

US EPA ARCHIVE DOCUMENT



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
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December 5, 2012

Mr. John Nordine
U.S. EPA
77 West Jackson Boulevard
Chicago, IL 60604-3590

TAILS: 03E15000-2013-TA-0228
03E15000-2013-CPA-0018

Dear Mr. Nordine:

This is in response to your November 15, 2012 letter requesting information on threatened and endangered species within the vicinity of the former Carboline site in Xenia, Ohio. The project involves a 7.5-acre site located at 125 Fairground Road, Xenia, Greene County, Ohio. Based on aerial photographs, the project site currently contains a former industrial building, mowed lawn, forest habitat, and a stream. No specific information was provided about any habitat onsite or activities planned for the site.

There are no Federal wildlife refuges, wilderness areas, or Critical Habitat within the vicinity of this site.

The Service recommends that impacts to streams and wetlands be avoided and buffers surrounding these systems be preserved. Streams and wetlands provide valuable habitat for fish and wildlife resources, and the filtering capacity of wetlands helps to improve water quality. Buffers of native vegetation surrounding these systems are also important in preserving their wildlife-habitat and water quality-enhancement properties. We recommend that any proposed projects use best construction techniques to minimize erosion. Prevention of non-native, invasive plant establishment is critical in maintaining quality habitats. All disturbed areas should be mulched and re-vegetated with native plants.

ENDANGERED SPECIES COMMENTS:

The proposed project lies within the range of the **Indiana bat** (*Myotis sodalis*), a federally listed endangered species. Since first listed as endangered in 1967, their population has declined by nearly 60%. Several factors have contributed to the decline of the Indiana bat, including the loss and degradation of suitable hibernacula, human disturbance during hibernation, pesticides, and the loss and degradation of forested habitat, particularly stands of large, mature trees. Fragmentation of forest habitat may also contribute to declines. During winter, Indiana bats hibernate in caves and abandoned mines. Summer habitat requirements for the species are not well defined but the following are considered important:

- (1) dead or live trees and snags with peeling or exfoliating bark, split tree trunk and/or branches, or cavities, which may be used as maternity roost areas;
- (2) live trees (such as shagbark hickory and oaks) which have exfoliating bark;
- (3) stream corridors, riparian areas, and upland woodlots which provide forage sites.

The site does appear to contain forested habitat which may contain roosting habitat and the stream corridor may provide foraging habitat.

In order for the Service to fully evaluate potential impacts to the Indiana bat additional information is required. We recommend including the following information:

1. A map of the site with all forested areas indicated, and a general description of the habitat, including acreage, dominant species composition, age, density of understory, and canopy cover, and representative photos of these areas.
2. A map identifying the location of any exposed bedrock that supports caves, crevices, fissures, or sinkholes, or abandoned mines of any kind, and representative photos of these areas.
3. A map indicating the location of suitable roost trees (dead or live trees with peeling bark, cracks, or crevices), and describe species, condition (live or dead), size (dbh), and canopy cover. In particular, potential maternity roost trees should be located and quantified. Potential maternity roosts are typically large diameter trees with peeling bark that receive solar exposure for at least half the day. Please include representative photos of these trees.
4. A map indicating the location of any wetlands, streams, ponds, and cleared paths or trails.
5. A description and quantification of any forested parcels and potential roost trees onsite that will be preserved.
6. A description of any other forested properties within the vicinity of the project that are protected in perpetuity (ex. parks, conservation easements, etc.).
7. A description of the connectivity of forested areas onsite and other adjacent forested parcels.
8. A list of avoidance and minimization measures to protect the bat and its habitat (such as preservation of suitable habitat, seasonal tree clearing, etc.).
9. Using the information above as justification, please include your determination of whether or not the project is likely to adversely affect the Indiana bat.

Based on this information, the Service will evaluate potential impacts to the Indiana bat from the proposed project. Depending on the extent of impacts to suitable Indiana bat habitat, we may recommend mist net or emergence surveys to determine bat usage of the project area. These surveys must be designed and conducted in coordination with this office, and *may only be completed between May 15 and August 15*. In lieu of first providing the above information for Service evaluation, the Applicant may elect to forgo a habitat evaluation and conduct a mist net survey on the property. If this option is selected, the Applicant should contact this office immediately for a list of permitted Indiana bat surveyors, and to ensure that the appropriate survey protocol is implemented.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the Endangered Species Act of 1973, as amended, and are consistent with the intent of the National Environmental Policy Act of 1969 and the U.S. Fish and Wildlife Service's Mitigation Policy. Please note that consultation under section 7 of the ESA may be warranted for this project if suitable habitat for federally listed species may be impacted by this project. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

If you have any questions regarding our response or if you need additional information, please contact Jennifer Finfera at extension 13.

Sincerely,



Mary Knapp, Ph.D.
Field Supervisor

cc: ODNR, DOW, SCEA Unit, Columbus, OH