

Amendment – Incorporating IPaC into the CPG MSHCP BO for Non-MSHCP species

The Service’s Information for Planning and Consultation (IPaC) system currently reflects the best available scientific information on the location of listed species. IPaC is updated regularly with new species location information. Therefore, CPG should use IPaC as the primary source of location-based species information when determining effects and if AMMs and BMPs apply, superseding any location-based species information currently described in the BO, in accordance with the framework described below.

CPG will use IPaC to generate an Official Species List (OSL) for all MSHCP projects that do not fall under the “small project” designation as defined in the MSHCP (Section 5.2.2).

- Non-MSHCP¹ species not on the OSL:
 - The OSL supersedes any geographic descriptions in the BO, no additional AMMs or BMPs would need to be applied, and no further coordination is necessary.
- Non-MSHCP NE species on the OSL²:
 - Additional consultation with the Field Office is necessary. To complete this, CPG should first utilize any applicable Dkey that is available.
- Non-MSHCP NLAA species on the OSL:
 - CPG shall apply all AMMs and BMPs as described in the BO, including any measures tied to specific locations or populations (e.g., HDD and avoidance of all stream impacts to the Duck River for pygmy madtom; avoidance of activities at Camp OtyOkwa for small whorled pogonia).
- Non-MSHCP LAA species on the OSL:
 - Additional consultation with the Field Office is necessary. To complete this, CPG should first utilize any applicable Dkey that is available.

When CPG employs an available Dkey to initiate consultation for non-MSHCP species on the OSL, the following framework applies:

¹ non-MSHCP species are defined as those species not covered under the MSHCP, but addressed only in the Biological Opinion

² non-MSHCP NE species were originally designated as such because the best available scientific information indicated that the species range did not overlap the Covered Lands. If a non-MSHCP NE species appears on an OSL, this suggests some new information indicates the species now does occur within the Covered Lands and therefore CPG should consult with the Field Office to determine what, if any, AMMs and BMPs should be applied.

- If the Dkey indicates a NE determination, no further consultation is required.
- If the Dkey indicates a NLAA determination, the IPaC Dkey output letter serves as the Tier 2 informal consultation, and all AMMs and BMPs required by the Dkey must be applied.
- If the Dkey indicates a May Affect determination, CPG will enter into a tiered consultation process with the Field Office, as outlined in the Consultation Approach section of this BO.

The above steps apply exclusively to non-MSHCP species addressed in the BO. CPG will continue to implement AMMs and BMPs for MSHCP species as detailed in, and in the locations described by, the MSHCP. **IPaC and Dkey outputs pertaining to MSHCP species should be disregarded** as those species are covered under the Incidental Take Permit associated with the MSHCP.

In the case that listed species not addressed in either the MSHCP or the BO appear on the OSL, separate consultation is required outside of the MSHCP framework. CPG should consult with the Field Office, which may be completed through use of an available Dkey.

Please submit information for **all** species needing additional consultation in a single project submission package to the Field Office and avoid multiple submissions for the same project.