



United States Department of the Interior

FISH AND WILDLIFE SERVICE

West Virginia Field Office
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Elkins, West Virginia 26241



FILE COPY

September 5, 2008

Mr. Clyde N. Thompson
Forest Supervisor
Monongahela National Forest
200 Sycamore Street
Elkins, West Virginia 26241

Re: Revised Tier 2 Biological Opinion, Lower Williams Project Area Environmental Impact Statement Assessment, Gauley Ranger District of the Monongahela National Forest

Dear Mr. Thompson:

This letter is in response to your request, dated August 6, 2007, for a site-specific review of the proposed Lower Williams Project on the Gauley Ranger District, Monongahela National Forest (MNF), West Virginia. The following comments are provided pursuant to the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) to ensure the protection of endangered and threatened species. The original version of this document contained incorrect acreage numbers in the Description of the Proposed Action section, which was then reflected in the Incidental Take table in the original Tier 2 biological opinion issued for the project on August 20, 2008. This document replaces the original Tier 2 opinion and corrects the numbers and provides a revised Incidental Take table. There are no changes to the proposed activities or additional impacts to federally-listed species.

On July 7, 2006, the U.S. Fish and Wildlife Service (Service) issued a programmatic Biological Opinion (programmatic BO) for the implementation of the 2006 Revised Monongahela National Forest Land and Resource Management Plan (Forest Plan). The programmatic BO established a two-tiered consultation process for Forest Plan activities, whereby the Service reviews, as they are developed, site-specific projects that may affect federally-listed species. The Service determines if any effects will occur as a result of a site-specific project in a manner, or to an extent, not evaluated or previously disclosed and discussed in the Service's programmatic BO.

We consider this site-specific project analysis for the Lower Williams Project to be "Tier 2" of the consultation process, with the programmatic consultation (and resulting BO) constituting the "Tier 1" consultation. Our project-specific (Tier 2) consultation focuses on: 1) compliance with the reasonable and prudent measures and associated terms and conditions in the programmatic BO; 2) consistency with the scope and effects previously analyzed and disclosed in the

programmatic BO and associated Biological Evaluation; 3) project-specific incidental take vs. take estimated in the programmatic BO; and 4) project-specific reasonable and prudent measures and associated terms and conditions (i.e., for non-jeopardy determinations). In the event of a “may affect” but “not likely to adversely affect” determination for a specific project that is consistent with the programmatic BO, no further evaluation by the Service is necessary and section 7(a)(2) consultation will be considered complete for that project (e.g., via a concurrence letter documenting the conclusion of informal consultation).

Species Not Likely To Be Adversely Affected

We have reviewed the information contained in the July 2007 Lower Williams Project Area Biological Evaluation and the Lower Williams Vegetation Supplemental Draft Environmental Impact Statement (2008), which describes the potential effects of the proposed project on federally-listed species. As detailed below, we concur with your not likely to adversely affect determinations for the federally-listed endangered running buffalo clover and federally-listed threatened small-whorled pogonia.

Running buffalo clover (*Trifolium stoloniferum*) was found within the project area during a survey conducted in 2007. Running buffalo clover exists in lightly disturbed forests and woodlands, often along old logging roads and trails that are underlain by limestone or other calcareous bedrock (USFWS 2007). In order to avoid and minimize impacts to running buffalo clover, Units 16 and 9 were dropped, reducing the acres of regeneration harvest with residuals to approximately 887 acres. Conventional logging areas would also be reduced to 703 acres, skid trails would be reduced to 42 miles, four landings would be dropped, and the landing associated with Unit 9 would be dropped. Forest Road (FR) 425 will not be used, which will reduce the miles of road hardening. Therefore, the project was modified to avoid all known populations of running buffalo clover.

Small-whorled pogonia (*Isotria medeoloides*) occurs in both fairly young forests and in maturing stands (USFWS 1992). The plant is usually found in mixed deciduous or mixed deciduous/coniferous forests. Common habitat features include: sparse to moderate ground cover; a relatively open understory canopy; and proximity to long, persistent breaks in the canopy, such as old logging roads or streams (USFWS 1992). While potential habitat characteristics are present, the small-whorled pogonia is not known to occur in the project area and site-specific surveys conducted in 2007 did not locate it. Therefore, no known populations of small-whorled pogonia are likely to be affected by the proposed project.

Species Likely To Be Adversely Affected

As described in the Service’s programmatic BO, adverse effects are likely to occur to the Indiana bat (*Myotis sodalis*) from harvesting or tree removal under the Forest Service’s management program activities. Therefore, given the nature of activities associated with the proposed project, we concur with your determination that incidental take of Indiana bats is possible within the analysis area. However, based on the implementation of reasonable and prudent measures and associated terms and conditions from the programmatic BO, we have concluded that activities associated with the project will not result in adverse effects to the Indiana bat beyond those that

were previously disclosed and discussed in the Service's programmatic BO. This Tier 2 BO identifies the incidental take of Indiana bat habitat anticipated due to implementation of the Lower Williams Project, Alternative 6 (preferred alternative), and the cumulative total of incidental take which has occurred (Table 1).

Description of the Proposed Action

The 14,397-acre Lower Williams Project Area is located in Webster County, between the mouth of the Williams River and the Three Forks of Williams, West Virginia. Approximately 92% (13,244 acres) of the project area is National Forest Land and the remaining 8% (1,153 acres) of the project area is private land, mostly on Dyer and Mills Mountain.

The MNF proposes to implement Alternative 6, or a modification of Alternative 3. The Lower Williams project area is designated as Management Prescription area (MP) 3.0 in the Monongahela Forest Plan. The desired future condition (DFC) of the area is described as "a mosaic of stands of predominantly hardwood trees and associated understories that provide habitat for a variety of wildlife species." The forest community types that occur within the Lower Williams project area are primarily mixed cove hardwood (10,383 acres), with northern hardwoods (1,226 acres) and mixed oak (2,002 acres). Currently, the area contains: 76% of mixed cove hardwood, 9% northern hardwood, and 15% mixed oak. The remaining 786 acres of the project area is non-forested. The Forest Plan DFC is 12% minimum percentage of early successional age classes for these types. The DFC for maintained or natural openings is 3-8%, compared to the existing condition of 1% existing openings.

The purpose of the project is to create early successional forest habitat and permanent openings within the area to improve habitat for species such as grouse, deer and squirrel; reduce the amount of competition between trees for light and water resources in dense, over-crowded stands to provide for sustainable timber and mast producing trees; and regenerate shade-intolerant tree species and to diversify forest age classes to improve the long-term sustainability of timber and increase the quality and growth rate of crop trees and mast producing trees.

The MNF selected Alternative 6, which is a modified version of Alternative 3 described in the Environmental Impact Statement (EIS). Alternative 6 was developed after running buffalo clover was discovered within the project area. Alternative 6 consists of 1,675 acres of harvest activities of which 942.8 acres are shelterwood and clear-cut harvests, 669.9 acres of commercial thinning, 34.4 acres of partial harvest savannah, and 37 acres of landings which could be converted to wildlife openings. Alternative 6 also includes approximately 2 miles of new road construction and 1.5 miles of road reconstruction.

There are three proposed helicopter landings included in the project. Conventional logging will be used on approximately 1,129 acres and helicopter logging will occur on approximately 551 acres.

Status of the Species

The current status of the Indiana bat, its life history, and continued threats are thoroughly described in pages 27 – 43 of the July 2006 programmatic BO. This description remains current with the exception of the identification of a new threat, White Nose Syndrome.

White-nose syndrome (WNS) refers to a white fungus on the noses of many affected bats. Fungus has also been observed on the ears, tails, and wing membranes of bats. WNS was first documented at four sites in New York in the winter of 2006-07 (although recently reviewed photographs of bats at a fifth site in February 2006 point to a likely earlier start). At least 30 sites in four states (New York, Vermont, Massachusetts, and Connecticut) have been documented with WNS. At several of those sites, significant bat mortality has been observed. The fungus may be a symptom and not the cause of the mortality observed to date. Bats affected with WNS do not always have a grossly visible fungus, but may display abnormal behaviors. These behaviors include bats (primarily little brown bats to date) roosting towards the entrances of caves/mines where the temperatures and humidity are far less stable than traditional roosting sites. Bats are also leaving their hibernacula far too early in the winter/spring in the northeast during cold temperatures before any insects are available for foraging. Many bats still inside hibernacula have not responded to human presence during surveys as healthy, unaffected bats would do. Affected bats appear to be using up their essential fat reserves well before spring emergence and are starving to death.

It is unclear at this point if or how WNS is transmitted. Eastern pipistrelle (*Pipistrellus subflavus*), little brown (*M. lucifugus*), northern long-eared (*M. septentrionalis*), small-footed (*M. liebii*), and Indiana bats have been found with WNS. Big brown bats (*Eptesicus fuscus*) are typically found in lower numbers in the affected sites; only two big brown bats have been found with small white patches of fungus, although it is currently unclear if this was associated with WNS. It is unclear if susceptibility actually varies by species within and among caves or if observed symptoms are expressed differentially by species (see below for further discussion). It is also unclear how long symptoms take to manifest after exposure to an unidentified agent(s). Finally, it is unclear what the long-term effects to the Indiana bats will be (e.g., geographic spread, mortality within affected sites).

As of April 3, 2008, all surveyed Indiana bat hibernacula in New York, except for Jamesville Quarry Cave and a newly-discovered site in Orange County (Bull Mine), have been documented with WNS. In addition, two Indiana bat hibernacula in Vermont (Aeolus and Skinner Hollow) have been documented with WNS. Massachusetts and Connecticut also reported hibernacula with WNS.

At affected Indiana bat hibernacula, impacts to Indiana bats are inconsistent. The New York State Department of Environmental Conservation (NYSDEC) redid photographic surveys of all New York State Indiana bat hibernacula in March of 2008 to compare with the 2006-2007 counts. At this point, we only have summaries of the survey results. For example, Indiana bat numbers and roosting locations appear normal at Barton Hill and Williams Hotel hibernacula as well (NYSDEC, pers. comm.). However, at Glen Park Cave, while the one cluster of Indiana bats (referred to as the K-cluster) appeared to be normal in location at the end of March 2008,

preliminary estimates were 1,200-1,400 bats (Hicks et al. 2008). This count is down from the count of 1,932 Indiana bats in 2006-2007. Haile's Cave represents the worst-case scenario for Indiana bats at WNS affected sites. Surveys of Haile's Cave in 2006-2007 found no Indiana bats (living or dead), while every previous survey since 1981 documented their presence (Hicks and Newman 2007). In 2004-2005, 685 Indiana bats were recorded. While this loss was certainly unanticipated, Haile's Cave had already been classified as an ecological trap hibernaculum in the Indiana Bat Draft Recovery Plan (Service 2007) due to the risk of flooding and freezing events at this site. In addition, late winter counts in Williams Preserve and Williams Lake are down by 92-99% when compared to 2006-2007 mid-winter surveys. In 2006-2007, there were approximately 13,014, and 1,003 Indiana bats in the Williams Preserve and Williams Lake, respectively. In April 2008, counts were closer to 124 and 80 Indiana bats (Hicks et al. 2008). It is unclear if some of the Indiana bats may have moved to new hibernacula or whether all should be considered dead. No carcasses were found at these two sites and bats found outside the Williams Hotel cannot account for that large of a drop in counts.

In addition to potential differences in mortality among sites, the NYSDEC has observed differential symptoms of WNS between Indiana bats and little brown bats within sites. Of a total of 1,190 bats counted from clusters containing both species, 5.5% of the Indiana bats and 51% of the little brown bats had obvious signs of facial fungus.

In summary, WNS is currently limited to sites in the northeast, not all hibernacula are affected in affected states, the degree of impact to bats within sites varies, and the observed impacts among bat species varies. Given the information currently available, it is uncertain whether the status of the species overall has significantly changed at this point in time. Winter counts in 2008-2009 will provide valuable insights into geographic spread and effects at which point range-wide, population level impacts and the status of the species can be re-evaluated. Meanwhile the Service, States, and multiple researchers are continuing to try to identify the cause of WNS and determine options for minimizing additional WNS-associated mortalities.

Environmental Baseline

The baseline conditions in relation to the Indiana bat and its habitat within the MNF are fully described in the July 2006 BO on pages 39-40 and 43-47. These descriptions remain current with the following exceptions. Surveys were conducted during the summer of 2006 at the site of the suspected maternity colony in Pendleton County (as described on page 39 of the July 2006 BO). Emergence counts at the previously identified roost tree documented over 30 bats emerging from the tree, however subsequent mist netting in the area suggests that no maternity activity is occurring at the site. Rather, these surveys indicate that the tree and area is used by a bachelor colony of male Indiana bats (B. Douglas, C. Stihler, D. Arling, C. Sanders; personal observations).

Additional surveys at the previously documented maternity colony on the MNF in Tucker County were also conducted in the summer of 2006. While the roost trees that were used in the previous years have become unsuitable, habitat reviews indicate that area continues to provide a large number of potentially suitable maternity roost trees. Although numerous male Indiana bats were captured, mist net surveys did not result in the capture of any female Indiana bats. These

results indicate that Indiana bats continue to use the areas for roosting and foraging throughout the summer, however it is not known whether a maternity colony still exists in the area.

During the winter of 2007/08 a number of West Virginia hibernacula were surveyed for the potential presence of WNS in conjunction with regularly scheduled population monitoring efforts. Other West Virginia hibernacula were also selected for WNS monitoring based on the probability that the cave had been visited by cavers who had recently visited areas affected by WNS. No evidence of WNS was found during those surveys with the exception of two live bats with small amounts of fungus on the forearms and ears that were found in Trout Cave, Pendleton County, West Virginia. These bats were collected and sent for testing. The results of those tests were inconclusive. Both bats were low in weight, one more than the other. The lab was not able to culture any fungi off of either bat. Both bats had roundworm parasites in their guts. Because no one knows how to define WNS, there is no definitive test the lab can run to see if it is present. These results were discussed by an assembly of biologists and scientists at a recent meeting on WNS in Albany, New York. Based on the absence of other symptoms of WNS such as unusual roosting locations, bats emerging during cold weather, evidence of excessively poor body condition, or the presence of dead bats, it was determined that West Virginia should be considered an unaffected State at this time. All areas currently affected by WNS occur within the Northeast Recovery Unit. All hibernacula within West Virginia occur within the Appalachian Recovery Unit.

Status of the Species Within the Action Area

A total of 17 sites within the Lower Williams watershed have been mist-net surveyed in 2000, 2002, 2004, 2005, and 2006. A total of 479 bats were captured; none were Indiana bats. However, the Forest Service has chosen not to discount the potential presence of Indiana bats within the project area.

There are no known Indiana bat hibernacula in the Lower Williams project area. However, Tub Cave and Lobelia Saltpeter are located on private lands within 14 miles of the watershed. Tub cave was last surveyed by WVDNR in January 2001. A total of 571 bats were counted of which 20 were Indiana bats (WVDNR 2002). This is an increase over the 1992 survey when only 3 Indiana bats were counted.

No Key Areas are located within the Lower Williams project area. A Key Area, as defined by the MNF, consists of a group of mature stands, totaling at least 150 acres, located as close as practical to the hibernacula. This area should include 20 acres of old growth forest or potential old growth and an additional 130 acres of mature forest. The area should include the area around the cave entrance, area above the cave entrance, foraging corridor and ridge tops/side slopes around the cave.

Factors Affecting the Environment of the Species (on the MNF and in the Action Area)

Effects from past management (turn of the century clear-cutting, thinning, wildlife opening, and roads) have produced the current condition, which provides considerable potential roosting habitat for the Indiana bat. At present, 5.5% (786 acres) of the project area is non-forested and

the remaining 94.5% (13,611 acres) of the area is forested. Much of this forested area (72%) is mixed hardwoods. Within the existing non-forested lands, other projects have produced upland water sources, such as wildlife ponds that benefit bats, and openings that are producing small amounts of edge exposed to solar radiation, which could benefit maternity roosts. Since 1994, an estimated 1,096 acres of private land in the watershed has been impacted by timber harvesting. On private land, partial harvesting is more common than regeneration harvests. Some private land within the watershed is in pasture and other agricultural uses. These uses are likely to continue in the future, and could include herbicide or pesticide use.

Effects of the Action

The proposed action (Alternative 6) would disturb a total of approximately 1,675 acres of potentially suitable Indiana bat habitat, and would affect approximately 12% of the total project area.

Direct effects through killing of an Indiana bat as a result of timber stand improvement work within the primary range are unlikely because Indiana bat key areas do not exist in the project area and no bats have been captured during mist net survey efforts. The conditions created by the proposed thinning are not expected to decrease the long-term suitability of these areas as Indiana bat roosting habitat. In this instance, the opening up of canopy cover should improve foraging as well as roosting conditions. This beneficial effect is the primary intent of these harvest units.

Thinning will create openings in the forest canopy. Indiana bat primary roosts are usually not surrounded by closed canopy and are often warmed by solar radiation, which provides a favorable microclimate for growth and development of young during normal weather (USFWS 2007). Humphrey *et al.* (1977) hypothesized that roost trees were usually located in openings within the forest because they provided the necessary thermoregulatory characteristics. This is supported by the analysis conducted of several maternity sites by 3D/E (1995) who found that most roosts were located in areas that had a canopy closure of 60 to 80%. The proposed thinning will reduce the current canopy closure to a more optimal level for Indiana bat foraging and increase the solar exposure of the remaining trees within the harvest area, thus potentially making them more suitable for Indiana bat roosting habitat. These effects are short-term, because canopy closure occurs in approximately 5-10 years after thinning occurs.

A more long-term effect of thinning is increased residual growth on the remaining trees, creating larger diameter and more suitable roost trees. Thinning would reduce vegetative competition and promote larger, older trees and allow remaining hardwood trees to grow larger. As noted in the programmatic BO, the exfoliating bark hardwood trees such as hickories and large oaks often provide roost sites. Consistent with the Forest Plan (Standard TE 24), the retention or creation of at least 6 snags and other den trees per acre will further increase the potential that a substantial number of potential roost trees within the project area will be maintained. Damage to residual trees during felling can also improve roosting quality and quantity as damage areas turn to cavities and crevices are more likely to develop due to resulting pathogen and insect attack at the injury point.

Thinning, timber stand improvement, road management and log landings whether inside or outside the primary range would have similar effects. Regeneration harvesting would affect potential foraging, roosting and migratory habitat by reducing canopy closure below optimal levels (3D/E 1995, Callahan *et al* 1997). These effects would last about 20 years until the canopy closes again. Potential roost trees would be removed and future roost tree availability could be reduced by large tree removal. The effect of potential roost tree loss would last several decades until trees in the regenerated areas reach roost tree size. Two-aged harvests leave more potential roost and maternity trees per acre than clearcutting. Therefore, the effects of clearcut harvesting are more severe and last for a greater duration. Road management activities require some tree felling. The effects described for regeneration harvesting apply to road management. Creating openings require removing trees, which would have the effects similar to those described for clearcut harvests, although on a much reduced scale. All these tree felling activities have the potential to cause take. Effect to roost tree loss would be reduced by retaining residual basal area in the two-age harvest units and by retaining cull trees, snags, and all shagbark hickories as required by the Forest Plan (Standard TE 23).

Potential adverse effects of the proposed action are consistent with the effects described in the programmatic BO. Tree removal during the non-hibernation period (April 1 - November 14) may result in mortality (take) of an individual roosting Indiana bat, if a tree that contains a roosting bat is removed intentionally or felled accidentally. If a bat using a roost tree that is removed is not killed during the removal, the roosting bat would be forced to find an alternative tree, causing a significant loss of energy that would result in harm or harassment of the individual. As noted in the "Status of the Species within the Action Area" section of this BO, negative mist net survey results suggest there is a low probability that Indiana bat maternity colonies are present within the Lower Williams project area.

The implementation of the terms and conditions of the programmatic BO, and project-specific and forest wide avoidance and conservation measures as described above, will minimize any incidental take and ensure that this area will continue to provide potential foraging and roosting habitat to support Indiana bats. All proposed activities fall within the scale and the scope addressed in the programmatic BO and within the level of take identified in the Incidental Take Statement. If future monitoring conducted on the MNF identifies additional evidence of Indiana bats utilizing the project areas, the MNF would consult with the Service and the WVDNR to develop further protective measures in accordance with the MNF Forest Plan and the programmatic BO.

Cumulative Effects

At present, 5.5% (786 acres) of the project area is non-forested and the remaining 94.5% (13,611 acres) of the area is forested. Timber harvesting and associated actions such as road construction, has taken place in the Lower Williams watershed both before and after National Forest ownership. On private land, partial harvesting is more common than regeneration harvests. Some private land within the watershed is in pasture and other agricultural uses. These uses are likely to continue in the future, and could include herbicide or pesticide use.

Over the past 20 years, a total of 3,430 acres (23.8%) in the project area has been affected by timber sale actions. These timber sales included regeneration and intermediate (thinning) harvests and road construction. It is expected that timber harvesting will continue on private lands in the foreseeable future at about the same rate as has been occurring in the past decade. After implementation of the proposed action, it is anticipated that more than 72% of the project area, including the majority of the area affected by MNF activities, will remain in a primarily forested condition. Therefore, we do not expect cumulative effects, as defined in the ESA, to be significant within the action area.

Conclusion

The actions and effects associated with the proposed Lower Williams project are consistent with those identified and discussed in the Service's programmatic BO. After reviewing the size and scope of the project, the environmental baseline, the overall status of the Indiana bat, new information on the species, the effects of the action, and the cumulative effects, it is the Service's biological opinion that the proposed action is not likely to jeopardize the continued existence of the Indiana bat.

Incidental Take Statement

The Service anticipates that the proposed actions associated with the Lower Williams Project will result in the incidental take of Indiana bat habitat (acres) as outlined in Table 1. The type and amount of anticipated incidental take is consistent with that described in the programmatic BO and does not cause the total annual level of incidental take (forested acres) in the programmatic BO to be exceeded. The actual incidental take reported by the Forest Service has consistently been below the annual levels estimated (authorized) in the programmatic BO, therefore, we do not anticipate that implementation of this project will result in the take levels in the programmatic BO to be exceeded.

Table 1: Actual vs. authorized incidental take (as measured indirectly by acreage) due to the removal or disturbance of potential Indiana bat habitat on the Monongahela National Forest

Activity	Upper Williams Project	Previous Projects (2008)	Total (2008)
Timber Harvest	1675	2.43	1677.53
Road Construction	29	29	29
Mineral Development	0	6.5	6.5
Prescribed Burn	0	0	0

Please note that as per the terms and conditions of the July 2006 BO, Tier 2 BOs including this one, will track the amount of incidental take authorized. However, incidental take does not actually occur until the time that the project is implemented. Most projects authorized under Tier 2 BOs will not be implemented for a number of years; therefore the MNF must annually

report the total amount of incidental take that occurs each year and for each project. This number will be compared to the maximum annual incidental take as authorized in the July 2006 programmatic BO. If it is determined during future project planning or the course of project implementation that either the authorized amount of project specific incidental take as detailed above, or the maximum amount of annual incidental take as detailed in the programmatic BO, may be exceeded, additional consultation with the Service will be required.

Reasonable and Prudent Measures

The Forest Service must implement all pertinent reasonable and prudent measures and terms and conditions stipulated in the programmatic BO to minimize the impact of the anticipated incidental take of Indiana bats, and to be exempt from the take prohibitions of section 9 of the ESA. The Service has determined that the implementing the reasonable and prudent measures specified in the programmatic BO, in conjunction with the project specific avoidance and conservation measures as described in the July 2007 Lower Williams Project Area Biological Evaluation will appropriately minimize the impact of incidental take anticipated for the Lower Williams Project.

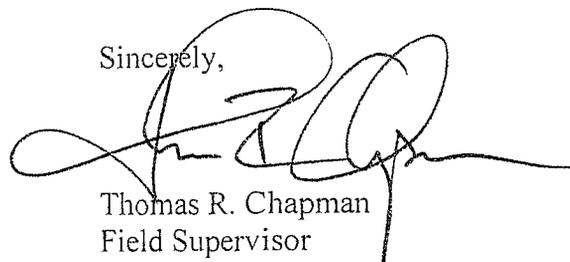
Reinitiation Notice

Incidental take that occurs as a result of this and other projects on the MNF cannot exceed the annual or cumulative incidental take levels established in the programmatic BO. If implementation of any project or projects is anticipated to exceed these take levels, further consultation will be necessary. To ensure that incidental take is not exceeded, quarterly reports should be provided to this office tabulating the amount of incidental take on projects being implemented and authorized throughout the MNF, as indirectly measured by acres affected.

This fulfills your consultation requirements for this action. Should new information reveal 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; or 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 a new species is listed or critical habitat is designated that may be affected by the action; or the amount or extent of take as identified in Table 1 is exceeded, reinitiation of formal consultation as outlined in 50 CFR 402.16 is required.

If you have any questions regarding this letter, please contact Ms. Christy Johnson-Hughes of my staff at (304) 636-6586 ext. 17, or at the letterhead address.

Sincerely,



Thomas R. Chapman
Field Supervisor

Mr. Clyde N. Thompson
September 5, 2008

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cc:

WVDNR – Anderson

Reader File

Project File

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