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# **NISOURCE/COLUMBIA PIPELINE MSHCP CONSULTATION IMPLEMENTATION GUIDANCE**

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MSHCP and non-MSHCP  
Species

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U.S. Fish and Wildlife Service  
Regions 3, 4, & 5

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MAY 8, 2014

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# CONSULTATION UNDER THE COLUMBIA PIPELINE MSHCP

## Stepwise Consultation Process

This will be done by the lead federal action agency, if there is more than one federal authorization required. Where designated, NiSource's Columbia Pipeline Group (Columbia or CPG<sup>1</sup>) may act as the non-federal representative for the purposes of informal consultation.

For species covered by the Multi-Species Habitat Conservation Plan (MSHCP), i.e., MSHCP species: Columbia and the federal action agency need to confirm and document that the proposed activity is consistent with the Multi-Species Habitat Conservation Plan (MSHCP), programmatic biological opinion (BO), and/or concurrence letters. If so, **no further consultation is required.**

For species not covered by the MSHCP, i.e., non-MSHCP species: If the proposed activity includes one of the not likely to adversely affect (NLAA) species or no effect (NE) species, Columbia and the federal action agency need to confirm that the proposed activity is consistent with the MSHCP and the consultation letter. If so, **no further consultation is required.**

If the proposed activity includes one of the likely to adversely affect (LAA) species, the federal action agency and the U.S. Fish and Wildlife Service (FWS) must engage in further consultation that will be appended to the programmatic BO. Your Columbia contact will be able to provide guidance and reference materials to assist with this process and ensure compliance.

For proposed activities that deviate from the MSHCP, programmatic BO, and/or concurrence letters: Additional section 7 consultation will be required (either reinstate or separate), which may be formal or informal depending on the anticipated impacts to listed species. Such deviations might include, but not be limited to, activities outside the covered lands, new techniques for construction and maintenance, etc.

Single projects consisting of activities that both comply with and deviate from the HCP will also require an additional separate consultation. For those activities that comply with the HCP, the analyses from the programmatic documents will continue to apply. The applicable analyses may be taken verbatim from the appropriate programmatic document (i.e., no new or additional analysis needed). For those activities that deviate from the HCP, additional effects analyses will be necessary. Regardless, **for any such additional consultation, the Service and the action agency will utilize as much of the information from the MSHCP and programmatic BO as is relevant.**

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<sup>1</sup> Columbia Pipeline Group is the subsidiary of NiSource, Inc., in charge of implementation of the MSHCP and Incidental Take Permit



## QUICK REFERENCE FOR SPECIES CONSULTATION CATEGORIES

### MSHCP SPECIES (LAA)

Madison cave isopod  
Nashville crayfish  
American burying beetle  
Indiana bat  
Clubshell mussel  
Fanshell mussel  
James spiny mussel  
Northern riffleshell  
Sheepnose  
Bog turtle

### MSHCP SPECIES (NLAA)

Cheat Mountain salamander  
Interior least tern  
Gray bat  
Louisiana black bear  
Virginia big-eared bat  
Birdwing pearl mussel  
Cracking pearl mussel  
Cumberland monkeyface  
Oyster mussel

### NON-MSHCP SPECIES (LAA)

Eastern massasauga rattlesnake  
Diamond darter  
Roanoke logperch  
Dwarf wedgemussel  
Pink mucket pearl mussel  
Rabbitsfoot  
Rayed bean  
Snuffbox  
Spectaclecase  
Northeastern bulrush

### NON-MSHCP SPECIES (NLAA)

West Virginia northern flying squirrel  
Kirtland's warbler  
Piping plover  
Red-cockaded woodpecker  
Kentucky arrow darter  
Pallid sturgeon  
Pygmy madtom  
Spotfin chub  
Fat pocketbook  
Fluted kidney shell  
Orangefoot pimpleback pearl mussel  
Ring pink mussel  
Rough pigtoe  
Slabside pearl mussel  
American chaffseed  
Eastern prairie fringed orchid  
Globe (Short's) bladderpod  
Harperella  
Leafy-prairie clover  
Leedy's roseroot  
Michaux's sumac  
Northern monkshood  
Pondberry  
Running buffalo clover  
Sensitive joint-vetch  
Shale barren rockcress  
Short's goldenrod  
Small-whorled pogonia  
Smooth coneflower  
Spring creek bladderpod  
Swamp pink  
Virginia sneezeweed  
Virginia spirea

**No Effect Species list located on next page**

NO EFFECT SPECIES

MSHCP SPECIES (NE)

Delmarva Peninsula fox squirrel  
West Indian manatee]  
Shenandoah salamander  
Blackside dace  
Cumberland snubnose darter  
Gulf sturgeon  
Maryland darter  
Scioto madtom  
Slackwater darter  
Cumberland bean pearlymussel  
Dromedary pearlymussel  
Louisiana pearlshell  
Pale Lilliput pearlymussel  
Purple cat's paw pearlymussel  
Tan riffleshell  
White cat's paw pearlymussel  
White wartyback pearlymussel  
Karner blue butterfly  
Mitchell's satyr butterfly  
Puritan tiger beetle  
Braun's rock cress  
Mead's milkweed  
Pitcher's (sand dune) thistle

NON-MSHCP SPECIES (NE)

Lakeside daisy  
Peter's Mountain mallow  
Price's potato-bean  
White-haired goldenrod

# STEPWISE CONSULTATION PROCESS

## PART A: MSHCP SPECIES

SCENARIO 1: Activities proposed as described in the MSHCP, programmatic BO, and concurrence letters that has no effect or may affect one or more of the MSHCP species and has a federal nexus. If proposed activities require federal authorization (aside from the incidental take permit), such as vegetation management, **no additional section 7 consultation is required**. Columbia will comply with the reporting requirements of the MSHCP to provide the FWS with information regarding these activities that lack a federal nexus.

1. Prior to implementation, Columbia confirms and documents that the planned activity is proposed as outlined in the MSHCP, programmatic BO, and/or programmatic concurrence letters.
2. Columbia sends information to the federal action agency<sup>2</sup> regarding the proposed activity in the form of a permit application and/or Environmental Report, following the outline in the Project Review and Documentation Section (page 11).
3. Federal action agency documents that the project is in compliance with the MSHCP, programmatic BO, and/or programmatic concurrence letters using the Columbia Project ESA Consultation Checklist (page 12). This documentation constitutes completion of the federal action agency's section 7 responsibilities.
4. Columbia completes its activity in compliance with the MSHCP, programmatic BO, and/or concurrence letter. No further consultation with the FWS is required.

SCENARIO 2: Activities *not* proposed as described in the MSHCP and programmatic BO, and concurrence letters that has no effect or may affect one or more of the MSHCP species and has a federal nexus.

1. Columbia sends information to the federal action agency regarding the proposed activity in the form of a permit application and/or Environmental Report, following the outline in the Project Review and Documentation Section (page 11). If Columbia and/or the federal action agency determines that the proposed activity has NE on one or more of the MSHCP species, no further consultation is needed. The agency documents their no effect determination using their standard Section 7 consultation process.

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<sup>2</sup> All references to the federal action agency may be construed as plural if more than one federal action agency is involved with a particular proposed activity.

2. If Columbia and/or the federal action agency determines that the proposed activity may affect one or more MSHCP species, Columbia prepares a project-specific biological evaluation (BE) and contacts the FWS to initiate the standard section 7 consultation process following steps 3 and/or 4 below. This consultation process will utilize and incorporate, as appropriate, all relevant information from the MSHCP, programmatic BO, and concurrence letters.
3. If Columbia and/or the federal action agency determines the proposed activity is NLAA MSHCP species, Columbia requests concurrence from the FWS.
  - a. If they concurs, the FWS issues a concurrence letter within 30 days, and Columbia completes its activity in compliance with the concurrence letter.
  - b. If the FWS does not concur, it issues a letter indicating that formal consultation is required in accordance with step 4 below.
4. If Columbia and/or the federal action agency determines the proposed activity is LAA MSHCP species, the federal action agency prepares a project-specific Biological Assessment (BA) and requests formal consultation with the FWS.
  - a. Based on the project-specific BA, the FWS evaluates the likely effects of the proposed activity to ensure that it will not jeopardize the continued existence of listed species or adversely modify designated critical habitat.
  - b. If the determination cannot be made (i.e., jeopardy or adverse modification is likely), the FWS will inform Columbia and the federal action agency within 90 days.
    - i. Columbia may modify the proposed activity to avoid jeopardy and reinitiate consultation; or
    - ii. Columbia may implement the reasonable and prudent alternative in the FWS's activity-specific BO.
  - c. If they conclude that the project is not likely to cause jeopardy or adverse modification, the FWS issues a project-specific BO and incidental take statement (ITS) to the federal action agency within 135 days. Columbia completes the activity in compliance with the project-specific BO and ITS.

## PART B: NON-MSHCP SPECIES

SCENARIO 1: Columbia plans an activity with a federal nexus that is proposed as described in the MSHCP, programmatic BO, and concurrence letters that has no effect or may affect one or more of the NE or NLAA non-MSHCP species.

1. Prior to implementation, Columbia confirms and documents that planned activity is proposed as outlined in the MSHCP, programmatic BO, and concurrence letters.
2. Columbia sends information to the federal action agency regarding the proposed activity in the form of a permit application and/or Environmental Report, following the outline in the Project Review and Documentation Section below (page 11).

3. Federal action agency documents that the project is in compliance with the MSHCP, programmatic BO, and concurrence letters using the Columbia Project ESA Consultation Checklist (page 12). This documentation constitutes completion of the federal action agency's section 7 responsibilities.
4. Columbia completes its activity in compliance with the MSHCP, programmatic BO, and concurrence letters. No further consultation with the FWS is required.

SCENARIO 2: Columbia plans an activity that is proposed as described in the MSHCP, programmatic BO, and concurrence letters that may affect one or more of the LAA non-MSHCP species.

1. Columbia sends information to the federal action agency regarding the proposed activity in the form of a permit application and/or Environmental Report, following the outline in the Project Review and Documentation Section below (page 11).
2. Federal action agency consultation requirements:
  - a. The federal action agency submits a tiered BA to the FWS.
  - b. If tiered BA determines the proposed action is NLAA any non-MSHCP species, federal agency requests informal consultation and concurrence letter from the FWS.
    - i. The FWS evaluates the determination and, if appropriate, issues a concurrence letter within 30 days. This documentation constitutes completion of the federal action agency's section 7 responsibilities.
    - ii. If the FWS disagrees with the NLAA determination, it informs Columbia and the federal action agency within 30 days and issues a letter indicating that initiation of formal consultation is required, following the process in 2.c below.
  - c. If tiered BA determines the proposed action is LAA one or more non-MSHCP species, federal action agency requests formal consultation with the FWS.
    - i. The FWS evaluates the likely effects of the project to ensure that it will not jeopardize the continued existence of listed species or adversely modify designated critical habitat.
    - ii. If the determination cannot be made (i.e., jeopardy or adverse modification is likely), the FWS will inform Columbia and the federal agency within 30 days.
      1. Columbia may modify the proposed activity to avoid jeopardy and reinitiate consultation; or
      2. Columbia may implement the reasonable and prudent alternative in the FWS's activity-specific appended BO.
    - iii. If the project will not cause jeopardy or adverse modification, the FWS issues an appended BO/ITS to federal action agency within 90 days. This document constitutes completion of the federal action agency's section 7 responsibilities.

3. Columbia completes its activity in compliance with the MSHCP, programmatic BO, programmatic concurrence letters, appended BO/ITS, and/or activity-specific concurrence letter, as applicable. No further consultation with the FWS is required.

SCENARIO 3: Columbia plans an activity that is *not* proposed as described in the MSHCP and programmatic BO that has no effect or may affect one or more of the non-MSHCP species and has a federal nexus. For this scenario, Columbia and the agencies will follow the process set forth in Part A, Scenario 2 above.

## TRACKING AND MONITORING OF SECTION 7 CONSULTATION

- The FWS will be the lead federal action agency for monitoring of the consultation.
- Annual MSHCP review meeting and report (FWS and Columbia):
  - Review take that has occurred in the past year for both MSHCP and non-MSHCP species.
  - Review annual work plan to evaluate take likely to occur in the next year.
  - FWS annually summarizes the total take and ensures and documents that the effects were as anticipated in the BO.
    - As necessary and appropriate, any new/changed information is integrated into the MSHCP/BO.
    - Based on the annual workplan, FWS estimates the amount of take reasonably certain to occur to ensure that the take will not be exceeded over the next year.
- MSHCP species
  - FWS updates the BO and tracks the take as specified in the ITS annually with the MSHCP monitoring.
  - FWS evaluates the information, analyses, and determinations in the BO, no effect determination, and concurrence letter to ensure that they are accurate and based on current information.
- Non-MSHCP Species (NE and NLAA)
  - FWS evaluates the information, analyses, and determinations in the no effect determination and concurrence letter to ensure that they are accurate and based on current information.
- Non-MSHCP species (LAA Species)
  - FWS updates the BO and tracks/authorizes the take with each tiered BO; FWS also evaluates the total take annually to ensure that the anticipated programmatic take has not been exceeded.
  - FWS evaluates the information, analyses, and determinations in the BO and concurrence letter to ensure that they are accurate and based on current information.

## PROJECT REVIEW & DOCUMENTATION PROTOCOLS

Columbia will provide the following documentation for all project applications, Environmental Reviews, BEs, and/or BAs developed for the federal agency(s). It is the federal agency's responsibility to ensure that all of these items are addressed during project review.

### PART A: MSHCP SPECIES

1. Identify the location of the project
  - a. Document whether or not it will occur entirely within the covered lands
2. Identify the project types or Columbia subactivities that are part of the proposed project
  - a. Documentation of how the project follows the descriptions in the MSHCP
3. Identify the species that may be affected
  - a. Cross-reference with the BO and concurrence letter to determine how those subactivities may affect each species
4. Document the avoidance and minimization measures (AMMs) that are part of the proposed action
  - a. Ensure that the necessary and applicable AMMs are included
  - b. If non-mandatory AMMs are not included in the project, document reasoning<sup>3</sup>
  - c. Complete project AMM verification form on Columbia Environmental Management and Construction Plan (EM&CP) for project records documentation

### PART B: NE OR NLAA NON-MSHCP SPECIES

1. Identify the location of the project
  - a. Document whether or not it will occur entirely within the covered lands
2. Identify the project types or Columbia subactivities that are part of the proposed project
  - a. Document how the project follows the descriptions in the MSHCP
3. Identify the species that may be affected
  - a. Cross-reference with the concurrence letter to determine how those subactivities may affect each species
4. Document the best management practice (BMPs) that are part of the proposed action
  - a. Ensure that the necessary and applicable AMMs are part of the proposed action
  - b. Complete project BMP verification form on Columbia EM&CP for project records

### PART C: LAA NON-MSHCP SPECIES

When a covered activity may affect any of the LAA non-MSHCP species, a tiered BA is required (see Tiered BA Outline on page 15). No additional guidance will be developed for LAA Non-MSHCP species. The consultation process will be documented via tiered formal and informal consultation.

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<sup>3</sup> Explanation for non-mandatory AMM use is not required for Indiana Bat per the MSHCP

# INTERAGENCY ENDANGERED SPECIES ACT CONSULTATION CHECKLIST FOR THE NiSOURCE MULTI-SPECIES HABITAT CONSERVATION PLAN

## APPLICANT SECTION

ACTION AGENCY (Recipient): \_\_\_\_\_

OTHER INVOLVED FEDERAL AGENCIES: \_\_\_\_\_

PROJECT NAME: \_\_\_\_\_

PROJECT I.D. NO. (if applicable): \_\_\_\_\_

NiSource and Columbia Pipeline Group (Columbia) has provided the attached documentation to involved federal agencies in accordance with "Project Review and Documentation Protocols" of the NiSource/Columbia Pipeline MSHCP Consultation Implementation Guidance<sup>4</sup>. This documentation describes if and how the project is covered by the NiSource Multi-Species Habitat Conservation Plan (MSHCP), programmatic biological opinion (BO), and/or programmatic concurrence letters. In addition, the action agency could refer to the following sections and/or pages of the MSHCP, BO, and/or concurrence letters to verify that the activity is covered by the MSHCP and associated Section 7 consultation under the Endangered Species Act (ESA):

Reference:

- NiSource MSHCP Chapter 2.3 Covered Lands (pp 2-11)
- NiSource MSHCP Chapter 2.4 Covered Activities (pp 11- 25)
- NiSource/Columbia Pipeline MSHCP Consultation Implementation Guidance Quick Reference for Species Consultation Categories (pp 5-6)
- NiSource/Columbia Pipeline Group's, "Habitat Conservation Program Best Management Practices Guidebook", v.1.0, March 12, 2014 (specific pages for each species are referenced in the attached application material)

By signing below, Columbia certifies that its proposed activity, as outlined in the accompanying application or notification, is consistent with the MSHCP, BO, and/or concurrence letters.

\_\_\_\_\_  
Columbia Pipeline representative

\_\_\_\_\_  
Date

By checking the box, Columbia is notifying the involved federal agencies that the proposed activity will require additional ESA Section 7 consultation because part of the activity may include: (1) any of the 10 Likely to Adversely Affect (LAA) species that are not included in the MSHCP<sup>5</sup>, (2) species not addressed in the MSHCP, BO, or concurrence letters<sup>5</sup>, (3) non-covered activities, (4) activities outside of the covered lands, or (5) activities otherwise deviating from the MSHCP, BO, and/or concurrence letters. Additional biological information about the species, habitat, or effects of the action may be required. The federal agencies can contact the U.S. Fish and

<sup>4</sup> See NiSource/Columbia Pipeline MSHCP Consultation Implementation Guidance. February 13, 2014. Pg 11.

<sup>5</sup> See NiSource/Columbia Pipeline MSHCP Consultation Implementation Guidance. February 13, 2014. Pg. 5.

Wildlife Service’s NiSource/Columbia MSHCP Implementation Coordinator (Karen Herrington, 850.348.6495, karen\_herrington@fws.gov) for more information.

## FEDERAL AGENCY SECTION

This checklist serves as the official documentation that each action agency involved has completed its Section 7 responsibilities under the ESA for NiSource and Columbia Pipeline Group (Columbia) projects conducted as described in the MSHCP, BO, and/or concurrence letters. Every agency that receives a copy of this checklist should fill it out. The MSHCP, BO, and concurrence letters can be found on the U.S. Fish and Wildlife Service (FWS) NiSource website:

<http://www.fws.gov/midwest/endangered/permits/hcp/nisource/index.html>

Quick access to the required Avoidance and Minimization Measures (AMMs) and Best Management Practices (BMP) can be found in the Columbia BMP Guidebook, which is also posted on the above website.

1. Does the federal action occur entirely within the covered lands as described in the MSHCP?  
 Yes. Go to #2.  
 No. Additional consultation is required because the action is not consistent with the MSHCP, BO, and/or concurrence letters. If the project may affect listed species, contact your local FWS Field Office.
2. Is the proposed action as described in the MSHCP, programmatic BO, and/or concurrence letter?  
 Yes. Go to #3.  
 No. Additional consultation is required because the action is not consistent with the MSHCP, BO, and/or concurrence letters. If the project may affect listed species, contact your local FWS Field Office.
3. Does the proposed action pose any effects on species not included in the MSHCP, BO or concurrence letters<sup>55</sup>?  
 Yes. Additional consultation is required because the species was not included in the MSHCP, BO, and/or concurrence letters. If the project may affect listed species not included in the consultation, contact your local FWS Field Office.  
 No. Go to #4.
4. Does the proposed action include MSHCP species<sup>65</sup> only?  
 Yes. Go to #6.  
 No. Go to #5.
5. Does the proposed action include any of the 10 Likely to Adversely Affect (LAA) species that are not included in the MSHCP (i.e., LAA non-MSHCP species) as addressed in the BO?  
 Yes. Additional consultation is required. Enter into tiered consultation with your local FWS office for any LAA non-MSHCP species.  
 No. Go to #6.

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<sup>6</sup> See NiSource/Columbia Pipeline MSHCP Consultation Implementation Guidance. February 13, 2014. Pg. 5

6. Are all mandatory AMMs and/or BMPs for each species included in the action?<sup>7</sup>  
 Yes. Go to #7.  
 No. Additional consultation is required because the proposed action is not consistent with the MSHCP, BO, and/or concurrence letter. Request additional information from Columbia about AMMs.
7. Are all non-mandatory AMMs and/or BMPs for each species included in the action?  
 Yes. Consultation is complete because the proposed action is consistent with the MSHCP, BO, and/or concurrence letter.  
 No. Go to #8.
8. Are reasons provided for not including non-mandatory AMMs for each species?<sup>8</sup>  
 Yes. Consultation is complete.  
 No. Request justification from Columbia, and attach documentation here. Once justification is provided, consultation is complete.

It is the federal agency's responsibility to comply with ESA Section 7 requirements for this project. The programmatic BO and/or the concurrence letters cover most of Columbia's activities implemented under the MSHCP within the covered lands. By signing below, the federal agency verifies that the proposed action within the agency's authority complies with the programmatic BO, and/or concurrence letters. If additional Section 7 consultation is required, the U.S. Fish and Wildlife Service's supplemental concurrence letter or biological opinion will be attached to this documentation.

AGENCY COMMENTS:

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\_\_\_\_\_  
 Federal Agency representative

\_\_\_\_\_  
 Date

<sup>7</sup> See NiSource/Columbia Pipeline Group's, "Habitat Conservation Program Best Management Practices Guidebook", v.1.0, March 12, 2014.

<sup>8</sup> Per the MSHCP, explanation for non-mandatory AMM use is not required for the Indiana Bat.

# Tiered BA Outline

## 1. BACKGROUND

The Programmatic Biological Opinion (BO) for the Columbia MSHCP establishes a two-level consultation process for future activities completed that may affect any of the LAA non-MSHCP species (see BO). Evaluation of the MSHCP and associated federal authorizations represents the Level 1 consultation for these LAA non-MSHCP species, with all subsequent site-specific evaluations for future actions completed as described by the MSHCP (and authorized by the ITP and other federal authorizations) being the Level 2 consultations. Under this approach, the Level 1 programmatic BO establishes guidelines and conditions that each individual future project must adhere to and operate within when activities include these LAA non-MSHCP species. These future projects will be subject to Level 2 consultations. The Level 1 programmatic opinion and ITS estimates the level of incidental take that is anticipated to occur from all future Level 2 projects. Due to the temporal and spatial uncertainty that exists at the programmatic level regarding the anticipated incidental take, however, incidental take will be exempted in the Level 2 BOs for site-specific actions as they are proposed, consulted on, and appended to the programmatic opinion.

### LAA Non-MSHCP species requiring Level 2 Consultation

- Diamond darter
- Roanoke logperch
- Dwarf wedgemussel
- Pink mucket pearlymussel
- Rabbitsfoot
- Rayed bean
- Snuffbox
- Eastern massasauga rattlesnake
- Spectaclecase
- Northeastern bulrush

Under this programmatic approach, the federal agencies must continue to review all future individual projects to determine if they may affect these LAA non-MSHCP listed species or designated critical habitat. For future projects that are not likely to adversely affect LAA non-MSHCP species or designated critical habitat, the FWS will issue a programmatic concurrence letter, as appropriate. For future projects that are likely to adversely affect LAA non-MSHCP species or designated critical habitat will be individually reviewed to determine: (1) whether they were contemplated in the Level 1 programmatic BO and (2) if they are consistent with the guidelines established in the Level 1 programmatic BO and whether any reasonable and prudent measures and terms and conditions provided in the incidental take statement are applicable. This will ensure that the effects of any incidental take resulting from individual projects is minimized. In response, the USFWS will produce a Level 2 BO that will be appended to the original programmatic BO.

Per this process, this Level 2 biological assessment (BA) is an analysis for a site-specific project that may affect one or more of those LAA non-MSHCP species, as described in the programmatic BO.

## 2. ACTION AREA

*Describe the specific action area, referencing how/where it fits into Columbia’s system. The action area is all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action.*

## 3. PROPOSED ACTION

*Briefly describe the proposed action, including subactivities, referencing the MSHCP and BO as appropriate. Identify any conservation measures or avoidance and minimization measures (AMMs) that will be incorporated into the project design.*

## 4. SPECIES THAT MAY BE AFFECTED

*List the species that may be affected by the proposed action. You can also list Not Likely to Adversely Affect (NLAA) and No Effect (NE) species here. This section should also document the MSHCP and non-MSHCP NLAA or NE species for which consultation has already been completed (but no further analysis is required). For each may affect species to be analyzed in this tiered BA, fill in the following table:*

Species Name	Determination in Programmatic BO	Determination in tiered BA

### 4.1. SPECIES A

*Provide a brief species overview (reference MSHCP/BO for more info) and a description of the species’ current population status and habitat in the action area (this is the important part). Do this for each may affect species.*

### 4.2. SPECIES B

### 4.3. SPECIES C

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## 5. Effects of the Action

*This section describes the effect of the action on each may affect species from Section 4. Most of this analysis, at a broad level, is already completed for you in the programmatic BO. Incorporate what you can by reference from that document. The only new information here will be how those actions will translate to the specific individuals/populations in this action area. Will a maternity colony be impacted and how so? Or will there be impacts to a wintering population?*

*Fill out this table for each species, pulling what you can from the Analyses tables in the programmatic BO. Also provide a text description for these impacts.*

Pipeline Activity	Subactivity	Impact &/or Stressor	Exposure	Individual Response	Population-level impact	Determination

## 6. SPECIES DETERMINATIONS

*Summarize your determination of effect, by species, based on the analysis in Section 5. For a "may affect, but not likely to adversely affect" finding, request concurrence. For a "may affect, likely to adversely affect" finding, request initiation of Formal Tiered Consultation.*