

From: [Stubbs, Kevin](#)
To: [Runge, Jeff](#)
Cc: [Burgess, Angela](#); [DeBerry, Drue](#); [Darnall, Nathan](#); [Powell, Tyson H](#); [Fenner, Daniel](#); [Polk, Jonna](#)
Subject: Re: NPPD White Paper
Date: Friday, January 22, 2021 8:12:43 AM
Attachments: [Smith and Clifford 2006 Examination of reproductive dynamics of Nicrophorus americanus at Camp Gruber FINAL report.doc](#)

I have reviewed the NPPD white paper and have concerns.

Average five-year density of ABB in the best habitat along the R-Project is 0.014 ABB/acre or approximately 1/10 of the density estimate used in the HCP. Using this highest average density, the estimated take of ABB with no avoidance measures—i.e., if all 574 acres were ABB habitat and if NPPD disturbed the entire area—would be 8 ABB (574 acres x 0.014 ABB/acre).

(b) (5)

[Redacted text block containing approximately 15 lines of blacked-out content]

In areas that are confirmed as ABB habitat, Forbes-Timberline, the construction contractor, will use construction matting as described above to avoid the vast majority of previously planned soil disturbance and will implement the clear-and-maintain protocol prior to the minimal areas of soil disturbance for structure installation and construction safety needs, which will eliminate the likelihood of take from the covered activities previously identified in the HCP. The use of construction matting would avoid any soil compaction that could impact the ABB.

(b) (5)

[Redacted text block containing approximately 4 lines of blacked-out content]

(b) (5)
[Redacted text block]

(b) (5)
[Redacted text block]

(b) (5)
[Redacted text block]

(b) (5)
[Redacted text block]

I spoke with Wyatt Hoback and agree with him, that take could be minimized to relatively low levels with all the proposed measures but complete avoidance is highly unlikely. I would recommend they address that through an HCP and mitigate for the take and habitat impacts.

Kevin
918-695-6769

From: Runge, Jeff <jeff_runge@fws.gov>

Sent: Wednesday, January 20, 2021 7:20 AM

To: Stubbs, Kevin <kevin_stubbs@fws.gov>

Cc: Burgess, Angela <Angela_Burgess@fws.gov>; DeBerry, Drue <drue_deberry@fws.gov>; Darnall, Nathan <nathan_darnall@fws.gov>; Powell, Tyson H <Tyson.Powell@sol.doi.gov>

Subject: NPPD White Paper

Hello Kevin,

Attached is NPPD's white paper. It would be beneficial to get your thoughts on the following topics for the call this Friday. First is NPPD's methods for delineating suitable/unsuitable habitat using survey data and aerial imagery (with emphasis on the exclusion of areas with dry soils). Because total ABB within the project footprint is based on Acres of Suitable Habitat * ABB Density, it would be important to verify how suitable habitat was delineated.

The second topic for discussion is mowing, thatch removal, carrion removal, and matting as it relates to soil disturbance in the 4(d) rule. We had NPPD address these topics in their white paper with consideration on soil compaction, soil moisture, or other soil-related impacts.

Thank you for your review of this document and for your participation on the call. For others copied in the email, please copy the group on any additional topics.

Jeff

Jeff Runge
U.S. Fish and Wildlife Service
9325 South Alda Road
Wood River, Nebraska 68883
Office: (308) 218-0049
Cell: (308) 379-8553