridors and will only be impacted in previously unfragmented areas or if tree clearing removed a narrow treed corridor that was the sole travel corridor. We anticipate effects will be greatest to pregnant females that expend additional energy to seek alternate travel corridors as a result of tree clearing. If pregnant females dramatically alter their travel corridor they will divert their energetic demands to seek new corridors and will likely give birth to smaller pups, which could decrease pup survival. Maternity roost trees were not documented in VA; therefore we expect the likelihood of pregnant females and the need to alter travel corridors to be low in VA. It is more likely that tree removal in WV will cause pregnant females to seek alternate travel corridors because known use summer habitat has been documented in WV. Ibats consistently follow tree-lined paths rather than cross open areas (Murray and Kurta 2004) and, depending on the amount of forested habitat in the surrounding area, tree removal may fragment the habitat such that Ibats traveling through the area will be more vulnerable to predation, resulting in injury or death. Because we expect Ibats will avoid the cleared areas, depending on the resulting level of fragmentation, tree clearing is likely to make the remaining forest less suitable for roosting or foraging, which will cause Ibats to expend more energy searching for alternative roosting or foraging sites, delaying their ability to gain post-hibernation weight.

Tree removal in known use summer habitat is likely to limit roosting options or necessitate roost tree switching when Ibats return the following season. Because maternity roost trees are ephemeral, Ibats have evolved to relocate roosts at the beginning of the season if needed. Because trees will be removed outside of the active season when the roost trees are not in use, the stress on an Ibat is decreased. Ibats have primary and secondary roosts and will shift between sites during a season (Humphrey et al. 1977, Gardner et al. 1991, Callahan 1993, Kurta et al. 1993, Romme et al. 1995). Therefore, in the rare instance a primary roost tree is cut, as long as alternate roosts remain in the vicinity, effects associated with loss of individual roost trees are likely to be short-term. There is a substantial amount of roosting habitat in the action area and we expect Ibats will relocate roosting areas with minimal effects to individuals.

Tree removal in unknown use spring staging/fall swarming habitat will remove foraging and roosting areas for a concentrated number of Ibats in an abbreviated season (i.e., spring emergence or fall swarming). Bats use the area around hibernacula to build fat reserves prior to hibernation and to socialize and mate in the fall. In the spring, bats spend a few hours or days around hibernacula or migrate immediately to summer habitat. Clearing trees around hibernacula will permanently decrease foraging and roosting habitat, requiring bats to spend more time searching for food, which could result in bats entering hibernation with less fat reserves resulting in decreased overwinter survival or poorer spring body condition or result in less time on social interactions, which could result in decreased breeding success. We expect the same effects on Ibats from tree removal in known use spring staging/fall swarming habitat as those described for unknown use spring staging/fall swarming habitat.

We do not anticipate Ibats will be present during tree removal activities, a TOYR (trees will be removed between November 15 and March 31, when Ibats will not be present) will be implemented around known hibernacula in WV and VA and no impacts are anticipated to Ibats hibernacula or hibernating bats. However, as discussed above tree clearing will render the habitat temporarily or permanently unsuitable for use by Ibats. Vegetation will grow back in the temporary construction ROW. We expect pine (*Pinus* spp.) and sweet gum (*Liquidambar styraciflua*) will colonize the temporary construction ROW in VA and beech (*Fagus* spp.) and maple (*Acer* spp.) will colonize the temporary construction ROW in WV, which will not create Ibat habitat. Trees that create suitable Ibat habitat will be planted along the construction ROW edge only in the limited native tree planting near 1 SWP colony (VHB 2017).

Northern long-eared bat – The potential effects of the proposed action are described in Appendix B Table 8. We did not reach a NE determination for NLEB for any of the subactivities.

There are several project subactivities that may affect (MA) the NLEB. Some of these have effects that have been previously addressed in the Service's January 5, 2016 programmatic biological opinion implementing the final 4(d) rule (https://www.fws.gov/midwest/endangered/mammals/nleb/pdf/BOnlebFinal4d.pdf) and are described in Appendix B Table 8; MA subactivities. For those subactivities, no detailed effects analysis discussion is required. For some components of the proposed action that MA NLEB, AMMs have been incorporated to ameliorate those effects and those are also noted in Appendix B Table 8.

There are other subactivities of the project that have not been addressed in the Service's January 5, 2016 programmatic biological opinion implementing the final 4(d) rule (Appendix B Table 8; LAA subactivities). Each of these subactivities involves tree clearing within 0.25 mile of hibernaculum PH-S018. Similar to the subactivities mentioned above, AMMs have been incorporated to ameliorate those effects and those are also noted in Appendix B Table 8.

For context, 170.94 acres of tree removal is proposed within 5 miles (anticipated spring staging/fall swarming range) of hibernaculum PH-S018. This activity will impact foraging and roosting areas for a concentrated number of bats in an abbreviated season (spring emergence or fall swarming). Bats use the area around hibernacula to build fat reserves prior to hibernation, to socialize and mate in the fall. In the spring, bats may spend a few hours or days around hibernacula or migrate immediately to summer habitat. Clearing trees around hibernacula will permanently decrease foraging and roosting habitat, which will require bats to spend more time searching for food, which could result in bats entering hibernation with less fat reserves resulting in decreased overwinter survival or poorer spring body condition or result in less time on social interactions, which could result in decreased breeding success.

In addition, NLEB may have summer maternity colonies around hibernaculum PH-S018. Individual NLEB home ranges have been minimally estimated at 148.8–173.7 acres (Owen et al. 2003, Lacki et al. 2009). The proposed clearing of 170.94 acres represents a loss of 98.4-100% of an individual home range. However, the proposed action is linear and therefore tree clearing is not anticipated to remove an entire potential home range rather, sections of potential home ranges. Depending on the resulting level of habitat fragmentation, tree clearing will make the remaining forest less suitable for future roosting or foraging. We expect NLEB will avoid the permanently cleared areas and start exploring undisturbed areas for future roost sites. This will cause NLEBs to expend more energy searching for alternative roosting or foraging sites, which will delay their ability to gain post-hibernation weight resulting in decreased growth.

We do not anticipate NLEBs will be present during tree removal activities, a TOYR (trees will be removed between November 15 and March 31, when NLEBs will not be present) will be implemented around known hibernacula in WV and no impacts are anticipated to NLEB hibernacula or hibernating bats. Tree clearing will render the habitat permanently unsuitable for use by NLEBs. However, because this clearing will occur when bats are in hibernation, it will avoid killing NLEB. We anticipate impacts will occur during the first spring, summer, and fall after tree clearing as bats emerge from hibernation. Most impacts will occur during the season after tree clearing. All impacts are expected to be limited and short-term in nature, and NLEBs are expected to acclimate to this change and shift to alternative habitat.

The majority of effects described above have been previously addressed in the Service's January 5, 2016 programmatic biological opinion implementing the final 4(d) rule and any incidental take that may occur further than 0.25 mile from a hibernacula is not prohibited under the final 4(d) rule (50 CFR §17.40(o)). However, any anticipated take of NLEB that may occur within 0.25 mile of a hibernaculum requires separate incidental take authorization (see Incidental Take Statement).

CUMULATIVE EFFECTS

ADDITIONAL INFO
REVISION

Cumulative effects are those "effects of future State or private activities, not involving federal activities, that are reasonably certain to occur within the action area" considered in this Opinion (50 CFR 402.02).

Small whorled pogonia – While the Service is not aware of any specific proposed projects scheduled to occur immediately within the action area, SWP is currently being affected by a variety of actions and activities in Seneca State Forest, such as trail maintenance, as described in the Environmental Baseline section above. WVDNR is considering options to reroute the existing trail (currently 550 ft away) further from the Seneca SWP colony to reduce potential foot traffic, which may crush SWP and spread invasive plants. This action would be beneficial to SWP.

Running Buffalo clover – While the Service is not aware of any specific proposed projects scheduled to occur immediately within the action area, RBC is likely currently being affected by a variety of actions and activities such as disturbance from foot traffic or ORV use on private lands as described in the Environmental Baseline section above. All RBC occurrences are on private land and most are located on or near old logging roads or trails; therefore, they will likely received some type of occasional disturbance, some of which may be beneficial and some of which may cause adverse effects.

Roanoke logperch – While the Service is not aware of any specific proposed projects scheduled to occur immediately within the action area, RLP is likely currently being affected by a variety of actions and activities such as alteration habitat, as described in the Environmental Baseline section above. RLP habitat destruction, modification, and fragmentation from chemical spills, non-point runoff, channelization, impoundments, impediments, and siltation is expected to continue to occur, resulting in declines in RLP abundance.

Clubshell – While the Service is not aware of any specific proposed projects scheduled to occur immediately within the action area, clubshell is currently being affected by a variety of actions and activities such as oil and gas development and associated water withdrawals as described in the Environmental Baseline section above. Multiple oil and gas wells, pipelines, and water impoundments are under construction within the watershed. These activities often result in increased sedimentation and erosion to waterways due to a large quantity of earth disturbing activities. Additionally, private landowner practices within riparian areas of Hackers Creek (e.g., clearing all riparian vegetation and application of herbicides within the riparian zone) have adversely affected habitat conditions which place added stress to the already declining clubshell population.

Rusty patched bumble bee – The Service is not aware of any future state, tribal, local, or private actions that are reasonably certain to occur within the action area at this time; therefore, no cumulative effects are anticipated.

Madison Cave isopod – While the Service is not aware of any specific proposed projects scheduled to occur immediately within the action area, MCI is likely currently being affected by a variety of actions and activities such as agriculture and forest management, as described in the

Environmental Baseline section above. These areas provide for sediments and contaminants to MCI habitat and we expect they contribute to degradation of MCI habitat in this area.

Indiana bat – The Service is not aware of any future state, tribal, local, or private actions that are reasonably certain to occur within the action area at this time; therefore, no cumulative effects are anticipated.

Northern long-eared bat – The Service is not aware of any future state, tribal, local, or private actions that are reasonably certain to occur within the action area at this time; therefore, no cumulative effects are anticipated.

JEOPARDY ANALYSIS

Section 7(a)(2) of the ESA requires that federal agencies ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of designated critical habitat.

Jeopardy Analysis Framework

"Jeopardize the continued existence of" means to engage in an action that reasonably would be expected, directly or indirectly, to reduce appreciably the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, numbers, or distribution of that species (50 CFR 402.02). The following analysis relies on 4 components: (1) Status of the Species, (2) Environmental Baseline, (3) Effects of the Action, and (4) Cumulative Effects. The jeopardy analysis in this Opinion emphasizes the rangewide survival and recovery needs of the listed species and the role of the action area in providing for those needs. It is within this context that we evaluate the significance of the proposed federal action, taken together with cumulative effects, for purposes of making the jeopardy determination.

Analysis for Jeopardy

Small whorled pogonia

Impacts to Individuals – The proposed action includes herbaceous vegetation and ground cover clearing, tree and shrubs clearing, tree side trimming, grading, trenching, blasting, regrading/stabilization, vegetation management, and permanent ROW repair/regrading. As discussed in the Effects of the Action, potential effects of the action include effects to SWP present within the action area year-around during construction and O&M. Effects include decreased fitness and reproductive success or death of individual SWP due to degradation and loss of SWP habitat caused by altered hydrology, changes in soil moisture, downslope erosion, sedimentation, changes to sunlight regime, and competition. Individual SWP may be crushed by rocks from blasting and experience injury and death. The AMMs (e.g., SWP Conservation Plan, Upland Erosion Control Plan, Restoration and Rehabilitation Plan, and Non-Native Invasive Plant Species Management Plan) will minimize the potential effects from surface water runoff during construction and restoration and competition from invasive plants. In summary, there will be impacts to individual SWP in their annual reproduction and survival rates.

Impacts to Populations – As we have concluded that individual SWP are likely to be killed or experience some reductions in their annual or lifetime reproductive success, we need to assess the aggregated consequences of the anticipated losses of the exposed individuals on the population to which these individuals belong.

Two colonies of SWP, Seneca and MNF containing 24 and 3 individuals (i.e., stems), respectively, were found during surveys of the action area and represent individual populations. A SWP colony of 4 individuals was found outside of the action area, approximately 0.3 mile away from the MNF colony (Allstar Ecology 2016a, 2016b; ERM 2017; VHB 2017), and is considered part of the MNF population because the 2 are less than the 0.62 mile (1 km) minimum separation distance for an "element occurrence" or population, as defined by NatureServe (2002). We expect that multiple project subactivities (Appendix B Table 1) will permanently affect the Seneca population because of the permanent habitat alteration and degradation of the population's upslope drainage and long-term changes in sunlight regime. We anticipate that the long-term viability of the Seneca population will be reduced significantly due to decreased fitness, reproductive output, and death of individual SWP and the population will have a lower number of SWP individuals permanently, but will likely not be extirpated. A portion of the MNF population (43%) will be temporarily affected by the subactivities in the construction ROW (Appendix B Table 1). For the MNF population, we anticipate a long-term reduction in fitness and reproductive success until the temporary construction ROW is restored and permanent vegetation, including shrubs and mid-story trees, is established. The affected populations represent 25% of all documented SWP populations in WV.

Impacts to Species – As we have concluded that populations of SWP are likely to experience reductions in their fitness or mortality, we need to assess the aggregated consequences of the anticipated losses and reductions in fitness of the exposed populations on the species as a whole. To understand the consequences of population-level effects at the species level, we need to understand the RND needs of the species. To meet the recovery objectives of SWP, the following must be met: 1) a minimum of 61 sites (or populations) (75% of number of sites known in 1992) must be permanently protected and distributed proportionately among the 3 geographic centers and the outliers; 2) these sites must represent at least 75% of the known self-sustaining, viable populations as determined at the time of reclassification, including a total of 20 sites having 80 stems or more (self-sustaining, viable population defined as showing a geometric mean of 20 emergent stems, over a 10-year period); 3) establishment of appropriate habitat management programs for occupied SWP habitat or protection of sufficient amount of unoccupied habitat adjacent to existing populations (Service 1992). The rangewide status of SWP is considered stable (Service 2008). As of 2007, 150 extant SWP populations were documented rangewide; however few SWP populations are monitored annually and some populations may only be visited once every 5 to 10 years, therefore it is difficult to fully assess population viability. Since 2007, 6 additional populations have been found in WV, thus the total rangewide is approximately 156 SWP populations.

The proposed action is anticipated to cause a long-term reduction in fitness of 1 population and permanent reduction in fitness of 1 population, affecting 1.3% of SWP populations rangewide. Due to the presence of 156 populations throughout its range, the reduced fitness of 2 populations

is not anticipated to change the status of the species.

Running Buffalo clover

Impacts to Individuals – The proposed action includes multiple subactivities (Appendix B Table 2) that will result in mortality of RBC individuals and will permanently alter and/or destroy RBC habitat. As discussed in the Effects of the Action, ground disturbance, tree clearing and trimming, and burning subactivities will kill individual plants. Additionally, these activities will permanently alter and degrade habitat such that conditions are no longer favorable for RBC re-establishment. Elimination of canopy cover which modifies the amount of sunlight reaching individual plants may reduce seed production and germination of some individuals and may lead to mortality of others. The increase in sunlight may also increase competition from invasive species which can outcompete RBC, prohibiting growth of individual plants. ORV traffic on improved access roads and the construction ROW will exceed disturbance frequencies tolerated by RBC and prevent re-establishment of RBC to some of the disturbed areas. Increased ease of access by white-tailed deer and the resulting herbivory will kill some RBC and lower reproductive output of other RBC. In summary, there will be impacts to individual RBC survival and fitness.

Impacts to Populations – As we have concluded that individual RBC are likely to experience mortality due to the proposed action, we need to assess the aggregated consequences of the anticipated losses of the exposed individuals on the populations to which these individuals belong.

Six populations of RBC, each consisting of multiple occurrences, will be affected by the proposed action (Appendix B Table 2). The loss of individuals from these occurrences will cause a reduction in fitness to 5 of the 6 affected populations; the remaining population will experience mortality as all individuals and occurrences will be killed due to project subactivities. There are approximately 5.1 acres of RBC within 150 ft of the construction ROW centerline and 0.8 acres will be directly affected and killed as a result of the action (FERC 2017).

Impacts to Species – As we have concluded that RBC populations are likely to experience reductions in their fitness and mortality, we need to assess the aggregated consequences of the anticipated losses of the exposed populations on the species as a whole. To understand the consequences of population-level effects at the species level, we need to understand the RND needs of RBC. To meet the goal of recovery of RBC, at least 34 populations, in total, must be distributed as follows: 2 A-ranked, 6 B-ranked, 6 C-ranked, and 20 D-ranked populations across at least 2 of the 3 regions in which RBC occurs (Appalachian, Bluegrass, and Ozark) (Service 2017). The rangewide status of the species is considered stable/improving with 152 healthy populations across all 3 regions (16 A-ranked, 35 B-ranked, 42 C-ranked, and 59 D-ranked) and 15% of these occur on protected lands (Service 2017). With the addition of the populations found during surveys for the proposed action, there are 160 RBC populations rangewide.

This proposed action will cause a reduction in fitness of 5 populations due to mortality of some individuals from some occurrences that make up these populations and will result in the loss of 1 population. There are approximately 5.1 acres of RBC within 150 ft of the construction ROW centerline and 0.8 acres will be directly affected and killed (FERC 2017). The 6 affected

populations represent 9.1% of RBC populations in WV and 3.75% of RBC populations rangewide. Due to the presence of 160 populations throughout its range, the reduced fitness of 5 populations and mortality of I population is not anticipated to change the status of the species.

As part of the proposed action, a 400-acre property containing part of an RBC population (approximately 50,000 rooted crowns) has been obtained and will be protected in perpetuity. This property will not be adversely affected by the proposed action. It will be enhanced for RBC by managing and treating invasive species, removing trees to provide more filtered sunlight, and providing periodic soil disturbance (e.g., disking, tractor tilling, and harrow rake digging) (AllStar Ecology 2017). Initial habitat enhancements will be monitored for a period of 5 years, which includes monitoring of existing populations. Protecting part of a RBC population is not anticipated to change the status of the species rangewide.

Roanoke logperch

Impacts to Individuals – The proposed action includes trenching, grading, constructing/improving access roads, and stream and wetland crossings. As discussed in the Effects of the Action, effects to individual RLP are expected to include injury or death from installation and dewatering of cofferdams, installation of the bridge center supports and blasting, if it occurs. Additionally, a temporary reduction in feeding or reproducing is expected as a result of either temporarily preventing access to a foraging or spawning area or altering habitat through the introduction of sediments, cofferdams, or bridge center supports such that the habitat is unsuitable for foraging or spawning. In response to sediment plumes, most RLP are anticipated to cease feeding or breeding activities and move to clearer water until sediment levels return to background levels. In particular, we expect spawning will be delayed or inhibited at Waqua and Sturgeon Creeks due to the installation of the bridge center supports during the RLP breeding period. Individuals will expend more energy to seek out different foraging and spawning areas. A TOYR (March 15 - June 30) to protect RLP during their spawning season will be implemented at Butterwood Creek and Nottoway River 1, which will minimize the potential for effects from sedimentation. Permanent removal of riparian vegetation is expected to decrease fitness of a small portion of RLP individuals. In summary, there will be impacts to individual RLPs in their annual reproduction and survival rates.

Impacts to Populations – As we have concluded that individual RLP are likely to be killed or experience some reduction in their annual reproductive success, we need to assess the aggregated consequences of the anticipated losses of the exposed individuals on the population to which these individuals belong.

We expect that the population level impacts from injury, death, and spawning disruption to the RLP will be relatively small because the proposed action affects a small number of individuals in 0.8% of the RLP habitat within the Nottoway River drainage, which is a small portion (0.16%) of the entire range of the species. Following completion of each action that results in adverse effects to RLP, we expect that the RLP population, given no other major stressors, will recover within 1-3 years assuming that most RLP in the action area experience temporary impacts. Similarly, habitat impacts are minor compared to the overall amount of RLP habitat available. The effects of the proposed action are expected to be primarily temporary; in general, RLP habitat will recover to a suitable condition following temporary impacts; and RLP are expected

to continue to occupy waterways within the action area. Therefore, we conclude that the effects from the proposed action do not pose a significant risk to the RLP and will not result in permanent population declines.

Impacts to Species – As we have concluded that populations of RLP are unlikely to experience reductions in their fitness, there will be no harmful effects (i.e., there will be no reduction in RND) on the species as a whole.

Clubshell

Impacts to Individuals – The proposed action includes multiple subactivities (Appendix B Table 4) that are ground disturbing and will result in sediment entering tributaries to Hackers Creek. As discussed in the Effects of the Action, potential effects of the action include effects to all individuals in the Hackers Creek clubshell population. Effects from sedimentation will impair feeding of individual mussels and degrade and alter habitat. Impaired feeding is anticipated to result in reduced physiological function; depressed rates of growth, reproduction, and recruitment; and ultimately mortality of a few individuals. Additionally, sedimentation may permanently alter and degrade habitat through siltation such that conditions are no longer favorable for clubshell. These effects will persist until high flows flush settled sediment downstream. We anticipate these changes in habitat will further impair feeding, resulting in sublethal effects on growth and reproduction or starvation with long-term exposure, affecting a majority of individual mussels. In summary, there will be impacts to individual clubshell survival and fitness as a result of impaired feeding and habitat degradation and alteration.

Impacts to Populations – As we have concluded that individual clubshell are likely to experience mortality due to the proposed action, we need to assess the aggregated consequences of the anticipated losses of the exposed individuals on the populations to which these individuals belong.

There is 1 population of clubshell in Hackers Creek. As a result of sedimentation, decreased water quality, and degraded and altered habitat we anticipate the Hackers Creek clubshell population will experience impaired feeding. When high flows continue to flush sediment downstream, we expect that within 6 months post-construction the habitat will begin to return to pre-construction conditions. At that time, the remaining mussels will be able to feed in an unimpaired manner. However, the population will remain below pre-construction numbers.

Impacts to Species – As we have concluded that 1 population of clubshell is likely to experience reductions in its fitness and mortality, we need to assess the aggregated consequences of the anticipated loss of the exposed population on the species as a whole. To understand the consequences of population-level effects at the species level, we need to understand the RND needs of the species.

In brief, the clubshell recovery criteria (Service 1994) are:

1. Viable populations must be established in 10 separate drainages (Tippecanoe River, IN; East Fork West Branch St. Joseph River, MI/OH; Fish Creek, IN/OH; Green River; KY; Little Darby Creek, OH; Elk River, WV; French Creek, PA; Allegheny River, PA; plus two additional drainages).

2. Each of the 10 populations must be large enough to survive a single adverse ecological event.
3. The populations and their drainages must be permanently protected from all foreseeable and controllable threats, both natural and anthropogenic.

The rangewide status of the species is considered declining. Throughout its range, there are 13 populations of clubshell occupying 21 streams (Service 2008). This includes more than 1 million individuals (Villella 2007). However, only 7 of these populations show evidence of reproductive success, none of which occur in WV (Service 2008). Clubshell populations exist in 3 river systems in WV: the Monongahela, Kanawha, and Ohio Rivers. The Hackers Creek population is the only remaining population in the Monongahela River system.

The proposed project is anticipated to adversely impact the Hackers Creek population; however, this population is not in one of the specified drainages listed in Recovery Criteria 1 nor is it likely to be part of the 2 unspecified additional drainages. The reduction in fitness of the Hackers Creek population will not prevent meeting the Recovery Criteria. Therefore, we conclude that this project will not reduce the likelihood of survival and recovery of the clubshell.

Rusty patched bumble bee

Impacts to Individuals – As discussed in the Effects of the Action, anticipated effects of the action include effects to individual RPBBs present within the HPZ year-round. Effects include reduced reproductive success of queens as a result of removal of spring ephemerals and other floral resources, and injury or death of individual workers or queens during the active season as a result of crushing by machinery during vegetation removal and construction in the construction ROW.

In response to removal of floral resources, the following season RPBB workers will be displaced and expend more energy to seek out nearby available foraging areas and experience reduced survival as a result of the decrease in food availability. Consequently, there will be impacts to annual survival rates of a small percentage of individual RPBB workers. Individual worker bees are responsible for supporting the reproductive success of the colony by providing food resources to the queen. The health of the colony is dependent on the number of workers foraging and providing resources. This is reflected by the higher likelihood of colony collapse associated with haplodiploidy, when 50% of the workers are replaced by diploid males that do not contribute food resources to the colony. Loss of a percentage of RPBB workers will reduce the reproductive success of the queen (i.e., not as many foundress queens produced) as a result of loss of foraging resources provided by workers.

Overwintering queens may be found within the HPZ. The access road surface is not suitable overwintering habitat due to soil compaction; however, suitable habitat exists alongside the access road. Widening and improvements will impact approximately 3 m of potentially suitable overwintering habitat on either side of the existing access road within the HPZ. Within the HPZ (653 ha), the proposed action will impact 7.3 ha (1.1%) of potentially suitable overwintering habitat. Because the probability of a queen being located in that 1.1% of potentially suitable overwintering habitat is unlikely, effects to individual overwintering queens are not anticipated.

Impacts to Populations – As we have concluded that a small percentage of individual RPBB are likely to be killed or experience some reductions in their annual or lifetime reproductive success, we need to assess the aggregated consequences of the anticipated losses and reductions in fitness (i.e., reproductive success and long-term viability) of the exposed individuals on the population to which these individuals belong.

A population of RPBB is represented by the number of successful nests or colonies comprising a given geographical area, rather than a number of individuals, because a colony is founded by a single queen and represents 1 reproductive unit (Chapman and Burke 2001, Zayed 2009, Service 2016). As a result of their genetic structure, a RPBB population can only persist on the landscape in a meta-population structure. A healthy population typically contains many colonies, and loss of a colony or overwintering queen could reduce the overall viability of any metapopulation associated with those colonies due to lost opportunities to interbreed and small population dynamics. Impacts to populations may result from loss of a colony nest through crushing, crushing overwintering foundress queens, or loss of a percentage of colony workers.

The colony nest associated with the single observed RPBB may be located anywhere within a 0.8 km radius (201 ha) of the observation location (Osborne et al. 1999, Knight et al. 2005, Wolf and Moritz 2008, Service 2016). Nest density of RPBB is assumed to be approximately 0.14/ha (Chapman et al 2003 [as cited in Charman et al. 2010], Darvill et al. 2004, Knight et al. 2005, Kraus et al. 2009, Wolf et al. 2012, Dreier et al. 2014, Wood et al. 2015). There are 201 ha of suitable nesting habitat in proximity to the observed location; therefore, there may be up to 28 nests (0.14 nests/ha x 201 ha) within 0.8 km of the observed RPBB worker. The proposed action will affect up to 1.08 ha (1,800 m total access road length x 6 m additional access road width) of suitable nesting habitat within a 0.8 km radius of the observed location, which represents 0.5% (1.08 ha/201 ha) of the suitable nesting habitat, and represents the territory of 1 colony if colonies are evenly distributed. As a result, there is a 15% (affected nesting area (1.08 ha)/average area utilized by each nest (7 ha) within nesting habitat) likelihood that 1 nest will be crushed within the 1.08 ha of suitable nesting habitat to be removed. However, due to the potential presence of an additional 27 colony nests within 0.8 km of the observed RPBB, and the metapopulation dynamics of RPBB, loss of 1 colony as a result of crushing is not likely to negatively impact the fitness or survival of the population.

Loss of a small percentage of colony workers may decrease the reproductive success of the colony as a result of loss of foraging resources provided by workers to the queen (i.e., not as many foundress queens produced to start new colonies); however, the overall survival of the original colony is unlikely to be affected. The proposed action will remove 7.3 ha (1.1%) of suitable habitat within the HPZ. Habitat removed as a result of widening and improving the access road is likely to be permanently lost; however, the project activities will shift the canopy opening such that floral resources will develop along the new edge of the access road over time. There are potentially up to 28 colonies within foraging distance of the HPZ; however, only a small percentage of foraging bees are expected to be impacted, which may represent a few individuals from each colony. Impacts to individuals from most colonies will not be measureable. Nest densities are estimated to be 0.14 nests/ha; therefore, there is likely to be no more than 1 nest in direct proximity to the 7.3 ha impacted by the project. Effects to 1 colony are expected through limited and temporary impacts to reproduction as a result of loss of foraging

habitat. We anticipate a small reduction in the reproductive capacity of queens associated with colonies within average foraging distance (0.8 km) of the proposed action, as a result of decreased foraging ability of workers. However, due to the metapopulation dynamics of RPBB, limited indirect impacts to ability of queens associated with 1 colony to produce workers and foundress queens are not likely to negatively impact the fitness or survival of the population.

Impacts to Species – As we have concluded that populations of RPBB are unlikely to experience reductions in their fitness, there will be no harmful effects (i.e., there will be no reduction in RND) on the species as a whole.

Madison Cave isopod

Impacts to Individuals – The proposed action includes trenching, blasting, grading, constructing/improving access roads, and wetland crossings. As discussed in the Effects of the Action, potential effects of the action include effects to MCI present within the action area during construction. Individuals will need to expend more energy to seek out different travel corridors, food sources, or mates. Effects include a temporary reduction in feeding or reproducing as a result of either a potentially blocked travel corridor or the need to shift from an area where MCI could be feeding or reproducing. Depending on the severity of the impact, some individuals are likely to die from crushing or smothering if they do not move from the area quickly. However, the AMMs (enhanced sediment and erosion control measures) will minimize the potential for direct and indirect effects from sedimentation. In summary, there will be impacts to individual MCIs in their annual survival rates.

Impacts to Populations – As we have concluded that individual MCIs are likely to be killed or experience some reduction in their annual reproductive success, we need to assess the aggregated consequences of the anticipated losses of the exposed individuals on the population to which these individuals belong.

No documented MCI localities occur in the proposed construction ROW centerline or ATWS; however, we consider Cochran's Cave an undocumented MCI locality. Documented localities represent a sampling point where MCI were captured. For this analysis we are using localities as a surrogate for a population.

Limited information exists on the connectivity of MCI populations, preventing an understanding of how impacts at a given site may relate to populations. Sites that are be impacted could be rapidly recolonized if the site was part of a larger population, or they could be eliminated with little chance of subsequent recolonization if not part of a larger population.

We expect decreased fitness of the Cochran's Cave MCI population. A total of 896.7 surface acres of MCI potential habitat is within 0.5 mile of the construction ROW centerline and ATWS that bisect Cochran's Cave. Within that area, the construction ROW centerline and ATWS bisect the Cochran's Cave Conservation Site, including the vertical entrance to the cave, totaling 11.2 surface acres of disturbance. While the AMMs provided in the FEIS (FERC 2017) will ameliorate much of the adverse effects, they will not be completely effective in preventing all sediment from entering the phreatic water. Additionally, the AMMs cannot completely prevent shifts in surface and sub-surface formations and hydrology from trenching, digging, or blasting.

Sudden shifts in subterranean structures are likely to crush or trap MCIs, alter their travel corridors, or isolate portions of the population. We anticipate a reduction in the fitness of this undocumented population.

Impacts to Species – As we have concluded that 1 undocumented population of the MCI is likely to experience a reduction in fitness, we need to assess the aggregated consequences of the anticipated reductions in fitness of the exposed population on the species as a whole.

To understand the consequences of population-level effects at the species level, we need to understand the RND needs of the species. In brief, the MCI recovery criteria (Service 1996) are:

1. Populations of MCI at Front Royal Caverns, Linville Quarry Cave No. 3, and Madison Saltpeter Cave/Steger's Fissure are shown to be stable over a 10-year monitoring period.
2. The recharge zone of the deep karst aquifer at each of the population sites identified in Criterion 1 is protected from all significant groundwater contamination sources.
3. Sufficient population sites are protected to maintain the genetic diversity of the species. Protection of newly discovered populations, if any, will be incorporated into this criterion insofar as they contribute to maintenance of overall genetic diversity.

The rangewide status of the species appears to be stable (Service 2011). The proposed project is anticipated to adversely impact 1 undocumented population; however, it is unlikely to adversely impact any of the populations listed in Recovery Criteria 1. The potential reduction in the fitness of 1 undocumented population will not measurably reduce the species ability to recover. Therefore, we conclude that this project will not reduce the likelihood of survival and recovery of the MCI.

<u>Indiana bat</u>

Impacts to Individuals – The proposed action includes removal of 4,448 acres of Ibat suitable habitat that is likely to cause pregnant females to expend energy when required to alter their travel corridors, and as a result give birth to smaller sized pups with a lower likelihood of survival. While a pup might die as a result of being born small, it is not expected given the low likelihood that maternity roost trees are in the action area. Tree removal may fragment the habitat such that individual Ibats traveling through the area will be more vulnerable to predation, resulting in injury or death. Tree clearing is likely to make the remaining forest less suitable for roosting or foraging, which will cause Ibats to expend more energy searching for alternative roosting or foraging sites resulting in impacts to individual Ibats in their annual survival rates.

We expect most effects from tree removal will occur during spring staging or fall swarming to individual Ibats that hibernate in Starr Chapel, Breathing, or Clark's Caves, which were known hibernacula with documented Ibats in the 2017 winter surveys. No direct effects are anticipated but individual Ibats may be temporarily harmed (reduced overwinter survival or reproductive success) by loss of spring staging/fall swarming habitat. Bats travel between hibernacula during fall swarming to mate and likely assess the relative suitability of potential hibernation sites (Brack et al. 2005). Effects to individual Ibats could be minor such as a slight shift in roosting/foraging areas or more significant such as delayed mating in the fall or fertilization in the spring. Bats born earlier in the year have a greater chance of surviving their first winter and breeding in their first year of life (Frick et al. 2010). Removing some of the roosting/foraging

habitat is likely to delay the birth of a small number of Ibats, thereby decreasing their odds of surviving.

Impacts to Populations – As we have concluded that individual Ibats are likely to experience some reduction in their lifetime survival or reproductive success, we need to assess the aggregated consequences of the anticipated reductions in fitness of the exposed individuals on the population to which these individuals belong.

Individuals using the known use spring staging/fall swarming habitat at 3 hibernacula will be affected. The effects are not expected to measurably decrease the fitness of the hibernating populations. Any removal of trees within the known use spring staging/fall swarming habitat will occur during the winter when bats are hibernating, which will limit disrupting fall swarming or spring staging activities and will avoid directly killing Ibats. Further, not every Ibat from the 3 hibernacula will be exposed to stressors associated with tree clearing because effects are to a small portion of the known use spring staging/fall swarming habitat around each hibernaculum. Acres of trees removed around the 3 hibernacula are as follows: Star Chapel Cave 96 acres (0.2% of known spring staging/fall swarming habitat); Breathing Cave 189 acres (0.5% of known spring staging/fall swarming habitat), and Clarke's Cave 141 acres (0.3% of known spring staging/fall swarming habitat) (see Table 4.7.1-7, page 4-265 of the FEIS for details [FERC 2017]). We anticipate limited effects during the first spring after tree clearing as bats emerge from hibernation. We anticipate most effects will occur during the first fall swarm after tree clearing. Bats are expected to acclimate to this change and shift to alternative habitat within the known use spring staging/fall swarming habitat. All effects are expected to be limited and short-term in nature. We do not expect a long-term reduction in any hibernating populations because the Ibat is adapted to ephemeral environments and a significant portion of the known use spring staging/fall swarming habitat will remain. The effects from the proposed action will not result in permanent population declines.

Impacts to Species – As we have concluded that populations of Ibats are unlikely to experience reductions in their fitness, there will be no harmful effects (i.e., there will be no reduction in RND) on the species as a whole. Additionally, as part of the proposed action, a 400-acre property containing 10 caves and 396 acres of forest that will not be affected by the action has been obtained and will be protected in perpetuity. The property will be improved and enhanced for bats through installation of watering/foraging pools, snag creation, and erection of artificial roost structures (bat boxes). Ibats have not been detected in any of these caves as of the date of this Opinion, but protection of this site may benefit Ibats in the future.

<u>Northern long-eared bat</u>

Impacts to Individuals – The majority of impacts to NLEB have been previously addressed in the Service's January 5, 2016 programmatic biological opinion implementing the final 4(d) rule. Some effects to NLEB associated with impacts to habitat surrounding hibernaculum PH-S018 have not. The proposed action includes the permanent removal of 170.94 acres of forest around a NLEB known hibernaculum; 0.4 acres are not addressed by the programmatic opinion. This area may be used as roosting/foraging habitat in the fall or spring or by maternity colonies. No direct effects are anticipated but individual NLEB may be temporarily affected by loss of fall swarming, spring staging, and summer habitat resulting in reduced overwinter survival or

reproductive success.

Impacts to Populations – As we have concluded that individual NLEB are likely to experience some reduction in their lifetime survival or reproductive success, we need to assess the aggregated consequences of the anticipated reductions in fitness of the exposed individuals on the population to which these individuals belong.

Bats are expected to acclimate to this permanent habitat removal by shifting to alternative habitat. All impacts are expected to be limited and short-term in nature. We do not expect a long-term reduction in the PH-S018 population or potential maternity colony because the NLEB is adapted to ephemeral environments and a significant portion of the spring staging/fall swarming winter habitat or potential maternity colony habitat will remain. Therefore, we conclude that the effects from the proposed action will not result in permanent population declines.

Impacts to Species – As we have concluded that populations of NLEB are unlikely to experience reductions in their fitness, there will be no harmful effects (i.e., there will be no reduction in RND) on the species as a whole. Additionally, as part of the proposed action, a 400-acre property containing 10 caves and 396 acres of forest that will not be affected by the action will be protected in perpetuity. The property will be improved and enhanced for bats through installation of watering/foraging pools, snag creation, and erection of artificial roost structures (bat boxes). NLEBs have not been detected in any of these caves as of the date of this Opinion, but protection of this site may benefit NLEBs in the future.

CONCLUSION

Small whorled pogonia – We considered the current overall stable status of the SWP and the similar condition of the species within the action area (environmental baseline). We then assessed the effects of the proposed action and the potential for cumulative effects in the action area on individuals, populations, and the species as a whole. These types of effects of the proposed action are currently considered primary factors influencing the status of the species. While the proposed action may compound those factors, as stated above, we do not anticipate any reductions in the overall RND of the SWP. It is the Service's Opinion that authorization to construct and operate the pipeline, as proposed, is not likely to jeopardize the continued existence of the SWP.

Running Buffalo clover – We considered the current overall stable/improving status of RBC and the similar condition of the species within the action area (environmental baseline). We then assessed the effects of the proposed action and the potential for cumulative effects in the action area on individuals, populations, and the species as a whole. These types of effects of the proposed action are currently considered primary factors influencing the status of the species. While they may compound those factors, as stated above, we do not anticipate any reductions in the overall RND of RBC. It is the Service's Opinion that authorization to construct and operate the pipeline, as proposed, is not likely to jeopardize the continued existence of RBC.

Roanoke logperch – We considered the current overall improving status of the RLP and the stable condition of the species within the action area (environmental baseline). We then assessed

the effects of the proposed action and the potential for cumulative effects in the action area on individuals and populations, and the species as a whole. These types of effects of the proposed action are not currently considered primary factors influencing the status of the species. While they may compound those factors, as stated above, we do not anticipate any reductions in the overall RND of the RLP. It is the Service's Opinion that authorization to construct and operate the pipeline, as proposed, is not likely to jeopardize the continued existence of the RLP.

Clubshell – We considered the current overall declining status of clubshell and the similar condition of the species within the action area (environmental baseline). We then assessed the effects of the proposed action and the potential for cumulative effects in the action area on individuals, populations, and the species as a whole. These types of effects of the proposed action are currently considered primary factors influencing the status of the species. While they may compound those factors, as stated above, we do not anticipate any reductions in the overall RND of the species. It is the Service's Opinion that authorization to construct and operate the pipeline, as proposed, is not likely to jeopardize the continued existence of the species.

Rusty patched bumble bee – We considered the current overall declining status of the RPBB and the unknown condition of the species within the action area (environmental baseline). We then assessed the effects of the proposed action and the potential for cumulative effects in the action area on individuals, populations, and the species as a whole. These types of effects of the proposed action are not currently considered primary factors influencing the status of the species. While they may compound those factors, as stated above, we do not anticipate any reductions in the overall RND of the RPBB. It is the Service's Opinion that authorization to construct and operate the pipeline, as proposed, is not likely to jeopardize the continued existence of the RPBB.

Madison Cave isopod – We considered the current overall stable status of the MCI and the similar condition of the species within the action area (environmental baseline). We then assessed the effects of the proposed action and the potential for cumulative effects in the action area on individuals, populations, and the species as a whole. These types of effects of the proposed action are currently considered primary factors influencing the status of the species. While the proposed action may compound those factors, as stated above, we do not anticipate any reductions in the overall RND of the MCI. It is the Service's Opinion that authorization to construct and operate the pipeline, as proposed, is not likely to jeopardize the continued existence of the MCI.

Indiana bat – We considered the current overall declining status of the Ibat and the similar condition of the species within the action area (environmental baseline). We then assessed the effects of the proposed action and the potential for cumulative effects in the action area on individuals, populations, and the species as a whole. These types of effects of the proposed action are currently considered primary factors influencing the status of the species. While they may compound those factors, as stated above, we do not anticipate any reductions in the overall RND of the Ibat. It is the Service's Opinion that authorization to construct and operate the pipeline, as proposed, is not likely to jeopardize the continued existence of the Ibat.

Northern long-eared bat – We considered the current overall declining status of the NLEB and

the similar condition of the species within the action area (environmental baseline). We then assessed the effects of the proposed action and the potential for cumulative effects in the action area on individuals, populations, and the species as a whole. These types of effects of the proposed action are currently considered primary factors influencing the status of the species. While they may compound those factors, as stated above, we do not anticipate any reductions in the overall RND of the NLEB. It is the Service's Opinion that authorization to construct and operate the pipeline, as proposed, is not likely to jeopardize the continued existence of the NLEB.

INCIDENTAL TAKE STATEMENT

Section 9 of the ESA and federal regulation pursuant to Section 4(d) of the ESA prohibit the take of endangered and threatened species, respectively, without a special exemption. Take is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct. Harm is further defined by the Service to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing essential behavioral patterns including breeding, feeding, or sheltering (50 CFR § 17.3). Harass is defined by the Service as intentional or negligent actions that create the likelihood of injury to listed species to such an extent as to significantly disrupt normal behavior patterns, which include, but are not limited to, breeding, feeding, or sheltering (50 CFR § 17.3). Incidental take is defined as take that is incidental to, and not the purpose of, the carrying out of an otherwise lawful activity. Under the terms of Section 7(b)(4) and Section 7(o)(2), taking that is incidental to and not intended as part of the agency action is not considered to be prohibited taking under the ESA provided that such taking is in compliance with the terms and conditions of this incidental take statement.

The measures described below are nondiscretionary, and must be undertaken by the FERC so that they become binding conditions of any grant or permit issued to the applicant, as appropriate, for the exemption in Section 7(o)(2) to apply. The FERC has a continuing duty to regulate the activity covered by this incidental take statement. If the FERC: (1) fails to assume and implement the terms and conditions or (2) fails to require the applicant to adhere to the terms and conditions of the incidental take statement through enforceable terms that are added to the permit or grant document, the protective coverage of Section 7(o)(2) may lapse. To monitor the impact of incidental take, the FERC must report the progress of the action and its impact on the species to the Service as specified in the incidental take statement [50 CFR 402.14(i)(3)].

On January 14, 2016, the Service published a final species-specific rule pursuant to Section 4(d) of the ESA for the NLEB (50 CFR §17.40(o)), which became effective February 16, 2016. The Section 4(d) rule defines prohibited take of the NLEB, which is limited to certain circumstances and activities within the full suite of prohibitions otherwise applicable to threatened species under 50 CFR §17.31. The majority of incidental take of the NLEB that may occur from the proposed action is not considered prohibited take under the NLEB 4(d) rule. Therefore, that taking does not require exemption from the Service. However, any incidental take associated with impacts to 0.4 acres of habitat removal within 0.25 miles of a hibernaculum is addressed below.

ADDITIONAL TEXT REVISION

Section 7(b)(4) and 7(o)(2) of the ESA generally do not apply to listed plants species. However, limited protection of listed plants from take is provided to the extent that the ESA prohibits the removal and reduction to possession of federally listed endangered plants or the malicious damage of such plants on areas under federal jurisdiction, or the destruction of endangered plants on non-federal areas in violation of State law or regulation or in the course of any violation of a State criminal trespass law.

AMOUNT OR EXTENT OF TAKE ANTICIPATED

The Service analyzed the effects to the species above.

Roanoke logperch – To estimate incidental take, we calculated the area of RLP habitat at each crossing (i.e., wetted width of the waterbody by the total of the construction ROW width and the 1,000 m stream length at each crossing) as follows: Butterwood Creek (8 m)(26 m + 1,000 m) = 8,208 m^2; Sturgeon Creek (8 m)(38 m + 1,000 m) = 8,304 m^2; Nottoway River 1 (22 m)(38 m + 1,000 m) = 22,836 m^2; and Waqua Creek (8 m)(27.4 m + 1,000 m) = 8,219.2 m^2. Total = 47,564 m^2. Then we calculated the subset of the action area (i.e., wetted width of the waterbody by the construction ROW width) for cofferdam and bridge center support placement and removal: Butterwood Creek (8 m x 26 m) = 208 m^2; Sturgeon Creek (8 m x 38 m) = 304 m^2; Nottoway River 1 (22 m x 38) = 836 m^2; and Waqua Creek (8 m x 27.4 m) = 219.2 m^2. Total = 1,567.2 m^2. Effects from cofferdam and bridge center support placement and removal comprise approximately 3.3% [(1,567.2 m^2/47,564 m^2)(100)] of the action area. The anticipated take is described in Table 5 below.

Table 5. RLP amount and type of anticipated incidental take.

Species	Amount of Take Anticipated	Life Stage when Take is Anticipated	Type of Take	Take is Anticipated as a Result of
RLP	5	Adults or juveniles	Injury or Kill	Crushing due to installation and removal of cofferdams and bridge center support (i.e., 3.3% of the action area x 150 RLP in action area).
RLP	145	Adults or juveniles	Harm or Harass	Sedimentation and subsequent habitat alteration from cofferdam dewatering and upland construction activities.

Clubshell – The Service anticipates incidental take of clubshell will be difficult to detect for the following reason: up to 70% of a population can be distributed below the substrate surface. However, the following level of take of this species can be anticipated by loss of habitat from 130 m downstream to 455 m upstream of Life's Run Bridge (County Route 14) (total of 585 m) because this area contains suitable clubshell habitat. The anticipated take is described in Table 6 below.

Table 6. Clubshell amount and type of anticipated incidental take.

Species	Amount of Take Anticipated	Life Stage when Take is Anticipated	Type of Take	Take is Anticipated as a Result of
Clubshell	Small percent of	Adults	Kill	Mortality of a few individuals from

	individuals present within 585 m			sedimentation.
Clubshell	Majority of individuals present within 585 m	Adults	Harm or Harass	Impaired feeding as a result of habitat degradation from sedimentation.

Rusty patched bumble bee – The Service anticipates incidental take of RPBB will be difficult to detect for the following reasons: species has small body size, losses may be masked by seasonal fluctuations in numbers and other environmental factors, and species occurs in habitat (i.e., underground) that makes detection difficult. However, the following level of take of this species can be anticipated by loss of 7.3 ha in the HPZ because this area contains suitable RPBB habitat. The anticipated take is described in Table 7 below.

Table 7. RPBB amount and type of anticipated incidental take.

Species	Amount of Take Anticipated	Life Stage when Take is Anticipated	Type of Take	Take is Anticipated as a Result of
RPBB	Small percent of individuals from 1 colony present within 7.3 ha	Queens	Harm or Harass	Reduced reproduction associated with loss or alteration of foraging habitat.
RPBB	1 colony present within 7.3 ha	Adult workers, males, or queen	Kill	Crushing due to pipeline construction, vegetation removal, and operational vehicle traffic.

Madison Cave isopod – The Service anticipates incidental take of the MCI will be difficult to detect for the following reasons: small body size, finding a dead or impaired specimen is unlikely, and species occurs in habitat (underground) that makes detection difficult. However, the following level of take of this species can be anticipated by disturbance of 896.7 surface acres because this area represents the MCI subterranean habitat within 0.5 mile of the construction ROW centerline and ATWS that bisects Cochran's Cave Conservation Site; and by disturbance of 11.2 surface acres because this subset of the 896.7 surface acres represents the MCI subterranean habitat disturbed by the construction ROW centerline and ATWS. The anticipated take is described in Table 8 below.

Table 8. MCI amount and type of anticipated incidental take.

Species	Amount of Take Anticipated	Life Stage when Take is Anticipated	Type of Take	Take is Anticipated as a Result of
MCI	All individuals present within 896.7 acres	All	Harm or Harass	Reduced reproduction associated with loss or alteration of foraging habitat from sediment introduced into flooded voids during construction.

MCI	Small percent of individuals present within 11.2 acres	All	Kill	Crushing or smothering during trenching or blasting during construction.

Indiana bat – The Service anticipates incidental take of the Ibat will be difficult to detect for the following reasons: species has small body size, finding a dead or impaired specimen is unlikely, and species occurs in habitat (forest and caves) that makes detection difficult. However, the following level of take of this species can be anticipated by loss of 4,447.982 acres because this area contains suitable Ibat habitat. To account for differences in Ibat use of the habitat categories (suitable unoccupied and unknown use habitat vs. known use habitat), a multiplier of 0.5 was used to estimate Ibat use for suitable unoccupied summer habitat and unknown use spring staging/fall swarming habitat. The anticipated take is described in Table 9 below.

Table 9. Ibat amount and type of anticipated incidental take.

Species	Amount of Take Anticipated	Life Stage when Take is Anticipated	Type of Take	Take is Anticipated as a Result of
Ibat	Small percent of individuals present within 1,637.69 acres of suitable unoccupied summer habitat	Adults	Harm, Harass, Injure, or Kill	Reduced reproduction associated with loss or alteration of travel corridors; increased vulnerability to predation; and decreased habitat suitability for future roosting and foraging.
Ibat	Small percent of individuals present within 144.1 acres of known use summer habitat	Adults	Harass	Relocating roosting areas when returning the following season.
Ibat	Small percent of individuals present within 89.05 acres of unknown use spring staging/fall swarming habitat	Adults or pups	Harm, Harass, or Kill	Reduced pup viability associated with loss or alteration of spring staging and fall swarming habitat. Reduced overwinter survival associated with loss of fall swarming habitat. Temporary reduced reproduction associated with loss or alteration of fall swarming, spring staging habitat, and summer roosting/foraging habitat.
Ibat	Small percent of individuals present within 850.4 acres known use spring staging/fall swarming habitat	Adults	Harm, Harass, or Kill	Reduced pup viability associated with loss or alteration of spring staging and fall swarming habitat. Reduced overwinter survival associated with loss of fall swarming habitat. Temporary reduced reproduction associated with loss or alteration of spring staging, fall swarming habitat, and summer roosting/foraging habitat.

Northern long-eared bat – The majority of effects have been previously addressed in the Service's January 5, 2016 programmatic biological opinion implementing the final 4(d) rule and any incidental take further than 0.25 mile from hibernacula PH-S018 is not prohibited under the

final 4(d) rule (50 CFR §17.40(o)). The Service anticipates incidental take of NLEB will be difficult to detect for the following reasons: species has small body size, finding a dead or impaired specimen is unlikely, and species occurs in habitat (forest and caves) that makes detection difficult. However, the following level of take of this species can be anticipated by the loss of 0.4 acres of habitat because this area is within 0.25 miles of hibernacula PH-S018. The anticipated take is described in Table 10 below.

Table 10. NLEB amount and type of anticipated incidental take.

Species	Amount of Take Anticipated	Life Stage when Take is Anticipated	Type of Take	Take is Anticipated as a Result of
NLEB	Small percent of individuals present within 0.4 acres	Adults	Harm or Harass	Reduced overwinter survival associated with loss of fall swarming habitat. Temporary reduced reproduction associated with loss or alteration of spring staging, fall swarming, and summer roosting/foraging habitat.

REASONABLE AND PRUDENT MEASURES

The Service believes the following reasonable and prudent measures are necessary and appropriate to minimize take:

Roanoke logperch –

- Provide information to individuals involved in project construction on how to avoid and minimize potential effects to the RLP.
- Conduct construction in a manner that minimizes disturbance to RLP.

Clubshell –

- Relocate clubshell.
- Provide information to individuals involved in project construction on how to avoid and minimize potential effects to the clubshell.
- Implement best management practices to protect water quality.

Rusty patched bumble bee –

- Minimize pre-construction vegetation clearing and ground disturbance.
- Use native species in restoration activities.
- Maintain suitable habitat within the permanent ROW.

Madison Cave isopod –

- Provide information to individuals involved in project construction on how to avoid and minimize potential effects to the MCI.

Indiana bat –

- Provide information to individuals involved in project construction on how to avoid and minimize potential effects to the Ibat.

Northern long-eared bat –

- The Service believes that all reasonable and prudent measures necessary and appropriate to minimize take of NLEB have been incorporated into the proposed action.

TERMS AND CONDITIONS

In order to be exempt from the prohibitions of Section 9 of the ESA, the FERC must comply with the following terms and conditions, which implement the reasonable and prudent measures described above and outline required reporting/monitoring requirements. These terms and conditions are nondiscretionary.

Roanoke logperch –

1. Prior to initiation of on-site work, notify all prospective employees, operators, and contractors about the presence and biology of the RLP, special provisions necessary to protect the RLP, activities that may affect the RLP, and ways to avoid and minimize these effects. This information can be obtained by reading RLP-related information in this Opinion or a fact sheet containing this information can be created and provided by FERC or the applicant.
2. No riprap will be placed below ordinary high water at any of the 4 crossings (Butterwood, Waqua, and Sturgeon Creeks and Nottoway River 1) where RLP is present/assumed present.
3. Construct cofferdams (Butterwood, Waqua, and Sturgeon Creeks and Nottoway River 1) using non-erodible materials. Remove cofferdams in their entirety upon project completion.
4. Fill any sandbags used in cofferdams with clean sand and no other materials. All sandbags must be new with no prior use and must be removed at the time of cofferdam removal.
5. Build cofferdams to a height, strength, and configuration to resist no less than normal peak daily flows. All construction must take place outside of the RLP TOYR.
6. Minimize instream (Butterwood, Waqua, and Sturgeon Creeks and Nottoway River 1) foot traffic during construction.
7. Vehicles or construction equipment may not enter Butterwood, Waqua, and Sturgeon Creeks and Nottoway River 1, except within cofferdams.
8. Inspect all vehicles for leaks immediately prior to instream or cofferdam work (Butterwood, Waqua, and Sturgeon Creeks and Nottoway River 1). Repair any leaks and clean construction vehicles thoroughly to remove any residual dirt, mud, debris, grease, motor oil, hydraulic fluid, coolant, or other hazardous substances from construction vehicles. Inspections, repairs, cleaning, and/or servicing will be conducted either before the vehicle, equipment, or machinery is transported into the field or at the work site within the staging area. All wash-water runoff and/or harmful materials will be appropriately controlled to prevent entry into the waterbody, including the riparian zone.

Clubshell –

1. One week prior to any construction activities, search the area 130 m downstream and 455 m upstream of Life's Run Bridge and collect all federally listed freshwater mussels. The search and collection will be conducted by a qualified surveyor(s) with a valid WVDNR

State Collecting Permit for these activities. The permitted surveyor(s) will take all federally listed mussels found to a Service-approved holding facility. These federally listed mussels will be held and propagated at the approved facility for reintroduction into the Monongahela River basin after project construction is completed. Contact the WV Field Office (WVFO) at elizabeth_stout@fws.gov regarding Service-approved facilities and reintroduction details.

2. Prior to initiation of on-site work, notify all prospective employees, operators, and contractors about the presence and biology of the clubshell, special provisions necessary to protect the clubshell, activities that may affect the clubshell, and ways to avoid and minimize these effects. This information can be obtained by reading clubshell-related information in this Opinion or a fact sheet containing this information can be created and provided by FERC or the applicant.
3. An EI will be onsite during construction activities within the Hackers Creek HUC-12 watershed between MP 14.7 and 21.1 and will have stop work authority. If compliance concerns are identified, the EI will resolve them.
4. Fuel and maintain vehicles or equipment and store all potentially toxic substances (fuels, paints, solvents, lubricants, etc.) within a containment site with adequate buffering (berms, vegetation, etc.) from any receiving waters of Hackers Creek.
5. Stabilize all disturbed sites and check that all erosion and sedimentation controls are properly installed and functioning within 24 hours of rain events along the construction ROW and access roads from MP 14.7 to 21.1.

Rusty patched bumble bee –

1. Minimize pre-construction clearing, grading, and vegetation removal within the HPZ.
2. Re-seed all construction ROW areas (temporary and permanent) within the HPZ and the dispersal zone with pollinator friendly native seed mixes consistent with recommendations for plant restoration by GWNF. Include species preferred by RPBB, list available at: https://www.fws.gov/midwest/endangered/insects/rpbb/pdf/PlantListRPBBJune2017.pdf.
3. In the HPZ, plant disturbed areas adjacent to the improved access road with established (not seeds) native flowering shrub varieties that will bloom within 3 years. Plant the same native flowering shrub varieties present within the HPZ.
4. Maintain suitable habitat for RPBB within the permanent ROW through mowing once every 3 years, as well as woody vegetation removal and select application of herbicide at a rate sufficient to discourage growth of trees.

Madison Cave isopod –

1. Prior to initiation of on-site work, notify all prospective employees, operators, and contractors about the presence and biology of the MCI, special provisions necessary to protect the MCI, activities that may affect the MCI, and ways to avoid and minimize these effects. This information can be obtained by reading MCI-related information in this Opinion or a fact sheet containing this information can be created and provided by FERC or the applicant.

Indiana bat –

1. Prior to initiation of on-site work, notify all prospective employees, operators, and

contractors about the presence and biology of the Ibat, special provisions necessary to protect the Ibat, activities that may affect the Ibat, and ways to avoid and minimize these effects. This information can be obtained by reading Ibat-related information in this Opinion or a fact sheet containing this information can be created and provided by FERC or the applicant.

Northern long-eared bat –
No terms and conditions provided.

MONITORING AND REPORTING REQUIREMENTS

Care must be taken in handling any dead specimens of proposed or listed species to preserve biological material in the best possible state. In conjunction with the preservation of any dead specimens, the finder has the responsibility to ensure that evidence intrinsic to determining the cause of death of the specimen is not unnecessarily disturbed. The finding of dead specimens does not imply enforcement proceedings pursuant to the ESA. The reporting of dead specimens is required to enable the Service to determine if take is reached or exceeded and to ensure that the terms and conditions are appropriate and effective. Upon locating a dead specimen, notify the Service's VA Law Enforcement Office at 804-771-2883 and the Service's VA Field Office (VAFO) at the phone number provided below or at 804-693-6694.

Roanoke logperch –

1. Any high water event that disturbs the construction site, including failure or overtopping of cofferdams, must be reported to the Service at the contact phone number/email address below within 24 hours.
2. Any spills of motor oil, hydraulic fluid, coolant, or similar fluids, not contained before entry into the action area, must be reported to the Service at the contact number/email provided below and National Response Center (800-424-8802) immediately.
3. Conduct a RLP survey and habitat assessment at Butterwood, Waqua, and Sturgeon Creeks and Nottoway River 1 crossings 6 months after project is complete to assess the status of the RLP. Survey/habitat assessment will be conducted 200 m upstream and 800 m downstream of each crossing site by a qualified surveyor(s) with a valid VDGIF Permit for these activities. Provide a report containing raw data and summarized information from the surveys and habitat assessments at each site to the VAFO at sumalee_hoskin@fws.gov within 30 days of completion of the survey/habitat assessment.

Clubshell –

1. Notify the WVFO at elizabeth_stout@fws.gov 2 weeks prior to beginning freshwater mussel removal upstream and downstream of Life's Run Bridge. Provide a report documenting the removal effort to the WVFO at elizabeth_stout@fws.gov within 30 days of completion of the removal effort. Include the following in the report: surveyor names, protocols used for surveying, handling, and transporting mussels; total number of individuals of each mussel species collected; date collected; water and air temperatures; river stage; condition, size and approximate age of live clubshell; non-listed mussels; and maps or figures showing the collection area relative to project features.
2. Notify the WVFO at elizabeth_stout@fws.gov when work begins within the Hackers

Creek HUC-12 between MP 14.7 and 21.1.

3. If compliance concerns are identified by the EI regarding construction activities within the Hackers Creek HUC-12 between MP 14.7 and 21.1, the EI will report these activities to the WVFO at elizabeth_stout@fws.gov within 24 hours.
4. If erosion and sedimentation controls fail within the Hackers Creek HUC-12 between MP 14.7 and 21.1 as a result of a precipitation event, the WVFO should be notified within 24 hours at elizabeth_stout@fws.gov.
5. To monitor sedimentation effects on remaining clubshell, measure turbidity 150 m downstream of and 455 m upstream of Life's Run Bridge (County Route 14). Measure turbidity downstream and upstream of the mouth of 1or more tributaries with crossings approximately 5 m downstream and 5 m upstream of the mouth. Measure turbidity continuously at least 1 month prior to construction, through the duration of construction activities, and 1 year post-construction or vegetation has become fully established, whichever happens last. Every 30 days, provide the last 30 days of raw data, and any summarized data, to the WVFO at elizabeth_stout@fws.gov.
6. Immediately report any unpermitted discharge of any potentially toxic substance to the WVFO at elizabeth_stout@fws.gov and WV Department of Environmental Protection (800-642-3074) upon discovery.

Rusty patched bumble bee –

1. Prior to initiation of vegetation clearing in the HPZ, provide the VAFO, at the email address below, the limits of equipment and vehicle traffic and staging and the methods to be used to ensure that traffic and staging will not exceed these limits.

Madison Cave isopod –

The Service believes that all monitoring and reporting has been incorporated into the proposed action.

Indiana bat –

1. Monitor Ibat activity around Star Chapel, Breathing Cave, and Clark's Cave to determine effects to Ibats in the fall swarming/spring staging areas. Two weeks prior to the start of tree clearing place acoustic monitors outside the entrance of each cave. Monitors will remain in place until 2 hibernating seasons after construction. Provide a report including the raw acoustic data every year on January 30th to the VAFO at sumalee_hoskin@fws.gov.

Northern long-eared bat –

The Service believes that all monitoring and reporting has been incorporated into the proposed action.

CONSERVATION RECOMMENDATIONS

Section 7(a)(1) of the ESA directs federal agencies to utilize their authorities to further the purposes of the ESA by carrying out conservation programs for the benefit of endangered and threatened species. Conservation recommendations are discretionary agency activities to minimize or avoid adverse effects of a proposed action on listed species or critical habitat, to

help implement recovery plans, or to develop information.

Small whorled pogonia –

- Conduct 10 years of post-construction monitoring annually (i.e., monitor each colony 1 time each year) during optimal survey timeframes for SWP to assess each colony's status and any potential threats to its continued success. Monitor the Seneca and MNF SWP colonies and the 2 SWP colonies immediately outside the action area (second MNF colony, GWNF colony). Atlantic is working with WVDNR, USFS, and the Service to fund continuation of monitoring efforts beyond 1 year post-construction. We recommend FERC verify that a monitoring plan is developed and funded.
- To determine the effectiveness of temporary diversion channels and temporary berms within the construction workspace located near the SWP colonies, install equipment to continuously monitor soil moisture and temperature prior to, during, and after construction (e.g., until the end of the first growing season after restoration activities are completed). Conduct this monitoring at Seneca and MNF SWP colonies and at a reference site to establish baseline conditions and take into account local weather/seasonal variation.
- Monitor ambient light levels prior to, during, and after construction (e.g., until the end of the first growing season after restoration activities are completed) at the MNF SWP colony.
- Conduct surveys of suitable SWP habitat in the surrounding area of the Seneca and MNF SWP colonies and the 2 SWP colonies immediately outside the action area (second MNF colony, GWNF colony) to determine if additional colonies are present.

Running Buffalo clover –

- Monitor the 8 known RBC populations within and adjacent to the action area and conduct surveys to locate additional populations.
- Contribute towards seed storage efforts from selected locations, and develop management agreements that will remain in place if the species was delisted.

Roanoke logperch –

- Fund or conduct riparian and stream restoration throughout the RLP range, especially the Nottoway River drainage, to limit siltation and nutrient releases into receiving waterways.
- Fund or conduct projects to identify and remove manmade barriers to fish passage that will benefit RLP.

Clubshell –

- Provide funding to the WVDNR or other Service-approved facilities to support activities to determine captive husbandry techniques suitable for propagation and augmentation of clubshell populations within the Monongahela River system.

Rusty patched bumble bee –

- Improve pollinator habitat throughout the permanent ROW by using pollinator friendly native seed mixes. Include species preferred by RPBB, list available at: https://www.fws.gov/midwest/endangered/insects/rpbb/pdf/PlantListRPBBJune2017.pdf.

Madison Cave isopod –

- Fund VDCR-DNH or other qualified and permitted entity to conduct research to improve knowledge of MCI basic biology and connectivity between documented locations.

Indiana bat –

- Fund research on understanding/controlling and mitigating the effects of WNS.
- Fund research to improve knowledge of Ibat use of suitable habitat in WV and VA.
- Plant native trees with exfoliating bark in the temporary construction ROW to replace those that were cleared. Contact VAFO (sumalee_hoskin@fws.gov) and WVFO (elizabeth_stout@fws.gov) for area-specific recommendations.
- Purchase or otherwise protect additional Ibat habitat, particularly known use summer habitat and known use spring staging/fall swarming habitat.

Northern long-eared bat –

- Fund research on understanding/controlling and mitigating the effects of WNS.

For the Service to be kept informed of actions minimizing or avoiding adverse effects or benefitting listed species or their habitats, the Service requests notification of the implementation of any conservation recommendations.

REINITIATION NOTICE

This concludes formal consultation on the action outlined in the request. As provided in 50 CFR 402.16, reinitiation of formal consultation is required where discretionary federal agency involvement or control over the action has been retained (or is authorized by law) and if: (1) the amount or extent of incidental take is exceeded; (2) new information reveals effects of the agency action that may affect listed species or critical habitat in a manner or to an extent not considered in this Opinion; (3) the agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in this Opinion; or (4) a new species is listed or critical habitat designated that may be affected by the action. In instances where the amount or extent of incidental take is exceeded, any operations causing such take must cease pending reinitiation.

Any modifications to the proposed action made since the issuance of the FEIS (FERC 2017) were not considered as part of this Opinion. The Service strongly recommends that any changes or modifications to the various construction and restoration plans listed in table 2.3.1-1 of the FEIS be summarized and provided to the Service to ensure reinitiation is not necessary prior to commencing work.

If you have any questions regarding this Opinion or our shared responsibilities under the ESA, please contact Troy Andersen of this office at (804) 824-2428 or via email at Troy_Andersen@fws.gov.

Sincerely,

Cindy Schulz
Field Supervisor
Virginia Ecological Services

Enclosures

cc: Corps, Norfolk, VA (Attn: William Walker)
DOI, Washington, DC (Attn: Erika Vaughan)
FERC, Washington, DC (Attn: Kevin Bowman)
Service, Elkins, WV (Attn: John Schmidt)
Service, Raleigh, NC (Attn: Tom Augspurger)
Service, State College, PA (Attn: Lora Lattanzi)
USFS, Atlanta, GA (Attn: Timothy Abing)
USFS, Elkins, WV (Attn: Kent Karriker)
USFS, Roanoke, VA (Attn: Jennifer Adams)
NCWRC, Raleigh, NC (Attn: Shannon Deaton)
VDACS, Richmond, VA (Attn: Keith Tignor)
VDGIF, Richmond, VA (Attn: Amy Ewing)
VDCR-DNH, Richmond, VA (Attn: Rene Hypes)
WVDNR, Elkins, WV (Attn: Cliff Brown)
ACP, Richmond, VA (Attn: Spencer Trichell)

LITERATURE CITED

Introduction

Federal Energy Regulatory Commission. 2017. Atlantic Coast Pipeline and Supply Header Project Final Environmental Impact Statement. Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556-000. Office of Energy Projects, Washington, DC.

Description of Proposed Action

Federal Energy Regulatory Commission. 2013a. Upland erosion control, revegetation, and maintenance plan. Washington, DC.

Federal Energy Regulatory Commission. 2013b. Wetland and waterbody construction and mitigation procedures. Washington, DC.

Federal Energy Regulatory Commission. 2017. Atlantic Coast Pipeline and Supply Header Project Final Environmental Impact Statement. Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556-000. Office of Energy Projects, Washington, DC.

Status of the Species

SWP

U.S. Fish and Wildlife Service. 2008. Small whorled pogonia (*Isotria medeoloides*) 5-year review: summary and evaluation. New England Field Office, Concord, NH.

RBC

U.S. Fish and Wildlife Service. 2011. Running buffalo clover (*Trifolium stoloniferum*) 5-year review: summary and evaluation. Ohio Field Office, Columbus, OH.

RLP

U.S. Fish and Wildlife Service. 2007. Roanoke logperch (*Percina rex*) 5-year review: summary and evaluation. Virginia Field Office, Gloucester, VA.

Clubshell

U.S. Fish and Wildlife Service. 2008. Clubshell (*Pleurobema clava*) 5-year review: summary and evaluation. Pennsylvania Field Office, State College, PA.

RPBB

U.S. Fish and Wildlife Service. 2016. Rusty patched bumble bee (*Bombus affinis*) species status assessment. Twin Cities Ecological Services Field Office, Bloomington, MN.

MCI

U.S. Fish and Wildlife Service. 2011. Biological opinion, Warren County Power Station low effect habitat conservation plan. Virginia Field Office, Gloucester, VA.

Ibat

U.S. Fish and Wildlife Service. 2009. Indiana bat (*Myotis sodalis*) 5-year review: summary and evaluation. Indiana Field Office, Bloomington, IN.

U.S. Fish and Wildlife Service. 2016. Revised programmatic biological opinion for transportation projects in the range of the Indiana bat and Northern long-eared bat. Midwest Regional Office, Bloomington, MN.

NLEB
N/A

Environmental Baseline

SWP

Allstar Ecology. 2016a. Atlantic Coast Pipeline, West Virginia interim botanical survey. Monongahela National Forest, Pocahontas County, WV. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Forest Service, Monongahela National Forest, Elkins, WV; and West Virginia Division of Natural Resources, Elkins, WV.

Allstar Ecology. 2016b. Atlantic Coast Pipeline, West Virginia botanical survey report. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Forest Service, Monongahela National Forest, Elkins, WV; and West Virginia Division of Natural Resources, Elkins, WV.

Environmental Resource Management. 2017. Atlantic Coast Pipeline, evaluation of the small whorled pogonia in the Monongahela and George Washington National Forests and the Seneca State Forest. Report to U.S. Forest Service, Monongahela National Forest, Elkins, WV.

U.S. Fish and Wildlife Service. 1992. Small whorled pogonia (*Isotria medeoloides*) recovery plan, first revision. Northeast Regional Office, Newton Corner, MA.

Vanasse Hangen Brustlin, Inc. 2016a. Atlantic Coast Pipeline, Virginia segment survey report for rare, threatened, and endangered plant species. 2016 Field Season. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA; Virginia Department of Conservation and Recreation, Richmond, VA; and U.S. Forest Service, George Washington National Forests, Roanoke, VA.

Vanasse Hangen Brustlin, Inc. 2016b. Atlantic Coast Pipeline, Virginia segment survey report for rare, threatened, and endangered plant species. George Washington National Forest - 2016 Field Season. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA; Virginia Department of Conservation and Recreation, Richmond, VA; and U.S. Forest Service, George Washington National Forest, Roanoke, VA.

Vanasse Hangen Brustlin, Inc. 2017. Atlantic Coast Pipeline, revised small whorled pogonia conservation plan. Report to U.S. Fish and Wildlife Service, West Virginia Field Office,

Elkins, WV; U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA; U.S. Forest Service, Monongahela National Forest, Elkins, WV; U.S. Forest Service, George Washington and Jefferson National Forests, Roanoke, VA; and West Virginia Division of Natural Resources, Elkins, WV.

RBC

AllStar Ecology. 2015. West Virginia Botanical Survey Report. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; and West Virginia Division of Natural Resources, Elkins, WV.

AllStar Ecology. 2016. West Virginia botanical survey report. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Forest Service, Monongahela National Forest, Elkins, WV; and West Virginia Division of Natural Resources, Elkins, WV.

AllStar Ecology. 2017. West Virginia botanical survey report. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Forest Service, Monongahela National Forest, Elkins, WV; and West Virginia Division of Natural Resources, Elkins, WV.

Environmental Resources Management. 2017. Shapefile of botanical survey results in West Virginia. Unpublished shapefile to U.S. Fish and Wildlife Service, Elkins, WV.

RLP

Anderson, G.B. 2016. Development and application of a multiscale model of habitat suitability for Roanoke logperch. Final Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA.

Environmental Solutions & Innovations, Inc. 2016. Habitat assessments conducted in 2016 for Roanoke logperch (*Percina rex*) along the proposed Atlantic Coast Pipeline in Virginia. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA.

Environmental Solutions & Innovations, Inc. 2017. Habitat assessments conducted for Roanoke logperch (*Percina rex*) along the proposed Atlantic Coast Pipeline in Virginia. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA.

Lahey, A.M. and P.L. Angermeier. 2006. Survey for Roanoke logperch in the Roanoke and Meherrin river drainages, Virginia. Final Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA. 21 pp.

Lahey, A.M. and P.L. Angermeier. 2007. Range-wide assessment of habitat suitability for Roanoke logperch (*Percina rex*). Final Report to Virginia Transportation Research Council, Charlottesville, VA. 54 pp.

Roberts, J.H. and P.L. Angermeier 2012. Monitoring of endangered Roanoke logperch (*Percina rex*) in Smith River upstream from the Philpott Reservoir on U.S. Army Corps of

Engineers property near Martinsville, Virginia: U.S. Geological Survey Open-File Report 2012–1221, 11 p.

Roberts, J.H., P.L. Angermeier, and E.M. Hallerman. 2013. Distance, dams and drift: what structures populations of an endangered, benthic stream fish? Freshwater Biology 58:1-15.

Virginia Department of Game and Inland Fisheries. 2005. Virginia's comprehensive wildlife conservation strategy. Virginia Department of Game and Inland Fisheries, Richmond, VA.

Virginia Fish and Wildlife Information Service. 2017. Species Information [Internet]. Richmond, VA [cited October 5, 2017]. Available from: http://vafwis.org/fwis.

Clubshell

Anderson, R.M. and D.A. Kreeger. 2010. Potential for impairment of freshwater mussel populations in DRBC special protection waters as a consequence of natural gas exploratory well development. Unpublished Report to U.S. Fish and Wildlife Service, State College, PA; and the Partnership for the Delaware Estuary, Wilmington, DE.

Box, J.M. and J. Mossa. 1999. Sediment, land use, and freshwater mussels: prospects and problems. Journal of the North American Benthological Society 18:99-117.

Ellis, M.M. 1931. Some factors affecting the replacement of the commercial fresh-water mussels. U.S. Department of Commerce Bureau of Fisheries. Fishery Circular 7:1-10.

Ellis, M.M. 1936. Erosion silt as a factor in aquatic environments. Ecology 17:29-42.

Environmental Solutions & Innovations, Inc. 2016. Freshwater mussel (*Unionidae*) surveys for the proposed Atlantic Coast Pipeline in West Virginia. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV, and West Virginia division of Natural Resources, Elkins, WV.

Houp, R.E. 1993. Observations on long-term effects of sedimentation on freshwater mussels (*Mollusca: Unionidae*) in the North Fork of Red River, Kentucky. Transactions of the Kentucky Academy of Science 54:93-97.

West Virginia Division of Natural Resources. 2004. Federal Assistance Performance Report: Endangered Species (Animals). Project E-1, Segment 21 (1 October 2003 – 30 September 2004) Elkins, WV.

West Virginia Division of Natural Resources. 2009. Federal Assistance Performance Report: Endangered Species (Animals). Project E-1, Segment 36 (1 October 2008 – 30 September 2009) Elkins, WV.

West Virginia Division of Natural Resources. 2014. Federal Assistance Performance Report: Endangered Species (Animals). Project E-1, Segment 31 (1 October 2013 – 30 September 2014) Elkins, WV.

RPBB

Atlantic Coast Pipeline, LLC. 2017. Summary of the rusty patched bumble bee habitat assessment conducted on the George Washington National Forest. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA.

Charman, T.G., J. Sears, R.E. Green, and A.F.G. Bourke. 2010. Conservation genetics, foraging distance and nest density of the scarce Great Yellow Bumblebee (*Bombus distinguendus*). Molecular Ecology 19:2661-2674.

Darvill B., M.E. Knight, and D. Goulson. 2004. Use of genetic markers to quantify bumblebee foraging range and nest density. Oikos 107:471-478.

Dreier, S., J.W. Redhead, I.A. Warren, A.F.G. Bourke, M.S. Heard, W.C. Jordan, S. Sumner, J. Wang, and C. Carvell. 2014. Fine-scale spatial genetic structure of common and declining bumble bees across an agricultural landscape. Molecular Ecology 23:3384-3395.

Goulson, D. 2010. Bumblebees: behavior, ecology, and conservation. Oxford University Press, New York, NY.

Knight, M.E., A.P. Martin, S. Bishop, J.L. Osborne, R.J. Hale, A. Sanderson, and D. Goulson. 2005. An interspecific comparison of foraging range and nest density of four bumblebee (*Bombus*) species. Molecular Ecology 14:1811-1820.

Kraus, F.B., S. Wolf, and R.F.A. Moritz. 2009. Male flight distance and population substructure in the bumblebee *Bombus terrestris*. Journal of Animal Ecology 78:247-252.

Osborne, J.L., S.J. Clark, R.J. Morris, I.H. Williams, J.R. Riley, A.D. Smith, D.R. Reynolds, and A.S. Edwards. 1999. A landscape-scale study of bumble bee foraging range and constancy, using harmonic radar. Journal of Applied Ecology 36:519-533.

U.S. Fish and Wildlife Service. 2016. Rusty patched bumble bee (*Bombus affinis*) species status assessment. Twin Cities Ecological Services Field Office, Bloomington, MN.

U.S. Fish and Wildlife Service. 2017. Survey protocols for the rusty patched bumble bee (*Bombus affinis*). Version 1.2. Twin Cities Ecological Services Field Office, Bloomington, MN.

Virginia Department of Conservation and Recreation Division of Natural Heritage. 2017. Rusty patched bumble bee habitat assessment. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA.

Wolf, S. and R.F.A. Moritz. 2008. Foraging distance in *Bombus terrestris* (Hymenoptera: Apidae). Apidologie 38:419-427.

Wolf, S., T. Toev, R.L.V. Moritz, and R.F.A. Moritz. 2012. Spatial and temporal dynamics of the male effective population size in bumblebees (Hymenoptera:Apidae). Population Ecology 54:115-124.

Wood, T.J., J.M. Holland, W.O.H. Hughes, and D. Goulson. 2015. Targeted agri-environment schemes significantly improve the population size of common farmland bumblebee species. Molecular Ecology 24:1668-1680.

MCI

GeoConcepts Engineering Inc. 2017a. Karst Survey Report Revision 1 Atlantic Coast Pipeline Augusta, Bath and Highland Counties VA and Pocahontas and Randolph Counties, WV. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA; U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; and Virginia Department of Conservation and Recreation Division of Natural Heritage, Richmond VA.

GeoConcepts Engineering Inc. 2017b. Cochran's Cave Conservation Area (CCCA) and Moffett Lake investigation update. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA; U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; and Virginia Department of Conservation and Recreation Division of Natural Heritage, Richmond VA.

Orndorff, W.D. and C.S. Hobson. 2007. Status survey for the Madison Cave isopod (*Antrolana lira*) in Virginia, 2005-2007. Natural Heritage Technical Report 07-11. Virginia Department of Conservation and Recreation, Division of Natural Heritage, Richmond, VA. 17pp.

Ibat

Environmental Resources Management. 2017a. Atlantic Coast Pipeline, Virginia segment protected bat species year 3 presence/ likely absence survey report. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA; U.S. Forest Service, George Washington National Forest, Roanoke, VA; and Virginia Department of Game and Inland Fisheries, Richmond, VA.

Environmental Resources Management. 2017b. Atlantic Coast Pipeline, West Virginia segment protected bat species year 3 presence/ likely absence survey report. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Forest Service, Monongahela National Forest, Elkins, WV; and West Virginia Division of Natural Resources, Elkins, WV.

Environmental Resources Management. 2017c. Supply Header Project, West Virginia segment protected bat species year 3 presence/ likely absence survey report. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV and West Virginia Division of Natural Resources, Elkins, WV.

Environmental Resources Management. 2017d. Atlantic Coast Pipeline, West Virginia segment protected bat species habitat assessment report spring 2017. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Forest Service, Monongahela National Forest, Elkins, WV; and West Virginia Division of Natural Resources, Elkins, WV.

Environmental Resources Management. 2017e. Atlantic Coast Pipeline, Virginia segment protected bat species habitat assessment report. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA; U.S. Forest Service, George Washington National Forest, Roanoke, VA; and Virginia Department of Game and Inland Fisheries, Richmond, VA.

Powers, K.E., R.J. Reynolds, W. Orndorff, W.M. Ford, and C.S. Hobson. 2015. Post-white –nose syndrome trends in Virginia's cave bats, 2008-2013. Journal of Ecology and the Natural Environment 7(4):113-123.

Stihler, C.W. 2012. White-nose syndrome a deadly enigma. West Virginia Wildlife Magazine. Fall/Winter edition. http://www.wvdnr.gov/wildlife/magazine/Archive/12Winter/White-nose_Syndrome.pdf.

U.S. Fish and Wildlife Service. 2007. Indiana bat (*Myotis sodalis*) draft recovery plan: first revision. Midwest Regional Office, Fort Snelling, MN. 258 pp.

U.S. Fish and Wildlife Service. 2015. Bat survey protocol for assessing use of potential hibernacula. https://www.fws.gov/midwest/Endangered/mammals/inba/pdf/inba_srvyprtcl.pdf.

U.S. Fish and Wildlife Service. 2017a. Ibat hibernacula data 3-6-2017. Unpublished data. Indiana Field Office, Bloomington, IN.

U.S. Fish and Wildlife Service. 2017b. Rangewide Indiana bat summer survey guidelines. https://www.fws.gov/midwest/endangered/mammals/inba/inbasummersurveyguidance.html.

NLEB

Federal Energy Regulatory Commission. 2017. Atlantic Coast Pipeline and Supply Header Project Final Environmental Impact Statement. Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556-000. Office of Energy Projects, Washington, DC.

Stihler, C.W. 2012. White-nose syndrome a deadly enigma. West Virginia Wildlife Magazine. Fall/Winter edition. http://www.wvdnr.gov/wildlife/magazine/Archive/12Winter/White-nose_Syndrome.pdf.

Effects of the Action

SWP

Brumback, W.E., S. Cairns, M.B. Sperduto, and C.W. Fyler. 2011. Response of an *Isotria medeoloides* population to canopy thinning. Northeastern Naturalist 18(2):185-196.

Burns, R.M. and B.H. Honkala. 1990. Silvics of North America: 1. Conifers; 2. Hardwoods. Agriculture Handbook 654, Vol. 2. U.S. Department of Agriculture, U.S. Forest Service, Washington, D.C.

Dibble, A.C. 2000a. Demographic monitoring and habitat manipulation experiment for small whorled pogonia (*Isotria medeoloides*). Report to U.S. Fish and Wildlife Service, Northeast Regional Office, Hadley, MA.

Dibble, A.C. 2000b. Demographic monitoring and habitat manipulation of the small whorled pogonia, *Isotria medeoloides*, (Orchidaceae), in New England, U.S.A. Draft manuscript to Maine Department of Conservation, Maine Natural Areas Program, Augusta, ME.

Dibble, A.C., W.A. Wright, and C.S. Campbell. 1997. Small whorled pogonia (*Isotria medeoloides*): demographic monitoring and habitat manipulation experiment. Report to Maine Department of Conservation, Maine Natural Areas Program, Augusta, ME and U.S. Fish and Wildlife Service, Northeast Regional Office, Newton Corner, MA.

Environmental Resource Management. 2017. Atlantic Coast Pipeline, evaluation of the small whorled pogonia in the Monongahela and George Washington National Forests and the Seneca State Forest. Report to U.S. Forest Service, Monongahela National Forest, Elkins, WV.

Federal Energy Regulatory Commission. 2017. Atlantic Coast Pipeline and Supply Header Project Final Environmental Impact Statement. Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556-000. Office of Energy Projects, Washington, DC.

McCormick, M.K., D.F. Whigham, and J.P. O'Neill. 2015. Restore the federally threatened small whorled pogonia (*Isotria medeoloides*) in three National Park Service regions. Report to the U.S. National Park Service, Washington, DC.

Vanasse Hangen Brustlin, Inc. 2017. Atlantic Coast Pipeline, revised small whorled pogonia conservation plan. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA; U.S. Forest Service, Monongahela National Forest, Elkins, WV; U.S. Forest Service, George Washington and Jefferson National Forests, Roanoke, VA; and West Virginia Division of Natural Resources, Elkins, WV.

RBC

Burkhart, J.Q., J.S. Rentch, and T.M. Schuler. 2013. Effects of forest management on Running Buffalo clover (*Trifolium stoloniferum*, Muhl. ex A. Eaton) distribution and abundance in the Fernow Experimental Forest. Natural Areas Journal 33:156-162.

Federal Energy Regulatory Commission. 2017. Atlantic Coast Pipeline and Supply Header Project Final Environmental Impact Statement. Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556-000. Office of Energy Projects, Washington, DC.

Madarish, D. and T.M. Schuler. 2002. Effects of forest management practices on the federally endangered Running Buffalo clover (*Trifolium stoloniferum* Muhl. ex A. Eaton). Natural Areas Journal 22:120-128.

RLP

Federal Energy Regulatory Commission. 2017. Atlantic Coast Pipeline and Supply Header Project Final Environmental Impact Statement. Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556-000. Office of Energy Projects, Washington, DC.

Clubshell

Ellis, M.M. 1936. Erosion silt as a factor in aquatic environments. Ecology 17(1):29-42.

Loar, J.M., L.L. Dye, R.R. Turner, and S.G. Hildebrand. 1980. Analysis of environmental issues related to small-scale hydroelectric development. Dredging. ORNL, Environmental Science Division Publication No. 1565, Oak Ridge, TN.

Marking, L.L. and T.D. Bills. 1980. Acute effects of silt and sand sedimentation on freshwater mussels. Pages 204-211 in J.L. Rasmussen, ed. Proceedings of the symposium on Upper Mississippi River bivalve mollusks. Upper Mississippi River Conservation Committee, Rock Island, IL.

RPBB

Atlantic Coast Pipeline, LLC. 2017. Summary of the rusty patched bumble bee habitat assessment conducted on the George Washington National Forest. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA.

Virginia Department of Conservation and Recreation Division of Natural Heritage. 2017. Rusty patched bumble bee habitat assessment. Report to U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA.

MCI

Federal Energy Regulatory Commission. 2017. Atlantic Coast Pipeline and Supply Header Project Final Environmental Impact Statement. Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556-000. Office of Energy Projects, Washington, DC.

GeoConcepts Engineering Inc. 2017c. Karst terrain assessment, construction, monitoring and mitigation plan, Atlantic Coast Pipeline, Randolph and Pocahontas Counties in West Virginia, and Highland, Augusta, and Nelson counties in Virginia. Report to Dominion Transmission, Inc. Clarksburg, WV.

Ibat

Callahan, E.V. 1993. Indiana bat summer habitat requirements. M.S. Thesis, University of Missouri, Columbia, MO.

Frick, W.F., D.S. Reynolds, and T.H. Kunz. 2010. Influence of climate and reproductive timing on demography of little brown myotis *Myotis lucifugus*. Journal of Animal Ecology 79:128-136.

Gardner, J.E., J.D. Garner, and J.E. Hofmann. 1991. Summary of *Myotis sodalis* summer habitat studies in Illinois: with recommendations for impact assessment. Report to Indiana/Gray bat Recovery Team Meeting, Columbia, MO.

Humphrey, S.R., A.R. Richter, and J.B. Cope. 1977. Summer habitat and ecology of the endangered Indiana bat, Myotis sodalis. Journal of Mammalogy 58:334-346.

Jachowski, D.S., J.B. Johnson, C.A. Dobony, J.W. Edwards, and W.M. Ford. 2014. Space use and resource selection by foraging Indiana bats at the northern edge of their distribution. Endangered Species Research 24(2):149.

Kniowski, A.B. and S.D. Gehrt. 2014. Home range and habitat selection of the Indiana bat in an agricultural landscape. Journal of Wildlife Management 78(3):503-512.

Kurta, A., J. Kath, E.L. Smith, R. Foster, M.W. Orick, and R. Ross. 1993. A maternity roost of the endangered Indiana bat (*Myotis sodalis*) in an unshaded, hollow, sycamore tree (*Platanus occidentalis*). American Midland Naturalist 130:405-407.

Menzel, J.M., W.M. Ford, M.A. Menzel, T.C. Carter, J.E. Gardner, J.D. Garner, and J.E. Hofmann. 2005. Summer habitat use and home-range analysis of the endangered Indiana bat. Journal of Wildlife Management 69(1):430-436.

Murray, S.W. and A. Kurta. 2004. Nocturnal activity of the endangered Indiana bat (*Myotis sodalis*). Journal of Zoology 262:197-206.

Romme, R.C., K. Tyrell, and V. Brack, Jr. 1995. Literature summary and habitat suitability index model: components of summer habitat for the Indiana bat, *Myotis sodalis*. Report to Indiana Department of Natural Resources, Division of Wildlife, Bloomington, Indiana by 3D/Environmental, Cincinnati, OH.

Sparks, D.W., C.M. Ritzi, J.E. Duchamp, and J.O. Whitaker, Jr. 2005. Foraging habitat of the Indiana bat, (*Myotis sodalis*) at an urban-rural interface. Journal of Mammalogy 86:713-718.

Watrous, K.S., T.M. Donovan, R.M. Mickey, S.R. Darling, A.C. Hicks, and S.L. VonOettingen. 2006. Predicting minimum habitat characteristics for the Indiana bat in the Champlain Valley. Journal of Wildlife Management 70(5):1228-1237.

Vanasse Hangen Brustlin, Inc. 2017. Atlantic Coast Pipeline, revised small whorled pogonia conservation plan. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA; U.S. Forest Service, Monongahela National Forest, Elkins, WV; U.S. Forest Service, George Washington and Jefferson National Forests, Roanoke, VA; and West Virginia Division of Natural Resources, Elkins, WV.

NLEB

Lacki, M.J., D.R. Cox, L.E. Dodd, and M.B. Dickinson. 2009. Response of northern bats (*Myotis septentrionalis*) to prescribed fires in eastern Kentucky forests. Journal of Mammalogy 90(5):1165-1175.

Owen, S.F., M.A. Menzel, W.M. Ford, B.R. Chapman, K.V. Miller, J.W. Edwards, and P.B. Wood. 2003. Home-range size and habitat used by the Northern Myotis (*Myotis septentrionalis*). American Midland Naturalist 150(2):352-359.

Analysis for Jeopardy

SWP

Allstar Ecology. 2016a. Atlantic Coast Pipeline, West Virginia interim botanical survey. Monongahela National Forest, Pocahontas County, WV. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Forest Service, Monongahela National Forest, Elkins, WV; and West Virginia Division of Natural Resources, Elkins, WV.

Allstar Ecology. 2016b. Atlantic Coast Pipeline, West Virginia botanical survey report. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Forest Service, Monongahela National Forest, Elkins, WV; and West Virginia Division of Natural Resources, Elkins, WV.

Environmental Resource Management. 2017. Atlantic Coast Pipeline, evaluation of the small whorled pogonia in the Monongahela and George Washington National Forests and the Seneca State Forest. Report to U.S. Forest Service, Monongahela National Forest, Elkins, WV.

NatureServe. 2002. Element Occurrence Data Standard [Internet]. Arlington, VA [Created February 6, 2002; cited October 5, 2017] . Available from: http://www.natureserve.org/conservation-tools/standards-methods/element-occurrence-data-standard.

U.S. Fish and Wildlife Service. 1992. Small whorled pogonia (*Isotria medeoloides*) recovery plan, first revision. Northeast Regional Office, Newton Corner, MA.

U.S. Fish and Wildlife Service. 2008. Small whorled pogonia (*Isotria medeoloides*) 5-year review: summary and evaluation. New England Field Office, Concord, NH.

Vanasse Hangen Brustlin, Inc. 2017. Atlantic Coast Pipeline, revised small whorled pogonia conservation plan. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Fish and Wildlife Service, Virginia Field Office, Gloucester, VA; U.S. Forest Service, Monongahela National Forest, Elkins, WV; U.S. Forest Service, George Washington and Jefferson National Forests, Roanoke, VA; and West Virginia Division of Natural Resources, Elkins, WV.

RBC

AllStar Ecology. 2017. West Virginia botanical survey report. Report to U.S. Fish and Wildlife Service, West Virginia Field Office, Elkins, WV; U.S. Forest Service, Monongahela National Forest, Elkins, WV; and West Virginia Division of Natural Resources, Elkins, WV.

Federal Energy Regulatory Commission. 2017. Atlantic Coast Pipeline and Supply Header Project Final Environmental Impact Statement. Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556-000. Office of Energy Projects, Washington, DC.

U.S. Fish and Wildlife Service. 2017. Draft Running Buffalo clover (*Trifolium stoloniferum*) 5-year review. Ohio Field Office, Columbus, OH.

RLP

N/A

Clubshell

U.S. Fish and Wildlife Service. 1994. Clubshell (*Pleurobema clava*) and northern riffleshell (*Epioblasma torulosa rangiana*) recovery plan. Hadley, MA.

U.S. Fish and Wildlife Service. 2008. Clubshell (*Pleurobema clava*) 5-year review: summary and evaluation. Pennsylvania Field Office, State College, PA.

Villella, R. 2007. A reassessment of freshwater mussels in the Allegheny River: some surprising results. (abs). Freshwater Conservation Society Symposium, 2007. Little Rock, Arkansas.

Watters, G.T. 1990. 1990 survey of the unionids of the Big Darby Creek System. Final Report to The Nature Conservancy. 229 pp.

RPBB

Chapman, R.E. and A.F.G. Bourke. 2001. The influence of sociality on the conservation biology of social insects. Ecology Letters 4:650-662.

Charman T.G., J. Sears, R.E. Green, and A.F.G. Bourke. 2010. Conservation genetics, foraging distance and nest density of the scarce great yellow bumblebee (*Bombus distinguendus*). Molecular Ecology 19:2661-2674.

Darvill B., M.E. Knight, and D. Goulson. 2004. Use of genetic markers to quantify bumblebee foraging range and nest density. Oikos 107:471-478.

Dreier, S., J.W. Redhead, I.A. Warren, A.F.G. Bourke, M.S. Heard, W.C. Jordan, S. Sumner, J. Wang, and C. Carvell. 2014. Fine-scale spatial genetic structure of common and declining bumble bees across an agricultural landscape. Molecular Ecology 23:3384-3395.

Knight M.E., A.P. Martin, S. Bishop, J.L. Osborne, R.J. Hale, A. Sanderson, and D. Goulson. 2005. An interspecific comparison of foraging range and nest density of four bumblebee (*Bombus*) species. Molecular Ecology 14:1811-1820.

Kraus F.B., S. Wolf, and R.F.A. Moritz. 2009. Male flight distance and population substructure in the bumblebee *Bombus terrestris*. Journal of Animal Ecology 78: 247-252.

Osborne, J.L., S.J. Clark, R.J. Morris, I.H. Williams, J.R. Riley, A.D. Smith, D.R. Reynolds, and A.S. Edwards. 1999. A landscape-scale study of bumble bee foraging range and constancy, using harmonic radar. Journal of Applied Ecology 36:519–533.

U.S. Fish and Wildlife Service. 2016. Rusty patched bumble bee (*Bombus affinis*) species status assessment. Twin Cities Ecological Services Field Office, Bloomington, MN.

Wolf, S. and R.F.A. Moritz. 2008. Foraging distance in *Bombus terrestris* (Hymenoptera: Apidae). Apidologie 38:419-427.

Wolf, S., T. Toev, R.L.V. Moritz, and R.F.A. Moritz. 2012. Spatial and temporal dynamics of the male effective population size in bumblebees (Hymenoptera:Apidae). Population Ecology 54:115-124.

Wood, T.J., J.M. Holland, W.O.H. Hughes, and D. Goulson. 2015. Targeted agri-environment schemes significantly improve the population size of common farmland bumblebee species. Molecular Ecology 24:1668-1680.

Zayed, A. 2009. Bee genetics and conservation. Apidologie 40(2):237-262.

MCI

Federal Energy Regulatory Commission. 2017. Atlantic Coast Pipeline and Supply Header Project Final Environmental Impact Statement. Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556-000. Office of Energy Projects, Washington, DC.

U.S. Fish and Wildlife Service. 1996. Madison cave isopod (*Antrolana lira*) recovery plan. Northeast Regional Office, Hadley, MA. 36 pp.

U.S. Fish and Wildlife Service. 2011. Biological opinion, Warren County Power Station low effect habitat conservation plan. Virginia Field Office, Gloucester, VA.

Ibat

Brack, V.W. 2005. Field techniques for biological assessment: assessment of potential hibernacula and swarming/staging habitat. Pages 89-92 *in* K.C. Vories and A. Harrington, eds. The proceedings of the Indiana bat and coal mining: A technical interactive forum. U.S. Department of the Interior: Office of Surface Mining, Alton, IL.

Federal Energy Regulatory Commission. 2017. Atlantic Coast Pipeline and Supply Header Project Final Environmental Impact Statement. Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556-000. Office of Energy Projects, Washington, DC.

Frick, W.F., D.S. Reynolds, and T.H. Kunz. 2010. Influence of climate and reproductive timing on demography of little brown myotis *Myotis lucifugus*. Journal of Animal Ecology 79:128-136.

NLEB
N/A

Appendix A.

CONSULTATION HISTORY

09-04-14	The Service and Dominion Resources Services, Inc. (DRSI) met to discuss ACP in NC.
09-15-14	The Service received a letter from DRSI initiating early Section 7 coordination and requesting technical assistance for ACP in VA.
11-21-14	The Service received a letter from DRSI providing notification of pre-filing to FERC regarding ACP.
12-09-14	The Service submitted a letter to DRSI providing initial recommendations on ACP in WV.
01-23-15	The Service submitted a letter to DRSI providing initial recommendations on ACP in VA.
02-04-15	The Service participated in a site visit to see examples of existing gas pipeline crossings of waterbodies in NC.
03-25-15	The Service submitted a letter to DRSI providing initial recommendations on ACP in NC.
05-21-15	The Service, WVDNR, USFS, The Nature Conservancy, DRSI, and Natural Resource Group, LLC (NRG) met to discuss ACP alternatives analysis in WV.
07-07-15	The Service, WVDNR, USFS, DRSI, and NRG met to discuss the alternatives assessment and to participate in a helicopter flyover of proposed alternative routes for ACP in WV.
09-17-15	The Service received a letter from DRSI providing information about ACP and SHP and requesting a meeting.
10-02-15	The Service received a letter from Atlantic providing notification of certification application to FERC for ACP.
10-26-15	The Service and DRSI met to discuss ACP and SHP, FERC application, and development of a biological assessment (BA).
12-01-15	The Service and DRSI met to discuss bat survey results and current project status for ACP in NC.
12-17-15	The Service, DRSI, and NRG met to discuss 2015 survey results and project schedule in WV.

01-07-16	The Service submitted a letter to FERC providing further recommendations on ACP in WV.
01-28-16	The Service submitted a letter to DRSI accepting their bat survey results for SHP and made a NLAA determination for the Indiana and northern long-eared bats in PA.
02-22-16	The Service received a letter from DRSI requesting Section 7 review and technical assistance for the GWNF-6 alternative route of ACP in VA.
02-25-16	The Service and DRSI met to discuss freshwater mussels and other aquatic species survey study plan and current project status for ACP in NC.
03-02-16	The Service received a letter from DRSI submitting the draft BA for ACP and SHP.
05-02-16	The Service submitted a letter to FERC providing comments on the draft BA for ACP.
06-02-16	The Service submitted a letter to FERC providing clarification and recommendations regarding ACP and upcoming field season and bats, aquatic species, and migratory birds.
06-04-16	The Service and DRSI met to discuss sensitive waterbody crossings by ACP in NC.
08-16-16	The Service received a letter from DRSI providing a revised draft BA for ACP and SHP.
11-02-16	DRSI submitted the revised BA to the Service.
11-07-16	The Service and FERC met to discuss SHP, ACP, and development of the Draft Environmental Impact Statement (DEIS).
11-22-16	The Service, DRSI, and ERM met to discuss survey results and current project status in WV.
11-29-16	The Service, DRSI, ERM, and U.S. Army Corps of Engineers met to discuss ACP and SHP.
12-30-16	The Service received the FERC's DEIS via the electronic docket.
01-31-17	The Service submitted a letter to FERC outlining key ACP issues recommended for resolution prior to finalizing the BA.

02-24-17	The Service received a letter from DRSI providing response to Service's 1/31/17 letter.
03-02-17	The Service submitted a letter to FERC clarifying the Service's 1/31/17 letter.
03-21-17 to 03-22-17	The Service and FERC met to discuss SHP, ACP, and development of the FEIS.
03-29-17	The Service, DRSI, and ERM met to discuss comments on the BA.
03-30-17	The Service submitted a letter to FERC providing comments on the DEIS.
04-28-17	The Service received a letter from DRSI submitting the ACP RBC Conservation Plan in WV.
07-21-17	The Service received FERC's 7/21/17 request to initiate formal consultation and conference and FEIS.
07-26-17	The Service received a letter from DRSI submitting the ACP SWP Conservation Plan in WV and VA.
09-06-17	The Service submitted a letter to FERC initiating formal consultation.
09-15-17	The Service received a letter from DRSI submitting the RPBB Impact Analysis and Conservation Measures.
09-21-17	The Service received a letter from DRSI submitting the revised ACP SWP Conservation Plan in WV and VA.

Appendix B. Species-Specific Effects Tables.

Tables 1-8 are color coded as follows:

- NE rows are light green
- NLAA rows are light yellow
- LAA are light red

Table 1. Analysis of effects on benefit-related measures

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 1. Analysis of effects on Small whorled pogonia.

Project Activity	Subactivity	Environmental Impact or Threat	Stressor	Stressor Pathway (optional)	Exposure (Resource Affected)	Range of Response	Conservation Need Affected	Demographic Consequences	NE, NLAA, or LAA	Comments
New Disturbance - Construction	Trenching (digging, blasting, dewatering, open trench, sedimentation)	physical impacts to individuals, habitat degradation	crushing, altered hydrology, changes to soil moisture, downslope erosion, sedimentation, burial	trenching in upslope drainage area, erosion, movement of soil and larger material (e.g boulders) when blasting	habitat, population, individuals	injury, death	reproduction, nutrition, habitat	numbers, reproduction	LAA	This subactivity in the pipeline construction ROW will affect 17.0 and 12.7%, respectively, of the Seneca and MNF colonies' upslope drainage areas. AMMs (e.g., Upland Erosion Control Plan, Restoration and Rehabilitation Plan, temporary diversion channels and berms in SWP Conservation Plan) will minimize potential effects from surface water runoff. Ground disturbance in the upslope drainage area and diversion of surface water flow away from SWP colonies will alter the surface and subsurface hydrology in the watershed of the colonies, causing changes in evapotranspiration rates and soil moisture of the SWP habitat downslope of the ROW. These stressors are likely to affect both the mycorrhizal fungi and SWP and cause decreased fitness and reproductive success and possibly death of SWP individuals. Blasting may also loosen large rocks, which could fall and crush SWP.
New Disturbance - Construction	Pipe Stringing - bending, welding, coating, padding and backfilling	neutral	none	NA	NA	NA	NA	NA	NE	No impacts to SWP habitat are anticipated from this action.
New Disturbance - Construction	Hydrostatic Testing (water withdrawal and discharge)	neutral	none	NA	NA	NA	NA	NA	NE	Activity not proposed within the upslope drainage area and 100-ft buffer downslope of SWP colonies.
New Disturbance - Construction	Regrading and Stabilization - restoration of corridor	physical impacts to individuals, habitat degradation	soil compaction, altered hydrology, changes to soil moisture, downslope erosion, sedimentation, burial, competition, increased nutrients, chemical contaminants	regrading in upslope drainage area, erosion, spread of herbaceous and invasive plant species, exposure to nutrients from surface water runoff (fertilizers, decomposed vegetation), exposure to chemicals from surface water runoff and wind	habitat, population, individuals	injury, death	reproduction, nutrition, habitat	numbers, reproduction	LAA	This subactivity in the pipeline construction ROW will affect 17.0 and 12.7%, respectively, of the Seneca and MNF colonies' upslope drainage areas. AMMs (e.g., Upland Erosion Control Plan, Restoration and Rehabilitation Plan, temporary diversion channels and berms in SWP Conservation Plan, Non-Native Invasive Plant Species Management Plan [NNIPSMP]) will minimize potential effects from surface water runoff, soil compaction, and competition from invasive plants in ROW. Ground disturbance in the upslope drainage area and diversion of surface water flow away from SWP colonies will alter the surface and subsurface hydrology in the watershed of the colonies, causing changes in evapotranspiration rates and soil moisture of the SWP habitat downslope of the ROW. These stressors are likely to affect both the mycorrhizal fungi and SWP and cause decreased fitness and reproductive success and possibly death of SWP individuals. For controlling invasive plants, hand application methods will be used along the ROW and no herbicides will be applied within 25 ft of federally listed plant species unless approved by the Service or USFS. In addition, SWP are located at least 70 ft from the ROW and therefore are not likely to be exposed to herbicides.
New Disturbance - Construction	Compression Facility, noise	neutral	none	NA	NA	NA	NA	NA	NE	Facilities do not occur within the upslope drainage area and 100-ft buffer downslope of SWP colonies.
New Disturbance - Construction	Communication Facility - guy lines, noise, lights	neutral	none	NA	NA	NA	NA	NA	NE	Facilities do not occur within the upslope drainage area and 100-ft buffer downslope of SWP colonies.
New Disturbance - Construction	Access Roads - upgrading existing roads, new roads temp and permanent - grading, graveling	neutral	none	NA	NA	NA	NA	NA	NE	No temporary or permanent access roads proposed near SWP colonies.
New Disturbance - Construction	Access Roads - upgrading existing roads, new roads temp and permanent - culvert installation	neutral	none	NA	NA	NA	NA	NA	NE	No temporary or permanent access roads proposed near SWP colonies.
New Disturbance - Construction	Access Roads - upgrading existing roads, new roads temp and permanent - tree trimming and tree removal	neutral	none	NA	NA	NA	NA	NA	NE	No temporary or permanent access roads proposed near SWP colonies.
New Disturbance - Construction	Stream Crossings, wet open cut ditch	neutral	none	NA	NA	NA	NA	NA	NE	SWP is not an aquatic species and not found in streams and wetland areas.
New Disturbance - Construction	Stream Crossings, flume	neutral	none	NA	NA	NA	NA	NA	NE	SWP is not an aquatic species and not found in streams and wetland areas.
New Disturbance - Construction	Stream Crossings, dam & pump	neutral	none	NA	NA	NA	NA	NA	NE	SWP is not an aquatic species and not found in streams and wetland areas.
New Disturbance - Construction	Stream Crossings, cofferdam	neutral	none	NA	NA	NA	NA	NA	NE	SWP is not an aquatic species and not found in streams and wetland areas.
New Disturbance - Construction	Stream Crossings, Horizontal Directional Drill (HDD)	neutral	none	NA	NA	NA	NA	NA	NE	SWP is not an aquatic species and not found in streams and wetland areas.
New Disturbance - Construction	Stream Crossings, conventional bore	neutral	none	NA	NA	NA	NA	NA	NE	SWP is not an aquatic species and not found in streams and wetland areas.
New Disturbance - Construction	Stream Crossings, direct pipe	neutral	none	NA	NA	NA	NA	NA	NE	SWP is not an aquatic species and not found in streams and wetland areas.
New Disturbance - Construction	Stream Equipment Crossing Structures	neutral	none	NA	NA	NA	NA	NA	NE	SWP is not an aquatic species and not found in streams and wetland areas.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - clearing	neutral	none	NA	NA	NA	NA	NA	NE	Activity not proposed within the upslope drainage area and 100-ft buffer downslope of SWP colonies.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - tree side trimming	neutral	none	NA	NA	NA	NA	NA	NE	Activity not proposed within the upslope drainage area and 100-ft buffer downslope of SWP colonies.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - grading, trenching, regrading	neutral	none	NA	NA	NA	NA	NA	NE	Activity not proposed within the upslope drainage area and 100-ft buffer downslope of SWP colonies.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - pipe stringing	neutral	none	NA	NA	NA	NA	NA	NE	Activity not proposed within the upslope drainage area and 100-ft buffer downslope of SWP colonies.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - HDD	neutral	none	NA	NA	NA	NA	NA	NE	Activity not proposed within the upslope drainage area and 100-ft buffer downslope of SWP colonies.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - conventional bore	neutral	none	NA	NA	NA	NA	NA	NE	Activity not proposed within the upslope drainage area and 100-ft buffer downslope of SWP colonies.
Operation & Maintenance	Facilities - vehicles, foot traffic, noise, communication facilities	neutral	none	NA	NA	NA	NA	NA	NE	Facilities do not occur within the upslope drainage area and 100-ft buffer downslope of SWP colonies.
Operation & Maintenance	Vegetation Management - mowing	physical impacts to individuals, habitat degradation	soil compaction, altered hydrology, changes to evapotranspiration rates and soil moisture, downslope erosion, burial, competition	removal of vegetation in upslope drainage area, spread of herbaceous and invasive plant species	habitat, population, individuals	injury, death	reproduction, nutrition, habitat	numbers, reproduction	LAA	This subactivity in the pipeline permanent ROW will affect 17.0 and 1.1%, respectively, of the Seneca and MNF colonies' upslope drainage areas. Soil compaction and removal of vegetation in the upslope drainage area will increase surface water flow and downslope erosion rates and alter surface and subsurface hydrology in the watershed of the colonies, causing changes in evapotranspiration rates and soil moisture in SWP habitat downslope of the ROW. These stressors are likely to affect both the mycorrhizal fungi and SWP and cause decreased fitness and reproductive success and possibly death of SWP individuals. Methods described in the Non-Native Invasive Plant Species Management Plan will minimize impacts due to invasive species.

ADDITIONAL INFO
REVISION

Table 1. Analysis of effects on Saudi schooled pupils.

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 7. Analysis of effects on RBC.

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 2. Analysis of effects on RBC.

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 2. Analysis of effects on RBC.

Region/ Activity	Subject	Environmental Impacts Theme	Phase	Mean Rating Interval	Standard Deviation Adjusted	Range of Degree	Cumulative Spec Effect	Beneficial Cumulative	SE 90.04 to 1.04	Comment
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	NA	NA	NA	NA	NA	NA	NA	NA	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	NA	NA	NA	NA	NA	NA	NA	NA	[illegible]
[illegible]	[illegible]	NA	NA	NA	NA	NA	NA	NA	NA	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	NA	NA	NA	NA	NA	NA	NA	NA	[illegible]
[illegible]	[illegible]	NA	NA	NA	NA	NA	NA	NA	NA	[illegible]

Table 3. Analysis of effects on [illegible]

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 3. Analysis of effects on [illegible]

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 3. Analysis of effects on RLP.

Pipeline Activity	Subactivity	Environmental Impact or Threat	Stressor	Stressor Pathway (optional)	Exposure (Resource Affected)	Range of Response	Conservation Need Affected	Demographic Consequences	NE, NLAA, or LAA	Comments
New Disturbance - Construction	Stream Crossings, wet open cut ditch	Permanent or temporary loss of habitat, Habitat degradation, Physical impacts to individuals, Reduction of prey population	Sedimentation, Contaminants, Altered flow	tributary and instream earth disturbanc can cause increase in sedimentation and turbidity, Equipment located in stream or tributary can increase chance of spills, altered flow velocities and temporary impoundment from in-water work, minor noise from construction activities in water. water work, minor	Habitat, Population, Individuals	Harass, Harm, Kill	Breeding, Feeding, Sheltering	Numbers, reproduction, distribution	NE	This is not proposed as a crossing method at the 4 RLP crossings (FEIS pg 4-288).
New Disturbance - Construction	Stream Crossings, flume	Permanent or temporary loss of habitat, Habitat degradation, Physical impacts to individuals, Reduction of prey population	Sedimentation, Contaminants, Altered flow	tributary and instream earth disturbanc can cause increase in sedimentation and turbidity, Equipment located in stream or tributary can increase chance of spills, altered flow velocities and temporary impoundment from in-water work, minor noise from construction activities in water. water work, minor	Habitat, Population, Individuals	Harass, Harm, Kill	Breeding, Feeding, Sheltering	Numbers, reproduction, distribution	NE	This is not proposed as a crossing method at the 4 RLP crossings (FEIS pg 4-288).
New Disturbance - Construction	Stream Crossings, dam & pump	Temporary loss of occupied habitat, Physical impacts to individuals, Habitat degradation and water quality degradation, reduction of prey population	Sedimentation, Altered flow, Contaminants, Impoundment	tributary and near stream earth disturbance may result in increased sedimentation altered flow may result in increased sedimentation, contaminant spills from equipment located in tributary stream, dam could restrict up/down stream movement of species, noise from in water work	Habitat, Population, Individuals	Harass, Harm, Kill	Breeding, Feeding, Sheltering	Numbers, reproduction, distribution	LAA	Temporary loss of instream habitat will occur at stream crossings. Instream activities will temporarily re-suspend sediments and increase turbidity. We expect RLP will avoid these areas until the instream structures are removed and turbidity returns to baseline levels. If instream work occurs during spawning, RLP will be unable to successfully spawn in these areas. If work occurs after completion of spawning, crushing or removal of eggs is likely to occur. Implementation of Fish relocation plan will minimize direct impacts.
New Disturbance - Construction	Stream Crossings, cofferdam	Temporary loss of occupied habitat, Physical impacts to individuals, Habitat degradation and water quality degradation, Reduction of prey population	Sedimentation, altered flow, contaminants, impoundment, noise	tributary and near stream earth disturbance may result in increased sedimentation altered flow may result in increased sedimentation, contaminant spills from equipment located in tributary stream, dam could restrict up/down stream movement of species, noise from in water work	Habitat, Population, Individuals	Harass, Harm, Kill	Breeding, Feeding, Sheltering	Numbers, reproduction, distribution	LAA	Temporary loss of instream habitat will occur at stream crossings that use cofferdams and bridge center supports. Additionally cofferdam placement/removal, installation of bridge center supports, and other instream activities will temporarily re-suspend sediments and increase turbidity. We expect RLP will avoid these areas until the instream structures are removed and turbidity returns to baseline levels. If instream work occurs during spawning, RLP will be unable to successfully spawn in these areas. If work occurs after completion of spawning, crushing or removal of eggs is likely to occur. TOYR will minimize direct impacts at Butterwood Creek and Nottoway River 1. Implementation of Fish relocation plan will minimize direct impacts.
New Disturbance - Construction	Stream Crossings, Horizontal Directional Drill (HDD)	Water quality degradation, Physical Impacts to Individuals, Reduction of prey population	Sedimentation, Frac-out, Noise	tributary, near and in stream earth disturbance may result in increased sedimentation, risk of frac-out during drilling operations, noise from drilling activities	Habitat, Population, Individuals	Harass, Harm, Kill	Breeding, Feeding, Sheltering	Numbers, reproduction, distribution	NLAA	HDD at the Nottoway River 2 (MP 32.6) crossing. RLP presence assumed. Based on the frack-out report, risk of frac-out is low.
New Disturbance - Construction	Stream Crossings, conventional bore	Permanent or temporary loss of habitat, Habitat degradation, Physical impacts to individuals, Reduction of prey population	Sedimentation, Contaminants, Altered flow, Noise	tributary and in stream earth disturbance can cause increase in sedimentation and turbidity, Equipment located in stream or tributary can increase chance of spills, altered flow velocities and temporary impoundment from in- water work, minor noise from construction activities in water.	Habitat, Population, Individuals	Harass, Harm, Kill	Breeding, Feeding, Sheltering	Numbers, reproduction, distribution	NE	This is not proposed as a crossing method at the 4 RLP crossings (FEIS pg 4-288).

Table 3. Analysis of tribes on Mt. [illegible]

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 3. Analysis of effects on [illegible]

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 4. Analysis of effects on Clubshell.

Pipeline Activity	Subactivity	Environmental Impact or Threat	Stressor	Stressor Pathway (optional)	Exposure (Resource Affected)	Range of Response	Conservation Need Affected	Demographic Consequences	NE or NLAA, or LAA	Comments
New Disturbance - Construction	Vehicle Operation and Foot Traffic	neutral	none	NA	NA	NA	NA	NA	NLAA	Foot traffic and vehicle operation is not likely to adversely affect clubshell.
New Disturbance - Construction	Clearing - herbaceous vegetation and ground cover	habitat degradation	altering habitat	increased sedimentation	juveniles, adults	harm, harass	breeding, feeding, sheltering	reproduction	LAA	Increased sediment load to stream will impair feeding of clubshell. Mussel gills can become overwhelmed with excessive suspended sediment, causing a mussel to either reduce its water and food intake rate or close altogether. Increased turbidity causing impaired feeding can result in reduced physiological function; depressed rates of growth, reproduction, and recruitment. Siltation resulting from increased seidment loads may also alter and degrade habitat conditions which may suffocate and kill some individual clubshell.
New Disturbance - Construction	Clearing - trees and shrubs	habitat degradation	altering habitat	increased sedimentation	juveniles, adults	harm, harass	breeding, feeding, sheltering	reproduction	LAA	Increased sediment load to stream will impair feeding of clubshell. Mussel gills can become overwhelmed with excessive suspended sediment, causing a mussel to either reduce its water and food intake rate or close altogether. Increased turbidity causing impaired feeding can result in reduced physiological function; depressed rates of growth, reproduction, and recruitment. Siltation resulting from increased seidment loads may also alter and degrade habitat conditions which may suffocate and kill some individual clubshell.
New Disturbance - Construction	Vegetation Disposal (upland) - dragging, chipping, hauling, piling, stacking	neutral	none	NA	NA	NA	NA	NA	NE	Vegetation disposal will not effect clubshell.
New Disturbance - Construction	Vegetation Disposal (upland) - brush pile burning	neutral	none	NA	NA	NA	NA	NA	NE	Brush pile burning will not effect clubshell.
New Disturbance - Construction	Vegetation Clearing - tree side trimming by bucket truck or helicopter	neutral	none	NA	NA	NA	NA	NA	NE	Side trimming of trees will not effect clubshell.
New Disturbance - Construction	Grading, erosion control devices	habitat degradation	altering habitat	increased sedimentation	juveniles, adults	harm, harass	breeding, feeding, sheltering	reproduction	LAA	Increased sediment load to stream will impair feeding of clubshell. Mussel gills can become overwhelmed with excessive suspended sediment, causing a mussel to either reduce its water and food intake rate or close altogether. Increased turbidity causing impaired feeding can result in reduced physiological function; depressed rates of growth, reproduction, and recruitment. Siltation resulting from increased seidment loads may also alter and degrade habitat conditions which may suffocate and kill some individual clubshell.
New Disturbance - Construction	Trenching (digging, blasting, dewatering, open trench, sedimentation)	habitat degradation	altering habitat	increased sedimentation	juveniles, adults	harm, harass	breeding, feeding, sheltering	reproduction	LAA	Increased sediment load to stream will impair feeding of clubshell. Mussel gills can become overwhelmed with excessive suspended sediment, causing a mussel to either reduce its water and food intake rate or close altogether. Increased turbidity causing impaired feeding can result in reduced physiological function; depressed rates of growth, reproduction, and recruitment. Siltation resulting from increased seidment loads may also alter and degrade habitat conditions which may suffocate and kill some individual clubshell.
New Disturbance - Construction	Pipe Stringing - bending, welding, coating, padding and backfilling	neutral	none	NA	NA	NA	NA	NA	NE	Pipe stringing will not effect clubshell.
New Disturbance - Construction	Hydrostatic Testing (water withdrawal and discharge)	neutral	none	NA	NA	NA	NA	NA	NE	No water withdrawals from Hackers Creek or nearby streams.Water will be jumped between segments and not discharged near clubshell.
New Disturbance - Construction	Regrading and Stabilization - restoration of corridor	habitat degradation	altering habitat	increased sedimentation and contaminant impacts to habitat	juveniles, adults	harm, harass	breeding, feeding, sheltering	reproduction	LAA	Increased sediment load to stream will impair feeding of clubshell. Mussel gills can become overwhelmed with excessive suspended sediment, causing a mussel to either reduce its water and food intake rate or close altogether. Increased turbidity causing impaired feeding can result in reduced physiological function; depressed rates of growth, reproduction, and recruitment. Siltation resulting from increased seidment loads may also alter and degrade habitat conditions which may suffocate and kill some individual clubshell.
New Disturbance - Construction	Compression Facility, noise	neutral	none	NA	NA	NA	NA	NA	NE	Noise will not effect clubshell.
New Disturbance - Construction	Communication Facility - guy lines, noise, lights	neutral	none	NA	NA	NA	NA	NA	NE	Noise and lights will not effect clubshell.

Table 4. Analysis of effects on Clubshell.

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	Comments
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 4. Analysis of effects on Clubshell.

Project Activity	Subactivity	Land ownership Impact on Theme	Scale	Direct Effects Impact on Theme	Indirect Effects Affect Scale	Range of Response	Cumulative Impact Effects	Beneficial Effect Management	Adverse Effect on S.A.A.	Comments
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	Facilities – [illegible], fuel traffic, [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	Vegetation Management – [illegible] and tree planting	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	Vegetation Management – [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	Vegetation Management – [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	Vegetation Management – [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	Vegetation Management – [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	[illegible] – [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	[illegible] – [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	[illegible] – [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	[illegible] – [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	[illegible] – [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Operation & Maintenance	[illegible] – [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 4. Analysis of effects on Clubshell.

Position Activity	Submission	Environmental Impact of Effects	Sources	Effects Of Effects Approved	Effects Approved Allowed	Range of Response	Operation Sold Effects	Demographic Consequences	SIP or SEAR or CEAR	Comments
Operation & Maintenance	Tunnel Improvement and Electric Protection Corporation (Operating, waste, fuel loss)	Limited	Low	NA	NA	NA	NA	NA	NE	Time assessment and effect [illegible]
Operation & Maintenance	Improvement [illegible]	Limited	Low	NA	NA	NA	NA	NA	NE	Impact [illegible]

Table 5. Analysis of effects on RPBB.

Pipeline Activity	Subactivity	Environmental Impact or Threat	Stressor	Stressor Pathway (optional)	Exposure (Resource Affected)	Range of Response	Conservation Need Affected	Demographic Consequences	NE, NLAA, or LAA	Comments
New Disturbance-Construction	Vehicle Operation and Foot Traffic	human activity & disturbance	decreased foraging; crushing colonies or overwintering queens	human presence	all life stages	Kill, harm, harass	breeding, feeding, sheltering	numbers, reproduction	LAA	Vehicle operation off established roads may crush RPBB individuals. There is no evidence that vehicle operation at low speeds on established roads would impact individual RPBB. Foot traffic is not expected to crush RPBB.
New Disturbance - Construction	Clearing - herbaceous vegetation and ground cover	clearing of floral habitat; human activity & disturbance	alteration of summer foraging habitat, & colony habitat; decreased foraging efficiency; crushing individuals, colonies or overwintering queens	vegetation removal; human presence	all life stages	kill, harm, harass	breeding, feeding, sheltering	numbers, reproduction	LAA	Clearing of herbaceous vegetation while RPBB are present in habitat is expected to have a direct effect on the quality, quantity, and timing of floral resources, thereby reducing survivability and reproductive success of queens; equipment used could crush individuals, queens or colonies.
New Disturbance - Construction	Clearing - trees and shrubs	clearing of foraging habitat; human activity & disturbance	alteration of summer foraging habitat, & colony habitat; decreased foraging efficiency; crushing individuals, colonies or overwintering queens	vegetation removal; human presence	all life stages	kill, harm, harass	breeding, sheltering	numbers, reproduction	LAA	Clearing of trees and shrubs while RPBB are present in habitat is expected to have a direct effect on the quality, quantity, and timing of floral resources, thereby reducing survivability and reproductive success of queens; equipment used could crush individuals, queens or colonies.
New Disturbance - Construction	Vegetation Disposal (upland) - dragging, chipping, hauling, piling, stacking	human activity & disturbance	alteration of summer foraging habitat, & colony habitat; decreased foraging & travel efficiency; crushing individuals in colonies or overwintering		all life stages	kill, harm, harass	breeding, feeding, sheltering	numbers, reproduction	LAA	Vegetation disposal may crush foraging individuals.
New Disturbance - Construction	Vegetation Disposal (upland) - brush pile burning	human activity &disturbance; smoke	decreased foraging	smoke; human presence & noise	all life stages	none expected	NA	NA	NLAA	Smoke inhalation may agitate bees but response is not expected to be detrimental.
New Disturbance - Construction	Vegetation Clearing - tree side trimming by bucket truck or helicopter	No side trimming occurs for new construction.	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Grading, erosion control devices	alteration of water flow; vegetation removal; human activity	alteration of foraging habitat	vegetation removal; human presence	all life stages	kill, harm, harass	breeding, feeding, sheltering	numbers, reproduction	LAA	Construction associated with grading and erosion control devices could crush foraging individuals if conducted in HPZ.
New Disturbance - Construction	Trenching (digging, blasting, dewatering, opentrench, sedimentation)	human activity;ground disturbance; instream & riparian disturbance; temporary dewatering	NA	instream sedimentation & water flow disruption; human presence & noise	unlikely	none expected	NA	NA	NLAA	This activity is not expected to occur in HPZ.
New Disturbance - Construction	Pipe Stringing - bending, welding, coating, paddingand backfilling	human activity	NA	human presence & noise	unlikely	none expected	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in disturbance of RPBB.
New Disturbance - Construction	Hydrostatic Testing (water withdrawal and discharge)	withdrawal/discharge of water into aquatic habitats; human activity	NA	water alterations; human presence & noise	unlikely	none expected	NA	NA	NLAA	This activity is not expected to occur in HPZ.
New Disturbance - Construction	Regrading and Stabilization - restoration of corridor	human activity & disturbance	Removal of foraging vegetation and nesting habitat; crushing of individuals	habitat disturbance, human presence & noise	all life stages	kill, harm, harass	breeding, feeding, sheltering	numbers, reproduction	LAA	Construction associated with this activity could crush foraging individuals if conducted in HPZ.
New Disturbance - Construction	Compression Facility, noise	noise disturbance	NA	human presence	unlikely	none expected	NA		NLAA	Noise created from this activity is anticipated to be insignificant and would not result in disturbance to RPBB.
New Disturbance - Construction	Communication Facility - guy lines, noise, lights	human activity and facilities	NA	human presence	unlikely	none expected			NLAA	Noise created from this activity is anticipated to be insignificant and would not result in disturbance to RPBB.
New Disturbance - Construction	Access Roads - upgrading existing roads, new roads temp and permanent - grading, graveling	alteration of surface water flow; vegetation removal; human activity	Removal of foraging vegetation and nesting habitat; crushing of individuals in colonies or overwintering	removal of foraging habitat	all life stages	kill, harm, harass	breeding, feeding, sheltering	numbers, reproduction	LAA	Construction associated with this activity could crush foraging individuals if conducted in HPZ.
New Disturbance - Construction	Access Roads - upgrading existing roads, new roads temp and permanent - culvert installation	tree removal; loss or alteration of forested habitat; human disturbance	Removal of foraging vegetation and nesting habitat, crushing of individuals in colonies or overwintering	vegetation removal; human presence	all life stages	kill, harm, harass	breeding, feeding, sheltering	numbers, reproduction	LAA	Construction associated with this activity could crush foraging individuals if conducted in HPZ.
New Disturbance - Construction	Access Roads - upgrading existing roads, new roads temp and permanent - tree trimming and tree removal	tree removal; loss or alteration of forested habitat; human disturbance	Removal of foraging vegetation and nesting habitat; crushing of individuals in colonies or overwintering	vegetation removal; human presence	all life stages	kill, harm, harass	breeding, feeding, sheltering	numbers, reproduction	LAA	Tree removal could crush foraging individuals
New Disturbance - Construction	Stream Crossings, wet open cut ditch	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Stream Crossings, flume	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Stream Crossings, dam & pump	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Stream Crossings, cofferdam	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Stream Crossings, Horizontal Directional Drill (HDD)	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Stream Crossings, conventional bore	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Stream Crossings, direct pipe	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance-Construction	Stream Equipment Crossing Structures	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - clearing	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - tree side trimming	No side trimming occurs for new construction.	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - grading, trenching, regrading	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - pipe stringing	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - HDD	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - conventional bore	RPBB not present	NA	NA	NA	NA	NA	NA	NE	NA
Operation & Maintenance	Facilities - vehicles, foot traffic, noise,communication facilities	increased human activity/disturbance	decreased foraging efficiency; crushing individuals	human presence; vehicle traffic	all life stages	Kill, harm, harass	breeding, feeding	numbers, reproduction	LAA	Vehicle traffic may crush RPBB foraging along roadsides. Traffic may disrupt foraging behavior and displace individual RPBBs.
Operation & Maintenance	Vegetation Management - mowing	loss or alteration of forested habitat; increased human activity/disturbance;	decreased foraging efficiency;	vegetation removal	all life stages	none expected	NA	NA	NLAA	Mowing may reduce RPBB foraging resources, alteration of habitat, mowing blades may crush RPBB. Conservation measure to maintain a minimum blade height of 10 inches during maintenance of the ROW should significantly reduce the likelihood of impacts from crushing.

Table 3. [illegible]

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]										
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]										
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]										
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]										
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 6. Analysis of effects on Medicaid Cost Sharing

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 6. Analysis of effects on Madison Cave isopod.

Pipeline Activity	Subactivity	Environmental Impact or Threat	Stressor	Stressor Pathway (optional)	Exposure (Resource Affected)	Range of Response	Conservation Need Affected	Demographic Consequences	NE, NLAA, or LAA	Comments
New Disturbance - Construction	Stream Crossings, wet ditch	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, chemical contaminants, changes in hydrology	NA	NA	NA	NA	NA	NLAA	AMMs address sedimentation, contaminants and impacts to karst features. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
New Disturbance - Construction	Stream Crossings, flume	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, chemical contaminants, changes in hydrology	NA	NA	NA	NA	NA	NLAA	AMMs address sedimentation, contaminants and impacts to karst features. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
New Disturbance - Construction	Stream Crossings, dam & pump	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, chemical contaminants, changes in hydrology	NA	NA	NA	NA	NA	NLAA	AMMs address sedimentation, contaminants and impacts to karst features. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
New Disturbance - Construction	Stream Crossings, cofferdam	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, chemical contaminants, changes in hydrology	NA	NA	NA	NA	NA	NLAA	AMMs address sedimentation, contaminants and impacts to karst features. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
New Disturbance - Construction	Stream Crossings, Horizontal Directional Drill (HDD)	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, chemical contaminants, changes in hydrology	NA	NA	NA	NA	NA	NLAA	HDD will not be used within mapped MCI potential habitat zone.
New Disturbance - Construction	Stream Crossings, conventional bore	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, chemical contaminants, changes in hydrology	NA	NA	NA	NA	NA	NLAA	Conventional bore will not be used within MCI potential habitat.
New Disturbance - Construction	Stream Crossings, direct pipe	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, chemical contaminants, changes in hydrology	NA	NA	NA	NA	NA	NLAA	Direct pipe will not be used within MCI potential habitat
New Disturbance - Construction	Stream Equipment Crossing Structures	NA	NA	NA	NA	NA	NA	NA	NE	Impacts from stream crossings considered above.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - clearing	Physical impacts to individuals, Habitat degradation	smothering, sedimentation	NA	NA	NA	NA	NA	NLAA	AMMs address sedimentation, contaminants and impacts to karst features. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - tree side trimming	NA	NA	NA	NA	NA	NA	NA	NE	No anticipated impacts from tree trimming. Will not affect the MCI because they will not introduce sediment or contaminants into the phreatic water.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - grading, trenching, regrading	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, contaminants	grading activity exposes the ground and sedimentation into possible connections to MCI habitat. Trenching may result in connections with subsurface habitat	Individuals, habitat	harass to mortality	feeding, finding shelters	numbers, repro	LAA	Grading redistributes and loosens soil making it more prone to erosion. Depending on the amount and speed of the erosion event, MCI may either avoid a particular area until the sediment is settled or be smothered. Loosened subsurface rocks from trenching may disrupt the subsurface water flow and alter MCI travel corridors. Trenching may intercept a subsurface void, creating a direct conduit for soil and sediment to force into the subsurface habitat. These changes will render habitat temporarily or permanently unsuitable for use by the MCI and is likely prevent movements among or between populations.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - pipe stringing	NA	NA	NA	NA	NA	NA	NA	NE	No impacts from pipe stringing component of activity.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - HDD	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, chemical contaminants, changes in hydrology	NA	NA	NA	NA	NA	NLAA	HDD will not be used within mapped MCI potential habitat zone.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - conventional bore	Physical impacts to individuals	chemical contaminants	NA	NA	NA	NA	NA	NLAA	Conventional bore will not be used within mapped MCI potential habitat zone.
Operation & Maintenance	Facilities - vehicles, foot traffic, noise, communication facilities	Physical impacts to individuals	chemical contaminants, sedimentation	NA	NA	NA	NA	NA	NLAA	No impacts from foot traffic. AMMs address contaminants and sedimentation from general vehicle-use; NOTE vehicle impacts for all O&M subactivities are evaluated here (i.e., vehicle impacts will not be considered under the remaining O&M subactivities). Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.

Table 6. Analysis of effects on Madison Cave isopod.

Pipeline Activity	Subactivity	Environmental Impact or Threat	Stressor	Stressor Pathway (optional)	Exposure (Resource Affected)	Range of Response	Conservation Need Affected	Demographic Consequences	NE, NLAA, or LAA	Comments
Operation & Maintenance	Vegetation Management - mowing	NA	NA	NA	NA	NA	NA	NA	NE	Mowing is not an earth disturbing activity - no expected increased sedimentation or contaminantion from mowing.
Operation & Maintenance	Vegetation Management - chainsaw and tree clearing	Physical impacts to individuals, Habitat degradation	sedimentation	NA	NA	NA	NA	NA	NLAA	No impact from selective tree removal. AMMs address sedimentation. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
Operation & Maintenance	Vegetation Management - herbicides - hand, vehicle mounted, aerial applications	Physical impacts to individuals	chemical contaminants	NA	NA	NA	NA	NA	NLAA	AMMs address herbicides. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS. No spraying of insecticides or herbicides would be allowed within the 300 ft karst feature buffer, except where allowed by state or federal agencies. Aerial spraying would not be utilized for invasive species control along the ROW.
Operation & Maintenance	Vegetation Disposal (upland) - dragging, chipping, hauling, piling, stacking	Physical impacts to individuals,	chemical contaminants, smothering	NA	NA	NA	NA	NA	NLAA	AMMs address potential contaminants from chipper. No stacking or piling will be done in potential MCI habitat. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
Operation & Maintenance	Vegetation Disposal (upland) - brush pile burning	NA	NA	NA	NA	NA	NA	NA	NE	No impacts from brush burning. Will not affect the MCI because they will not introduce sediment or contaminants into the phreatic water.
Operation & Maintenance	Vegetation Management - tree side trimming by bucket truck or helicopter	NA	NA	NA	NA	NA	NA	NA	NE	No impacts from tree trimming. Will not affect the MCI because they will not introduce sediment or contaminants into the phreatic water.
Operation & Maintenance	ROW repair, regrading, revegetation (upland) - hand, mechanical	Physical impacts to individuals	smothering, sedimentation	NA	NA	NA	NA	NA	NLAA	No impacts from hand repair. Mechanical repair impacts are addressed by AMMs. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
Operation & Maintenance	ROW repair, regrading, revegetation (wetland) - hand, mechanical	Physical impacts to individuals	smothering, sedimentation	NA	NA	NA	NA	NA	NLAA	No impacts from hand repair. Mechanical repair impacts are addressed by AMMs. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
Operation & Maintenance	ROW repair, regrading, revegetation - in stream stabilization and/or fill	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, chemical contaminants, changes in hydrology	NA	NA	NA	NA	NA	NLAA	AMMs address sedimentation, contaminants and impacts to karst features. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
Operation & Maintenance	Access Road Maintenance - grading, graveling	Physical impacts to individuals, Habitat degradation	smothering, sedimentation, chemical contaminants	NA	NA	NA	NA	NA	NLAA	AMMs address sedimentation, contaminants and impacts to karst features. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS. We anticipate impacts from road maintance would be smaller because the majority of impacts are expected from the creation or widening of road.
Operation & Maintenance	Access Road Maintenance - culvert replacement	Physical impacts to individuals, Habitat degradation	smothering, sedimentation	NA	NA	NA	NA	NA	NLAA	AMMs address sedimentation, contaminants and impacts to karst features. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
Operation & Maintenance	General Appurtenance and Cathodic Protection Construction - Off ROW Clearing	Habitat alteration	sedimentation	NA	NA	NA	NA	NA	NLAA	AMMs address sedimentation and impacts to karst features. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
Operation & Maintenance	General Appurtenance and Cathodic Protection Construction - trenching, anode, bell hole	Habitat alteration	sedimentation		NA	NA	NA	NA	NLAA	AMMs address sedimentation and impacts to karst features. Details are located in the Karst Terrain Assessment Construction, Monitoring and Mitigation Plan (GeoConcepts Engineering, Inc. 2017c) in Appendix I of the FEIS and page 4-300 of the FEIS.
Operation & Maintenance	Inspection Activities - ground and aerial	NA	NA	NA	NA	NA	NA	NA	NE	No impacts from inspections. Will not affect the MCI because they will not introduce sediment or contaminants into the phreatic water.

ADDITIONAL INFO MADISON

Table 7. Analysis of effects on Ibat.

Pipeline Activity	Subactivity	Environmental Impact or Threat	Stressor	Stressor Pathway (optional)	Exposure (Resource Affected)	Range of Response	Conservation Need Affected	Demographic Consequences	NE, NLAA, or LAA	Comments
New Disturbance - Construction	Vehicle Operation and Foot Traffic	Human activity and disturbance	daytime arousal	human presence	all life stages, spring-fall	NA	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees.
New Disturbance - Construction	Clearing - herbaceous vegetation and ground cover	Clearing of forested habitat, Human activity, and disturbance	alteration of summer roosting habitat, & staging/swarming habitat, daytime arousal	vegetation removal, human presence	all life stages, spring-fall	NA	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from roost trees or disturb hibernating bats. Mowing of herbaceous vegetation while bats are present in habitat is expected to have a direct effect on the quality, quantity, and timing of prey resources; however, the affect on bats foraging is considered insignificant due to the small area of impact within a bats ~2.5 mile home range.
New Disturbance - Construction	Clearing - trees and shrubs	Clearing of forested habitat, Human activity and disturbance	alteration of summer roosting habitat, & staging/swarming habitat, daytime arousal	vegetation removal, human presence	all life stages, spring-fall	kill, harm, harass	breeding, sheltering	numbers, reproduction	LAA	We expect the majority of effects to Ibats from tree clearing will occur in suitable unoccupied summer habitat that Ibats use as a travel corridor between hibernacula and roost trees. We anticipate effects will be greatest to pregnant females that expend additional energy to seek alternate travel corridors as a result of tree clearing. If pregnant females dramatically alter their travel corridor they will divert their energetic demands to seek new corridors and will likely give birth to smaller pups, which could decrease pup survival. Tree removal may fragment the habitat such that Ibats traveling through the area will be more vulnerable to predation, resulting in injury or death. Tree removal in known use summer habitat will limit roosting options or necessitate roost tree switching when Ibats return the following season. Because maternity roost trees are ephemeral, Ibats have evolved to relocate roosts at the beginning of the season if needed. Tree removal in unknown use spring staging/fall swarming habitat will remove foraging and roosting areas for a concentrated number of Ibats in an abbreviated season (i.e., fall swarming or spring emergence). Clearing trees around hibernacula will decrease foraging and roosting habitat, requiring bats to spend more time searching for food, which could result in bats entering hibernation with less fat reserves or spending less time on social interactions, which could delay breeding. We expect the same effects on Ibats from tree removal in known use spring staging/fall swarming habitat as those described for unknown use spring staging/fall swarming habitat. We do not anticipate impacts to bats when they are hibernating based on the protections Karst Mitigation Plan included in Appendix I of the FEIS (FERC 2017).
New Disturbance - Construction	Vegetation Disposal (upland) - dragging, chipping, hauling, piling, stacking	Human activity and disturbance, Obstructed hibernacula entrances or vents	loss or alteration of hibernation conditions, hibernacula no longer suitable, daytime arousal	alteration of water or air flow in/out of hibernacula, human presence	all life stages, all seasons	NA	NA	NA	NLAA	AMMs avoid potential impacts to hibernacula; noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from roost trees.
New Disturbance - Construction	Vegetation Disposal (upland) - brush pile burning	Human activity and disturbance, smoke	alteration of hibernating conditions, daytime arousal	smoke, human presence & noise	all life stages, all seasons	NA	NA	NA	NLAA	The direct loss of bats from smoke caused by burning brush piles in summer is insignificant because the effects are difficult to detect and measure. Additionally, the majority of the project area is in suitable unoccupied summer habitat, AMMs will prevent smoke from entering hibernacula in the winter.
New Disturbance - Construction	Vegetation Clearing - tree side trimming by bucket truck or helicopter	Human activity	daytime arousal	human presence & noise	all life stages, all seasons	NA	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from roost trees.
New Disturbance - Construction	Grading, erosion control devices	Alteration of water flow, Vegetation removal, Human activity	altered water flow & humidity in hibernacula	altered water flow	all life stages, all seasons	NA	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from roost trees; AMMs prevent discharge of a significant amount of water into the recharge area of known hibernacula potentially flooding hibernating bats.
New Disturbance - Construction	Trenching (digging, blasting, dewatering, open trench, sedimentation)	Human activity, Ground disturbance, Instream and riparian disturbance, Temporary dewatering	decreased aquatic invertebrates, daytime arousal	instream sedimentation & water flow disruption, human presence & noise	all life stages, all seasons	NA	NA	NA	NLAA	AMMs limit potential impacts to hibernacula by restricting blasting within 0.5 mile of hibernacula; ECS requirements limit loss of aquatic invertebrates so that any loss of Ibat forage is insignificant.
New Disturbance - Construction	Pipe Stringing - bending, welding, coating, padding and backfilling	Human activity	daytime arousal	human presence & noise	all life stages, spring-fall	NA	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from roost trees.
New Disturbance - Construction	Hydrostatic Testing (water withdrawal and discharge)	Withdrawal/discharge of water into aquatic habitats, Human activity	decreased aquatic invertebrates, daytime arousal	water alterations, human presence & noise	all life stages, all seasons	NA	NA	NA	NLAA	AMMs prevent discharge of a significant amount of water into the recharge area of known hibernacula potentially flooding hibernating bats; noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees, ECS requirements limit loss of aquatic invertebrates so that any loss of Ibat forage is insignificant.
New Disturbance - Construction	Regrading and Stabilization - restoration of corridor	Human activity and disturbance, Obstructed hibernacula entrances or vents	loss or alteration of hibernation conditions, daytime arousal	alteration of water or air flow in/out of hibernacula, human presence	all life stages, all seasons	NA	NA	NA	NLAA	AMMs avoid potential impacts to hibernacula; noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees.
New Disturbance - Construction	Compression Facility, noise	Noise disturbance	daytime arousal	human presence	all life stages, spring-fall	NA	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees
New Disturbance - Construction	Communication Facility - guy lines, noise, lights	Human activity and Facilities	daytime arousal	human presence	all life stages, spring-fall	NA	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees.
New Disturbance - Construction	Access Roads - upgrading existing roads, new roads temp and permanent - grading, graveling	Alteration of surface water flow, Vegetation removal, Human activity	altered water flow & humidity in hibernacula, alteration of summer roosting habitat, & spring staging/fall swarming habitat, daytime arousal	removal of forested habitat, altered surface water flow into hibernacula, human presence	all life stages	kill, harm, harass	breeding, sheltering	numbers, reproduction	NLAA	AMMs limit potential impacts to hibernacula; noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees.
New Disturbance - Construction	Access Roads - upgrading existing roads, new roads temp and permanent - culvert installation	Tree removal, Loss or alteration of forested habitat, Human disturbance	alteration of summer roosting habitat, & spring staging/fall swarming habitat, increased daytime arousal	vegetation removal, human presence	all life stages	NA	NA	NA	NLAA	The small area and level of impact from these activities on forested habitat is not expected to have noticeable or measurable impacts on Ibats or their habitat.

ATTACHMENT 1 REVISION

Table 7. Analysis of effects on Elem.

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 7. Analysis of effects on Ibat.

Pipeline Activity	Subactivity	Environmental Impact or Threat	Stressor	Stressor Pathway (optional)	Exposure (Resource Affected)	Range of Response	Conservation Need Affected	Demographic Consequences	NE, NLAA, or LAA	Comments
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - clearing	Clearing of forested habitat, Human activity and disturbance	alteration of summer roosting habitat, & spring staging/fall swarming habitat, daytime arousal	vegetation removal, human presence	all life stages, spring-fall	kill, harm, harass	breeding, sheltering	numbers, reproduction	LAA	We expect the majority of effects to Ibats from tree clearing will occur in suitable unoccupied summer habitat that Ibats use as a travel corridor between hibernacula and roost trees. We anticipate effects will be greatest to pregnant females that expend additional energy to seek alternate travel corridors as a result of tree clearing. If pregnant females dramatically alter their travel corridor they will divert their energetic demands to seek new corridors and will likely give birth to smaller pups, which could decrease pup survival. Tree removal may fragment the habitat such that Ibats traveling through the area will be more vulnerable to predation, resulting in injury or death. Tree removal in known use summer habitat will limit roosting options or necessitate roost tree switching when Ibats return the following season. Because maternity roost trees are ephemeral, Ibats have evolved to relocate roosts at the beginning of the season if needed. Tree removal in unknown use spring staging/fall swarming habitat will remove foraging and roosting areas for a concentrated number of Ibats in an abbreviated season (i.e., fall swarming or spring emergence). Clearing trees around hibernacula will decrease foraging and roosting habitat, requiring bats to spend more time searching for food, which could result in bats entering hibernation with less fat reserves or spending less time on social interactions, which could delay breeding. We expect the same effects on Ibats from tree removal in known use spring staging/fall swarming habitat as those described for unknown use spring staging/fall swarming habitat. We do not anticipate impacts to bats when they are hibernating based on the protections Karst Mitigation Plan included in Appendix I of the FEIS (FERC 2017)
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - tree side trimming	Tree removal, Loss or alteration of forested habitat, Human disturbance	alteration of summer roosting/foraging habitat, & spring staging/fall swarming habitat, increased arousal, daytime disturbance, roost abandonment, increased predation due to daytime activity	vegetation removal, human disturbance	unlikely	kill, harm, harass	breeding, sheltering	numbers, reproduction	NLAA	AMMs minimize potential effects; vegetation alterations to travel corridors and foraging habitat should be extremely small; Noise and activity levels are anticipated to be so low as to not cause bats to flush from adjacent roost trees or hibernacula; Although some roosting habitat may be taken during side trimming during the winter, we do not expect indirect effects to occur because the majority of the tree and therefore roosting habitat will not be removed. Thus, the effects are insignificant.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - grading, trenching, regrading	Alteration of surface water flow, Vegetation removal, Human activity, Wetland disturbance	flooding hibernacula, decreased aquatic invertebrates, alteration of spring staging/fall swarming habitat, daytime arousal	removal of wetland vegetation, water disruption, alteration of water or air flow in/out of hibernacula, human presence & noise	all life stages, all seasons	NA	NA	NA	NLAA	AMMs will limit potential impacts to hibernacula; noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees; impacts to wetland biota would be temporary and limited & localized and not expected to cause any noticeable decrease in Ibat foraging.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - pipe stringing	Human activity	daytime arousal	human presence & noise	all life stages, spring-fall	NA	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - HDD	Alteration of surface water flow, Vegetation removal, Human activity, Wetland disturbance	flooding hibernacula, decreased aquatic invertebrates, alteration of spring staging/fall swarming habitat, daytime arousal	removal of wetland vegetation, water disruption, drilling fluids in wetland, increased water flow into hibernacula, human presence & noise	all life stages	NA	NA	NA	NLAA	AMMs will limit potential impacts to hibernacula; noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees; impacts to wetland biota would be temporary and limited & localized and not expected to cause any noticeable decrease in Ibat foraging.
New Disturbance - Construction	Crossings, wetlands and other water bodies (non-riparian) - conventional bore	Alteration of surface water flow, Vegetation removal, Human activity, Wetland disturbance	flooding hibernacula, decreased aquatic invertebrates, alteration of spring staging/fall swarming habitat, daytime arousal	removal of wetland vegetation, water disruption, drilling fluids in wetland, increased water flow into hibernacula, human presence & noise	all life stages	NA	NA	NA	NLAA	AMMs will limit potential impacts to hibernacula; noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees; impacts to wetland biota would be temporary and limited & localized and not expected to cause any noticeable decrease in Ibat foraging.
Operation & Maintenance	Facilities - vehicles, foot traffic, noise, communication facilities	Increased human activity and disturbance	increased daytime arousal	human presence	all life stages, (not hibernation)	NA	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees, nor would it impact foraging bats or bats using travel corridors; NOTE vehicle impacts for all O&M subactivities are evaluated here (i.e., vehicle impacts will not be considered under the remaining O&M subactivities).
Operation & Maintenance	Vegetation Management - mowing	Loss or alteration of forested habitat, Increased human activity and disturbance	decreased foraging & travel efficiency, increased predation	alteration of spring- summer-fall travel corridors, vegetation removal	all life stages, (not hibernation)	NA	NA	NA	NLAA	Noise created from this activity is anticipated to be insignificant and would not result in the flushing of bats from adjacent roost trees. nor would it impact foraging bats or bats using travel corridors.
Operation & Maintenance	Vegetation Management - chainsaw and tree clearing	Loss or alteration of forested habitat	alteration of travel corridors, summer roosting/foraging habitat, & spring staging/fall swarming habitat, increased arousal, daytime disturbance, roost abandonment, increased predation due to daytime activity	vegetation removal, human disturbance	all life stages, (not hibernation)	Kill, harm, harass	breeding, sheltering	numbers, reproduction	LAA	We expect the majority of effects to Ibats from tree clearing will occur in suitable unoccupied summer habitat that Ibats use as a travel corridor between hibernacula and roost trees. We anticipate effects will be greatest to pregnant females that expend additional energy to seek alternate travel corridors as a result of tree clearing. If pregnant females dramatically alter their travel corridor they will divert their energetic demands to seek new corridors and will likely give birth to smaller pups, which could decrease pup survival. Tree removal may fragment the habitat such that Ibats traveling through the area will be more vulnerable to predation, resulting in injury or death. Tree removal in known use summer habitat may limit roosting options or necessitate roost tree switching when Ibats return the following season. Because maternity roost trees are ephemeral, Ibats have evolved to relocate roosts at the beginning of the season if needed. Tree removal in unknown use spring staging/fall swarming habitat may remove foraging and roosting areas for a concentrated number of Ibats in an abbreviated season (i.e., fall swarming or spring emergence). Clearing trees around hibernacula will decrease foraging and roosting habitat, requiring bats to spend more time searching for food, which could result in bats entering hibernation with less fat reserves or spending less time on social interactions, which could delay breeding. We expect the same effects on Ibats from tree removal in known use spring staging/fall swarming habitat as those described for unknown use spring staging/fall swarming habitat. We do not anticipate impacts to bats when they are hibernating based on the protections Karst Mitigation Plan included in Appendix I of the FEIS (FERC 2017).

ADDITIONAL INFO
REVISION

Table 7. Analysis of effects on that.

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 8. Analysis of effects on Northern long-eared bat.

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 8. Analysis of effects on Northern long-eared bat.

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Table 8. Analysis of effects on Northern long-eared bat.

Pipeline Activity	Subactivity	Environmental Impact or Threat	Stressor	Stressor Pathway (optional)	Exposure (Resource Affected)	Range of Response	Conservation Need Affected	Demographic Consequences	NE, NLAA, MA, or LAA	Comments
Operation & Maintenance	ROW repair, regrading, revegetation (wetland) - hand, mechanical	Tree removal, Loss or alteration of forested habitat, Human disturbance	alteration of summer roosting habitat, & spring staging/fall swarming habitat, increased daytime arousal	vegetation removal, human disturbance	unlikely	NA	NA	NA	MA	These effects have been previously addressed in the Service's programmatic biological opinion implementing the final 4(d) rule dated January 5, 2016.
Operation & Maintenance	ROW repair, regrading, revegetation - instream stabilization and/or fill	Tree removal, Loss or alteration of forested habitat, Human disturbance	alteration of summer roosting habitat, & spring staging/fall swarming habitat, increased daytime arousal	vegetation removal, human disturbance	unlikely	NA	NA	NA	MA	These effects have been previously addressed in the Service's programmatic biological opinion implementing the final 4(d) rule dated January 5, 2016.
Operation & Maintenance	Access Road Maintenance - grading, graveling	Tree removal, Loss or alteration of forested habitat, Human disturbance	alteration of summer roosting habitat, & spring staging/fall swarming habitat, increased daytime arousal	vegetation removal, human disturbance	unlikely	harm, harass	breeding, sheltering	numbers, reproduction	MA	These effects have been previously addressed in the Service's programmatic biological opinion implementing the final 4(d) rule dated January 5, 2016.
Operation & Maintenance	Access Road Maintenance - culvert replacement	Tree removal, Loss or alteration of forested habitat, Human disturbance	alteration of summer roosting habitat, & spring staging/fall swarming habitat, increased daytime arousal	vegetation removal, human disturbance	all life stages	NA	NA	NA	MA	These effects have been previously addressed in the Service's programmatic biological opinion implementing the final 4(d) rule dated January 5, 2016.
Operation & Maintenance	General Appurtenance and Cathodic Protection Construction - Off ROW Clearing	tree removal, loss or alteration of forested habitat, human disturbance	alteration of summer roosting habitat, & staging/swarminghabitat, increased daytime arousal	vegetation removal,human presence	all life stages	kill, harm, harass	breeding, sheltering	numbers, reproduction	LAA	Effects from this activity will occur within ½-mile of a known hibernacula and take is not exempt by the 4(d) rule. Approximately 0.4 acres of forest clearing will occur along an existing access road. AMMs minimize potential effects; vegetation alterations to travel corridors and foraging habitat should be extremely small; noise created from this activity is covered by the 4d rule. The flushing of bats from roost trees as they are being cut during daylight hours would increase the likelihood that the bats would become prey for predators.
Operation & Maintenance	General Appurtenance and Cathodic Protection Construction - trenching, anode, bell hole	Human disturbance	increased daytime arousal	human presence	all life stages	NA	NA	NA	MA	These effects have been previously addressed in the Service's programmatic biological opinion implementing the final 4(d) rule dated January 5, 2016.
Operation & Maintenance	Inspection Activities - ground and aerial	Human activity and Disturbance	daytime arousal	human presence	all life stages, spring-fall	NA	NA	NA	MA	These effects have been previously addressed in the Service's programmatic biological opinion implementing the final 4(d) rule dated January 5, 2016.

ADDITIONAL INFO
REVISION