



**Transcontinental Gas Pipe Line Company, LLC**

**Requirement G-6 – United States Fish and Wildlife Service**

**Regional Energy Access Expansion Project – Effort Loop**

**April 2021  
(Revised October 2022)**



**Transcontinental Gas Pipe Line Company, LLC**

**Requirement G-6.1 – Correspondences**

**Regional Energy Access Expansion Project – Effort Loop**

**April 2021  
(Revised October 2022)**



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, Pennsylvania 16801-4850

August 31, 2022

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First St., NE  
Washington, DC 20426

Re: USFWS Project #2022-0043217 (formally 2020-0592)  
PNDI Receipt # 702499

Dear Secretary Bose:

Thank you for your letter of March 30, 2022, requesting concurrence regarding the effect of the proposed Transcontinental Gas Pipe Line Company, LLC (Transco) Regional Energy Access Expansion Project (the Project), on federally listed endangered, threatened and proposed species in Pennsylvania and New Jersey. You concluded that the proposed Project may affect, but is not likely to adversely affect two federally listed endangered species, the Indiana bat (*Myotis sodalis*) and northeastern bulrush (*Scirpus ancistrochaetus*), and two species listed as threatened, the northern long-eared bat (*Myotis septentrionalis*) and bog turtle (*Glyptemys muhlenbergii*). The following comments are provided pursuant to the Endangered Species Act (Act) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) to ensure the protection of endangered and threatened species and pertain to portions of the Project that are in Pennsylvania.

On June 3, 2022, the Service's Pennsylvania Field Office received all pertinent information from Transco in order to initiate informal section 7 consultation and begin assessing the Project. After further discussions with Transco, we also received an updated restrictions table on August 19, 2022. A complete project description is available in the draft Environmental Impact Statement<sup>1</sup>. The portion of the Project in Pennsylvania involves construction and operation of 22.3 miles of 30-inch-diameter pipeline loop in Luzerne County, Pennsylvania (Regional Energy Lateral (REL)); installation of 13.8 miles of 42-inch-diameter pipeline loop in Monroe County, Pennsylvania (Effort Loop); two wetland mitigation sites, located in Northampton and Luzerne Counties, Pennsylvania; and installation or modification of compressor stations in Luzerne and York Counties, Pennsylvania. The project also includes installation of ancillary facilities such as mainline valves, communication facilities, and pig launchers and receivers, and various

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<sup>1</sup> <https://www.ferc.gov/industries-data/natural-gas/environment/environmental-documents> - last accessed August 15, 2022

temporary access roads and staging areas to support construction activities, and to establish new permanent access roads to support operation of new facilities.

### *Northeastern bulrush*

Mallory Gilbert, a qualified northeastern bulrush surveyor, conducted a presence/absence survey for this species in August 2020. According to the October 2020 survey report, no northeastern bulrush were found in the wetlands that appeared to have suitable habitat for this species in, or adjacent to, the Project area. Based on our review of this report, we concur with your determination that implementation of the proposed project may affect, but is not likely to adversely affect this species.

### *Bog turtle*

To assess potential effects of the proposed project on bog turtles and their habitat, Robert Bull, a qualified bog turtle surveyor, conducted Phase 1 bog turtle habitat assessments between April and July 2020 following the methods described under “*Bog Turtle Habitat Survey*” (Phase 1 survey) of the *Guidelines for Bog Turtle Surveys* (revised April 29, 2020)<sup>2</sup>. According to the August 2020 survey report, of 14 wetlands surveyed, one (referred to as “Wetland BT-1”) appeared to have the combination of habitat characteristics of areas occupied by bog turtles. However, because this wetland is in a relatively urban setting, shows evidence of disturbance such as stormwater runoff, and is not located in close proximity to other known bog turtle sites, it is not likely to support bog turtles. Therefore, we concur with your determination that the Project may affect, but is not likely to adversely affect the bog turtle.

In addition, a wetland mitigation site in Northampton County is in the range of the bog turtle. The Service concurred by letter of October 6, 2021, that this species appears to be absent and that the proposed wetland mitigation is not likely to adversely affect the bog turtle.

### *Northern long-eared bat and Indiana bat*

Approximately 285.64 (203.23 acres associated with the REL and 82.41 acres associated with the Effort Loop) acres of tree removal are associated with the Project. Land-clearing, especially of forested areas, may adversely affect Indiana bats and northern long-eared bats by killing, injuring, or disturbing roosting bats, and by removing or reducing the quality of foraging and roosting habitat. In order to assess the effect of proposed forest clearing on the Indiana bat and northern long-eared bat on any bat maternity colonies present Transco completed acoustic bat surveys (i.e., microphones were deployed to record bat calls during the summer maternity season). To assess the effect of the project on bat hibernacula and supporting habitat, surveys were completed to locate potential hibernacula entrances and evaluate if coal mines in proximity to the Project may support bats. Chris Sanders, a Service recognized qualified bat surveyor, conducted these surveys in accordance with Service-approved survey guidance, and provided various reports documenting the results.

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<sup>2</sup> <https://ipac.ecosphere.fws.gov/guideline/survey/population/182/office/52410.pdf>

### Maternity colony surveys

Fifty sites along the 30-inch-diameter pipeline loop in Luzerne County, referred to as the 'REL' portion of the Project were surveyed and 22 sites along the 13.8 miles of 42-inch-diameter Effort Loop in Monroe County were surveyed for bat (acoustic) calls in accordance with the Service's *Range-wide Indiana Bat and Northern Long-eared Bat Survey Guidance*<sup>3</sup>. The survey report concluded probable presence for the northern long-eared bat at three survey sites along the REL and Effort Loop but probable absence of Indiana bats from both the REL and Effort Loop. The survey reports also indicated probable presence for eight other bat species along the REL and Effort Loop, including two species of Federal concern, the little brown bat (*Myotis lucifugus*) and tricolored bat (*Perimyotis subflavus*). Total tree clearing proposed within 3 miles of the northern long-eared bat detection areas along the REL and Effort Loop comprise a small percentage of the available forested habitat (0.42 % and 0.23 %, respectively). However, loss of roost trees within the roosting area of a northern long-eared bat colony can fragment or break up the colony and reduce fitness of colony members.

To avoid directly killing or harming roosting northern long-eared bats within 3 miles of a summer acoustic detection location (Effort Loops Sites 7 and 8 and REL Sites 6, 12, and Bald Mt Alt Site 2), Transco proposes the following restriction/avoidance measure outlined in their August 19, 2022, *Bat Restrictions Summary Table*.

- Within 3 miles of summer acoustic detection locations (Effort Sites 7 and 8 and REL Sites 6, 12, and Bald Mt Alt Site 2), felling of all trees or dead snags greater than 3 inches in diameter at breast height that need to be harvested to facilitate the project (including any access roads or off right-of-way work spaces) will occur between November 16 and March 31 to avoid impacting bats roosting within the project area.

Based on the small percentage of suitable roosting habitat available that will be removed, and the linear nature of the pipeline, we do not expect colony fragmentation or other indirect adverse effects to occur as a result of forest habitat loss.

### Hibernacula surveys

White-nose syndrome (WNS) is a devastating fungal disease that has killed large numbers of hibernating bats in eastern North America. Pd (*Pseudogymnoascus destructans*), the fungus causing the disease, has been detected throughout the range of the Indiana bat and northern long-eared bat in Pennsylvania. Known hibernating populations of Indiana bats and northern long-eared bats in Pennsylvania in the past decade have been severely reduced by WNS and many hibernacula have no bats remaining or single digit population numbers.

To evaluate the potential effects of the project to Indiana bats and northern long-eared bats, the qualified bat surveyor completed a survey for possible hibernation sites. Due to restrictions on handling bats in 2020 to mitigate the spread of SARS-CoV2, the Pennsylvania Game Commission (PGC) did not allow capture or handling of bats to infer species presence/absence

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<sup>3</sup> <https://www.fws.gov/library/collections/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>

during fall 2020 surveys; therefore, acoustic surveys were completed in fall 2020. Of 28 potential hibernacula acoustically surveyed from September 15, 2020, through October 31, 2020, probable Indiana bat presence was determined at a location referred to as “REL Hiber 07” and probable northern long-eared bat presence was determined in sites referred to as “REL Hiber 05”, “REL Hiber 09”, and “REL Hiber 17”. In fall 2021 when direct handling of bats was permitted by the PGC, an additional 28 potential hibernacula were surveyed using harp trapping techniques outlined in the Service’s *Range-wide Indiana Bat and Northern Long-eared Bat Survey Guidance*, and probable northern long-eared bat presence was determined at a site referred to as “REL Hiber 46”. A juvenile non-reproductive male northern long-eared bat was captured at this site.

Follow-up internal mine surveys were conducted at REL Hiber 07 on March 18, 2022, by the PGC. No bats of any species were found. This leads the Service to conclude that either this hibernacula has an extremely low number of hibernating Indiana bats such that they were unable to be visually detected, or that the positive Indiana bat acoustic recording that was captured in fall 2020 during the ‘no bat handling State restriction’ recorded an Indiana bat or another *Myotis* species passing by outside of this mine. Still, Transco is considering REL Hiber 07 an Indiana bat hibernacula for the purposes of the Project.

As proposed, construction of the REL and the Effort Loop pipelines and associated infrastructure and access will not directly disturb any hibernacula entrances (Table 1) or be close enough to cause collapse, result in erosion, or otherwise directly affect these underground habitat features. However, because mine passage may extend below the Project area, Transco reviewed historic mine maps and concluded that the subject mines are located at sufficient depth that no disturbance is expected due to pipeline construction and that no shifting, filling, collapse or alteration of microclimate in the mine passages is expected as a result of pipeline trenching and installation.

**Table 1.** Summary of identified northern long-eared bat (NLEB) hibernation sites and distance to Regional Energy Access Expansion (REL) Project activities.

Site Name	Distance of portal to Limits of Disturbance (feet)	Distance of portal to Pipeline (feet)
NLEB REL Hiber 5	754	870
Indiana bat REL Hiber 7	993	1,077
NLEB REL Hiber 9	352	450
NLEB REL Hiber 17	948	1,032
NLEB REL Hiber 46	129	237

Total tree clearing proposed within 5 miles of the Indiana bat hibernacula along the REL Loop would comprise a small percentage of the available forested habitat (0.46%). Similarly, total tree clearing proposed within 5 miles of the four northern long-eared bat hibernacula along the REL Loop comprise a small percentage of the available forested habitat (0.37 %). However, loss of roost trees within the spring staging and fall swarming areas of these hibernacula can adversely affect Indiana bats and northern long-eared bats. Additionally, although no direct hibernacula

disturbance is anticipated, forested habitat surrounding hibernacula entrances is used by the bats during spring staging, fall swarming and potentially by some male and non-reproductive female bats. This activity is typically centered and concentrated near the entrance(s) and is predicatively more diffuse moving outward due to the larger area when suitable forested habitat is abundant. To avoid direct adverse effects to hibernating Indiana bats and northern long-eared bats, Transco has committed to the following restrictions/avoidance measures outlined in their August 19, 2022 *Bat Restrictions Summary Table*.

*Indiana bat - REL Hiber 07:*

Due to the REL portion of the Project passing within 5 miles of one Indiana bat hibernacula, Transco will implement the following avoidance measures:

- No blasting will be conducted within 0.5 mile of the subsurface limits of REL Hiber 7.
- Within 5 miles of REL Hiber 7 trees will be cleared between November 16 and March 31.
- No activities will occur overtop of the mine workings associated with REL Hiber 7.

*Northern long-eared bat hibernacula - REL Hiber 05, REL Hiber 09, REL Hiber 17, and REL Hiber 46:*

Due to the REL portion of the Project passing within 5-miles of four northern long-eared bat hibernacula, Transco will implement the following avoidance measures:

- No blasting will be conducted within 0.5 mile of the subsurface limits of identified northern long-eared bat hibernacula.
- Within 5 miles of identified northern long-eared bat hibernacula trees will be cleared between November 16 and March 31.
- Pipeline construction activities involving ground disturbance (i.e., trenching, grading, mechanized tree felling and pipeline installation) within a 0.5-mile radius of identified northern long-eared bat hibernacula will occur between April 1 and November 15
  - In instances where the mine investigation study revealed that no impact to the mine is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities, this time of year restriction does not apply (mileposts 9.16-9.25, 10.2-11.25, 15.75-15.95).

In summary, with the implementation of the avoidance measures detailed above, which are also included in the August 19, 2022, *Bat Restrictions Summary Table* from Transco, and considering the distance of forest removal, blasting, and construction from the known hibernaculum entrances, and the relatively small area of forest removal proposed in habitat surrounding the hibernacula, we do not anticipate that the proposed action will cause habitat or hibernacula alteration that would result in incidental take. Further, due to the small percentage of forest or roost habitat available that will be removed, the linear nature of the pipeline and the extensive area of forest habitat available in proximity to the Project, we concur with your March 30, 2022, determination that the Project may affect, but is not likely to adversely affect the Indiana bat and northern long-eared bat.

*Voluntary Indiana bat and northern long-eared bat Conservation Measures:*

The avoidance measures detailed above must be implemented in order to support our effects determinations. In addition, Transco is proposing to implement several voluntary conservation measures following construction of the Project to benefit these bat species and aid in WNS recovery efforts. According to their May 27, 2022, document, Transco proposes the following:

- Install, replace, or repair gates on up to six mine portals that are connected to active bat hibernacula located along the Regional Energy Lateral, pending landowner authorization.
- Coordinate with the Pennsylvania Department of Conservation and Natural Resources and the PGC to:
  - Complete bat surveys on portions of the Mocanaqua Tract within Pinchot State Forest and portions of the adjacent section of State Game Lands 224, pending landowner authorization. The surveys will include mine portal investigations, spring acoustic surveys, and fall surveys of up to 25 mine portals.
  - Install or replace gates on up to five mine portals that are connected to active bat hibernacula on the properties.

Transco will provide final reports to the Service on any of the voluntary activities that take place.

Tricolored bat and little brown bat

Tricolored bat and little brown bat are currently being evaluated by the Service to determine whether they should be proposed for listing as endangered or threatened. Species being reviewed for potential listing generally are known to be facing various threats, and have usually suffered substantial population declines and/or habitat loss. Although these species receive no regulatory protection under the Act, the Service strongly encourages Federal agencies and other planners to consider these species when planning and implementing their projects. Efforts to conserve these species now may preclude the need to list them as endangered or threatened under the Act in the future. The Service Listing Workplan<sup>4</sup> indicates that a listing decision regarding the tricolored bat is expected in fiscal year 2022 and in fiscal year 2023 for the little brown bat.

As noted above, both the tricolored bat and little brown bat were documented in the REL and Effort Loop portions of the project during summer 2020 acoustic surveys, suggesting that maternity activity is supported in proximity to the Project. Avoidance measures proposed for Indiana bats and northern long-eared bats may also conserve these species, which also roost in forested areas or structures in the active season (April 1-November 15) and hibernate in caves and mines in the inactive season (November 16-March 31). If either tricolored bat or little brown bat are listed as endangered or threatened, and if ongoing Project actions may affect these species, additional consultation will be necessary.

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<sup>4</sup> <https://www.fws.gov/project/national-listing-workplan>

*To avoid potential delays in reviewing your project, please use the above-referenced USFWS project tracking number in any future correspondence regarding this project.*

If you have any questions regarding this matter, please contact Pamela Shellenberger of my staff at 814-206-7459.

Sincerely,

A handwritten signature in black ink that reads "Sonja Jahrsdoerfer". The signature is written in a cursive style with a large, prominent 'S' at the beginning.

Sonja Jahrsdoerfer  
Project Leader

cc:

Joanne Wachholder (FERC)  
Josh Henry (Williams/Transco)  
Ryan Nelson (WHM Group)  
Diane Lazinsky (DOI Boston)  
Andrew Raddant (DOI Boston)  
Ron Popowski (NJFO USFWS)  
Becky Dunlap (PA DEP)

Email:

Joanne Wachholder (FERC): [joanne.wachholder@ferc.gov](mailto:joanne.wachholder@ferc.gov)

Josh Henry (Williams): [josh.henry@williams.com](mailto:josh.henry@williams.com)

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Becky Dunlap (PA DEP): [redunlap@pa.gov](mailto:redunlap@pa.gov)

**Bat Restriction Summary Table**  
**Regional Energy Access Expansion Project**  
**Transcontinental Gas Pipeline Company, LLC**

Species	Listing Status	Hibernacula ID <sup>2</sup>	Restriction 1 - Tree Clearing Activities Near Hibernacula	Restriction 2 - Ground Disturbance Activities Near Hibernacula	Restriction 3 - Blasting Near Hibernacula	Restriction 4 - Additional Site-Specific
<b>Federal</b>						
Indiana Bat	Federally Endangered	7	Transco will adhere to TOYRs within 5-miles of identified IBAT hibernacula and clear trees between November 16 and March 31.	No activities will occur overtop of the mine workings associated with Portal 7.	No blasting will be conducted within 0.5-mile of the subsurface limits of identified IBAT hibernacula.	
Northern Long-Eared Bat	Federally Threatened	5, 9, 17, 46	Transco will adhere to TOYR's within 5-miles of identified Northern Long-Eared bat hibernacula and clear trees between November 16 and March 31.	Pipeline construction activities involving ground disturbance (i.e., trenching, grading, mechanized tree felling and pipeline installation) will adhere to TOYRs within a 0.5-mile radius of identified NLEB hibernacula and must occur between April 1 and November 15.  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities, this TOYR is not proposed. (9.16-9.25, 10.2-11.25, 15.75-15.95).	No blasting will be conducted within 0.5-mile of the subsurface limits of identified NLEB hibernacula.	Within 3 miles of a summer acoustic detection location (Effort Sites 7 and 8 and REL Sites 6, 12, and Bald Mt Alt Site 2), felling of all trees or dead snags greater than 3 inches in diameter at breast height that need to be harvested to facilitate the project (including any access roads or off-ROW work spaces) should occur between November 16 and March 31 to avoid impacting bats roosting within the project area.
<b>State</b>						
Tri-Colored Bat	State Endangered	9, 18, 46	Transco will adhere to TOYR's within 5-miles of identified Tri-Colored bat hibernacula and clear trees between November 16 and March 31.	Pipeline construction activities involving ground disturbance (i.e., trenching, grading, mechanized tree felling, and pipeline installation) will adhere to TOYRs within a 0.5-mile radius of identified Tri-colored bat hibernacula and must occur between April 1 and November 15.  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities, this TOYR is not proposed (9.16-9.25, 10.2-11.25, 15.75-15.95).	No blasting will be conducted within 0.5-mile of the subsurface limits of identified Tri-colored bat hibernacula.	Within 2.5 miles of a summer acoustic detection location (Effort Sites 18 and REL Sites 4 and 33), felling of all trees or dead snags greater than 3 inches in diameter at breast height that need to be harvested to facilitate the project (including any access roads or off-ROW work spaces) should occur between November 16 to March 31 to avoid impacting bats roosting within the project area.  Transco is proposing 1.20 acres of tree felling at Compressor Station 515 to occur outside of the time of year restrictions identified for the Tri-Colored bat. Although this area falls within the 2.5 mile buffer established for positive summer acoustic surveys for an acoustic detection of a tri-colored bat 2.2 miles away, 5 summer acoustic surveys with 2 survey nights each, were conducted just outside of the boundary of CS 515 with no bats detected. Additionally this small set of trees is located adjacent to the existing active compressor station.
Little Brown Bat	State Endangered	2, 6, 7, 8, 18	Transco will adhere to TOYR's within 0.25-miles of identified Little Brown bat hibernacula and clear trees between November 16 and March 31.	Pipeline construction activities involving ground disturbance (i.e., trenching, grading, mechanized tree felling, and pipeline installation) will adhere to TOYRs within a 0.25-mile radius of identified Little Brown Bat hibernacula and must occur between April 1 and November 15.  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities, this TOYR is not proposed (9.16-9.25, 10.2-11.25, 15.75-15.95).	No blasting will be conducted within 0.25-mile of the subsurface limits of identified Little Brown Bat hibernacula.	
Eastern Small-footed bat	State Threatened	5, 6, 7, 9, 14, 18, 20, 25, 41, 46	Transco will adhere to TOYR's within 0.25-miles of identified Eastern Small Footed bat hibernacula and clear trees between November 16 and March 31.	Pipeline construction activities involving ground disturbance (i.e., trenching, grading, mechanized tree felling, and pipeline installation) will adhere to TOYRs within a 0.25-mile radius of identified Eastern small-footed bat hibernacula and must occur between April 1 and November 15.  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities, this TOYR is not proposed (9.16-9.25, 10.2-11.25, 15.75-15.95).	No blasting will be conducted within 0.25-mile of the subsurface limits of identified Eastern Small-footed bat hibernacula.	



Transcontinental Gas Pipe Line Company, LLC  
2800 Post Oak Boulevard, Level 11  
Houston, Texas 77056

February 4, 2020

United States Department of Interior  
Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, PA 16801-4850

**Re: PNDI Large Project Submission for Environmental Review  
Transcontinental Gas Pipe Line Company, LLC  
Regional Energy Access Project**

To Whom it May Concern:

Transcontinental Gas Pipe Line Company, LLC (Transco) is in the process of defining the proposed Regional Energy Access Project (Project), which would expand Transco's existing facilities to meet growing demand for natural gas. Currently, the Pennsylvania Project components consist of two pipeline segments, one new compressor station, upgrades to two existing compressor stations, and additions or modifications to aboveground ancillary facilities along the existing and proposed pipelines.

This correspondence is intended to initiate Pennsylvania Natural Diversity Index (PNDI) consultation with the Pennsylvania Game Commission, Pennsylvania Fish and Boat Commission, Pennsylvania Department of Conservation and Natural Resources, and United States Fish and Wildlife Service (USFWS) regarding the presence of Threatened, Endangered, and special concern species occurring along or in the vicinity of the proposed Project.

For the purposes of the PNDI review, the Pennsylvania Project components are listed below:

**Project Components**

- Regional Energy Lateral - Approximately 22 miles of 30-inch-diameter pipeline, both co-located pipeline along the existing Transco Leidy pipeline system and greenfield pipeline, in Luzerne County, PA;
  - Ten Alternative Route options (Alt\_REL\_A-J); are included with this submission, as the route is still being designed;
- Effort Loop - Approximately 14 miles of 42-inch-diameter pipeline looping the existing Transco Leidy pipeline system in Monroe County, PA;
- New Compressor Station 510 - New gas turbine-driven Compressor Station in Northampton County, PA, located adjacent to the existing Leidy pipeline system. The options currently requested for review are:

- CS 510 – Option MP 30.6
- CS 510 – Option MP 31.4
- CS 510 – Option MP 32.6
- CS 510 – Option MP 33.1
- Existing Compressor Station 515 – Additional horsepower at an existing Compressor Station in Luzerne County, PA located adjacent to the existing Leidy pipeline system;
- Existing Compressor Station 195 – Modifications will include additional horsepower at an existing Compressor Station in York County. No earth disturbance is being proposed for the modification, and;
- Aboveground Ancillary Facilities – Modifications or additions of receipt and delivery meter stations, valve sites, and regulator stations along the proposed pipeline routes and along Transco’s existing pipeline system.

The summary table below outlines the location of Project components in Pennsylvania as shown on Attachment A: PA Natural Diversity Index - Project Map and Attachment B: Topographic Project Location Maps.

<b>Table 1. Project Facility Summary Table</b>		
<b>Project Component</b>	<b>County</b>	<b>Attachment B - Topographic Project Location Map</b>
Proposed 30" Regional Energy Lateral	Luzerne	1A-1D
Existing Compressor Station 515	Luzerne	1A
Existing Carverton Meter Station	Luzerne	1C & 1D
Proposed 42" Leidy D Effort Loop	Monroe	2A- 2C
Proposed Compressor Station 510	Northampton	3
Existing Lower Mud Run Meter Station and Delaware Regulator	Northampton	3
Existing Compressor Station 195	York	4
Existing Chapin Meter Station	Wyoming	5
Existing Puddlefield Meter Station	Wyoming	6
Existing Chester Meter Station	Delaware	7

The proposed Regional Energy Lateral and Effort Loop will be co-located within/adjacent to the existing Transco right-of-way (ROW) to the extent possible. The temporary and/or permanent ROW will need to be widened at varying widths to accommodate the Project construction. Potential access roads that may be proposed for use are included. In general, these are existing access roads that may be subject to improvements to accommodate Project construction.

Field surveys have not been initiated for the Project; however, are planned to begin in the spring of 2020. Temporary and permanent workspaces (e.g. disturbance areas) have not been defined at this time. During and following field surveys and throughout the design process, the proposed pipeline route and overall limits of disturbance areas are subject to refinements.

United States Geological Survey Mapping depicting the locations of the described Project facilities can be found in Attachment B. The final large project PNDI review receipt is located within Attachment C. GIS shapefiles have been uploaded as part of the PNDI Online submission. A compact disc, as well as hard copies of this correspondence have been sent via U.S. mail to the USFWS. Within the shapefiles, attribute information is included that provides the unique identifiers to the features shown on the mapping.

Should the Project, as presented, indicate the need for species-specific field studies or indicate other Project considerations, please provide a response outlining those requirements.

If you have any questions regarding this correspondence and information request, or require additional Project information, please do not hesitate to call me at (713) 215-4232 or contact me via e-mail at [karen.olson@Williams.com](mailto:karen.olson@Williams.com). Alternatively, you can contact Ryan Nelson, Senior Project Manager at WHM Consulting, LLC at (814) 689-1650 or via e-mail at [ryann@whmgroup.com](mailto:ryann@whmgroup.com). I appreciate your assistance and thank you for your attention to this request.

Respectfully submitted,

TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC

A handwritten signature in blue ink, appearing to read "Karen Olson", with a long horizontal line extending to the right.

Karen Olson  
Environmental Specialist

Attachments:            Attachment A: PA Natural Diversity Index – Project Map  
                              Attachment B: Topographic Project Location Maps  
                              Attachment C: Final Large Project PNDI Review Receipt

cc:        Josh Henry, Transco  
            Ryan Nelson, WHM Consulting, LLC

**From:** [UPS Quantum View](#)  
**To:** [sfox@whmgroup.com](mailto:sfox@whmgroup.com)  
**Subject:** UPS Delivery Notification, Tracking Number 1Z8797VV0393892874  
**Date:** Wednesday, February 5, 2020 10:07:58 AM



## Your package has been delivered.

**Delivery Date:** Wednesday, 02/05/2020

**Delivery Time:** 10:04 AM

At the request of WHM CONSULTING, INC this notice alerts you that the status of the shipment listed below has changed.

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<b>Tracking Number:</b>	<b><a href="#">1Z8797VV0393892874</a></b>
<b>Ship To:</b>	Fish Wildlife Serv PA Field Off US Dept of Interior 110 RADNOR RD ROOM 101 STATE COLLEGE, PA 16801 US
<b>UPS Service:</b>	UPS GROUND
<b>Number of Packages:</b>	1
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## Kevin Clark WHM

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**From:** Shellenberger, Pamela <pamela\_shellenberger@fws.gov>  
**Sent:** Friday, March 13, 2020 1:09 PM  
**To:** Chris Sanders; Anderson, Robert M; 'Braun, Olivia'  
**Cc:** 'Olson, Karen'; 'Henry, Josh'; Ryan Nelson  
**Subject:** Re: [EXTERNAL] Regional Energy Access Project - Regional Energy Lateral Hibernacula Search

Good afternoon,

Chris, I reviewed your Phase 2 hibernacula search proposal and agree with the methods you outlined. Please note that we are working on a formal response to William's February 4, 2020 letter, and will reflect this proposed hibernacula survey and correspondence in that letter.

Thank you,

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Pamela Shellenberger

U.S. Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, PA 16801  
814-234-4090 x7459  
<http://www.fws.gov/northeast/pafo/>

*Working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people.*

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**From:** Chris Sanders <sanders@batgate.com>  
**Sent:** Monday, March 9, 2020 3:06 PM  
**To:** Anderson, Robert M <robert\_m\_anderson@fws.gov>; Shellenberger, Pamela <pamela\_shellenberger@fws.gov>; 'Braun, Olivia' <olbraun@pa.gov>  
**Cc:** 'Olson, Karen' <Karen.Olson@williams.com>; 'Henry, Josh' <Josh.Henry@williams.com>; 'Ryan Nelson' <ryann@whmgroup.com>  
**Subject:** [EXTERNAL] Regional Energy Access Project - Regional Energy Lateral Hibernacula Search

Hello Bob, Pam, and Olivia,

Attached is our proposed Phase 2 study plan for hibernacula searches along the Regional Energy Access Project, which results from a Phase 1 desktop search of the project. Spring seems to be coming early this year and we like to perform the Phase 2 before understory leaf out, as that will make searches for potential hibernacula more reliable. Please review at your convenience and let us know if you concur.

Thanks,  
Chris

---

Chris Sanders



Sanders Environmental Inc.  
322 Borealis Way  
Bellefonte PA 16823  
814-659-8257 (cell)

---

**From:** Ryan Nelson <[ryann@whmgroup.com](mailto:ryann@whmgroup.com)>  
**Sent:** Monday, March 9, 2020 2:19 PM  
**To:** Chris Sanders <[sanders@batgate.com](mailto:sanders@batgate.com)>  
**Cc:** 'Olson, Karen' <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>; 'Henry, Josh' <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Subject:** RE: Hibernacula Search Plan - REA

Chris,

You can send to USFWS/PGC. Please copy Karen, Josh and I.

I spoke to Olivia Braun at the PGC this morning. She will be the Project contact. You can copy her on the email. She is actively reviewing the current PNDI submission (01/31). She is planning to document the survey plan in her response letter.

For the USFWS, sending to Bob Anderson and Pam Shellenberger is good.

Thanks  
Ryan

---

**From:** Chris Sanders <[sanders@batgate.com](mailto:sanders@batgate.com)>  
**Sent:** Sunday, March 08, 2020 4:26 PM  
**To:** Ryan Nelson <[ryann@whmgroup.com](mailto:ryann@whmgroup.com)>  
**Cc:** 'Olson, Karen' <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>; 'Henry, Josh' <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Subject:** RE: Hibernacula Search Plan - REA

Got it!

Ryan, I should be the sender? Could you confirm that we are dealing with Pam USFWS and Tracey PGC? I have not been directly in the loop on correspondence on this project, so wanted to double check who it should be going to.

Thanks,  
Chris

---

Chris Sanders



Sanders Environmental Inc.  
322 Borealis Way  
Bellefonte PA 16823

814-659-8257 (cell)

---

**From:** Henry, Josh <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Sent:** Friday, March 6, 2020 4:48 PM  
**To:** Ryan Nelson <[ryann@whmgroup.com](mailto:ryann@whmgroup.com)>; Olson, Karen <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>  
**Cc:** Chris Sanders ([sanders@batgate.com](mailto:sanders@batgate.com)) <[sanders@batgate.com](mailto:sanders@batgate.com)>  
**Subject:** RE: Hibernacula Search Plan - REA

All,

I reviewed with Karen, this can be submitted as soon as we define QBS in Phase 2 #1 instead of #2.

Thank you,

Josh Henry  
412-713-0485

*If you have received this message in error, please reply to advise the sender of the error and then immediately delete this message.*

---

**From:** Ryan Nelson <[ryann@whmgroup.com](mailto:ryann@whmgroup.com)>  
**Sent:** Friday, March 6, 2020 2:29 PM  
**To:** Henry, Josh <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>; Olson, Karen <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>  
**Cc:** Chris Sanders ([sanders@batgate.com](mailto:sanders@batgate.com)) <[sanders@batgate.com](mailto:sanders@batgate.com)>  
**Subject:** [EXTERNAL] Hibernacula Search Plan - REA

Karen/Josh,

Attached is the hibernacula search plan and attachments. Please let me know if you have any questions.

Thanks,

Ryan Nelson, PWS  
Senior Project Manager  
WHM Consulting, Inc.  
A Member of the WHM Group <sup>sm</sup>  
2525 Green Tech Drive, Suite B  
State College, PA 16803  
Office – 814-689-1650 ext. 102  
Mobile – 814-592-9848  
[ryann@whmgroup.com](mailto:ryann@whmgroup.com)

---

**This email originates outside of Williams. Use caution if this message contains attachments, links or requests for information.**

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## Kevin Clark WHM

---

**From:** Ryan Nelson  
**Sent:** Tuesday, March 17, 2020 3:22 PM  
**To:** Shellenberger, Pamela; Olson, Karen  
**Subject:** RE: Regional Energy Access Project  
**Attachments:** REA Project Shapefiles.zip

Hi Pam!

Attached are confidential shapefiles for the limited purpose of facilitating your environmental review. The information is entitled to protection from disclosure under Pennsylvania's Freedom of Information Act on the basis of its business confidentiality and because it is critical energy infrastructure information CEII category.

If you have any questions, please contact me.

Thanks  
Ryan

Ryan Nelson, PWS  
Senior Project Manager  
WHM Consulting, Inc.  
A Member of the WHM Group <sup>sm</sup>  
2525 Green Tech Drive, Suite B  
State College, PA 16803  
Office – 814-689-1650 ext. 102  
Mobile – 814-592-9848  
[ryann@whmgroup.com](mailto:ryann@whmgroup.com)

---

**From:** Shellenberger, Pamela <pamela\_shellenberger@fws.gov>  
**Sent:** Friday, March 13, 2020 1:23 PM  
**To:** Olson, Karen <Karen.Olson@williams.com>  
**Cc:** Ryan Nelson <ryann@whmgroup.com>  
**Subject:** Regional Energy Access Project

Good afternoon -

Thank you for your letter of February 4, 2020. Can you please send me shapefiles of the project with mile markers? I realize this maybe have been included on the CD you provided, but our laptops no longer have CD players. (?)

Thank you!

---

Pamela Shellenberger

U.S. Fish and Wildlife Service

Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, PA 16801  
814-234-4090 x7459  
<http://www.fws.gov/northeast/pafo/>

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## Kevin Clark WHM

---

**From:** Ryan Nelson  
**Sent:** Friday, March 27, 2020 2:01 PM  
**To:** Shellenberger, Pamela; Olson, Karen  
**Cc:** Henry, Josh  
**Subject:** RE: Regional Energy Access Project

Pam,

Below is a summary table of the current tree clearing estimates, broken down for each Project component. These estimates are subject to change as the Project layout develops. If you need additional information, please contact me or Karen.

<b>Regional Energy Access Project - Tree Clearing Summary</b>		
<b>Project Component</b>	<b>County</b>	<b>Tree Clearing Estimate (acres)</b>
Proposed 30" Regional Energy Lateral (Includes Compressor Station 515, and Carverton Meter station)	Luzerne	+/- 180
Proposed 42" Leidy D Effort Loop	Monroe	+/-70
Proposed Compressor Station 510	Northampton	<5
Existing Lower Mud Run Meter Station and Delaware Regulator	Northampton	<1
Existing Compressor Station 195	York	0
Existing Chapin Meter Station	Wyoming	<1
Existing Puddlefield Meter Station	Wyoming	<1
Existing Chester Meter Station	Delaware	<1

Thanks,  
Ryan

---

**From:** Shellenberger, Pamela <pamela\_shellenberger@fws.gov>  
**Sent:** Friday, March 13, 2020 1:26 PM  
**To:** Olson, Karen <Karen.Olson@williams.com>  
**Cc:** Ryan Nelson <ryann@whmgroup.com>  
**Subject:** Re: Regional Energy Access Project

Additionally, since a lot of this is co-located, can you provide me with an idea of how many acres of trees will be removed for each of the project areas listed under the 'project components' section on the February 4, 2020 cover letter?

Thanks, again!

---

Pamela Shellenberger

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814-234-4090 x7459  
<http://www.fws.gov/northeast/pafo/>

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---

**From:** Shellenberger, Pamela <[pamela\\_shellenberger@fws.gov](mailto:pamela_shellenberger@fws.gov)>  
**Sent:** Friday, March 13, 2020 1:22 PM  
**To:** Olson, Karen <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>  
**Cc:** 'Ryan Nelson' <[ryann@whmgroup.com](mailto:ryann@whmgroup.com)>  
**Subject:** Regional Energy Access Project

Good afternoon -

Thank you for your letter of February 4, 2020. Can you please send me shapefiles of the project with mile markers? I realize this maybe have been included on the CD you provided, but our laptops no longer have CD players. (?)

Thank you!

---

Pamela Shellenberger

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<http://www.fws.gov/northeast/pafo/>

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## Kevin Clark WHM

---

**From:** Shellenberger, Pamela <pamela\_shellenberger@fws.gov>  
**Sent:** Tuesday, May 12, 2020 11:41 AM  
**To:** Ryan Nelson  
**Cc:** Henry, Josh; Olson, Karen (Karen.Olson@williams.com)  
**Subject:** Re: [EXTERNAL] REA - Bog Turtle Survey Follow Up Questions

Hi Ryan,

Thank you for your patience on my response. I appreciate the additional information you provided about this site. Due to the disturbance that is already adjacent to the wetland (a road and businesses), and the fact that there will be no disturbance or hydrologic impacts to the potential bog turtle habitat, the Service has concluded that there is no need to conduct Phase 2 surveys on the potential bog turtle habitat wetland at the Route 209 site.

Please let me know if you have further questions.

Thank you,

---

Pamela Shellenberger

U.S. Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, PA 16801  
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<http://www.fws.gov/northeast/pafo/>

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**Note: I am temporarily teleworking. You can continue to reach me through email or by calling the number listed above.**

---

**From:** Ryan Nelson <ryann@whmgroup.com>  
**Sent:** Tuesday, May 12, 2020 9:01 AM  
**To:** Shellenberger, Pamela <pamela\_shellenberger@fws.gov>  
**Cc:** Henry, Josh <Josh.Henry@williams.com>; Olson, Karen (Karen.Olson@williams.com) <Karen.Olson@williams.com>  
**Subject:** RE: [EXTERNAL] REA - Bog Turtle Survey Follow Up Questions

Pam,

I am following up with you on the SR 209 wetland with potential bog turtle habitat, which we have been discussing over the past couple of weeks. I apologize for again reaching out to you, as I know working lately has been challenging for us

all with the Covid-19 restrictions we all are facing. That said, I am following up to see if you have made a determination of survey or construction BMP needs at this site based on the information provided. Since we are now almost in the middle of the bog turtle season, Transco needs to determine if surveys are necessary. Due to the size of the wetland, Phase 2 Presence/Absence Surveys and Trapping would both be proposed at this site. Surveys are scheduled to begin on May 14 if you determine surveys are necessary or if we do not receive a response, to error on the side of caution.

Thank you for your time in reviewing this site and if you have any questions, please contact me.

Thanks  
Ryan

---

**From:** Ryan Nelson  
**Sent:** Friday, May 08, 2020 6:09 AM  
**To:** 'Shellenberger, Pamela' <[pamela\\_shellenberger@fws.gov](mailto:pamela_shellenberger@fws.gov)>  
**Cc:** 'Olson, Karen ([Karen.Olson@williams.com](mailto:Karen.Olson@williams.com))' <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>; 'Henry, Josh' <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Subject:** RE: [EXTERNAL] REA - Bog Turtle Survey Follow Up Questions

Good morning, Pam,

I am following up with you to see if you have determined if surveys are needed in the SR 209 wetland we have been discussing.

Thanks  
Ryan

---

**From:** Ryan Nelson  
**Sent:** Tuesday, May 05, 2020 2:56 PM  
**To:** Shellenberger, Pamela <[pamela\\_shellenberger@fws.gov](mailto:pamela_shellenberger@fws.gov)>  
**Cc:** Olson, Karen ([Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)) <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>; Henry, Josh <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Subject:** RE: [EXTERNAL] REA - Bog Turtle Survey Follow Up Questions

Pam,

The pipeline would cross under Culvert 1, remaining in place.

Culvert 2 is associated with stormwater.

Thanks  
Ryan

---

**From:** Shellenberger, Pamela <[pamela\\_shellenberger@fws.gov](mailto:pamela_shellenberger@fws.gov)>  
**Sent:** Monday, May 04, 2020 4:00 PM  
**To:** Ryan Nelson <[ryann@whmgroup.com](mailto:ryann@whmgroup.com)>  
**Cc:** Olson, Karen ([Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)) <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>; Henry, Josh <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Subject:** Re: [EXTERNAL] REA - Bog Turtle Survey Follow Up Questions

Thanks, Ryan.

Would the pipeline cross under culvert 1?

Was there any continuous flow through culvert 2, or just stormwater flow?

---

Pamela Shellenberger

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**Note: I am temporarily teleworking. You can continue to reach me through email or by calling the number listed above.**

---

**From:** Ryan Nelson <[ryann@whmgroupp.com](mailto:ryann@whmgroupp.com)>  
**Sent:** Monday, May 4, 2020 2:09 PM  
**To:** Shellenberger, Pamela <[pamela\\_shellenberger@fws.gov](mailto:pamela_shellenberger@fws.gov)>  
**Cc:** Olson, Karen (<[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)> <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>); Henry, Josh <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Subject:** RE: [EXTERNAL] REA - Bog Turtle Survey Follow Up Questions

Pam,

Flow is west to east.

Culvert Notes:

- Culvert 1 carries surface hydrology from W2-T6 to the gravel area shown on the map. This culvert would not be removed during construction, therefore no impact during or post construction.
- Culvert 2 is likely associated with stormwater, due to the proximity to SR 209 and the parking area. The need for removal of culvert 2 will be evaluated through design due to the crossing of Rt 209. If the need to impact this culvert is identified, the culvert would be removed at the crossing location for installation of the bore pit for the crossing of SR209. It would be capped on the downstream side to prevent any runoff from the bore pit into the culvert. The culvert would be restored post-construction, if the need to impact is determined.
- Culverts 3 and 4 will not be impacted.

Sediment control and BMP's will be put in place around the LOD to protect culverts 1 and 3 and inlet protection will be provided for culvert 2 if necessary.

Excavations in this area will occur for up to 2 months due to the complexity of the road crossing and parking lot. It will take 6-8 months for the full restoration to be completed.

Thanks,  
Ryan

---

**From:** Shellenberger, Pamela <[pamela\\_shellenberger@fws.gov](mailto:pamela_shellenberger@fws.gov)>  
**Sent:** Friday, May 01, 2020 4:29 PM  
**To:** Ryan Nelson <[ryann@whmgroup.com](mailto:ryann@whmgroup.com)>  
**Cc:** Olson, Karen ([Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)) <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>; Henry, Josh <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Subject:** Re: [EXTERNAL] REA - Bog Turtle Survey Follow Up Questions

Ryan,

Thank you for this additional information. So flow direct is basically west to east into the potential bog turtle habitat? How will hydrology look during and post construction? Will the culverts be restored? How long will construction take in this area?

Thanks,

---

Pamela Shellenberger

U.S. Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, PA 16801  
814-234-4090 x7459  
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**Note: I am temporarily teleworking. You can continue to reach me through email or by calling the number listed above.**

---

**From:** Ryan Nelson <[ryann@whmgroup.com](mailto:ryann@whmgroup.com)>  
**Sent:** Thursday, April 30, 2020 4:45 PM  
**To:** Shellenberger, Pamela <[pamela\\_shellenberger@fws.gov](mailto:pamela_shellenberger@fws.gov)>  
**Cc:** Olson, Karen ([Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)) <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>; Henry, Josh <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Subject:** RE: [EXTERNAL] REA - Bog Turtle Survey Follow Up Questions

Pam,

Regarding the Sugar Hollow Site, thank you for the clarification.

Regarding the Route 209 site, since your response was provided, the site was re-visited to further review the hydrologic connection status of the potential bog turtle habitat and the delineated wetlands. It was determined that there is a connection via culverts. The culvert locations are shown on the attached mapping. Descriptions of each are provided below. Photographs of this area have also been included.

- Culvert 1 - A culvert is located at the down valley portion of W2-T6. This culvert travels under the parking lot perpendicular to the pipeline and outlets in a gravel area west of Dairy Lane.

- Culvert 2 – A culvert travels underneath the same parking lot, approximately parallel to the pipeline, and outlets in the same gravel area as Culvert 1.
- Culvert 3 – This culverts inlet is at the gravel area noted above, for the outlets of Culverts 1 and 2. This culvert travels under Dairy Lane.
- Culvert 4 – This culvert is separate from culverts 1-3 and travels underneath Dairy Lane

If you need further information to complete your determination of the need for surveys at this location, please let me know.

Thanks  
Ryan

---

**From:** Shellenberger, Pamela <[pamela\\_shellenberger@fws.gov](mailto:pamela_shellenberger@fws.gov)>  
**Sent:** Monday, April 20, 2020 4:51 PM  
**To:** Ryan Nelson <[ryann@whmgroupp.com](mailto:ryann@whmgroupp.com)>  
**Cc:** Olson, Karen <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>; Henry, Josh <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Subject:** Re: [EXTERNAL] REA - Bog Turtle Survey Follow Up Questions

Ryan,

Thanks for this follow-up information.

For the Route 209 site, are wetlands that are potential bog turtle habitat hydrologically connected (via stream, wetland, culvert, bridge etc.) to the delineated conceptual wetlands?

For the Sugar Hollow site that is 700' outside of the modeled range of the bog turtle, as of January 2020, we do not consider this to be within the range of the bog turtle, nor is it nearby a known occurrence that is with the range of the bog turtle.

Please let me know if you have any questions.  
Thank you!

---

Pamela Shellenberger

U.S. Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, PA 16801  
814-234-4090 x7459  
<http://www.fws.gov/northeast/pafo/>

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**Note: I am temporarily teleworking. You can continue to reach me through email or by calling the number listed above.**

---

**From:** Ryan Nelson <[ryann@whmgroup.com](mailto:ryann@whmgroup.com)>  
**Sent:** Friday, April 17, 2020 8:38 AM  
**To:** Shellenberger, Pamela <[pamela\\_shellenberger@fws.gov](mailto:pamela_shellenberger@fws.gov)>  
**Cc:** Olson, Karen <[Karen.Olson@williams.com](mailto:Karen.Olson@williams.com)>; Henry, Josh <[Josh.Henry@williams.com](mailto:Josh.Henry@williams.com)>  
**Subject:** [EXTERNAL] REA - Bog Turtle Survey Follow Up Questions

Pam,

In follow up to our call yesterday regarding bog turtles on Transco's Regional Energy Access Project, Phase 1 surveys were completed on the Effort Loop in Monroe County last week by Bob Bull. Two areas were identified with potential habitat. A summary of those is outlined below. Coordinates near each location are provided in the maps.

#### Habitat Area Summary

1. Area 1 (Near State Route 209/Dairy Lane)
  - a. Wetland not to be impacted, but is within 80' of workspace
  - b. Pipeline and wetland are separated by a 2-lane road (Dairy Lane).
  - c. West of Dairy lane is a mechanics garage and large parking lot, where the pipeline is proposed
  
2. Area 2 (Sugar Hollow Road)
  - a. Wetland/stream complex along Sugar Hollow Run
  - b. Wetlands are to be impacted by pipeline (and stream to be crossed)
  - c. Potential habitat is currently not proposed for impact.
  - d. The PNDI viewer indicates this area out of the range of the bog turtle (by +/- 700')

#### Question

Given the conditions of each site noted above, would Phase 2 surveys be required? We would plan to complete surveys in 2020.

If you need further information, please let me know.

Thanks  
Ryan

Ryan Nelson, PWS  
Senior Project Manager  
WHM Consulting, Inc.  
A Member of the WHM Group <sup>sm</sup>  
2525 Green Tech Drive, Suite B  
State College, PA 16803  
Office – 814-689-1650 ext. 102  
Mobile – 814-592-9848  
[ryann@whmgroup.com](mailto:ryann@whmgroup.com)



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, Pennsylvania 16801-4850

May 12, 2020

Karen Olsen  
Transcontinental Gas Pipe Line Company, L.L.C.  
2800 Post Oak Blvd. Level 11  
Houston, TX 77056

RE: USFWS Project #2020-0592

Dear Ms. Olsen:

Thank you for your letter of February 4, 2020; your emails of March 17, 2020, March 27, 2020, and April 17, 2020, which provided additional information; and our follow-up phone call on April 16, 2020, regarding information about federally listed and proposed endangered and threatened species within the area affected by the proposed Regional Energy Access Project. This project is located in Delaware, Luzerne, Monroe, Northampton, Wyoming and York Counties, Pennsylvania. The following comments are provided pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) to ensure the protection of endangered and threatened species and the Migratory Bird Treaty Act (MBTA, 16 U.S.C. 703-712; Ch. 128; July 13, 1918; 40 Stat. 755, as amended) to ensure the protection of migratory bird species.

The project consists of an expansion of Transco's existing facilities to meet growing natural gas demands. This involves two pipeline segments (approximately 22 miles of 30" pipeline and 14 miles of 42" pipeline), one new compressor station in Northampton County, upgrades to two existing compressor stations, one in Luzerne and one in York County, and additions/modifications to aboveground ancillary facilities along the existing and proposed pipelines.

## Federally Listed Species

### **Indiana and northern long-eared bats**

With the exception of Wyoming County, the proposed project is located within the range of the Indiana bat (*Myotis sodalis*), a species that is federally listed as endangered. The entire proposed project is located within the range of the federally threatened northern long-eared bat (*Myotis septentrionalis*).

Indiana bats and northern long-eared bats hibernate in caves and abandoned mines during the winter months (November through March), and use a variety of upland, wetland and riparian

habitats during the spring, summer and fall. These bats usually roost in dead or living trees with exfoliating bark, crevices or cavities. Female Indiana and northern long-eared bats form nursery colonies under the exfoliating bark of dead or living trees, such as shagbark hickory, black birch, red oak, white oak, and sugar maple, in upland or riparian areas.

Approximately 250 acres of trees are proposed for removal. Land clearing, especially of forested areas, may adversely affect these bat species by killing, injuring or disturbing roosting bats, and by removing or reducing the quality of foraging and roosting habitat. Due to the anticipated impacts of the project to forested habitat, a bat survey of the project area should be conducted between May 15 and August 15 by a qualified, Service-approved biologist using the *2020 INDIANA BAT SUMMER SURVEY GUIDELINES*, which can be found at the following link: <http://www.fws.gov/northeast/pafo/surveys.html>. Survey results should be submitted to the Service for review and concurrence.

In addition, if any natural caves or abandoned mines occur within the project area, it is possible that bats may be using them during hibernation or potentially as summer roost sites. Entrances to these potential hibernacula could be intentionally or inadvertently closed or destroyed during activities such as land clearing, grading, fill disposal, mining, road construction or building construction. If bats are present within a cave or abandoned mine when this occurs, they will become trapped inside and perish. Even if bats are not present during the closure, they may be adversely affected when they return to their hibernaculum in the fall and find it closed. This will force them to expend energy looking for another suitable hibernaculum during a time when it is crucial that they store up sufficient fat reserves for hibernation. Bats are at an increased risk of mortality when they enter hibernation with insufficient fat reserves, or are unable to locate a cave/mine with the suite of conditions (*e.g.*, temperature, humidity, air flow) necessary for successful hibernation.

To determine whether this project will affect any potential Indiana bat or northern long-eared bat hibernacula, the project area should be surveyed for cave and mine openings. All openings should be accurately mapped using a GPS unit. If potentially unstable mines (*e.g.*, abandoned coal mines) occur in the project area, the openings of these mines should be evaluated using the *PROTOCOL FOR ASSESSING BAT USE OF POTENTIAL HIBERNACULA* which can be found at the following link:

[https://www.fws.gov/northeast/pafo/pdf/20190826\\_PENNSYLVANIA%20PROTOCOL%20FOR%20ASSESSING%20POTENTIAL%20HIBERNACULA\\_Appendix%20A.pdf](https://www.fws.gov/northeast/pafo/pdf/20190826_PENNSYLVANIA%20PROTOCOL%20FOR%20ASSESSING%20POTENTIAL%20HIBERNACULA_Appendix%20A.pdf).

The Pennsylvania Game Commission has developed this protocol to determine whether abandoned mines may serve as potentially suitable bat habitat. Following this initial mine opening assessment, a qualified bat surveyor (<https://www.fws.gov/northeast/pafo/endangered/surveys.html>) should survey each potentially suitable opening, as well as the area in the immediate vicinity of these openings. Surveys should be carried out in accordance with the survey protocol and a copy of the survey results should be submitted to the Service and the Pennsylvania Game Commission for review and concurrence.

If any caves or stable hard rock mines (*e.g.*, limestone mines) occur in the project area, they should be surveyed for hibernating bats during the winter. Interior winter hibernacula surveys should be coordinated with the Pennsylvania Game Commission. Survey results should be submitted to the Service for review and concurrence. If caves or hard rock mines cannot be safely entered, their openings should be surveyed as described above.

Prior to conducting any survey, however, the Pennsylvania Game Commission should be contacted to determine whether or not they have surveyed the cave/mine in the past. If adequate surveys have been conducted in the recent past, this may preclude the need to conduct additional surveys.

Should Indiana bats or northern long-eared bats be found during any survey, further consultation with the Service will be necessary, including the submission of detailed project plans, and an analysis of alternatives to avoid and minimize adverse effects.

### *Status of Northern long-eared bat*

Finally, during our meeting on April 16, 2020, you asked about the status of the northern long-eared bat and the recent court order. During our conversations, you asked about scenarios that involved the northern long-eared bat being listed as endangered, or the 4(d) rule being dropped. At this time, the species remains listed as threatened with a 4(d) rule, and it is not possible to predict if, or when the status may change. There are no known northern long-eared bat or Indiana bat roost trees near the proposed right-of-way (ROW), and no known Indiana bat hibernacula or known northern long-eared bat hibernacula within 0.25 mile of the ROW.

However, to assist your planning purposes, please note that there is 1 northern long-eared bat hibernacula approximately 2 miles directly west of where the ROW crosses Pittston Boulevard, and a group of northern long-eared hibernacula approximately 1.5-2 miles northeast of the ROW between I-81 and Route 476.

In accordance with the Northern Long-Eared Bat Interim Conferencing Guidance, northern long-eared bat hibernacula are defined as all suitable habitat located within 5 miles of a hibernaculum. Suitable spring staging/fall swarming habitat for this species consists of a variety of forested/wooded habitats where they roost, forage, and travel, which is most typically within 5 miles of a hibernaculum. Impacts to winter hibernacula habitat consist of clearing trees within 5 miles of caves or mines where this species hibernates, thus reducing staging/swarming habitat. Per our discussions on April 16, 2020, and using the best scientific information available for this species, you should consider the locations of these known northern long-eared bat hibernacula in your project planning.

### **Bog turtle**

Delaware, Northampton, York, and portions of Monroe County are within the known range of the bog turtle (*Clemmys muhlenbergii*), a species that is federally listed as threatened. Bog turtles inhabit shallow, spring-fed fens, sphagnum bogs, swamps, marshy meadows, and pastures characterized by soft, muddy bottoms; clear, cool, slow-flowing water, often forming a network of rivulets; high humidity; and an open canopy. Bog turtles usually occur in small, discrete populations occupying suitable wetland habitat dispersed along a watershed. The occupied "intermediate successional stage" wetland habitat is usually a mosaic of micro-habitats ranging from dry pockets, to areas that are saturated with water, to areas that are periodically flooded. Some wetlands occupied by bog turtles are located in agricultural areas and are subject to grazing by livestock.

Because wetlands occur within the project area, their potential suitability as bog turtle habitat should be assessed, as described under "*Bog Turtle Habitat Survey*" (Phase 1 survey) of the

*Guidelines for Bog Turtle Surveys* ([www.fws.gov/northeast/pafo/endangered/surveys.html](http://www.fws.gov/northeast/pafo/endangered/surveys.html)). This Phase 1 survey should evaluate all wetlands within the project action area. The project “action area” includes all areas that will be directly or indirectly affected by the proposed project (including all phases of multi-phased projects) and all project-associated features, such as roads, water and sewer lines, utility lines, stormwater and sedimentation basins, buildings and other structures, driveways, parking lots, yards/lawns, and wells.

Due to the skill required to correctly identify potential bog turtle habitat, we recommend that the Phase 1 survey be done by a qualified surveyor (<https://www.fws.gov/northeast/pafo/endangered/surveys.html>). Service concurrence of negative habitat results is not necessary when a qualified surveyor does the survey in full accordance with USFWS guidelines. Please send a courtesy copy of negative results to us (label as "Negative Phase 1 Survey Results by Qualified Bog Turtle Surveyor: USFWS Courtesy Copy"). If the Phase 1 survey is done by someone who is not on this list, it is likely that third-party verification of the findings will be necessary. Current staffing shortages preclude our ability to conduct field visits to confirm determinations regarding habitat conditions. Use of a qualified surveyor will expedite our review of the survey results.

If potential bog turtle habitat is found in the project action area, efforts should be made to avoid any direct or indirect impacts to those wetlands (*Bog Turtle Conservation Zones* see [www.fws.gov/northeast/pafo/endangered/bogturtle.html](http://www.fws.gov/northeast/pafo/endangered/bogturtle.html)). Avoidance of direct and indirect effects means no disturbance to or encroachment into the wetlands (e.g., filling, ditching or draining) for any project-associated features or activities. Adverse effects may also be anticipated to occur when lot lines include portions of the wetland; when an adequate upland buffer is not designated around the wetland (*Bog Turtle Conservation Zones*); or when roads, stormwater/sedimentation basins, impervious surfaces, or wells affect the hydrology of the wetland.

If potential habitat is found, submit (along with your Phase 1 survey results) a detailed project description and detailed project plans documenting how direct and indirect impacts to the wetlands will be avoided. If adverse effects to these wetlands cannot be avoided, a more detailed and thorough survey will be necessary, as described under “*Bog Turtle Survey*” (Phase 2 survey) of the *Guidelines*. The Phase 2 survey should be conducted by a qualified bog turtle surveyor ([www.fws.gov/northeast/pafo/endangered/surveys.html](http://www.fws.gov/northeast/pafo/endangered/surveys.html)).

According to our April 16, 2020 conversation, we understand that you are in the process of completing Phase 1 surveys. Please submit survey results to the Service for review and concurrence.

### **Northeastern bulrush**

Luzerne, Monroe and Northampton Counties are within the known range of the northeastern bulrush (*Scirpus ancistrochaetus*), a federally listed, endangered plant.

Potential habitat for this species could be affected if the project will directly or indirectly affect wetlands. The northeastern bulrush is typically found in ponds, wet depressions, shallow sinkholes, vernal pools, small emergent wetlands, or beaver-influenced wetlands. These wetlands are often located in forested areas and characterized by seasonally variable water levels.

To conserve northeastern bulrush (if present) and other wetland-dependent species of concern, project-related activities should avoid adversely affecting the surface and groundwater recharge areas. This would include establishment of 300-foot wide upland buffer areas around wetlands, as well as 50-100 foot wide buffers along waterways (perennial and intermittent rivers, streams, creeks and tributaries). When adequately vegetated, these buffers will act to filter pollutants and stabilize streambanks. Earth disturbance, spraying or tree-cutting activities (tree felling, skid trails etc.), should not occur in these wetlands and their buffers. If these buffers are included, implementation of the proposed project is not likely to adversely affect the northeastern bulrush.

If you are unable to adopt the buffer restrictions detailed above, we recommend that a qualified botanist with field experience in the identification of this species conduct a thorough survey of all potentially suitable wetland habitat within the proposed project area to determine the presence of the northeastern bulrush before any permits are approved or earth-moving activities begin. Surveys for this species should be conducted between June 1 and September 30, when the flowering/fruitleting culm is present. A survey report should be submitted to the Service for review and comment. A list of botanists skilled in the location and identification of the northeastern bulrush is available here: <https://www.fws.gov/northeast/pafo/endangered/surveys.html>.

In cases where adverse effects to federally listed species cannot be avoided, further consultation with the Service would be necessary to avoid potential violations of section 9 (prohibiting “take” of listed species) and/or section 7 (requiring Federal agencies to consult) of the Endangered Species Act. Information about the section 7 and section 10 consultation processes (for Federal and non-Federal actions, respectively) can be obtained by contacting this office or accessing the Service’s Endangered Species Home Page (<http://endangered.fws.gov>).

#### Assessment of Risks to Migratory Birds

The Service is the principal Federal agency charged with protecting and enhancing populations and habitat of migratory bird species. The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Department of the Interior. The Service recognizes that some birds may be killed even if all reasonable measures to avoid take are implemented.

The potential exists for avian mortality from habitat destruction and alteration within the project boundaries. Site-specific factors that should be considered in project siting to avoid and minimize the risk to birds include avian abundance; the quality, quantity and type of habitat; geographic location; type and extent of bird use (*e.g.* breeding, foraging, migrating, etc.); and landscape features. Please review the following general recommendations for avoiding and minimizing impacts to migratory birds within and around the project area.

1. Where disturbance is necessary, clear natural or semi-natural habitats (*e.g.*, forests, woodlots, reverting fields, shrubby areas) and perform maintenance activities (*e.g.*, mowing) between September 1 and March 31, which is outside the nesting season for most native bird species. Without undertaking specific analysis of breeding species and their respective nesting seasons on the project site, implementation of this seasonal restriction will avoid take of most breeding birds, their nests, and their young (*i.e.*, eggs, hatchlings, fledglings).

2. Minimize land and vegetation disturbance during project design and construction. To reduce habitat fragmentation, co-locate roads, fences, lay down areas, staging areas, and other infrastructure in or immediately adjacent to already-disturbed areas (*e.g.*, existing roads, pipelines, agricultural fields) and cluster development features (*e.g.*, buildings, roads) as opposed to distributing them throughout land parcels. Where this is not possible, minimize roads, fences, and other infrastructure.
3. Avoid permanent habitat alterations in areas where birds are highly concentrated. Examples of high concentration areas for birds are wetlands, State or Federal refuges, Audubon Important Bird Areas, private duck clubs, staging areas, rookeries, leks, roosts, and riparian areas. Avoid establishing sizable structures along known bird migration pathways or known daily movement flyways (*e.g.*, between roosting and feeding areas).
4. To conserve area-sensitive species, avoid fragmenting large, contiguous tracts of wildlife habitat, especially if habitat cannot be fully restored after construction. Maintain contiguous habitat corridors to facilitate wildlife dispersal. Where practicable, concentrate construction activities, infrastructure, and man-made structures (*e.g.*, buildings, cell towers, roads, parking lots) on lands already altered or cultivated, and away from areas of intact and healthy native habitats. If not feasible, select fragmented or degraded habitats over relatively intact areas.
5. Develop a habitat restoration plan for the proposed site that avoids or minimizes negative impacts to birds, and that creates functional habitat for a variety of bird species. Use only plant species that are native to the local area for revegetation of the project area.

Please be aware that because these are general guidelines, some of them may not be applicable to the current project design or they may have already been included in the project design.

*To avoid potential delays in reviewing your project, please use the above-referenced USFWS project tracking number in any future correspondence regarding this project.*

If you have any questions regarding this project, please contact Pamela Shellenberger of my staff at 814-234-4090.

Sincerely,



Sonja Jahrsdoerfer  
Project Leader

cc: Tracey Librandi Mumma

## Kevin Clark WHM

---

**From:** Chris Sanders <sanders@batgate.com>  
**Sent:** Wednesday, September 9, 2020 12:40 PM  
**To:** 'Anderson, Robert'; 'Shellenberger, Pamela'; 'Braun, Olivia'  
**Cc:** 'Olson, Karen'; 'Henry, Josh'; Ryan Nelson  
**Subject:** Regional Energy Access Project - Regional Energy Lateral Hibernacula Search Report - 9/9/20 Map update  
**Attachments:** 2020 REA Hibernacula Investigation Report v2-2 small.pdf

Hello Pam and Olivia,

Attached is a updated version of the report. The report mapping has been updated to reflect the additional surveyed area completed along the current route on the eastern portion of the Project.

If you have any questions on this report, please let us know.

If you have any comments or concur with the plan to acoustically sample these portals, we are ramping up to begin deployment and are poised to tweak our methods to fit any comments.

Thanks,  
Chris

---

Chris Sanders



Sanders Environmental Inc.  
322 Borealis Way  
Bellefonte PA 16823  
814-659-8257 (cell)

---

**From:** Chris Sanders <sanders@batgate.com>  
**Sent:** Friday, September 4, 2020 3:29 PM  
**To:** 'Anderson, Robert' <robert\_m\_anderson@fws.gov>; 'Shellenberger, Pamela' <pamela\_shellenberger@fws.gov>; 'Braun, Olivia' <olbraun@pa.gov>  
**Cc:** 'Olson, Karen' <Karen.Olson@williams.com>; 'Henry, Josh' <Josh.Henry@williams.com>; 'Ryan Nelson' <ryann@whmgroup.com>  
**Subject:** Regional Energy Access Project - Regional Energy Lateral Hibernacula Search Report

Hello Pam and Olivia,

Attached is the REA Hibernacula Investigation Report. We will send our proposed study plan in a separate email as file sizes, although reduced via adobe, are too large for both to fit in one email. Please let me know if you have any questions.

Thanks,  
Chris

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Chris Sanders



Sanders Environmental Inc.  
322 Borealis Way  
Bellefonte PA 16823  
814-659-8257 (cell)

## Kevin Clark WHM

---

**From:** Ryan Nelson  
**Sent:** Wednesday, November 25, 2020 1:31 PM  
**To:** Pamela Shellenberger (pamela\_shellenberger@fws.gov)  
**Cc:** Henry, Josh; Olson, Karen (Karen.Olson@williams.com); Chris Sanders (sanders@batgate.com); RA-PGC\_PNDI@pa.gov  
**Subject:** Regional Energy Access Expansion Project - 2020 Summer Bat Acoustic Presence/Absence Survey Report

Good Afternoon, Pam,

Transcontinental Gas Pipeline Company, LLC has completed the 2020 Summer Acoustic Survey for the Regional Energy Access Expansion Project. The USFWS Project number is 2020-0592. The PGC ID is 202002030501. The report can be found at the link below. Should you have any questions, comments or issues accessing the report, please let me know.

 [Summer Acoustic Report](#)

Thanks!

Ryan Nelson, PWS  
Senior Project Manager  
WHM Consulting, LLC  
A Member of Prima Terra Holdings, LLC  
2525 Green Tech Drive, Suite B  
State College, PA 16803  
Office – 814-689-1650 ext. 102  
Mobile – 814-592-9848  
[ryann@whmgroup.com](mailto:ryann@whmgroup.com)

## Kevin Clark WHM

---

**From:** Ryan Nelson  
**Sent:** Wednesday, November 25, 2020 1:37 PM  
**To:** Pamela Shellenberger (pamela\_shellenberger@fws.gov)  
**Cc:** Henry, Josh; Olson, Karen (Karen.Olson@williams.com)  
**Subject:** Regional Energy Access Expansion Project - 2020 Northeastern Bulrush Survey Report and Migratory Bird Plan

Good Afternoon, Pam,

Transcontinental Gas Pipeline Company, LLC has completed the 2020 Northeastern Bulrush Survey and the Migratory Bird Plan for the Regional Energy Access Expansion Project. The USFWS Project number is 2020-0592. The reports can be found at the link below. Should you have any questions, comments or issues accessing the reports, please let me know.

 [Bulrush Report and Migratory Bird Plan](#)

Thanks!

Ryan Nelson, PWS  
Senior Project Manager  
WHM Consulting, LLC  
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2525 Green Tech Drive, Suite B  
State College, PA 16803  
Office – 814-689-1650 ext. 102  
Mobile – 814-592-9848  
[ryann@whmgroup.com](mailto:ryann@whmgroup.com)

## Ryan Nelson

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**From:** Ryan Nelson  
**Sent:** Thursday, February 25, 2021 3:00 PM  
**To:** Henry, Josh; Librandi Mumma, Tracey; Shellenberger, Pamela  
**Cc:** Chris Sanders (sanders@batgate.com); Olson, Karen; Ali Trunzo  
**Subject:** Regional Energy Access Expansion Project - Survey Reports

Good Afternoon Pam and Traci,

I have posted the following reports to the Sharepoint site below. Included are both previously submitted reports and new reports.

Previously Submitted Reports:

1. 2020 Summer Bat Acoustic Presence/Absence Survey Report
2. Summer Acoustic Study Summary Letter and Site 12 Review
3. 2020 Eastern Small-Footed Bat Habitat Assessment
4. Phase 1 Hibernacula Search

New Reports:

1. 2020 Fall Bat Acoustic – Phase 2 Hibernacula Survey
2. Phase 1 Hibernacula Search – Addendum

 [USFWS PGC 022321](#)

Should you have any questions on the reports or have issues accessing the sharepoint, please contact me.

Thank you!

Ryan

Ryan Nelson, PWS  
Senior Project Manager  
WHM Consulting, LLC  
A Member of Prima Terra Holdings, LLC  
2525 Green Tech Drive, Suite B  
State College, PA 16803  
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# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, Pennsylvania 16801-4850

October 6, 2021

Ryan Nelson  
WHM Consulting, LLC  
2525 Green Tech Drive, Suite B  
State College, PA 16803

RE: USFWS Project # 2020-1530  
PNDI Receipt #731161

Dear Mr. Nelson:

Thank you for your letters of September 29, 2020, and August 31, 2021, which provided the U.S. Fish and Wildlife Service (Service) with Phase 1, Phase 2, and Phase 3 bog turtle surveys regarding the proposed Perin Wetland Mitigation Project located in Plainfield Township, Northampton County, Pennsylvania. Perin proposes to build a wetland mitigation site on an existing farm for a proposed transmission line. The project area is within the range of the bog turtle (*Clemmys muhlenbergii*), a species that is federally listed as threatened. The following comments are provided pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) to ensure the protection of endangered and threatened species.

To determine the potential effects of the proposed project on bog turtles and their habitat, Robert Bull, a recognized qualified bog turtle surveyor, conducted a Phase 1 bog turtle habitat assessment on September 17, 2020. According to the Phase 1 report, one wetland extends to within 300 feet of the proposed limit of disturbance. Following the methods described under “*Bog Turtle Habitat Survey*” (Phase 1 survey) of the *Guidelines for Bog Turtle Surveys*, Mr. Bull determined that the wetland referred to as Wetland 1 had the combination of soils, vegetation, and hydrology typical of habitat occupied by bog turtles. We concur with this determination.

To conduct a more detailed and thorough evaluation of Wetland 1, Mr. Bull and his assistants completed Phase 2 bog turtle surveys not only on Wetland 1 (Habitat Area A (2.7 acres)), but also a second wetland called Habitat Area B (0.18 acre) on May 1, 14, 23, and 31, 2021. According to the survey report, although the sites contained suitable bog turtle habitat, and several amphibian and reptile species were observed (green frog, painted turtle, red eared slider, spotted turtle, snapping turtle, northern water snake, northern red salamander, long tailed salamander) no bog turtles were found in these wetlands.

To verify and further support the Phase 2 findings, Mr. Bull also conducted a Phase 3 trapping survey for 21 days (concurrently with the Phase 2 survey); between May 14 and June 9, 2021 (30,240 trap hours). According to the survey report, incidental captures included: green frog, red salamander, painted turtle, snapping turtle, spotted turtle, cat bird, red-wing blackbirds, and Virginia rail, but no bog turtles were captured as a result of the trapping effort (60 traps). Additionally, no bog turtles were observed by the trapping team incidental to the trapping efforts.

Based on our review of this information, including the project description, project locations, and anticipated activities; and the probable absence of bog turtles in the subject wetlands, we conclude that construction and implementation of the proposed project are not likely to adversely affect the bog turtle.

This determination is valid for 2 years from the date of this letter. If the proposed project has not been fully implemented prior to this, an additional review by this office is recommended. Should project plans change, or if additional information on listed or proposed species becomes available, this determination may be reconsidered.

This response relates only to endangered or threatened species under our jurisdiction, based on an office review of the proposed project's location. No field evaluation has been completed by this office.

*To avoid potential delays in reviewing of your project, please use the above-referenced USFWS project tracking number in any future correspondence regarding this project.*

If you have any further questions regarding this matter, please contact Jennifer Kagel of my staff at [Jennifer\\_Kagel@fws.gov](mailto:Jennifer_Kagel@fws.gov).

Sincerely,



Sonja Jahrsdoerfer  
Project Leader

[ryann@whmgroup.com](mailto:ryann@whmgroup.com)

## Ryan Nelson

---

**From:** Henry, Joshua <Josh.Henry@williams.com>  
**Sent:** Wednesday, December 1, 2021 1:40 PM  
**To:** Shellenberger, Pamela; Guers, Sue  
**Cc:** Olson, Karen; Ryan Nelson; Chris Sanders; Broush, Jennifer (EXT)  
**Subject:** USFWS/PGC Meeting Minutes and 2021 Fall Trapping Report  
**Attachments:** 112221\_USFWS\_PGC\_Mtg\_Minutes.pdf

All,

I hope everyone had a wonderful Thanksgiving. Please see the attached meeting minutes from our call on 11/22/2021. I have also attached a link to the 2021 Fall Trapping Report, if this does not work for you, please let me know. I will be reaching out again soon to set up another meeting to go through the updated TOYR's as outlined in the minutes.

 [2021 Fall Trapping Report](#)

Thank you,



**Josh Henry** | Williams | Environmental Specialist

Office: 412-787-4277 | Cell: 412-713-0485 | 2000 Commerce Drive, Park Place 2, Pittsburgh, PA, 15275



*If you have received this message in error, please reply to advise the sender of the error and then immediately delete this message.*

## Henry, Joshua

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**From:** Henry, Joshua  
**Sent:** Friday, June 3, 2022 3:19 PM  
**To:** 'Shellenberger, Pamela'  
**Subject:** Mapping and Table Typo  
**Attachments:** 06-03-22-Proposed\_Restrictions-Clean.pdf; 06-03-22-Proposed\_Restrictions-Tracked.pdf; REL\_BatRestrictionsMapping\_OVERALL\_06032022.pdf

**Importance:** High

Pam,

We had a data request come in for some typos in the map and table. See attached. Nothing material changed, but I wanted you to have a final version. I included a tracked version of the table for you.

Thank you,



**Josh Henry** | Williams | Environmental Specialist

Office: 412-787-4277 | Cell: 412-713-0485 | 2000 Commerce Drive, Park Place 2, Pittsburgh, PA, 15275

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**Bat Restriction Summary Table**  
**Regional Energy Access Expansion Project**  
**Transcontinental Gas Pipe Line Company, LLC**

Species	Listing Status	Hibernacula ID <sup>2</sup>	Restriction 1 - Tree Clearing Activities Near Hibernacula	Restriction 2 - Ground Disturbance Activities Near Hibernacula	Restriction 3 - Blasting Near Hibernacula	Restriction 4 - Additional Site-Specific
<b>Federal</b>						
Indiana Bat	Federally Endangered	7	Adhere to TOYRs within 0.5-mile of identified IBAT hibernacula and must be cleared between November 16 and March 31.  Transco will adhere to TOYRs within 5-miles of identified IBAT hibernacula and clear trees between November 16 and March 31.	No activities will occur overtop of the mine workings associated with Portal 7.	No blasting will be conducted within 0.5- mile of the subsurface limits of identified IBAT hibernacula.	
Northern Long-Eared Bat	Federally Threatened	5, 9, 17, 46	Within 5 miles of identified NLEB hibernacula, trees must be cleared between November 16 and March 31.  Within 0.25-mile of identified NLEB hibernacula trees must be cleared with non-mechanized equipment (i.e. hand-fell).  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities, hand felling is not required and mechanized felling is permissible (10.2-11.25, 15.7-15.95)	Pipeline construction activities involving ground disturbance (i.e., trenching, grading, and pipeline installation) will adhere to TOYRs within a 0.25-mile radius of identified NLEB hibernacula and must occur between April 1 and November 15.  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities, this restriction is not proposed (10.2-11.25, 15.7-15.95).	No blasting will be conducted within 0.25- mile of the subsurface limits of identified NLEB hibernacula.  Additionally, blasting will adhere to TOYR within 0.25 to 0.5 mile of identified NLEB hibernacula. Blasting in this area must be conducted between April 1 and November 15.	Within 3 miles of a summer acoustic detection location (Effort Sites 7 and 8 and REL Sites 6, 12, and Bald Mt Alt Site 2), felling of all trees or dead snags greater than 3 inches in diameter at breast height that need to be harvested to facilitate the project (including any access roads or off-ROW work spaces) should occur between November 16 and March 31 to avoid impacting bats roosting within the project area.
<b>State</b>						
Tri-Colored Bat	State Endangered	9, 18, 46	Within 0.25-mile of identified Tri-Colored hibernacula, trees must be cleared between November 16 and March 31 and with non-mechanized equipment (e.g. hand-fell).  Within 0.25-mile of identified Tri-Colored bat hibernacula, trees must be cleared with non-mechanized equipment (i.e. hand-fell).  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities,hand-felling is not required and mechanized felling is permissible (10.2-11.25, 15.7-15.95).	Pipeline construction activities involving ground disturbance (i.e., trenching, grading, and pipeline installation) will adhere to TOYRs within a 0.25-mile radius of identified Tri-colored bat hibernacula and must occur between April 1 and November 15.  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities, this restriction is not proposed (10.2-11.25, 15.7-15.95).	No blasting will be conducted within 0.25- mile of the subsurface limits of identified Tri-colored bat hibernacula.  Additionally, blasting will adhere to TOYR within 0.25 to 0.5 mile of identified Tri-Colored Bat hibernacula. Blasting in this area must be conducted between April 1 and November 15.	Within 2.5 miles of a summer acoustic detection location (Effort Sites 18 and REL Sites 4 and 33), felling of all trees or dead snags greater than 3 inches in diameter at breast height that need to be harvested to facilitate the project (including any access roads or off-ROW work spaces) should occur between November 16 to March 31 to avoid impacting bats roosting within the project area.  Transco is proposing 1.20 acres of tree felling at Compressor Station 515 to occur outside of the time of year restrictions identified for the Tri-Colored bat. Although this area falls within the 2.5 mile buffer established for positive summer acoustic surveys for an acoustic detection of a tri-colored bat 2.2 miles away, 5 summer acoustic surveys with 2 survey nights each, were conducted just outside of the boundary of CS 515 with no bats detected. Additionally this small set of trees is located adjacent to the existing active compressor station.
Little Brown Bat	State Endangered	2, 6, 7, 8, 18	Within 0.25-mile of identified Little brown bat hibernacula, trees must be cleared between November 16 and March 31 and with non-mechanized equipment (e.g. hand-fell).  Within 0.25-mile of identified Little Brown bat hibernacula, trees must be cleared with non-mechanized equipment (i.e. hand-fell).  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities,hand-felling is not required and mechanized felling is permissible (10.2-11.25, 15.7-15.95).	Pipeline construction activities involving ground disturbance (i.e., trenching, grading, and pipeline installation) will adhere to TOYRs within a 0.25-mile radius of identified Little Brown Bat hibernacula and must occur between April 1 and November 15.  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities, this restriction is not proposed (10.2-11.25, 15.7-15.95).	No blasting will be conducted within 0.25- mile of the subsurface limits of identified Little Brown Bat hibernacula.  Additionally, blasting will adhere to TOYR within 0.25 to 0.5 mile of identified Little Brown Bat hibernacula. Blasting in this area must be conducted between April 1 and November 15.	
Eastern Small-footed bat	State Threatened	5, 6, 7, 9, 14, 18, 20, 25, 41, 46	Within 0.25-mile of identified Eastern small-footed hibernacula, trees must be cleared between November 16 and March 31 and with non-mechanized equipment (e.g. hand-fell).  Within 0.25-mile of identified Eastern Small-footed bat hibernacula, trees must be cleared with non-mechanized equipment (i.e. hand-fell).  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities,hand-felling is not required and mechanized felling is permissible (10.2-11.25, 15.7-15.95).	Pipeline construction activities involving ground disturbance (i.e., trenching, grading, and pipeline installation) will adhere to TOYRs within a 0.25-mile radius of identified Eastern small-footed bat hibernacula and must occur between April 1 and November 15.  In instances where the mine investigation study revealed that no impact to the mines is likely due to flooded conditions or depth of mine beneath the proposed ground disturbance activities, this restriction is not proposed (10.2-11.25, 15.7-15.95).	No blasting will be conducted within 0.25- mile of the subsurface limits of identified Eastern Small-footed bat hibernacula.  Additionally, blasting will adhere to TOYR within 0.25 to 0.5 mile of identified Eastern Small-Footed Bat hibernacula. Blasting in this area must be conducted between April 1 and November 15.	



**Transcontinental Gas Pipe Line Company, LLC**

**Requirement G-6.2 – 2020 Summer Bat Acoustic  
Presence/Absence Survey Report**

**Regional Energy Access Expansion Project – Effort Loop**

**April 2021**

Transco requests that the Threatened and Endangered Species Survey Report be accorded privileged treatment, and that it be placed in a non-public file.



**Transcontinental Gas Pipe Line Company, LLC**

**Requirement G-6.3 – Negative Phase 1 Survey Results –  
Bog Turtle**

**Regional Energy Access Expansion Project – Effort Loop**

**April 2021**

Transco requests that the Threatened and Endangered Species Survey Report be accorded privileged treatment, and that it be placed in a non-public file.



**Transcontinental Gas Pipe Line Company, LLC**

**Requirement G-6.4 – 2020 USFWS Northeastern  
Bulrush Survey Report**

**Regional Energy Access Expansion Project – Effort Loop**

**April 2021**

Transco requests that the Threatened and Endangered Species Survey Report be accorded privileged treatment, and that it be placed in a non-public file.