



**ATSI**  
Aqua-Terr Systems, Inc.

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10 March 2014

Brock Applegate  
Major Projects Mitigation Biologist  
Washington Department of Fish and Wildlife (WDFW)  
16018 Mill Creek Blvd.  
Mill Creek, WA 98012-1541

RE: Supplemental Information to the Vegetation Habitat, Rare Plants and Wildlife Study Report for Black Canyon Hydro, LLC (BCH) FERC Project No. P-14110 King County, WA; Townsend's Big-Eared Bat

Dear Mr. Applegate,

We understand there is a concern regarding the possible presence of Townsend's Big-Eared Bat or said bat habitat within the above referenced project area. Between March and July 2013, ATSI staff completed 16 site reconnaissance's of the Direct Impact Sites to review for all species and habitats. Based on our observations, we have the following comments regarding said bat.

Maternity and hibernation colonies of Townsend's Big-Eared Bat typically are in caves and mine tunnels. They prefer relatively cold places for hibernation, often near entrances and in well-ventilated areas. They do not use crevices or cracks; they hang from the ceiling, generally near the zone of total darkness. Night roosts include caves, buildings, and tree cavities. Throughout much of the known range, they commonly occur in mesic habitats characterized by coniferous and deciduous forests, but they occupy a broad range of habitats. In Washington, they can be found in limestone caves, lava tubes, and human-made structures in coastal lowlands, cultivated valleys, and nearby hills covered with mixed vegetation. On the West Coast, they are found regularly in forested regions and buildings, and in areas with a mosaic of woodland, grassland, and/or shrubland. Generally, they are uncommon in prairies and extreme desert. They are able to fly through narrow passages. Females gather in small nursery colonies in the warm parts of caves or mines, sometimes in buildings (western United States). Individuals generally return to the same maternity roost in successive years.

Said referenced habitat was not observed within the Direct Impact Sites and although bats were documented during the 5 May 2013 crepuscular survey at Alternatives A and B, approximately 10 to 20 feeding above the clear cut access road at dusk, there is no way to determine if they were Townsend's Big-Eared. Because the bats observed were not identified to species, it is assumed that they are not Townsend's Big-Eared because their habitat was not observed. Specifically, as the Townsend's Big-Eared Bat and its roosting habitat were not observed within or adjacent to the Direct Impact Sites, it is our best professional judgment that further investigation by means of surveys is not necessary. Regarding bats in general, it is apparent that they are tolerant of the existing land uses within the vicinity, i.e. logging, as they were present during our study.

Please contact ATSI with questions or additional information requests.

Respectfully,



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Jim Wiggins, MS, PWS  
ATSI President/Senior Biologist



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Karla Van Leaven, BS, PWS  
ATSI Associate Biologist

**Copy To**  
Chris Spens and Alex Grant (BCH)