



## **Information Request 28**

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## **IR 28 – Species at Risk**

### **References:**

EIS Guidelines, Sections 2.7.2.7 and 2.7.2.8  
EIS, Section 2.7.2.8

### **Related Comments:**

CEAR # 292 (Environment Canada)

### **Rationale:**

In Sections 2.7.2.7 and 2.7.2.8, the EIS Guidelines state that in conducting its environmental assessment, the Proponent shall pay particular attention in its EIS to species at risk and their habitats. Section 2.7.2.8 also states that it will include the identification and assessment of any changes to Schedule 1 of the SARA and their habitats and COSEWIC- listed species since the 2009/2010 review and postings of any recovery strategies.

In the EIS (Table 2.7.2.8, p. 1059), Taseko states that additional species at risk that have been designated since the previous assessment “were previously identified at the provincial level as being species at risk and were addressed within the March 2009 EIS/Application.”

This element of the Guidelines is relevant to the assessment of environmental effects of the Project because, although the Project would occur on provincial lands, the Panel needs to determine the effects on federally listed species as listed in subsections 79(1) and 79(2) of the *Species at Risk Act*.

Environment Canada stated that the status of several wildlife species has changed since the previous review and that it is not clear that these have been taken into account in the New Prosperity EIS. The list of wildlife species which has changed since the submission of the 2009 EIS, includes the following bird species:

- Lewis Woodpecker (*Melanerpes lewis*): up-listed from Special Concern to Threatened (Schedule 1)
- Barn Swallow (*Hirundo rustica*): Threatened (COSEWIC)
- Common Nighthawk (*Chordeiles minor*): Threatened (Schedule 1)
- Bobolink (*Dolichonyx oryzivorus*): Threatened (COSEWIC)
- Peregrine Falcon, spp anatum (*Falco peregrinus anatum*): down-listed from Threatened to Special Concern (Schedule 1)
- Olive-sided Flycatcher (*Contopus cooperi*): Threatened (Schedule 1)
- Rusty Blackbird (*Euphagus carolinus*): Special Concern (Schedule 1)
- Short-eared Owl (*Asio flammeus*): Special Concern (Schedule 1)

### **Information Requested:**

In order to appropriately determine the significance of environmental effects on all species at risk (including those newly designated), the Panel requests that Taseko:

- a. Provide a discussion on how disturbance of habitat for listed species under the *Species at Risk Act* was factored into the determination of significance.
- b. Clarify how species at risk have been assessed and provide an explanation of how listed species were treated differently from non-listed species in the assessment. Include a discussion about how recent changes to the status of species potentially impacted by the Project have been factored into the environmental assessment, taking into account the available species management information.
- c. Discuss any impact of new recovery strategies developed for American badger, Great Basin gopher snake, and the flammulated owl.

**Information Request #28a**

In order to appropriately determine the significance of environmental effects on all species at risk (including those newly designated), the Panel requests that Taseko:

Provide a discussion on how disturbance of habitat for listed species under the *Species at Risk Act* was factored into the determination of significance.

**Response Summary**

Potential disturbance of habitat for listed species under the *Species at Risk Act* was factored into the determination of significance in a variety of ways, depending on the species. Potential effects on habitat availability, resulting from direct habitat loss or alteration, and/or indirect loss or alteration from sensory disturbance and reduction of habitat patch size, were included as one of the potential environmental effects incorporated within the scope of the assessment. Habitat for some species was directly assessed, whereas for others was inferred from effects on surrogate key indicators. In the Discussion section of this IR, how disturbance of habitat was assessed for each listed species is summarized in table form.

**Discussion**

Potential effects on habitat availability, resulting from direct habitat loss or alteration, and/or indirect loss or alteration from sensory disturbance and reduction of habitat patch size, were included as one of the potential environmental effects incorporated within the scope of the assessment.

Potential effects on habitat availability were assessed for all species listed under the *Species at Risk Act* either directly by their selection as a key indicator, or, indirectly as are inferred from surrogate key indicators.

The general approach to assessing disturbance of habitat for SARA listed species was presented in the 2009 EIS/Application and 2012 EIS, and involved determining:

- If, and where, habitat disturbance was likely to occur as a result of the Project;
- Whether direct or indirect loss of suitable habitat may occur for each key indicator; and,
- Whether the loss of habitat was significant by comparing it to a prescribed threshold or standard, or, in the absence of a prescribed standard, determining significance qualitatively.

As illustrated, specific habitat assessments were conducted by a variety of methods, including both quantitative and qualitative means. Assessment methods were quantitative for key indicators for which there were prescribed thresholds or standards available (e.g., grizzly bears, see Section 2.7.2.8, 2012 EIS/Application) or, in the absence of prescribed thresholds or

standards, qualitative methods were used (e.g., amphibians, see Section 6.3.21.5, 2009 EIS/Application).

In addition to assessing the direct loss of habitat (e.g., the mine site footprint), the effect of sensory disturbance was also evaluated. A sensory disturbance buffer was applied around the maximum disturbance area (MDA) to delineate the mine site LSA. The buffer varies in width – from 800 m wide around the north end of the mine where high human use features such as the pit, camp and production facilities are located, to 400 m wide around areas with lower human use features are located such as the tailings pond. This buffer was incorporated into the assessment of effects on habitat suitability for each key indicator.

Table 28A-1 provides a summary of the approach used to assess project effects on habitat availability on each species potentially affected by the changes to the new mine site layout considered to have status as a Conservation Concern (as designated by the Committee on the Status of Endangered Wildlife in Canada - COSEWIC) and/or listed under the *Species at Risk Act (SARA)*. Table 28A-1 also, includes the relevant section reference in the 2009 EIS/Application and 2012 EIS/Application. Table 28A-2 provides a summary of the approach for those species assessed in 2009 which are not affected by the change in mine site layout as their habitat is associated with other project components that have not changed (e.g. transmission line).

**Table 28A-1. Summary of habitat availability assessments for species of conservation concern which are known or likely to occur in the mine site area of the Project**

Species at Risk (SARA Status)	Method of Assessment: Habitat Availability	Section Reference of EIS	
		2009 EIS/Application	2012 EIS/Application
Wolverine, <i>luscus</i> subspecies (not listed) COSEWIC: Special Concern (2003)	Inferable from effects assessment for grizzly bear	Section 6.3.4.4: Project Effect of Loss or Alteration of Grizzly Bear Habitat for all project components	Section 2.7.2.8: Loss or Alteration of Habitat  Section 2.7.2.8: Detailed Assessment of the Project Effect of Loss or Alteration of Grizzly Bear Habitat for the mine site RSA
Grizzly bear (not listed) COSEWIC: Special Concern (2002)	Quantitative Assessment of Significance  Quantitative Assessment of Effects	Section 6.3.4.4: Project Effect of Loss or Alteration of Grizzly Bear Habitat	Section 2.7.2.8: Loss or Alteration of Habitat  Section 2.7.2.8: Detailed Assessment of Loss or Alteration of Grizzly Bear Habitat for the mine site RSA
<sup>1</sup> Woodland caribou, northern ecotype (Schedule 1, 2005) COSEWIC: Threatened/Special Concern (2002)	Inferable from effects assessments for old forest and mule deer	Section 5.3.1: Old Forest; Section 6.3.2.4: Project Effect of Loss or Alteration of Mule Deer Habitat for all project components	Section 2.7.2.7: Old Forest  Section 2.7.2.8: Loss or Alteration of Habitat  Section 2.7.2.8: Detailed Assessment for Mule Deer Habitat for the mine site RSA
<sup>1</sup> Band-tailed pigeon (Schedule 1, 2011) Special Concern (2008)	Inferable from effects assessments for old forest, fisher natal denning habitat and Barrow's goldeneye nesting habitat	Section 5.3.1: Old Forest;  Section 6.3.6.4: Project Effect of Loss or Alteration of Fisher Habitat;  Section 6.3.11.4: Project Effect of Loss or Alteration of Barrow's Goldeneye Habitat for all project components	Section 2.7.2.7: Old Forest  Section 2.7.2.8: Loss or Alteration of Habitat  Section 2.7.2.8: Loss or Alteration of Habitat for Barrow's goldeneye habitat for the MDA
Short-eared owl (Schedule 1, 2012) COSEWIC: Special Concern (2008)	Qualitative Assessment of Significance  Quantitative Assessment of Effects	Section 6.3.19.4: Project Effect of Loss or Alteration of Short-eared Owl Habitat for all project components	Section 2.7.2.8: Loss or Alteration of Short-eared Owl Habitat of the MDA
Rusty blackbird (Schedule 1, 2009) COSEWIC: Special Concern (2006)	Inferable from effects assessments for wetlands and mallard breeding habitat (and detailed assessment for waterfowl)	Section 5.4.2: Wetland Ecosystems; Section 6.3.10.4: Project Effect of Loss or Alteration of Mallard Habitat for all project components	Section 2.7.2.7: Wetland Ecosystem  Section 2.7.2.8: Loss or Alteration of Habitat;  Section 2.7.2.8: Detailed Assessment for MDA
Amphibians	Qualitative Assessment of Significance  Quantitative Assessment of Effects	Section 6.3.21.4: Project Effect of Loss or Alteration of Amphibian Habitat for all project components	Section 2.7.2.8: Loss or Alteration of Habitat for MDA
Western toad (Schedule 1, 2005) COSEWIC: Special Concern (2002)	Inferable from effects assessment for amphibians	Section 6.3.21.4: Project Effect of Loss or Alteration of Amphibian Habitat for all project components	Section 2.7.2.8: Loss or Alteration of Habitat for MDA

<sup>1</sup> Note: Species is considered to have a low likelihood of interaction with the Project (see 2009 EIS, Volume 5, Section 6).

Species at Risk (SARA Status)	Method of Assessment: Habitat Availability	Section Reference of EIS	
		2009 EIS/Application	2012 EIS/Application
<sup>1</sup> Western painted turtle (Schedule 1, 2007) COSEWIC: Special Concern (2006)	Inferable from effects assessments for wetlands and mallard breeding habitat (and detailed assessment for waterfowl)	Section 5.3.2: Wetland Ecosystems; Section 6.3.10.4: Project Effect of Loss or Alteration of Mallard Habitat for all project components	Section 2.7.2.7: Wetland Ecosystem Section 2.7.2.8: Loss or Alteration of Habitat; Section 2.7.2.7: Detailed Assessment for MDA

**Table 28A-2. Summary of habitat availability assessments for species of conservation concern which are not likely to occur in the mine site area but in other Project components**

Species at Risk (SARA Status)	Method of Assessment: Habitat Availability	Section Reference of 2009 EIS/ Application
American badger, <i>jeffersonii</i> subspecies (Schedule 1, 2003) COSEWIC: Endangered (2012)	Qualitative Assessment of Significance Qualitative Assessment of Effects	Section 6.3.7.4 Project Effect of Loss or Alteration of American Badger Habitat for all project components
Townsend's big-eared bat (not listed) COSEWIC: Not listed  Species is not currently included under SARA, though provided here for reference to other species (listed under SARA) for which potential effects of habitat availability are inferred	Qualitative Assessment of Significance Quantitative Assessment of Effects	Section 6.3.8.4: Project Effect of Loss or Alteration of Townsend's Big-Eared Bat Habitat for all project components
Fringed myotis COSEWIC: Data Deficient (2004)	Inferable from effects assessment for Townsend's big-eared bat	Section 6.3.8.4: Project Effect of Loss or Alteration of Townsend's Big-Eared Bat Habitat for all Project Components
Spotted bat (Schedule 1, 2005) Special Concern (2004)	Qualitative assessment of Significance Qualitative assessment of effects	Section 6.3.24.1: Project Effect of Loss or Alteration of spotted bat Habitat for all project components
Peregrine falcon <i>anatum</i> subspecies (Schedule 1, 2003) Special Concern (2007)	Inferable from effects assessment for prairie falcon	Section 6.3.18.4: Project Effect of Loss or Alteration of Prairie Falcon Habitat for all project components
Long-billed curlew (Schedule 1, 2003) Special Concern (2011)	Qualitative Assessment of Significance Quantitative Assessment of Effects	Section 6.3.13.4: Project Effect of Loss or Alteration of Long-billed Curlew Habitat for all project components
Flammulated owl (Schedule 1, 2003) COSEWIC: Special Concern (2010)	Qualitative Assessment of Significance Qualitative Assessment of Effects	Section 6.3.20.4: Project Effect of Loss or Alteration of Flammulated Owl Habitat for all project components
Burrowing owl (Schedule 1, 2003) COSEWIC: Endangered (2006)	Inferable from effects assessments for badger and long-billed curlew	Section 6.3.7.4: Project Effect of Loss or Alteration of American Badger Habitat; Section 6.3.13.4: Project Effect of Loss or Alteration of Long-billed Curlew Habitat for all project components
Common nighthawk (Schedule 1, 2003) COSEWIC: Threatened (2007)	Inferable from effects assessment for grasslands and long-billed curlew	Section 5.3.4: Grassland Ecosystems: Section 6.3.13.4: Project Effect of Loss or Alteration of Long-billed Curlew Habitat for all project components
Lewis's woodpecker (Schedule 1, 2012) COSEWIC: Threatened	Qualitative Assessment of Significance	Section 6.3.14.4: Project Effect of Loss or Alteration of Woodpecker Habitat



Species at Risk (SARA Status)	Method of Assessment: Habitat Availability	Section Reference of 2009 EIS/ Application
(2010)	Quantitative Assessment of Effects	
Olive-sided flycatcher (Schedule 1, 2010) COSEWIC: Threatened (2007)	Inferable from effects assessment for old forest and summer roost habitat for Townsend's big-eared bat	Section 5.3.1: Old Forest; Section 6.3.8.3: Project Effect of Loss or Alteration of Townsend's Big-eared Bat Habitat for all project components
Barn swallow COSEWIC: Threatened (2011)	This species uses open areas with human-made structures (e.g., bridges, buildings), thus habitat loss is not considered a concern with regards to the Project.	Section 6.1.3.1: Selection of Key Indicators, Table 6-4
Yellow-breasted chat (Schedule 1, 2003) COSEWIC: Endangered (2011)	Qualitative Assessment of Significance  Quantitative Assessment of Effects	Section 6.3.15.4: Project Effect of Loss or Alteration of Yellow-breasted Chat Habitat for all project components
Bobolink COSEWIC: Threatened (2010)	Inferable from effects assessments for grasslands and long-billed curlew	Section 5.3.4: Grassland Ecosystems; Section 6.3.13.4: Project Effect of Loss or Alteration of Long-billed Curlew Habitat for all project components
Great Basin Spadefoot toad (Schedule 1, 2003) COSEWIC: Threatened (2007)	Inferable from effects assessment for amphibians	Section 6.3.21.4: Project Effect of Loss or Alteration of Amphibian Habitat for all project components
Gopher snake, <i>deserticola</i> subspecies (Schedule 1, 2005) COSEWIC: Threatened (2002)	Qualitative assessment of Significance  Qualitative assessment of Effects	Section 6.3.22.1: Great Basin Spadefoot Snake for all project components
North American racer (Schedule 1, 2006) COSEWIC: Special Concern (2004)	Inferable from effects assessment for grasslands	Section 5.3.4: Grassland Ecosystems
Northern rubber boa (Schedule 1, 2005) COSEWIC: Special Concern (2003);	Inferable from effects assessments for grasslands and dry forest KIs (e.g., Lewis's woodpecker)	Section 5.3.4: Grassland Ecosystems; Section 6.3.14: Project Effect of Loss or Alteration of Woodpecker Habitat

**Information Request #28b**

In order to appropriately determine the significance of environmental effects on all species at risk (including those newly designated), the Panel requests that Taseko:

Clarify how species at risk have been assessed and provide an explanation of how listed species were treated differently from non-listed species in the assessment. Include a discussion about how recent changes to the status of species potentially impacted by the Project have been factored into the environmental assessment, taking into account the available species management information.

**Response Summary**

How species at risk were assessed varies by species and is described for each species in Tables 28A-1 and 28A-2.

The conservation status of species was a consideration in the selection of key indicators to ensure the species at risk was sufficiently assessed, either directly or through alternative key indicators (KIs). IR 28a outlines the general approach for assessing all KIs, whether they were listed species or non-listed species.

The conservation status was a consideration in developing mitigation measures to ensure avoidance or minimization of effects on these species habitats. Mitigation measures for listed species take into consideration regulatory management information available. Relative to non-listed species, additional mitigation measures have been committed to for avoiding or minimizing effects. Detail by species is tabulated in Table 28B-3.

**Discussion**

In addition to general mitigation measures for minimizing effects on non-listed wildlife and their habitat (Section 2.7.2.7 and 2.7.2.8 of the 2012 EIS; Volume 5, Section 6.4.1 and Table 6-67 (Mine), 6-68 (Transmission Line), and 6-69 (Access road) of the 2009 EIS/Application), and specific mitigation measures for rare plants and communities of conservation concern (see response to IR 34), additional measures have been committed to for avoiding or minimizing effects on species at risk, and informing a prediction of non-significance of potential effects of the Project on species at risk. Examples of specific measures from available species management information are:

- a. Field surveys will be conducted to inform the final alignment of the transmission line to protect residences of species at risk (e.g., American Badger denning sites).
- b. Pre-clearance surveys will be conducted for avoidance of occupied nests or dens (e.g. nest surveys for Common nighthawk).

- c. Disturbance will be avoided or minimized by considering sensitive windows in the construction schedule (e.g. potential nest sites during the breeding season for Lewis's Woodpeckers).

Taseko adopted the conservative approach of evaluating potential Project effects on species of conservation concern whether recognized by the Provincial and/or the Federal government. While the conservation status changed at the federal level for eight species at risk, these same species had been previously listed provincially and were already considered in both the 2009 EIS/Application and EIS/Application, (see Table 28B-1).

Supplemental to the mitigation measures, the Habitat Compensation Plan (HCP) includes habitat compensation conservation for species at risk such as Western toad (see response to IR 32).

**Table 28B-1. Summary of species at risk with recent status changes known or likely to occur in the Project area and available management information (as of January 2013)**

Species (SARA Status)	Reference		Regulatory Management Information	Mitigation Measures using regulatory management information
	2009 EIS/Application	2012 EIS/Application		
American badger, <i>jeffersonii</i> subspecies (Endangered, Schedule 1 – 2003)	Section 6.3.7.4: Project Effect of Loss or Alteration of American Badger Habitat	Section 2.7.2.8: Key Changes and Issues (Table 2.7.2.8-4)	Recovery Strategy for the Badger ( <i>Taxidea taxus</i> ) in British Columbia (BC Ministry of Environment, 2008)	The recovery strategy indicates the importance of reducing the effects of road mortality. Therefore, while no new roads are proposed for transmission line construction, should any road or trail for construction be required, in areas with the potential for American badger will examine the use of ‘badger-friendly culvert’ crossings.  In addition, surveys for American badger dens will be conducted to ensure avoidance during the transmission line final alignment and planning pole placement.
Band-tailed pigeon (Special Concern, Schedule 1 – 2011)	Section 5.3.1: Old Forest; Section 6.3.6.4: Project Effect of Loss or Alteration of Fisher Habitat;  Section 6.3.11.4: Project Effect of Loss or Alteration of Barrow’s Goldeneye Habitat	Section 2.7.2.7: Old Forest;  Section 2.7.2.8: Loss or Alteration of Habitat;  Section 2.7.2.8: Loss or Alteration of Habitat	None available	No species-specific mitigation, standard measures apply (e.g., pre-construction nest surveys to ensure avoidance during nest occupation)
Short-eared owl (Special Concern, Schedule 1 – 2012)	Section 6.3.19.4: Project Effect of Loss or Alteration of Short-eared Owl Habitat	Section 2.7.2.8: Loss or Alteration of Habitat	None available	No species-specific mitigation, standard measures apply (e.g., pre-construction nest surveys to ensure avoidance during nest occupation). Best Management Practices (BMPs) for raptors will apply.
Common nighthawk (Threatened, Schedule 1 – 2010)	Section 5.3.4: Grassland Ecosystems; Section 6.3.13.4: Project Effect of Loss or Alteration of Long-billed Curlew Habitat	Section 2.7.2.7: Grassland Ecosystems;  Section 2.7.2.8: Loss or Alteration of Habitat (Table 2.7.2.8-4)	None available	No species-specific mitigation, standard measures apply (e.g., pre-construction nest surveys to ensure avoidance during nest occupation)
Lewis’s woodpecker (Threatened, Schedule 1 – 2012)	Section 6.3.14.4: Project Effect of Loss or Alteration of Woodpecker Habitat	Section 2.7.2.8: Loss or Alteration of Habitat (Table 2.7.2.8-4)	Management Plan for the Lewis’s Woodpecker ( <i>Melanerpes lewis</i> ) in Canada (Environment Canada, 2011)	Management plans confirm the importance of retaining breeding habitat including suitable nesting trees within matrix landscape that includes mature forest, grasslands and low shrub densities for insect foraging. Pre-construction surveys will be conducted and potential/suitable nest trees within the transmission line ROW (i.e., early seral stage vegetation with nesting trees which mimics stand replacing fires) will be considered during final alignment. Disturbance around potential nest sites will be avoided or minimized during the breeding season (May- August); this window will be factored into the construction management plan for the transmission line.

Species (SARA Status)	Reference		Regulatory Management Information	Mitigation Measures using regulatory management information
	2009 EIS/Application	2012 EIS/Application		
Olive-sided flycatcher (Threatened, Schedule 1 – 2010)	Section 5.3.1: Old Forest; Section 6.3.8.3:	Section 2.7.2.7 Old Forest; Loss or Alteration of Habitat (Table 2.7.2.8-4)	None available	No species specific mitigation, standard measures apply (e.g., pre-construction nest surveys)
Barn swallow (not listed)	Section 6.1.3.1: Selection of Key Indicators (Table 6-4)	Not assessed further.	None available	No species specific mitigation, standard measures apply (e.g., pre-construction nest surveys to ensure avoidance during nest occupation)
Bobolink (not listed)	Section 5.3.4: Grassland Ecosystems; Section 6.3.13.4: Project Effect of Loss or Alteration of Long-billed Curlew Habitat	Section 2.7.2.7: Grassland Ecosystems; Section 2.7.2.8: Loss or Alteration of Habitat (Table 2.7.2.8-4)	None available	No species specific mitigation, standard measures apply (e.g., pre-construction nest surveys to ensure avoidance during nest occupation)

**Information Request #28c**

In order to appropriately determine the significance of environmental effects on all species at risk (including those newly designated), the Panel requests that Taseko:

Discuss any impact of new recovery strategies developed for American badger, Great Basin gopher snake, and the flammulated owl.

**Response Summary**

Taseko's commitments related to the minimization of potential effects of the Project on American Badger, Great Basin gopher snake and flammulated owl are consistent with new and existing recovery strategies. A discussion by species is provided in the Discussion section below. Taseko intends to remain current on management plans and recovery strategies on Species at Risk potentially affected by the Project and will engage with federal and provincial regulators on any new measures and/or best practices that may be applicable during permitting.

**Discussion**

Taseko considers its commitments related to the minimization of potential effects of the Project to be consistent with new and existing recovery strategies for the American Badger, Great Basin gopher snake and flammulated owl. Species-specific mitigations include:

**American Badger** - The only potential effect from the project identified is changes to habitat availability within the transmission line right-of-way (see Section 6.3.7, 2009 EIS/Application). During on-ground assessments for finalizing the alignment and selection pole placement sites, observed and potential den sites will be considered to ensure avoidance. Effects on small mammals, which serve as prey, will be mitigated by measures directed at minimizing or eliminating effects on wildlife in general, such as minimizing site clearing area, minimizing construction of any new roads to access the transmission line by utilizing existing access, no road construction in the grasslands, and conducting preconstruction surveys in order to avoid sensitive wildlife habitat features (see Section 6.4.1, 2009 EIS/Application). In addition, should construction of any roads or trails be required in areas of potential for the presence of American badger, badger-friendly culvert crossings will be utilized for crossings.

**Great Basin gopher snake** –The potential effect of the Project on this species is damage to den sites during the construction of the transmission line (see Section 6.3.22.1, 2009 EIS/Application). During final alignment and determination of pole placement sites, potential den sites such as rock outcrops or old badger dens and these will be avoided. Effects on small mammals, which serve as prey, will be mitigated by measures directed at minimizing or eliminating effects on wildlife in general such as minimizing site clearing

areas and avoiding, if possible, wildlife habitat features (see Section 6.4.1, 2009 EIS/Application).

**Flammulated owl** - The only potential effect identified on flammulated owl is change to habitat availability within the transmission line Right of Way (Section 6.3.20, 2009 EIS/Application). Moderate and highly suitable nesting habitat will be identified during final alignment planning and avoided where possible, specifically through site-specific routing near Meason Creek (Section 6.3.20.4, 2009 EIS/Application). Effects on small mammals and invertebrates, which serve as prey, will be mitigated by measures directed at minimizing or eliminating effects on wildlife in general such as minimizing site clearing areas and avoiding, if possible, wildlife habitat features (see Section 6.4.1, 2009 EIS/Application).