



United States Department of the Interior

FISH AND WILDLIFE SERVICE

176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407



December 17, 2014

Mr. William A. Mullins
Baker and Miller PLLC
2401 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20037

Re: STB Docket AB-490 (Sub-No. 2X), Railroad Abandonment, Greenville, County,
South Carolina, FWS Log No. 2015-TA-0120

Dear Mr. Mullins:

On December 11, 2014, the South Carolina Ecological Services Field Office of the U.S. Fish and Wildlife Service (Service) received your letter dated November 13, 2014, regarding the above-referenced project. Your letter was forwarded to our office for review from the Service's Regional Office in Atlanta, Georgia. As indicated in your letter, the Greenville County Economic Development Corporation expects to file a notice of exemption with the Surface Transportation Board for the abandonment of 3.29 miles of rail line in Greenville, South Carolina. Included with your letter is an Environmental and Historic Report (E&HR), for the project and are you seeking our review and comment for consideration by the U.S. Department of Transportation-Surface Transportation Board.

The information provided does not describe how the tracks will be physically removed from the abandoned right of way. The Service is unclear on whether the existing rail line right of way will be used to access the abandoned tracks or will multiple new access points along the route be needed to facilitate track removal. If new access points are needed, impacts to natural resources must be considered in the E&HR. The existing railroad parallels Laurel Creek and its adjacent palustrine forested wetlands. Removal of tracks and railroad bridges may increase sedimentation into Laurel Creek if no appropriate management practices are implemented. We recommend that you contact the U.S. Army Corps of Engineers, Charleston District for information and guidance regarding potential wetland impacts and permitting requirements.

The Service's database indicates that no National Parks or National Wildlife Refuges are present along the route. Federally designated critical habitat is not found with the project corridor, however several federally protected threatened and endangered (T&E) species do occur within Greenville County. Greenville County is known to harbor multiple federally protected plants

including the dwarf flowered heartleaf (*Hexastylis naniflora*) and the bunched arrowhead (*Sagittaria fasciculata*). Suitable habitat for these and other T&E species may occur on or adjacent to the railroad right of way. Please find enclosed a list of T&E species that are known to occur within the county. The Service recommends a survey for each of these species be conducted along the corridor, including the adjacent Laurel Creek, during the appropriate survey window for each species. A list of the appropriate survey windows for T&E plants and animals is also enclosed. We further recommend you contact the South Carolina Department of Natural Resources regarding State protected lands.

Additional information regarding the potential presence of T&E species or designated critical habitat may be found using the Service's Information Planning and Conversation Web-based mapping tool: <http://ecos.fws.gov/ipac/>. At this site, you will find an interactive mapping tool designed to allow users to generate their own list of T&E species and critical habitat that may be in the project area. For future projects, the Service recommends you visit this Web site and follow the mapping instructions to obtain the information.

The Service has included a list of species that have been petitioned for listing under the Endangered Species Act as well as Candidate Species. These species are collectively referred to as "At-Risk Species" (ARS). We have included a list of the ARS that may occur in Greenville County, South Carolina. Although there are no Federal protections afforded to ARS, please consider including them in your evaluation of this project. Incorporating proactive measures to avoid or minimize harm to ARS may improve their status and assist with precluding the need to list these species in the future. Additional information on ARS can be found at:

<http://www.fws.gov/southeast/candidateconservation>

One notable ARS is the Northern long-eared bat (*Myotis septentrionalis*) (NLEB). Greenville County is within the known range of the NLEB and it may be found roosting or foraging within tree lined corridors similar to that found in your project area. During the summer, NLEBs typically roost singly or in colonies in cavities, underneath bark, crevices, or hollows of both live and dead trees and/or snags. It has also been occasionally found roosting in structures like barns, bridges, and sheds. During the winter, NLEBs predominately hibernate in caves and abandoned mine portals. Additional habitat types may be identified as new information is obtained.

If you have any questions, please contact Mr. Mark Caldwell at (843) 727-4707, ext. 215 and reference FWS Log No. 2015-TA-0120.

Sincerely,


Thomas D. McCoy
Acting Field Supervisor

TDM/MAC

South Carolina List of At-Risk, Candidate, Endangered, and Threatened Species - Greenville County

- * Contact National Marine Fisheries Service (NMFS) for more information on this species
- ** The U.S. Fish and Wildlife Service (FWS) and NMFS share jurisdiction of this species
- ARS At-Risk Species - Species that the FWS has been petitioned to list and for which a positive 90-day finding has been issued (listing may be warranted); information is provided only for conservation actions as no Federal protections currently exist.
- BGEPA Federally protected under the Bald and Golden Eagle Protection Act
- C FWS or NMFS has on file sufficient information on biological vulnerability and threat(s) to support proposals to list these species
- CH Critical Habitat
- E Federally Endangered
- P or P - CH Proposed for listing or critical habitat in the Federal Register
- S/A Federally protected due to similarity of appearance to a listed species
- T Federally Threatened

COUNTY	CATEGORY	COMMON NAME	SCIENTIFIC NAME	STATUS
Greenville	Amphibian	Green salamander	<i>Aneides aeneus</i>	ARS
	Bird	None Found		
	Crustacean	Broad River Spiny crafish	<i>Cambarus spicatus</i>	ARS
	Crustacean	Mimic crayfish	<i>Distocambarus carlsoni</i>	ARS
	Fish	American eel	<i>Anguilla rostrata</i>	ARS
	Insect	None Found		
	Mammal	Eastern small-footed bat	<i>Myotis leibii</i>	ARS
	Mammal	Northern long-eared bat	<i>Myotis septentrionalis</i>	ARS
	Mollusk	None Found		
	Plant	Bunched arrowhead	<i>Sagittaria fasciculata</i>	E
	Plant	Carolina hemlock	<i>Tsuga caroliniana</i>	ARS
	Plant	Dwarf-flowered heartleaf	<i>Hexastylis naniflora</i>	T
	Plant	Mountain sweet pitcher plant	<i>Sarracenia rubra ssp. jonesii</i>	E
	Plant	Purple pitcher plant	<i>Sarracenia purpurea var. montana</i>	ARS
	Plant	Rock gnome lichen	<i>Gymnoderma lineare</i>	E
	Plant	Small whorled pogonia	<i>Isotria medeoloides</i>	T
	Plant	Sun-facing coneflower	<i>Rudbeckia heliopsidis</i>	ARS
	Plant	Swamp pink	<i>Helonias bullata</i>	T
	Plant	White fringeless orchid	<i>Platanthera integrilabia</i>	C
	Plant	White irisette	<i>Sisyrinchium dichotomum</i>	E
	Reptile	Bog turtle	<i>Clemmys muhlenbergii</i>	S/A, T

These lists should be used only as a guideline, not as the final authority. The lists include known occurrences and areas where the species has a high possibility of occurring. Records are updated as deemed necessary and may differ from earlier lists.

For a list of State endangered, threatened, and species of concern, please visit <https://www.dnr.sc.gov/species/index.html>.

OCCURANCES OF FEDERALLY THREATENED, ENDANGERED, AND CANDIDATE ANIMAL SPECIES IN SOUTH CAROLINA

SCIENTIFIC NAME	COMMON NAME	STATUS	TIME PERIOD	COMMENTS
<i>Acipenser brevirostrum</i>	Shortnose sturgeon*	E	February 1 – April 30	Spawning migration
<i>Acipenser oxyrinchus</i>	Atlantic sturgeon*	E	February 1 – April 30	Spawning migration
<i>Ambystoma cingulatum</i>	Frosted flatwoods salamander	T, CH	January 1 – April 30	Larvae present in breeding ponds
<i>Balaena glacialis</i>	Right whale*	E	November 1 – April 30	Off the coast
<i>Balaenoptera physalus</i>	Finback whale*	E	November 1 – April 30	Off the coast
<i>Calidris canutus rufa</i>	Red knot	C	August 1 – May 31	Migration and wintering
<i>Caretta caretta</i>	Loggerhead sea turtle**	T	May 1 – October 31	Nesting and hatching
<i>Charadrius melodus</i>	Piping plover	T, CH	July 15 – May 1	Migration and wintering
<i>Chelonia mydas</i>	Green sea turtle**	T	May 1 – October 31	Nesting and hatching
<i>Clemmys muhlenbergii</i>	Bog turtle	T, S/A	April 15 – September 15	Active period
<i>Gopherus polyphemus</i>	Gopher tortoise	C	April 1 – October 31	Active period
<i>Dermochelys coriacea</i>	Leatherback sea turtle**	E	May 1 – October 31	Nesting and hatching
<i>Haliaeetus leucocephalus</i>	Bald eagle	BGEPA	October 1 – May 15	Nesting season
<i>Lasmigona decorada</i>	Carolina heelsplitter	E, CH	March 1 – September 30	Optimal survey window
<i>Lepidochelys kempii</i>	Kemp's ridley sea turtle**	E	May 1 – October 31	In coastal waters
<i>Megaptera novaengliae</i>	Humpback whale*	E	January 1 – March 31	Migration off the coast
<i>Mycteria americana</i>	Wood stork	E	February 15 – September 1	Nesting season
<i>Picoides borealis</i>	Red-cockaded woodpecker	E	April 1 – July 31	Nesting season
<i>Trichechus manatus</i>	West Indian manatee	E	May 15 – October 15	In coastal waters
<i>Vermivora bachmanii</i>	Bachman's warbler	E	May 1 – June 15	Breeding

- E Federally endangered
- T Federally threatened
- P Proposed in the Federal Register
- CH Critical Habitat
- C The U.S. Fish and Wildlife Service or the National Marine Fisheries Service has on file sufficient information on biological vulnerability and threat(s) to support proposals to list these species
- S/A Federally protected due to similarity of appearance to a listed species
- * Contact the National Marine Fisheries Service for more information on this species
- ** The U.S. Fish and Wildlife Service and the National Marine Fisheries Service share jurisdiction of this species
- BGEPA Federally protected under the Bald and Golden Eagle Protection Act

For additional information about these species, please visit the U.S. Fish and Wildlife Service web page at <http://endangered.fws.gov>.

**OPTIMAL SURVEY WINDOWS FOR SOUTH CAROLINA'S
FEDERALLY THREATENED, ENDANGERED, AND CANDIDATE PLANT SPECIES**

SCIENTIFIC NAME	COMMON NAME	STATUS	SURVEY WINDOW
<i>Amaranthus pumilus</i>	Seabeach amaranth	T	July–October
<i>Amphianthus pusillus</i>	Little amphianthus or Pool sprite	T	late March–April
<i>Aster georgianus</i>	Georgia aster	C	early October–mid November
<i>Echinacea laevigata</i>	Smooth coneflower	E	late May–October
<i>Gymnoderma lineare</i>	Rock gnome lichen	E	year round
<i>Helianthus schweinitzii</i>	Schweinitz's sunflower	E	late August–October
<i>Helonias bullata</i>	Swamp pink	T	April–May
<i>Hexastylis naniflora</i>	Dwarf-flowered heartleaf	T	March–May
<i>Isoetes melanospora</i>	Black spored quillwort	E	May–October
<i>Isotria medeoloides</i>	Small whorled pogonia	T	mid May–early July
<i>Lindera melissifolia</i>	Pondberry	E	February–March
<i>Lysimachia asperulaefolia</i>	Rough-leaved loosestrife	E	mid May–June
<i>Oxypolis canbyi</i>	Canby's dropwort	E	mid August–September
<i>Narthecium americanum</i>	Bog asphodel	C	June–July
<i>Platanthera integrilabia</i>	White fringeless orchid	C	late July–October
<i>Ptilimnium nodosum</i>	Harperella	E	July–October in periods of low water
<i>Rhus michauxii</i>	Michaux's sumac	E	May–October
<i>Ribes echinellum</i>	Miccosukee gooseberry	T	November–July
<i>Sagittaria fasciculata</i>	Bunched arrowhead	E	mid May–July
<i>Sarracenia rubra ssp. jonesii</i>	Mountain sweet pitcher-plant	E	April–October
<i>Schwalbea americana</i>	American chaffseed	E	May–August (1–2 months after a fire)
<i>Sisyrinchium dichotomum</i>	White irisette or Reflexed blue eyed grass	E	late May–July
<i>Trillium persistens</i>	Persistent trillium	E	early March–mid April
<i>Trillium reliquum</i>	Relict trillium	E	mid March–April
These recommended survey windows were determined from species recovery plans and field observations. For additional information about these species, please visit the U.S. Fish and Wildlife Service web page at http://endangered.fws.gov .			

STATUS KEY:

- E Federally endangered
- T Federally threatened
- C The U.S. Fish and Wildlife Service or the National Marine Fisheries Service has on file sufficient information on biological vulnerability and threat(s) to support proposals to list these species