



Tennessee Valley Authority, 1101 Market Street, LP 5A, Chattanooga, Tennessee 37402-2801

July 08, 2008

10 CFR 52.80

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of)
Tennessee Valley Authority)

Docket Numbers 52-014 and 52-015

NUCLEAR REGULATORY COMMISSION (NRC) – BELLEFONTE NUCLEAR PLANT
(BLN) – RESPONSE TO NRC INFORMATION NEEDS RELATED TO JUNE 2008
SITE SURVEY FOR TERRESTRIAL ECOLOGY SPECIES

Reference: Letter from Ashok Bhatnagar (TVA) to Mr. R. William Borchardt (NRC),
"Application for Combined License for BLN Units 3 and 4," dated
October 30, 2007

The purpose of this letter is to provide responses to the information needs relating to the June 2008 site survey for Terrestrial Ecology (TE) species, as identified by the NRC reviewers during the Environmental Report (ER) site audit conducted at the Tennessee Valley Authority (TVA) Bellefonte Nuclear Plant, Units 3 and 4 (BLN) site during the week of March 31 through April 4, 2008.

By the referenced letter, TVA submitted an application for a combined license for two AP1000 advanced passive pressurized-water reactors at the BLN site. Included in the review of a combined license application (COLA) is an environmental site audit during which the NRC staff tours the proposed plant site and environs and reviews the applicable documents that support the information provided in the ER. At the April 4, 2008 exit meeting for the BLN site audit, the NRC staff provided a list of information that was determined to be necessary to complete the review of the ER.

TVA and NRC staff agreed, at the site audit exit meeting, that six NRC information needs would be addressed based upon information obtained during a planned seasonal site survey scheduled for mid-June 2008. The enclosure to this letter identifies the

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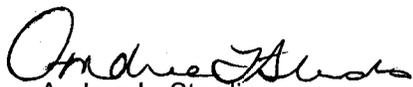
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status of the 26 TE information needs, provides TVA's responses to the six NRC TE information needs related to the June 2008 site surveys, and identifies changes that will be made in a future revision of the BLN application. The June 2008 Vegetation Survey and Bat Suitability Index Report are made available for NRC review at NuStart's contractors' offices.

If there are any questions, please contact Phillip Ray at 1101 Market Street, LP 5A, Chattanooga, Tennessee 37402-2801, by telephone at (423) 751-7030, or via email at pmray@tva.gov.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of July, 2008.



Andrea L. Sterdis
Manager, New Nuclear Licensing and Industry Affairs
Nuclear Generation Development & Construction

Enclosure: Response to NRC Information Needs – June 2008 Site Survey for
Terrestrial Ecology (TE) Species

cc: See Page 3

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cc: (Enclosures

- E. Cummins, Westinghouse
- S. P. Frantz, Morgan Lewis
- M. W. Gettler, FP&L
- R. C. Grumbir, NuStart
- P. S. Hastings, NuStart
- P. Hinnenkamp, Entergy
- M. A. Hood, NRC/HQ
- M. C. Kray, NuStart
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- B. Anderson, NRC/HQ
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- A. M. Monroe, SCE&G
- C. R. Pierce, SNC
- R. Register, DOE/PM
- L. Reyes, NRC/RII
- J. M. Sebrosky, NRC/HQ
- T. Simms, NRC/HQ

ENCLOSURE
RESPONSE TO NRC INFORMATION NEEDS
JUNE 2008 SITE SURVEY FOR TERRESTRIAL ECOLOGY SPECIES

**RESPONSE TO NRC
INFORMATION NEEDS**

**JUNE 2008 SITE SURVEY FOR
TERRESTRIAL ECOLOGY (TE) SPECIES**

This enclosure provides the status of the NRC information needs related to the staff's review of Terrestrial Ecology (TE) and provides TVA responses to six of these "TE" information needs. The six TE information needs addressed in this enclosure are those that are addressed by the seasonal site survey that was performed in mid-June 2008.

If appropriate, the resolution to the information needs also provides marked-up text that will be included in a future revision to the Bellefonte Nuclear Plant, Units 3 and 4 (BLN) Environmental Report. For these mark-ups, blue, underlined text indicates new text, and red, strike-out text indicates deleted text.

"TE" Information Needs

NRC Information Need Number	Status
• TE-01	Resolved at BLN site audit.
• TE-02	Resolved at BLN site audit.
• TE-03	Response provided in this enclosure.
• TE-04	Resolved at BLN site audit.
• TE-05	Response provided in this enclosure.
• TE-06	Response provided in this enclosure.
• TE-07	Response provided in this enclosure.
• TE-08	Response provided in this enclosure.
• TE-09	Resolved at BLN site audit.
• TE-10	Resolved at BLN site audit. Future ER changes to be provided in errata report.
• TE-11	Resolved at BLN site audit.
• TE-12	Response provided in this enclosure.
• TE-13	Resolved at BLN site audit.
• TE-14	Resolved at BLN site audit.
• TE-15	Resolved at BLN site audit.
• TE-16	Resolved at BLN site audit.
• TE-17	Resolved at BLN site audit.
• TE-18	Resolved at BLN site audit.
• TE-19	Resolved at BLN site audit.
• TE-20	Response provided by TVA's June 2 letter (Reference 1).
• TE-21	Response provided by TVA's June 2 letter (Reference 1).

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Responses to NRC Information Needs – June 2008 Site Survey for Terrestrial Ecology Species

- TE-22 Response provided by TVA's June 2 letter (Reference 1).
- TE-23 Resolved at BLN site audit.
- TE-24 Resolved at BLN site audit.
- TE-25 Resolved at BLN site audit.
- TE-26 Response provided by TVA's June 2 letter (Reference 1).

Reference:

1. Letter from Andrea L. Sterdis, Tennessee Valley Authority, to NRC Document Control Desk, "Response to NRC Information Needs Related to Terrestrial and Aquatic Ecology," dated June 2, 2008.

NRC Review of the BLN Environmental Report**NRC Information Needs - BLN ER Site Audit Exit Meeting****NRC Environmental Category: TERRESTRIAL ECOLOGY**

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

What tree and shrub species are dominant in shrub-scrub thickets? What tree species are considered pioneer species in this region?

BLN INFORMATION NEED: TE-03**BLN RESPONSE:**

A June 2008 plant survey at the BLN site determined the dominant scrub-shrub species found in these areas are early successional forest and forest edge species such as sumacs (*Rhus* spp.), pines (*Pinus virginiana* and *Pinus taeda*), young black locust (*Robinia pseudoacacia*), and young ash (*Fraxinus* spp.) (over calcareous soils). These species are considered pioneer species on the BLN site. As stated in Subsection 4.2.1.1.2, the scrub-shrub thickets eventually develop into mature woody vegetation (natural forest) over time.

The June 2008 BLN plant survey report (including a map of the areas surveyed) is made available for NRC review at NuStart's contractors' offices.

ASSOCIATED BLN COL APPLICATION REVISIONS:

Revise COLA Part 3, ER Chapter 2, Subsection 2.4.1.1.2, as follows:

Scrub-shrub communities occur as a seral stage of succession that develop within areas previously disturbed. Seral stages of succession for developing scrub-shrub communities typically include a dominant grass species stage, followed by a community of perennial herbaceous species, then a community with the majority of the biomass as woody, shrub species. This habitat continues to develop into communities dominated by mature woody vegetation.

Scrub-shrub communities observed within the BLN site boundary were located within previously disturbed areas. Observations indicated these communities have been minimally influenced beyond original facility construction. ~~Data collected on species diversity can be found in existing reports (References 1, 2, and 3).~~ Scrub-shrub species found in these areas are early successional forest and forest edge species such as sumacs (*Rhus* spp.), pines (*Pinus virginiana* and *Pinus taeda*), young black locust (*Robinia pseudoacacia*), sweet gum (*Liquidambar styraciflua*), and young ash (*Fraxinus* spp.) (over calcareous soils).

ATTACHMENTS:

None.

NRC Review of the BLN Environmental Report**NRC Information Needs - BLN ER Site Audit Exit Meeting****NRC Environmental Category: TERRESTRIAL ECOLOGY**

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

Need a vegetative description of native grass stands.

BLN INFORMATION NEED: TE-05**BLN RESPONSE:**

ER Subsection 2.4.1.1.1 is revised to add descriptions of vegetative species identified in grassy field areas at the site. Areas of native grasses have generally been disturbed by recurring timbering, construction, and agricultural activities, but native grass fields remain in localized areas, as shown on Figure 2.4-1. Plant species previously identified in an October 1997 Environmental Impact Statement in grassy field areas at the site include Bermuda grass, fescue, broomsedge, orchard grass, dandelion, buttercup, false wild strawberry, plantain, blackberry, and various other grass species. A survey conducted in June 2008 identified fescue (*Festuca pratensis*) and common needlerush (*Juncus effusus*) as the predominant grass species near the construction site. Fescue (*Festuca pratensis*) (exotic), orchard grass (*Dactylis glomerata*) (exotic), broomsedge (*Andropogon virginicus*) (dominant) and oat grass (*Danthonia sp.*) (dominant) were common in grassy areas at the site.

The June 2008 BLN plant survey report (including a map of the areas surveyed) is made available for NRC review at NuStart's contractors' offices.

ASSOCIATED BLN COL APPLICATION REVISIONS:

Revise COLA Part 3, ER Chapter 2, Subsection 2.4.1.1.1, as follows:

Improved and native grass fields were generally associated with existing infrastructure at the BLN site. Improved grass species were introduced to the site after initial ground disturbance and primarily provided ornamental ground cover. Native grass and pioneering herbaceous species existed within areas cleared prior to initial facility construction (References 1, 2, and 3). Native vegetation has also been disturbed by recurring timbering, construction, and agricultural activities. Plant species previously identified in grassy field areas include Bermuda grass, fescue, broomsedge, orchard grass, dandelion, buttercup, false wild strawberry, plantain, blackberry, and various other grass species (Reference 2). A survey conducted in June 2008 identified fescue (*Festuca pratensis*) and common needlerush (*Juncus effusus*) as the predominant grass species near the construction site. Fescue (*Festuca pratensis*) (exotic), orchard grass (*Dactylis glomerata*) (exotic), broomsedge (*Andropogon virginicus*) (dominant) and oat grass (*Danthonia sp.*) (dominant) were common in grassy areas at the site.

Enclosure

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Responses to NRC Information Needs – June 2008 Site Survey for Terrestrial Ecology
Species

ATTACHMENTS:

None.

NRC Review of the BLN Environmental Report**NRC Information Needs - BLN ER Site Audit Exit Meeting****NRC Environmental Category: TERRESTRIAL ECOLOGY**

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information needs:

- TE-06:** Need a vegetative description of the mapped Mixed Hardwood Forested Wetland cover type.
- TE-07:** Need a vegetative description of the mapped Emergent Wetland

BLN INFORMATION NEEDS: TE-06 and TE-07**BLN RESPONSE:**

Descriptions of the mapped Mixed Hardwood Forested Wetland cover type and the Emergent Wetland at the BLN site are provided below and reflect the results of a site survey conducted on June 11 and 12, 2008. Mixed Hardwood Forested Wetland species are further categorized as Wetland Mixed Hardwoods and Bottomland Hardwoods. ER Subsection 2.4.1.2.1 is revised to reflect wetland species identified in June 2008.

The June 2008 BLN plant survey report (including a map of the areas surveyed) is made available for NRC review at NuStart's contractors' offices.

Bottomland Hardwoods (canopy trees 12" to 36" in diameter at breast height)

Canopy species: red maple (*Acer rubrum*) (dominant species), green ash (*Fraxinus pennsylvanica*) (dominant species), overcup oak (*Quercus lyrata*), American elm (*Ulmus americana*), willow oak (*Quercus phellos*), cherrybark oak (*Quercus pagoda*), water oak (*Quercus nigra*), cottonwood (*Populus deltoides*), box elder (*Acer negundo*), and sycamore (*Platanus occidentalis*).

Understory species: spicebush (*Lindera benzoin*) and box elder (*Acer negundo*).

Wetland Mixed Hardwoods (canopy trees 12" to 42" in diameter at breast height)

Canopy species: cherrybark oak (*Quercus pagoda*) (dominant species), water oak (*Quercus nigra*) (dominant species), sweet gum (*Liquidambar styraciflua*) (dominant species), willow oak (*Quercus phellos*), overcup oak (*Quercus lyrata*), sugarberry (*Celtis laevigata*), American elm (*Ulmus americana*), sycamore (*Platanus occidentalis*), and green ash (*Fraxinus pennsylvanica*).

Understory species: persimmon (*Diospyros virginiana*), muscadine (*Vitis rotundifolia*), and supplejack vine (*Berchemia scandens*).

Emergent Wetland

The marsh complex consists of cattail (*Typha latifolia*) (dominant species), alder (*Alnus serrulata*), buttonbush (*Cephalanthus occidentalis*), and creeping rush (*Juncus repens*).

ASSOCIATED BLN COL APPLICATION REVISIONS:

Revise COLA Part 3, Chapter 2, Subsection 2.4.1.2.1, by inserting three new paragraphs after the first paragraph, as follows:

Qualitative aquatic habitat data obtained during a site reconnaissance in 2006 indicated several wetlands types were located within the BLN site boundary (Figure 2.4-1). The dominant wetland type was bottomland/riparian forested wetland. Bottomland hardwood forests associated with the Gunter'sville Reservoir and Town Creek riparian ecotones are diverse and mature, having been altered very little during and after construction of existing Bellefonte structures. Emergent and hardwood forested wetlands were also identified within the BLN site boundary and are illustrated in Figure 2.4-3. The Cowardin classification was not strictly followed in reconnaissance field notes, as both mixed hardwood forested wetland and bottomland/riparian forested wetland would have been classified PFO1 (palustrine, forested, broad-leaved deciduous). Water regime may have further defined the areas, but wetland information was gathered in a relatively short amount of time rather than extensively monitored.

A summer 2008 survey identified understory and canopy vegetative species in bottomland/riparian forested wetland. Understory species were predominantly spicebush (*Lindera benzoin*) and box elder (*Acer negundo*). The composition of canopy species contained the following:

- Red maple (*Acer rubrum*) (dominant species)
- Green ash (*Fraxinus pennsylvanica*) (dominant species)
- Overcup oak (*Quercus lyrata*)
- American elm (*Ulmus americana*)
- Willow oak (*Quercus phellos*)
- Cherrybark oak (*Quercus pagoda*)
- Water oak (*Quercus nigra*)
- Cottonwood (*Populus deltoides*)
- Box elder (*Acer negundo*)
- Sycamore (*Platanus occidentalis*)

Vegetative composition of mixed hardwood forested wetland areas consisted of various canopy and understory species. Understory plant species were primarily persimmon (*Diospyros virginiana*), muscadine (*Vitis rotundifolia*), and supplejack vine (*Berchemia scandens*). The canopy of mixed hardwood forested wetland areas contained the following:

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- Cherrybark oak (*Quercus pagoda*) (dominant species)
- Water oak (*Quercus nigra*) (dominant species)
- Sweet gum (*Liquidambar styraciflua*) (dominant species)
- Willow oak (*Quercus phellos*)
- Overcup oak (*Quercus lyrata*)
- Sugarberry (*Celtis laevigata*)
- American elm (*Ulmus americana*)
- Sycamore (*Platanus occidentalis*)
- Green ash (*Fraxinus pennsylvanica*)

Emergent wetland areas are mapped primarily along the northwestern site boundary, as shown in Figure 2.4-1. Plant species that compose the emergent wetlands (marsh complex) included the following:

- Cattail (*Typha latifolia*) (dominant species)
- Alder (*Alnus serrulata*)
- Buttonbush (*Cephalanthus occidentalis*)
- Creeping rush (*Juncus repens*)

ATTACHMENTS:

None.

NRC Review of the BLN Environmental Report**NRC Information Needs - BLN ER Site Audit Exit Meeting****NRC Environmental Category: TERRESTRIAL ECOLOGY**

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

What habitat features are present for Price's potato-bean and Morefield's leather flower and where are they located (need this delineated on a map or GIS as interpretation of "western portion" of BLN Site may not preclude it from construction area).

BLN INFORMATION NEED: TE-08**BLN RESPONSE:**

A winter 2007 habitat survey revealed potential habitat for Price's potato-bean (*Apios priceana*) and Morefield's leather flower (*Clematis morefieldii*) in the western portion of the site. A more thorough investigation was performed on June 11 and June 12, 2008, during the appropriate flowering season, in which a TVA botanist and TVA contractor (botanist) first examined actual habitat in an adjacent county, where populations of both plants were thriving, to gain a precise understanding of the habitat for these two species. Both species are known to occur in open, relatively dry calcareous woodlands on limestone in northern Alabama. This site was dominated by a mixed hardwood/open mixed hardwood forest over a steep boulder (limestone)-covered slope. A few Price's potato bean plants were found along with some non-flowering *Clematis* vines.

The botanists then returned to the BLN site and to the location of potential appropriate habitat that was identified in the winter 2007 survey. This habitat in the western portion of the BLN site is similar to the general description of appropriate habitat according to the recovery plans. However, neither Price's potato-bean nor Morefield's leather flower was identified on the BLN site, and after visualizing actual habitat for the two plants, both botanists agreed that, based on evaluation of habitat, substrate material, and associated species, habitat to support Price's potato-bean or Morefield's leather flower populations is not available on the BLN site.

The June 2008 BLN plant survey report (including a map of the areas surveyed) is made available for NRC review at NuStart's contractors' offices.

ASSOCIATED BLN COL APPLICATION REVISIONS:

Revise COLA Part 3, ER Chapter 2, Subsection 2.4.1.4.1, fourth paragraph through the eighth paragraph, as follows:

Although several rare plants were determined by the TVA to be present within 5 mi. of the BLN site (Table 2.4-2), the USFWS determined Price's potato-bean listed threatened (LT), green pitcher plant (listed endangered) (LE), Morefield's leather flower (LE), and white fringeless orchid (candidate) (C) were plants of concern in the area. ~~The USFWS also concluded a winter habitat survey would be sufficient providing habitat for endangered plants was not located within the disturbance area.~~ A 2007 winter habitat survey of the BLN site found that no habitat for the green pitcher plant, the white fringeless orchid, or the

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~~American hearts tongue fern existed on the BLN site. However, potential-habitat that met the general requirements outlined in the recovery plans for Price's potato bean and Morefield's leather flower was identified in the western portion of within the BLN site. A more thorough plant survey was performed in June 2008 to review the habitat and look for Morefield's leather flower and Price's potato-bean during the appropriate flowering season. Prior to re-surveying the BLN site, TVA botanists visited a population of Morefield's leather flower and Price's potato-bean in an adjacent county to examine known habitat for these two species that would serve as the basis for determining the presence of appropriate habitat on the BLN site. ; however, habitat was located on the western portion of the site not within the proposed construction areas. Neither Price's potato-bean nor Morefield's leather flower was identified on the BLN site, and it was determined that habitat in the western portion of the BLN site was, in fact, not appropriate to support either Morefield's leather flower or Price's potato-bean. No habitat for the green pitcher plant, the white fringeless orchid, or the American hearts tongue fern was discovered on BLN property.~~

Threatened American hart's-tongue fern (*Phyllitis scolopendrium Americana*) (LT) is listed on the Alabama Department of Conservation and Natural Resources website (Reference 17) as protected species within Jackson County, Alabama. However, these species are not identified as potentially occurring at the project site. American hart's-tongue fern has been identified in a cave mouth about 20 mi. west of the BLN site. No suitable habitat for this species occurs on or adjacent to the BLN site. (Reference 3)

Price's potato-bean is found in open, wooded areas, such as in forest gaps or along forest edges. The species is more common to mesic areas and is often found in open, low areas near a stream or along the banks of streams and rivers. Price's potato-bean is sometimes found near the base of small limestone bluffs. Most populations are observed in cleared areas associated with power lines or roadside rights-of-way. (Reference 14) ~~A survey performed in June 2008 determined that H~~habitat for this species ~~is expected to~~does not occur on, ~~or immediately adjacent to,~~ the BLN site, but it is not expected that the species occur within the proposed area of disturbance, due to the limited size and distribution of potential habitat.

The green pitcher plant occurs in wet woods and stream banks on Sand Mountain. No suitable habitat for the green pitcher plant occurs on-site, and the species has not been identified in the immediate area (Reference 3).

Morefield's leather-flower occurs in patches near seeps and springs in rocky limestone woods, typically at elevations of 800 – 1100 ft., on the south- and southwest-facing slopes of mountains (Reference 13). ~~A winter-June 2007-2008~~ habitat survey determined appropriate habitat ~~may be found~~does not exist on the BLN site for this plant ~~but not in the proposed construction area.~~

ATTACHMENTS:

None.

NRC Review of the BLN Environmental Report**NRC Information Needs - BLN ER Site Audit Exit Meeting****NRC Environmental Category: TERRESTRIAL ECOLOGY**

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

Were bat surveys conducted to determine presence/absence of Indiana bat spring/summer maternal roosts within BLN forested tracts? Roosting occurs under exfoliating bark and cracks in trees and BLN forests include tree species known for exfoliating bark (hickory). If surveys were not conducted, how was it determined that no spring/summer maternal roosts exist within forested stands of the BLN site?

BLN INFORMATION NEED: TE-12**BLN RESPONSE:**

A survey to identify Indiana bat habitat in the construction area of BLN property was conducted by TVA on June 11, 2008. Nine survey points were analyzed within and adjacent to the construction area. Of the nine points where the Habitat Suitability Index was applied, seven are considered poor-quality habitat and two were moderate-quality habitat. Overall, Indiana bat habitat in the construction area of the BLN site is of poor quality. The lack of a mature forest, high density of subcanopy vegetation, and the scarcity of suitable roost trees resulted in an overall low rating for this forest stand.

The June 2008 Indiana Bat Habitat Survey report (including maps and images of the areas surveyed) is made available for NRC review at NuStart's contractors' offices.

ASSOCIATED BLN COL APPLICATION REVISIONS:

Revise COLA Part 3, ER Chapter 2, Subsection 2.4.1.4.1, by inserting a paragraph at the end of the subsection and making additional minor edits, as follows:

Gray bat colonies are closely linked to caves or cave-like habitats. During summer, these bats are highly selective for caves providing specific temperature and roost conditions. ~~According to the DOE (Reference 3),~~ two known summer roosting sites for the gray bat, Blowing Wind Cave and Nitre Cave, occur within 9 mi. of the BLN (Reference 3-48). Gunter's Reservoir provides suitable foraging habitat for this species. Gray bats are known to travel more than 12 mi. from summer roost caves to reach optimal foraging areas (References 3 and 18). Therefore, gray bat sightings are expected to occur along the shoreline habitat on the BLN site.

Indiana bats are a species of bat that utilize limestone caves for winter hibernation. Summer records are very limited. Few species have been identified under bridges and in old buildings, and several maternity colonies have been found under loose bark and in the hollows of trees. Summer foraging by females and juveniles is limited to riparian and floodplain areas. Males forage over floodplain ridges and hillside forests, and usually roost in caves. ~~According to the DOE (Reference 3),~~ Indiana bats have been observed hibernating

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in caves within 9 mi. of the BLN (Reference 3). Therefore, there is potential for Indiana bats foraging along the forested riparian areas on the BLN site.

To TVA's knowledge, Indiana bats have never been captured in summer mist net surveys in Jackson County. Furthermore, a June 2008 survey for habitat suitable for maternal colonies in the construction area of the BLN site revealed mostly low-quality habitat for Indiana bats. It is, therefore, unlikely that Indiana bats utilize habitat present on the BLN site.

ATTACHMENTS:

None.