Sullivan, Tim <tim_r_sullivan@fws.gov>

Constitution DEIS comments

Wiley, John <john_wiley@fws.gov> Mon, Apr 7, 2014 at 11:08 AM
To: Tim Sullivan <tim_r_sullivan@fws.gov>

Tim,

From your initial response above

Northern monkshood

Page 4-97. Surveys for northern monkshood were conducted in 2012 and 2013. All but four parcels with potential suitable habitat were surveyed and no plants were found. The DEIS includes several measures in the event populations are found in the future. The FERC has determined the project may affect, but is not likely to adversely affect the northern monkshood because no plants were found during the surveys and because of recommendations to develop avoidance, minimization, and mitigation measures. The FWS cannot concur with this determination because some areas have not yet been surveyed. If any individuals of the species are anticipated to **be** adversely impacted (i.e., avoidance is not fully possible), formal consultation is required.[RN1]

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