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To: "LarryEvans@bcpeabody.com"; "daniel_paganrosa@yahoo.com"
Cc: FOIA Exemption (b)(6) SAJ
Subject: Fw: short list of listed plants by area
Date: Friday, June 10, 2011 9:57:17 AM

Per conversation

FOIA Exemption (b)(6)

Chief, North Permits Branch

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Cc: Edwin_Muniz@fws.gov <Edwin_Muniz@fws.gov>; Rafael_Gonzalez@fws.gov <Rafael_Gonzalez@fws.gov>; Omar_Monsegur@fws.gov <Omar_Monsegur@fws.gov>
Sent: Fri Jun 10 08:42:10 2011
Subject: short list of listed plants by area

Dear FOIA Exemption (b)(6) and FOIA Exemption (b)(6)

As we discussed in our meeting of June 8, 2011, we have prepared the following short list of plants that should be discussed in the BA. It is important to mention that this list is prepared based on the Service observations in the field and the information that was discussed in the May 16, 2011 and June 2, 2011. The Service has not received yet any written information regarding the proposed changes to the project ROW nor the shapefiles georeferencing the boundaries of the ROW. We have also requested that all information regarding the survey transect be overlaid over the ROW to better evaluate the level of efforts surveying the entire ROW for plants. This is very important since listed plants are rare, most of the time we find solitary individuals, difficult to identify and have patchy distribution. Without intensive surveys it may be possible that not-detected individuals may be affected during construction.

Dry limestone hills from Guayanilla to Ponce (Peñuelas Area):

- 1) *Ottoschulzia rhodoxylon*
- 2) *Trichilia triacantha*
- 3) *Buxus valhii*
- 4) *Eugenia woodburyana*
- 5) *Catesbaea melanocarpa*
- 6) *Cordia rupicola*

Central Adjuntas and Peñuelas (*Cyathea* was included as the area of Cerrote was the type locality for the species):

- 1) *Juglans jamaicensis*

2) *Polystichum calderoense*

3) *Cyathea dryopteroides* - Area of Cerrote is the type locality for this species. Type locality means that it is the area from where the species was described.

Rio Abajo . The applicant has mentioned that the limestone hills and forested habitat present at the base of the hill will not be affected, but the Service has not received the modified ROW demonstrating the proposed changes to avoid these areas. As we mentioned during the last two meetings, if the ROW is moved outside the hills and forested habitat adjacent to the hills, effects to these species are not anticipated.

1) *Cordia bellonis*

2) *Ottoschulzia rhodoxylon*

3) *Daphnopsis helleriana*

4) *Solanum drymophilum*

5) *Pleodendron macranthum*

6) *Tectarea estremerana*

Northern limestone Karst (from Manati to Vega Baja area): This list is conservative since we have not seen the shapefile with the information of the final ROW nor the georeferenced information of the transects that were conducted to surveys the ROW. Based on the site visits we conducted, we observed suitable habitat for these species in the areas.

1) *Ottoschulzia rhodoxylon*

2) *Buxus vahlii*

3) *Banara vanderbiltii*

4) *Cordia bellonis*

5) *Daphnopsis helleriana*

6) *Solanum drymophilum*

7) *Myrcia paganii*

8) *Shoepfia arenaria*

9) *Tectarea estremerana*

10) *Auerodendron pauciflorum*

11) *Zanthoxylum thomasianum*

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There are three constants in life...change, choice and principles.
Stephen R. Covey