



REDHORSE ENVIRONMENTAL

P.O. Box 148

Tionesta, PA 16353

www.redhorseenvironmental.com

11 August 2026

Cody Palombaro (Anderson)
Biologist
Buffalo District – Regulatory Division
US Army Corps of Engineers
478 Main St.
Buffalo, NY 14202

Response to Comments: LRB-2026-00845 (Buckeye Partners LP - F-0005785 Pipeline Maintenance Project Mantua, Ohio)

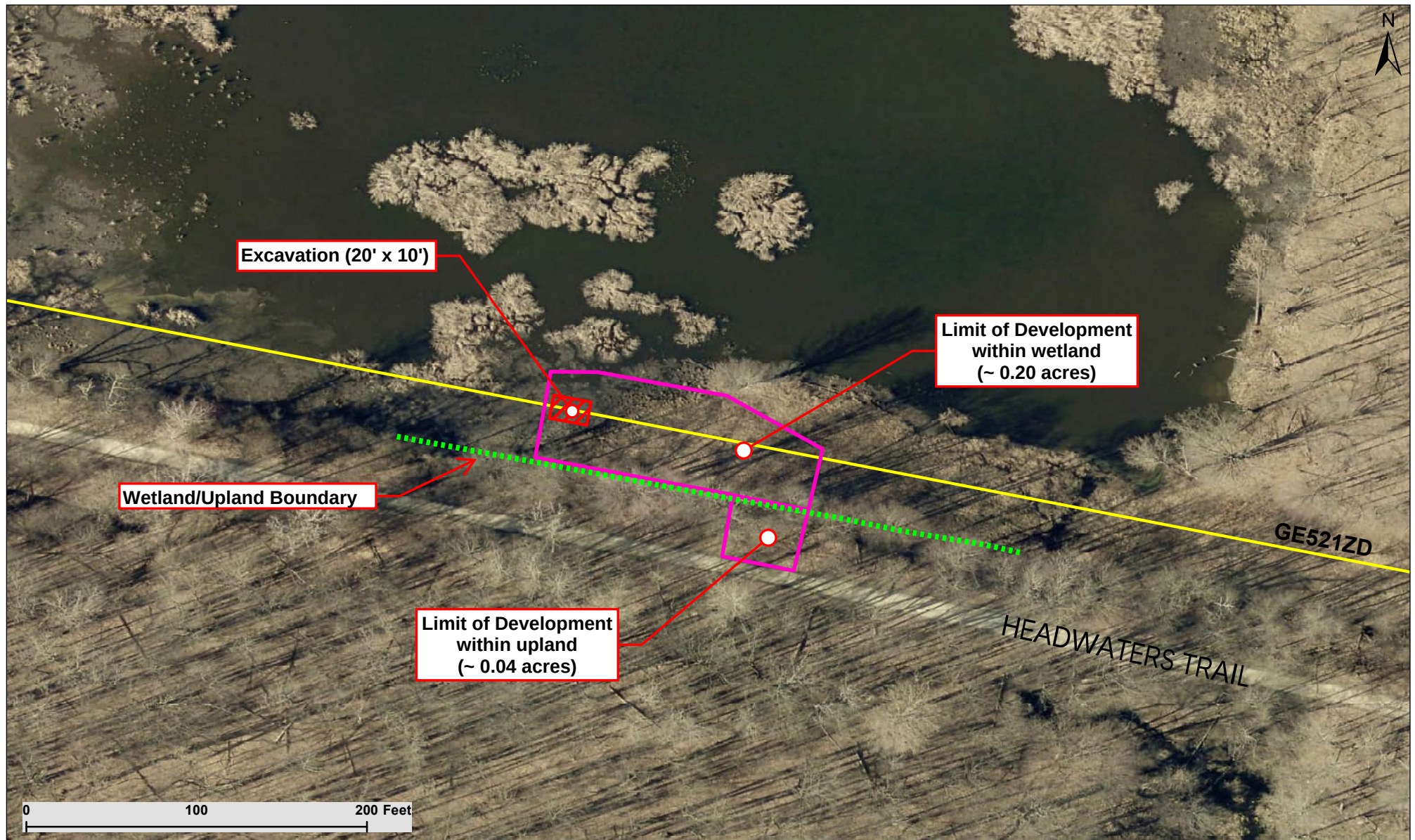
- To clarify, what is the area of impact for timber mats? Is this the 0.25-acre LOD identified on the application?
 - YES. The total area of temporary impact associated with timber mats for the project is ~ 0.25 acres.
- Is the entire limit of disturbance within the wetland? Please show the wetland boundary and what part(s) of the review area are within the wetland vs. outside of the wetland. on the project map/plan showing the area of excavation and timber mats. The application states that the sediment bag will be located outside the wetland, at the abandoned railroad grade near the project work area.
 - NO. The LOD (timber mats and excavation) in the wetland is approximately 0.20 acres. The LOD (timber mats) in the upland is ~ 0.04 acres. See the attached map showing the wetland & upland LOD areas and wetland boundary.
- ORAM scores verified by Ohio EPA are required for temporary impacts exceeding 0.1-acre. Please provide the verified ORAM scores from OEPA as outlined in Regional Condition 6g (see pages 9-10 of NWP 3)
 - ORAM scoring documentation has been sent to ODNR for review (7/30/2026) and may require 45 – 60 days for completion. My ORAM assessment found the greater wetland area to be Category 3.
- Are any endangered species located within the project vicinity? Information about species located in the area is available at USFWS's IPAC website: <https://ipac.ecosphere.fws.gov/>
 - ODNR's Environmental Review is currently assessing the site for State of Ohio Listed Species.
 - NO Critical Habitat has been identified at the project area.
 - NO Effects Determination for all species (see attached USFWS Technical Letter & Biological Opinion).
- Is any tree clearing required for the proposed project? If so, what area or number of trees will be cleared?
 - NO. No trees will be cut/removed at the project site.
- Are any federally-listed or eligible historic resources within the vicinity of the proposed project? If so, will there be any impacts to the properties?
 - NO.
- Is this project in a component of the Wild and Scenic River system or "study river" designated for possible inclusion in the system?
 - NO. The Cuyahoga River is an Ohio Scenic River and is not Federally Designated. The National Park Service has evaluated the eligibility of the Cuyahoga River within Cuyahoga Valley National Park for potential inclusion in the National Wild and Scenic Rivers

If you have additional questions or require additional documentation please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce C. Dickson".

Bruce C. Dickson, PhD
Director of Operations/Senior Ecologist
RedHorse Environmental
PO Box 148
Tionesta, PA 16353
814-806-6073



DRAWN BY BCD

DATE 8/10/2026

JOB NO.

Project Manager: Rich Burns



REDHORSE ENVIRONMENTAL
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Buckeye Partners Line 521 F-0005785
Mantua, OH

Project Limit of Development:
Wetland & Upland Boundary



Figure 1. Access point from Headwaters Trail onto the ROW (wetland) will be located between the two trees shown in the photo above. There is ample room to place timber mats between these trees to protect upland soils and allow access to the ROW. No trees will be cut during construction of the project.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

Phone: (614) 416-8993 Fax: (614) 416-8994



In Reply Refer To:

08/11/2026 13:18:17 UTC

Project code: 2026-0129499

Project Name: Buckeye Partners LP - F-0005785 Pipeline Maintenance Project Mantua Ohio

Subject: Technical Assistance letter for the project named 'Buckeye Partners LP - F-0005785 Pipeline Maintenance Project Mantua Ohio' for specified threatened and endangered species that may occur in your proposed project location consistent with the All Ohio Determination Key (DKey)

Thank you for using the assisted determination keys in IPaC. This letter is provided pursuant to the U.S. Fish and Wildlife Service's (Service's) authority under the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA). On August 11, 2026, Bruce Dickson used the All Ohio Bat DKey; dated February 09, 2026, in the Service's online IPaC application to evaluate potential impacts to federally listed bat species, from a project named 'Buckeye Partners LP - F-0005785 Pipeline Maintenance Project Mantua Ohio'.

Due to the project, type, size, and location, the Service does not have any concerns regarding federally endangered, threatened, or proposed species or proposed or designated critical habitat. If there are any project modifications during the term of this action, or additional information for listed or proposed species or their critical habitat becomes available, or if new information reveals effects of the action that were not previously considered, please contact us for additional project review.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

Buckeye Partners LP - F-0005785 Pipeline Maintenance Project Mantua Ohio

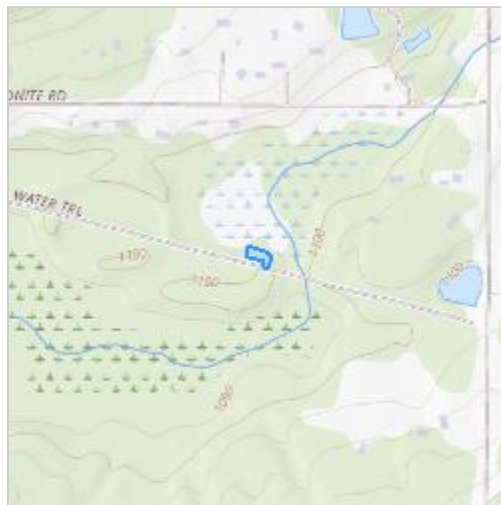
2. Description

The following description was provided for the project 'Buckeye Partners LP - F-0005785 Pipeline Maintenance Project Mantua Ohio':

Buckeye Partners liquid fuels Line 521 was found to have a pipeline defect at ~ 41.281820 -81.196665 south of Mennonite Road in Mantua Township, Portage County, Ohio. Contractors will expose, inspect, and repair the pipeline to avoid a future release. The excavation will be 20' x 10' x 7'. The site is in a mapped wetland (PEM1F) connected to a tributary to the Cuyahoga River on ODNR Managed Lands. All construction activities will be conducted from timber mats with spoil materials (segregated organic matter/top soil and subsoil) stored on timber mats. The excavation will be back-filled in reverse order of soil removal and restored to original conditions/elevations. Organic topsoil containing the wetland seed bank and rhizomes will facilitate vegetation restoration. The limit of disturbance where timber mats will be deployed will be ~ 0.25 acres (0.20 a wetland; 0.04 a upland). Project start is anticipated to be in September 2026 pending permits from USACE and ODNR.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@41.281699950000004,-81.19640646500378,14z>

NOTE: The location has been updated to reflect the Project's Action Area delineated in CPB.



QUALIFICATION INTERVIEW

1. Does the project involve removal, modification, or maintenance of a human-made building-like structure (barn, house, or other building) known or suspected to contain roosting bats?
No
2. Does the project involve **building, maintaining or repairing** a communications tower?
No
3. Is this an Ohio Department of Transportation (ODOT) project with an assigned ODOT PID?
No
4. Does the project fall under the "FHWA, FRA, FTA Programmatic Consultation for Transportation Project affecting IBAT, NLEB, or TCB"?
No
5. Does the project involve the modification, replacement or removal of an existing bridge or culvert?
No
6. Does the project involve purposeful take of listed bats (including for scientific purposes, or to enhance the survival of a species)?
No
7. Will the project involve blasting?
No
8. Does the project involve the installation or operation of wind turbines and/or solar panels?
No
9. Does the project involve aerial or other large-scale application of any chemical (including insecticide, herbicide, biopesticide, etc.)?
No
10. Is this project part of a larger phased project?
No
11. Does the project involve prescribed fire?
No
12. Does the Project Area contain any known or potential hibernacula (natural caves, mines, rocky outcroppings, tunnels, or underground quarries)?
No
13. Does the project involve clearing or trimming trees ≥ 3 " dbh?
No

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Bruce Dickson
Address: PO Box 148
City: Tionesta
State: PA
Zip: 16353
Email: bdickson@redhorseenvironmental.com
Phone: 8148066073

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Army Corps of Engineers
Name: Cody Palombaro
Email: cody.a.palombaro@usace.army.mil
Phone: 7165489307

BUCKEYE PARTNERS LP - F-0005785 PIPELINE MAINTENANCE PROJECT MANTUA OHIO

BIOLOGICAL ANALYSIS

Prepared using IPaC

Generated by Bruce Dickson (bdickson@redhorseenvironmental.com)

August 11, 2026

The purpose of this document is to assess the effects of the proposed project and determine whether the project may affect any federally threatened, endangered, proposed, or candidate species. If appropriate for the project, this document may be used as a biological assessment (BA), as it is prepared in accordance with legal requirements set forth under [Section 7 of the Endangered Species Act \(16 U.S.C. 1536 \(c\)\)](#).

In this document, any data provided by U.S. Fish and Wildlife Service is based on data as of August 11, 2026.

Prepared using IPaC version 6.146.1-rc3

BUCKEYE PARTNERS LP - F-0005785 PIPELINE MAINTENANCE PROJECT MANTUA OHIO BIOLOGICAL ASSESSMENT

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1 DESCRIPTION OF THE ACTION

1.1 PROJECT NAME

Buckeye Partners LP - F-0005785 Pipeline Maintenance Project Mantua Ohio

1.2 EXECUTIVE SUMMARY

The pipeline maintenance project will follow USACE Nationwide Permit Terms & Conditions. The implementation of conservations measures (use of timber mats, spoil storage on timber mats, E&S control measures) and minimization of the size of the impact area will limit temporary disturbance of local flora and fauna.

1.3 EFFECT DETERMINATION SUMMARY

SPECIES (COMMON NAME)	SCIENTIFIC NAME	LISTING STATUS	PRESENT IN ACTION AREA	EFFECT DETERMINATION
Indiana bat [†] . This species or critical habitat is covered by a DKey.	Myotis sodalis	Endangered		NE
Mitchell's satyr Butterfly	Neonympha mitchellii mitchellii	Endangered	Yes	NLAA
Monarch butterfly	Danaus plexippus	Proposed Threatened	Yes	NLAA
Northern Long-Eared Bat [†] . This species or critical habitat is covered by a DKey.	Myotis septentrionalis	Endangered		NE

[†] This species or critical habitat has been analyzed through a Determination Key.

1.4 PROJECT DESCRIPTION

1.4.1 LOCATION



LOCATION

Portage County, Ohio

1.4.2 DESCRIPTION OF PROJECT HABITAT

The site is a NWI mapped PEM1F wetland that has been recently dewatered. Vegetation consists of shrubs and a diverse community of sedges and forbs. Ohio ORAM scoring completed on site designated the greater wetland area as Category 3.

1.4.3 PROJECT PROPONENT INFORMATION

Provide information regarding who is proposing to conduct the project, and their contact information. Please provide details on whether there is a Federal nexus.

REQUESTING AGENCY

Private Entity

FULL NAME

Bruce Dickson

STREET ADDRESS

PO Box 148

CITY

Tionesta

STATE

PA

ZIP

16353

PHONE NUMBER

8148066073

E-MAIL ADDRESS

bdickson@redhorseenvironmental.com

LEAD AGENCY

Army Corps of Engineers

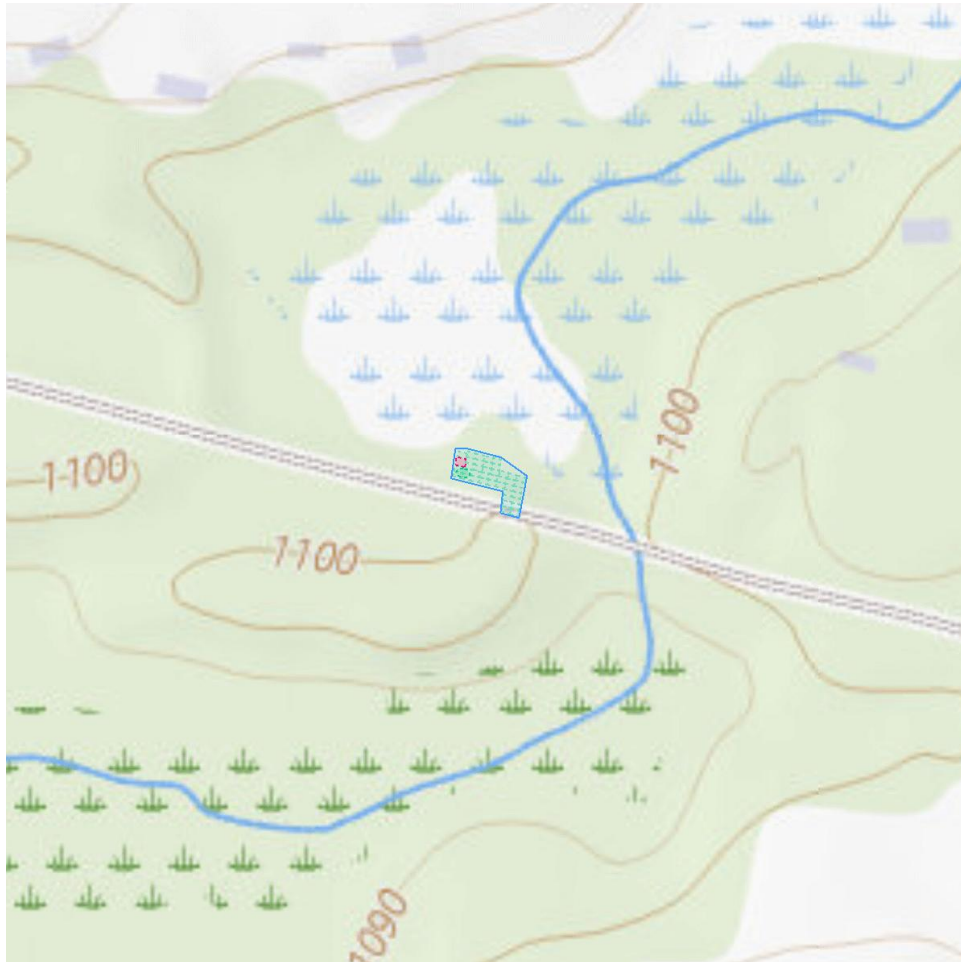
1.4.4 PROJECT PURPOSE

Buckeye Partners liquid fuels Line 521 was found to have a pipeline defect at ~ 41.281820 -81.196665 south of Mennonite Road in Mantua Township, Portage County, Ohio. Contractors will expose, inspect, and repair the pipeline to avoid a future release. There excavation will be 20' x 10' x 7'. The site is in a mapped wetland connected to a tributary to the Cuyahoga River on ODNR Managed Lands. All construction activities will be conducted from timber mats with spoil materials (segregated organic matter/top soil and subsoil) stored on timber mats. The excavation will be back-filled in reverse order of soil removal and restored to original conditions/elevations. Organic topsoil containing the wetland seed bank and rhizomes will facilitate vegetation restoration.

1.4.5 PROJECT TYPE AND DECONSTRUCTION

This project is a pipeline operation & maintenance project.

1.4.5.1 PROJECT MAP



LEGEND



Project footprint



Excavation: Excavate soils/sediments



Temporary Soil Stockpile: Soil stockpile (structure)



Timbermats: Multi-use path (structure)

1.4.5.2 MULTI-USE PATH

STRUCTURE COMPLETION DATE

September 30, 2026

REMOVAL/DECOMMISSION DATE (IF APPLICABLE)

September 30, 2026

STRESSORS

- [Increase in human presence](#)

DESCRIPTION

The timber mat path will protect wetland soils and allow equipment usage. The mats will be installed at project start-up and removed following project completion. Primary impact will be temporarily covering existing plant community.

1.4.5.3 SOIL STOCKPILE

STRUCTURE COMPLETION DATE

September 30, 2026

REMOVAL/DECOMMISSION DATE (IF APPLICABLE)

September 30, 2026

STRESSORS

This activity is not expected to have any impact on the environment.

DESCRIPTION

The segregated excavated soils (organic/subsoils) will be temporarily stored on timber mats and surrounded by filter sock preventing sediment movement off of the mats. Once repairs are complete the excavated soils will be returned to the excavation in reverse order of removal.

1.4.5.4 EXCAVATE SOILS/SEDIMENTS

ACTIVITY START DATE

September 15, 2026

ACTIVITY END DATE

September 30, 2026

STRESSORS

- [Decrease in vegetation](#)
- [Change in soil](#)
- [Increase in human presence](#)
- [Increase in noise](#)
- [Increase in soil disturbance](#)
- [Increase in vehicle traffic](#)

DESCRIPTION

An excavation 20' x 10' x 7' will be needed to access the pipeline. The spoil will be segregated and stored on timber mats. Upon completion of repairs the spoil will be returned to the excavation in reverse order of removal and the area returned to original elevations. Existing seed bank and plant materials (rhizomes) will serve to revegetate the site.

1.4.6 ANTICIPATED ENVIRONMENTAL STRESSORS

Describe the anticipated effects of your proposed project on the aspects of the land, air and water that will occur due to the activities above. These should be based on the activity deconstructions done in the previous section and will be used to inform the action area.

1.4.6.1 PLANT FEATURES

Individuals from the Plantae kingdom, such as trees, shrubs, herbs, grasses, ferns, and mosses. This feature also includes products of plants (e.g., nectar, flowers, seeds, etc.).

1.4.6.1.1 DECREASE IN VEGETATION

ANTICIPATED MAGNITUDE

This stressor is not expected to occur; the following explanation has been provided:

This stressor was completely avoided by implementing a conservation measure.

CONSERVATION MEASURES

- [no trees ≥3 inches dbh will be cleared.](#)
- [Timber mats](#)

STRUCTURES AND ACTIVITIES

- [Excavate soils/sediments](#)

1.4.6.2 AQUATIC FEATURES

Bodies of water on the landscape, such as streams, rivers, ponds, wetlands, etc., and their physical characteristics (e.g., depth, current, etc.). This feature includes the groundwater and its characteristics. Water quality attributes (e.g., turbidity, pH, temperature, DO, nutrients, etc.) should be placed in the Environmental Quality Features.

1.4.6.3 SOIL AND SEDIMENT

The topmost layer of earth on the landscape and its components (e.g., rock, sand, gravel, silt, etc.). This feature includes the physical characteristics of soil, such as depth, compaction, etc. Soil quality attributes (e.g., temperature, pH, etc.) should be placed in the Environmental Quality Features.

1.4.6.3.1 CHANGE IN SOIL

ANTICIPATED MAGNITUDE

This stressor is not expected to occur; the following explanation has been provided:

This stressor was completely avoided by implementing a conservation measure.

CONSERVATION MEASURES

- [Soil removal/return sequencing](#)

STRUCTURES AND ACTIVITIES

- [Excavate soils/sediments](#)

1.4.6.4 HUMAN ACTIVITIES

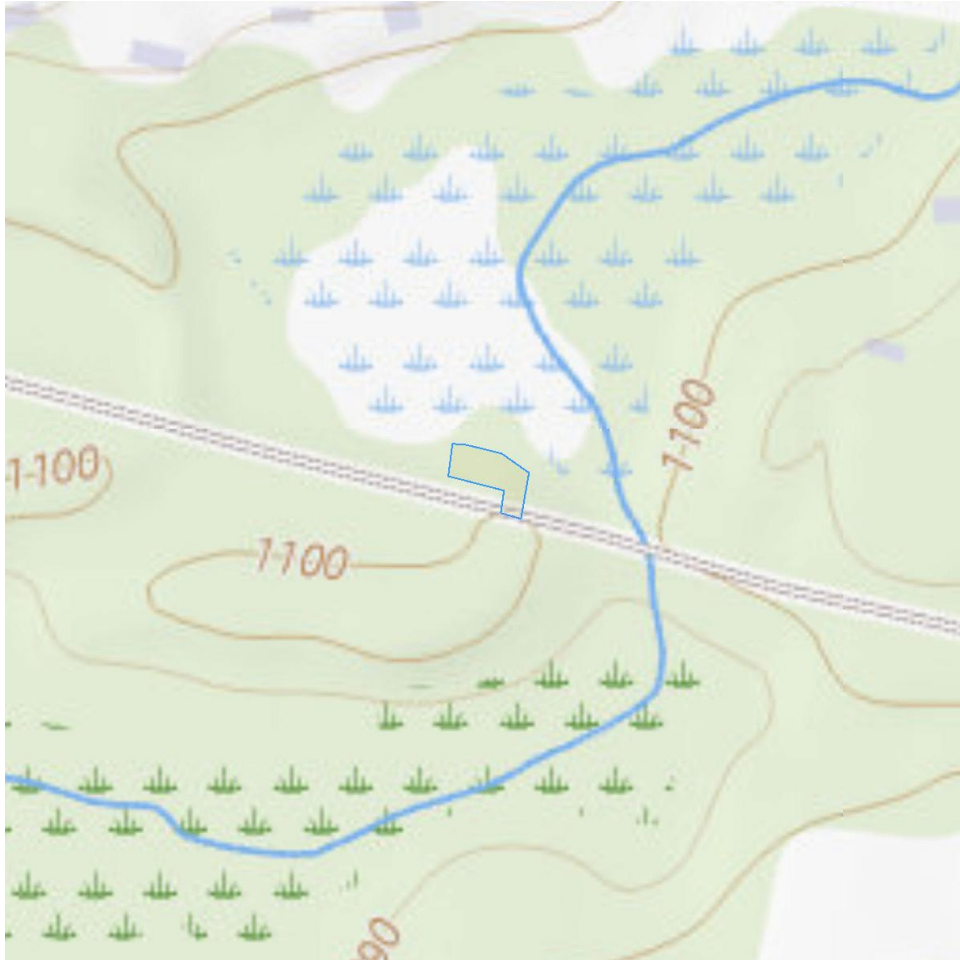
Human actions in the environment (e.g., fishing, hunting, farming, walking, etc.).

1.4.6.4.1 INCREASE IN HUMAN PRESENCE

ANTICIPATED MAGNITUDE

Workers will be active on the site during daylight hours only (no nighttime work with artificial lighting). Staging and meetings etc will occur away from the work site.

STRESSOR LOCATION



LEGEND

-  Project footprint
-  Stressor location

CONSERVATION MEASURES

- [Work schedule](#)

STRUCTURES AND ACTIVITIES

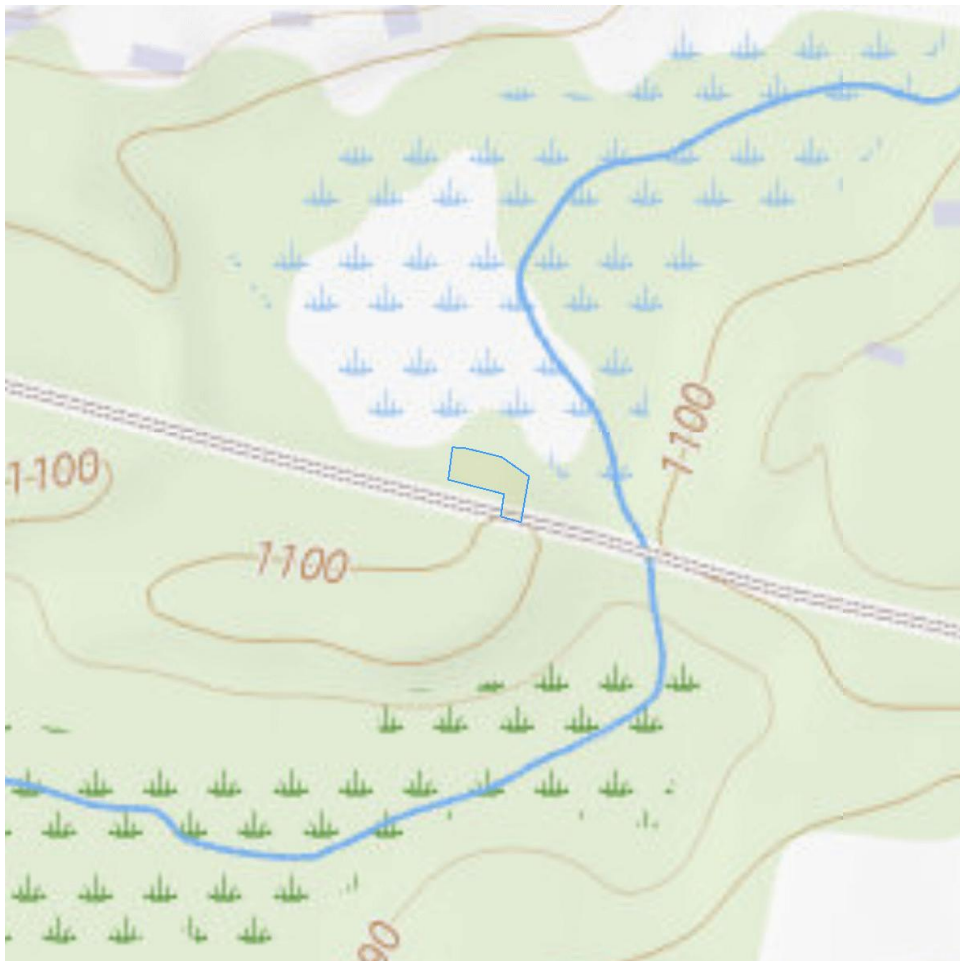
- [Excavate soils/sediments](#)
- [Multi-use path](#)

1.4.6.4.2 INCREASE IN NOISE

ANTICIPATED MAGNITUDE

minor noise associated with equipment usage is unavoidable

STRESSOR LOCATION



LEGEND

-  Project footprint
-  Stressor location

CONSERVATION MEASURES

- [Work schedule](#)

STRUCTURES AND ACTIVITIES

- [Excavate soils/sediments](#)

1.4.6.4.3 INCREASE IN SOIL DISTURBANCE

ANTICIPATED MAGNITUDE

This stressor is not expected to occur; the following explanation has been provided:

This stressor was completely avoided by implementing a conservation measure.

CONSERVATION MEASURES

- [Soil removal/return sequencing](#)

STRUCTURES AND ACTIVITIES

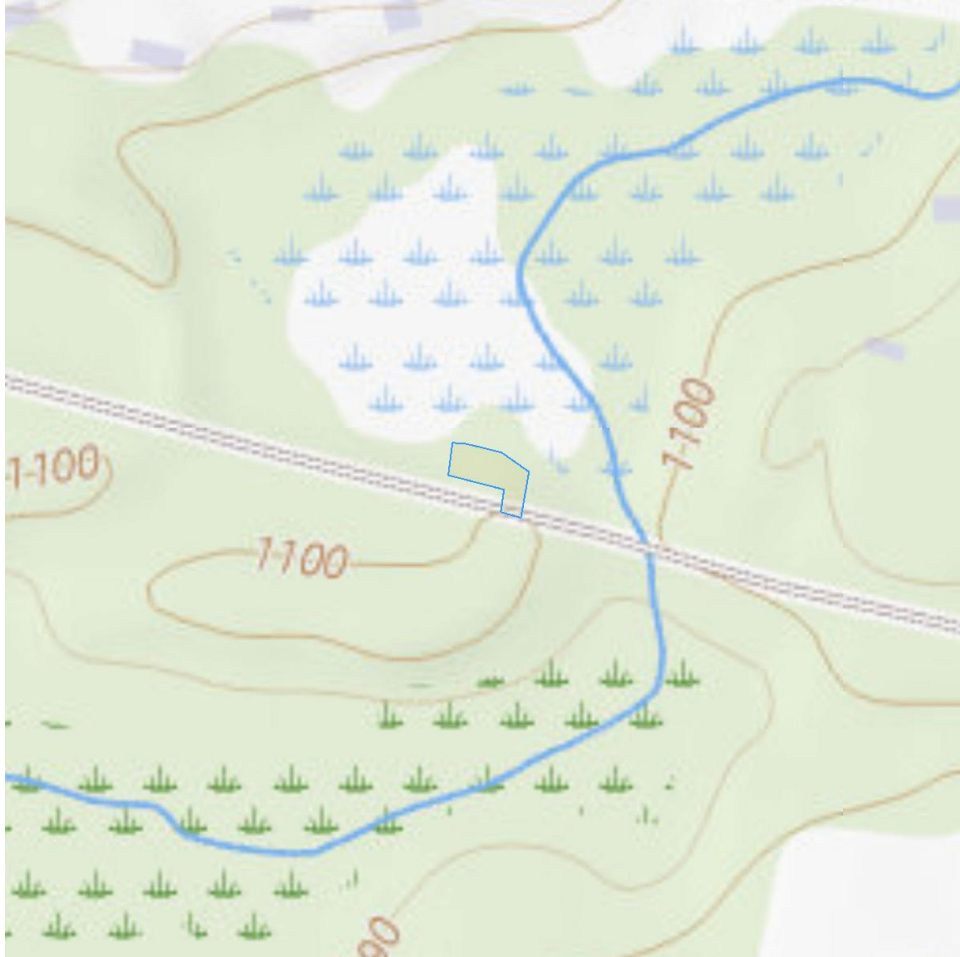
- [Excavate soils/sediments](#)

1.4.6.4.4 INCREASE IN VEHICLE TRAFFIC

ANTICIPATED MAGNITUDE

vehicle access is necessary to complete work but will be minimized as much as possible

STRESSOR LOCATION



LEGEND

-  Project footprint
-  Stressor location

CONSERVATION MEASURES

- [Work schedule](#)

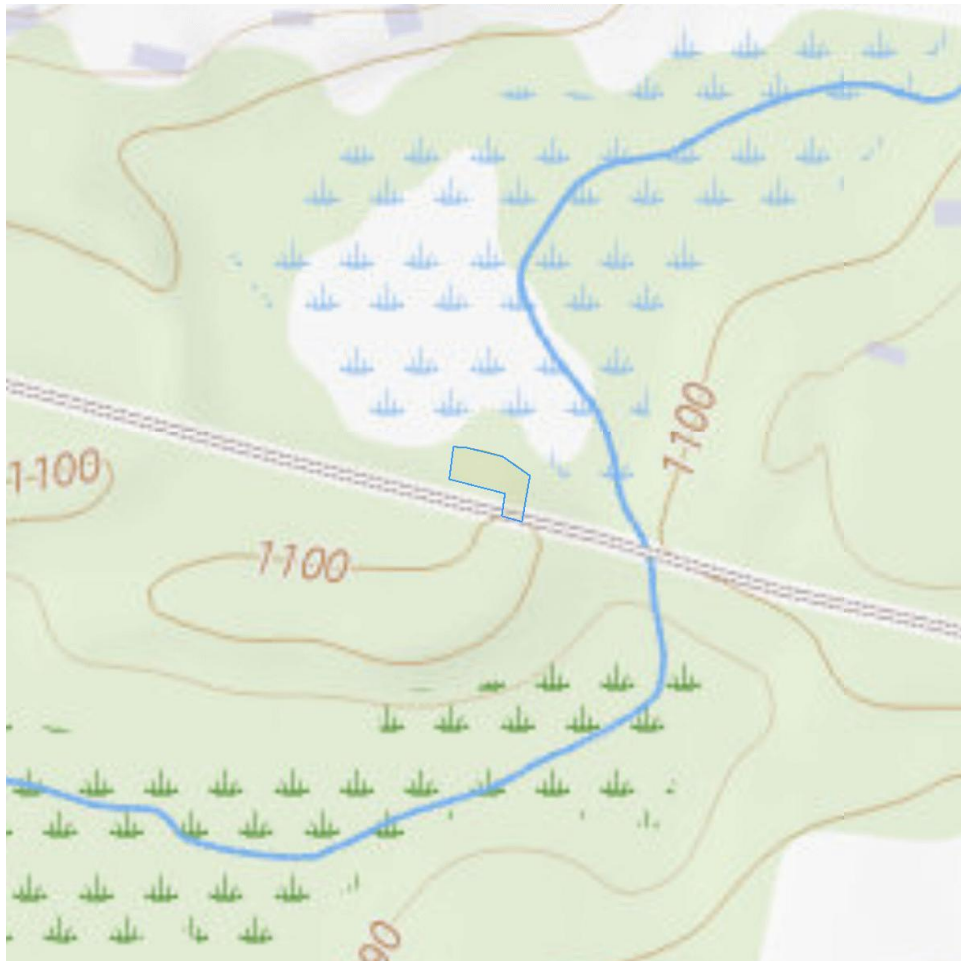
STRUCTURES AND ACTIVITIES

- [Excavate soils/sediments](#)

1.4.6.5 SPECIES INTERACTIONS / INTRODUCTIONS

Interactions that occur between two or more different species (e.g., competition, pollination, predation, symbiosis, etc.).

1.5 ACTION AREA



LEGEND

-  Project footprint
-  Stressor location

1.6 CONSERVATION MEASURES

1.6.1 <P>NO TREES ≥3 INCHES DBH WILL BE CLEARED.</P>

DESCRIPTION

no trees will be cut or modified at the project location.

STRESSORS

- [Decrease in vegetation](#)

1.6.2 <P>NO TREES ≥3 INCHES DBH WILL BE CLEARED.</P>

DESCRIPTION

there is no tree clearing involved at this project

1.6.3 SOIL REMOVAL/RETURN SEQUENCING

DESCRIPTION

soils will be removed sequentially and returned in reverse order of removal (subsoil segregated from organic soil) and returned to original elevations

STRESSORS

- [Change in soil](#)
- [Increase in soil disturbance](#)

1.6.4 TIMBER MATS

DESCRIPTION

timber mats will be placed on soils to protect surface vegetation and reduce compaction

STRESSORS

- [Decrease in vegetation](#)

DIRECT INTERACTIONS

- [crushing](#)

1.6.5 WORK SCHEDULE

DESCRIPTION

work will only occur during daylight hours. no work will be conducted at night with artificial lighting

STRESSORS

- [Increase in human presence](#)
- [Increase in noise](#)
- [Increase in vehicle traffic](#)

1.7 PRIOR CONSULTATION HISTORY

none

1.8 OTHER AGENCY PARTNERS AND INTERESTED PARTIES

none

1.9 OTHER REPORTS AND HELPFUL INFORMATION

I am coordinating with ODNR regarding project planning

RELEVANT DOCUMENTATION

- [Buckeye Partners Line 521 F-0005785 Construction Layout and ES Plan w air photo](#)

2 SPECIES EFFECTS ANALYSIS

This section describes, species by species, the effects of the proposed action on listed, proposed, and candidate species, and the habitat on which they depend. In this document, effects are broken down as direct interactions (something happening directly to the species) or indirect interactions (something happening to the environment on which a species depends that could then result in effects to the species).

These interactions encompass effects that occur both during project construction and those which could be ongoing after the project is finished. All effects, however, should be considered, including effects from direct and indirect interactions and cumulative effects.

2.1 MITCHELL'S SATYR BUTTERFLY

2.1.1 STATUS OF THE SPECIES

This section should provide information on the species' background, its biology and life history that is relevant to the proposed project within the action area that will inform the effects analysis.

2.1.1.1 LEGAL STATUS

The Mitchell's satyr Butterfly is federally listed as 'Endangered' and additional information regarding its legal status can be found on the [ECOS species profile](#).

2.1.1.2 RECOVERY PLANS

Available recovery plans for the Mitchell's satyr Butterfly can be found on the [ECOS species profile](#).

2.1.1.3 LIFE HISTORY INFORMATION

No description available

IDENTIFIED RESOURCE NEEDS

Emergent aquatic vegetation

Sedges presence in vegetation community

2.1.1.4 CONSERVATION NEEDS

RECOVERY PLAN FOR MITCHELL'S SATYR BUTTERFLY *Neonympha mitcheliji*
mitcheliji French (Lepidoptera: Nymphalidae: Satyrinae)

April 1998

Region 3 U.S. Fish and Wildlife Service Ft. Snelling, Minnesota

2.1.2 ENVIRONMENTAL BASELINE

*The environmental baseline describes the species' health **within the action area only** at the time of the consultation, and does not include the effects of the action under review. Unlike the species information provided above, the environmental baseline is at the scale of the Action area.*

2.1.2.1 SPECIES PRESENCE AND USE

The area contains grasses, sedges and forbs that may meet life cycle requirements for egg laying and sedges as a food source for caterpillars.

2.1.2.2 SPECIES CONSERVATION NEEDS WITHIN THE ACTION AREA

maintain sedge dominated plant community

2.1.2.3 HABITAT CONDITION (GENERAL)

EMERGENT AQUATIC VEGETATION (SEDGES PRESENCE IN VEGETATION COMMUNITY)

patches of sedges are contained throughout the greater wetland well beyond the project work area

2.1.2.4 INFLUENCES

the wetland is managed in part by ODNR and is therefore largely protected.

2.1.2.5 ADDITIONAL BASELINE INFORMATION

not a fen but contains a riparian sedge community

2.1.3 EFFECTS OF THE ACTION

This section considers and discusses all effects on the listed species that are caused by the proposed action and are reasonably certain to occur, including the effects of other activities that would not occur but for the proposed action.

2.1.3.1 INDIRECT INTERACTIONS

RESOURCE NEED	STRESSORS	CONSERVATION MEASURES	AMOUNT OF RESOURCE IMPACTED	INDIVIDUALS AFFECTED
Emergent aquatic vegetation (sedges presence in vegetation community)	No exposure path			<i>There will be no impacts to this resource, so no individuals will be affected.</i>

2.1.3.2 DIRECT INTERACTIONS

DIRECT INTERACTION	CONSERVATION MEASURES	INDIVIDUALS IMPACTED	IMPACT EXPLANATION
Crushing	Timber mats	No	not actually known to inhabit site

2.1.4 CUMULATIVE EFFECTS

impacts are minimal and temporary in nature with full recovery of vegetation community at project location so there should be no cumulative effects

2.1.5 DISCUSSION AND CONCLUSION

DETERMINATION: [NLAA](#)

COMPENSATION MEASURES

none other than site restoration of project work area

2.2 MONARCH BUTTERFLY

2.2.1 STATUS OF THE SPECIES

This section should provide information on the species' background, its biology and life history that is relevant to the proposed project within the action area that will inform the effects analysis.

2.2.1.1 LEGAL STATUS

The Monarch butterfly is federally listed as 'Proposed Threatened' and additional information regarding its legal status can be found on the [ECOS species profile](#).

2.2.1.2 RECOVERY PLANS

Available recovery plans for the Monarch butterfly can be found on the [ECOS species profile](#).

2.2.1.3 LIFE HISTORY INFORMATION

For information on monarch conservation, visit <https://www.fws.gov/initiative/pollinators/monarchs>, http://www.mafwa.org/?page_id=2347, and, for the West, <https://wafwa.org/committees-working-groups/monarch-working-group/>.

Adult monarch butterflies are large and conspicuous, with bright orange wings surrounded by a black border and covered with black veins. The black border has a double row of white spots, present on the upper side of the wings. Adult monarchs are sexually dimorphic, with males having narrower wing venation and scent patches. The bright coloring of a monarch serves as a warning to predators that eating them can be toxic.

During the breeding season, monarchs lay their eggs on their obligate milkweed host plant (primarily *Asclepias* spp.), and larvae emerge after two to five days. Larvae develop through five larval instars (intervals between molts) over a period of 9 to 18 days, feeding on milkweed and sequestering toxic chemicals (cardenolides) as a defense against predators. The larva then pupates into a chrysalis before emerging 6 to 14 days later as an adult butterfly. There are multiple generations of monarchs produced during the breeding season, with most adult butterflies living approximately two to five weeks; overwintering adults enter into reproductive diapause (suspended reproduction) and live six to nine months.

In many regions where monarchs are present, monarchs breed year-round. Individual monarchs in temperate climates, such as eastern and western North America, undergo long-distance migration, and live for an extended period of time. In the fall, in both eastern and western North America, monarchs begin migrating to their respective overwintering sites. This migration can take monarchs distances of over 3,000 km and last for over two months. In early spring (February-March), surviving monarchs break diapause and mate at the overwintering sites before dispersing. The same individuals that undertook the initial southward migration begin flying back through the breeding grounds and their offspring start the cycle of generational migration over again.

IDENTIFIED RESOURCE NEEDS

Forbs

Flowering forbs for nectar distributed throughout the local landscape

Host species

Asclepias syriaca. patches of plants distributed throughout local landscape

2.2.1.4 CONSERVATION NEEDS

maintenance of Milkweeds and Nectar Sources. protection of migration corridors and overwintering habitats

2.2.2 ENVIRONMENTAL BASELINE

*The environmental baseline describes the species' health **within the action area only** at the time of the consultation, and does not include the effects of the action under review. Unlike the species information provided above, the environmental baseline is at the scale of the Action area.*

2.2.2.1 SPECIES PRESENCE AND USE

The greater wetland area is an open vegetation community containing various flowering forbs that could be used as a source of nectar. While various flowering species were observed within the greater wetland no *Asclepias syriaca* were documented at the project site.

2.2.2.2 SPECIES CONSERVATION NEEDS WITHIN THE ACTION AREA

maintenance of patches of Milkweeds and Nectar Sources

2.2.2.3 HABITAT CONDITION (GENERAL)

the greater wetland supported multiple species that would provide feeding opportunities for *Danaus plexippus*.

2.2.2.4 INFLUENCES

habitat loss and decline in milkweed sources

2.2.2.5 ADDITIONAL BASELINE INFORMATION

Monarchs were observed in general area of project.

2.2.3 EFFECTS OF THE ACTION

This section considers and discusses all effects on the listed species that are caused by the proposed action and are reasonably certain to occur, including the effects of other activities that would not occur but for the proposed action.

2.2.3.1 INDIRECT INTERACTIONS

RESOURCE NEED	STRESSORS	CONSERVATION MEASURES	AMOUNT OF RESOURCE IMPACTED	INDIVIDUALS AFFECTED
Forbs (flowering forbs for nectar distributed throughout the local landscape)			<i>This resource is not present in the action area</i> no milkweed present in work area	<i>There will be no impacts to this resource, so no individuals will be affected.</i>
Host species (asclepias syriaca. patches of plants distributed throughout local landscape)			<i>This resource is not present in the action area</i> <i>Asclepias syriaca</i> not observed in project area	<i>There will be no impacts to this resource, so no individuals will be affected.</i>

2.2.3.2 DIRECT INTERACTIONS

No direct interactions leading to effects on species are expected to occur from the proposed project.

Justification:

during initial project construction activities the site will be monitored for *Asclepias syriaca* and *Danaus plexippus*

2.2.4 CUMULATIVE EFFECTS

Cumulative effects will be avoided via conservation measures and restoration of site to original elevation and vegetation community

2.2.5 DISCUSSION AND CONCLUSION

DETERMINATION: NLAA

COMPENSATION MEASURES

none other than site restoration to original conditions

3 CRITICAL HABITAT EFFECTS ANALYSIS

No critical habitats intersect with the project action area.

4 SUMMARY DISCUSSION AND CONCLUSION

4.1 SUMMARY DISCUSSION

There is no designated critical habitat at the project work area.

Conservation measures will protect habitat (soils/vegetation) and restoration will return the site to a condition similar to pre-project conditions following temporary disturbance.

4.2 CONCLUSION

The pipeline maintenance project will follow all USACE guidelines (spoil storage, soil removal/return sequence, and restore to site to original elevations) to minimize the footprint and temporary site impacts. Conservation measures (use of timber mats, E & S measures) will also be implemented to protect adjacent areas and minimize on-site disturbance. Restoration of the vegetation community will be with the local seed bank and rhizomes in the organic layer that will allow the habitat to become reestablished to support local species.