



United States Department of the Interior



FISH AND WILDLIFE SERVICE

New England Field Office
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REF: New England Clean Power Link Transmission Line Project
Alburgh to Ludlow, VT

December 1, 2015

Mr. Brian Mills
Office of Electricity Delivery and Energy Reliability
OE-20
U.S. Department of Energy
1000 Independence Avenue Southwest
Washington, DC 20585

Dear Mr. Mills:

This responds to your letter, dated October 14, 2015, requesting that we review your Biological Assessment (October 2015) for the proposed project (Project) referenced above, and concur with your determination that the Project may affect, but is not likely to adversely affect the federally endangered Indiana bat (*Myotis sodalis*) and the threatened northern long-eared bat (*Myotis septentrionalis*). Our office met with staff of Stantec and TDI New England on August 14, 2015, and September 9, 2015, to coordinate details for the analysis for the Project. Your request and our response are provided in accordance with the Endangered Species Act (87 Stat. 884, as amended: 16 U.S.C. 1531, *et seq.*).

The proposed Project includes the construction, operation, and maintenance of an approximately 154-mile-long, 1,000-megawatt, high-voltage electric power transmission system originating in the Canadian Province of Quebec and terminating at a proposed high voltage direct current converter station in Ludlow, Vermont. The Project includes a 97-mile-long aquatic segment through Lake Champlain and a 57-mile-long terrestrial segment that will be buried underground within existing roadway right-of-ways in Vermont. The purpose of the converter station is to convert the electrical power from direct current to alternating current and then connect to an existing substation.

The Project will require minimal tree clearing within the existing right-of-way and for the converter station. The total non-contiguous acreage of tree clearing is approximately 48 acres. Of the 48 acres to be cleared, approximately 37 acres will be temporarily cleared and 11 acres will be permanently cleared.

Indiana Bat

We concur with your determination that the Project is not likely to adversely affect the Indiana bat. According to the project description, potential roost trees identified during a 2014 field survey will not be cut. In the event that project changes are proposed that would impact potential Indiana bat roost trees, acoustic surveys, as described in Appendix A of the Biological Assessment, will be conducted. If *Myotis* calls are recorded, emergence surveys in accordance with the U.S. Fish and Wildlife Service's *2015 Range-Wide Indiana Bat Summer Survey Guidelines* (Survey Guidelines) will be conducted, and further consultation with this office would occur.

Northern Long-Eared Bat

Because bat acoustic surveys were not conducted in the project area, northern long-eared bats are assumed to be present. A field assessment was conducted in the summer of 2015 to identify potential summer roosting habitat and to determine the potential for long-term habitat loss on these areas.

Approximately 40 acres of non-contiguous potential summer roosting habitat along the 57-mile terrestrial segment of the Project were identified. For those areas that may provide habitat, tree clearing activities would occur between September 1 and April 14, when bats are not expected to be present. Alternatively, if clearing of potentially suitable habitat cannot occur during this time of year, acoustic presence/absence surveys in accordance with the Survey Guidelines will be conducted, and further consultation with this office would occur.

We concur with your determination that the Project is not likely to adversely affect northern long-eared bats because your proposed time-of-year schedule will avoid direct impacts to the species, and because you will conduct presence/absence surveys when adherence to the time-of-year restriction schedule is not possible.

Approximately 48 acres of forest surrounded by large forested blocks, dispersed over 57 miles of the terrestrial portion of the Project, will be cleared. Indirect effects to roosting habitat are not likely to occur because the limited amount of area proposed for tree removal will result in a small amount of forest clearing relative to the available habitat in the immediate surrounding area. Therefore, impacts to potential roosting habitat will be insignificant.

