

August 5, 2022

## **IN REPLY REFER TO**

SIR# 56633

Moody & Associates, Inc. Jordan Bell 11548 Cotton Road Meadville, Pennsylvania 16335

RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species

PNDI Search No. 734429

Big Sewickley Creek Withdrawal Economy Borough: BEAVER County

Dear Jordan Bell:

This responds to your inquiry about a Pennsylvania Natural Diversity Inventory (PNDI) Internet Database search "potential conflict" or a threatened and endangered species impact review. These projects are screened for potential conflicts with rare, candidate, threatened or endangered species under Pennsylvania Fish and Boat Commission jurisdiction (fish, reptiles, amphibians, aquatic invertebrates only) using the Pennsylvania Natural Diversity Inventory (PNDI) database and our own files. These species of special concern are listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, and the Pennsylvania Fish and Boat Code (Chapter 75), or the Wildlife Code.

## Southern Redbelly Dace (Chrosomus erythrogaster, PA Threatened)

PennEnergy Resources has requested to withdrawal 1.5 million gallons of water per day from Big Sewickley Creek for development of the B50 well-pad. Ongoing coordination with this office has led to reductions in the proposed daily withdrawal volume from Big Sewickley Creek and the abandonment of plans to withdrawal water from North Fork Big Sewickley Creek. Through coordination, we have requested that multiple methods be employed to estimate water level changes in Big Sewickley Creek resulting from the proposed withdrawal. This level of analysis was requested to evaluate potential impacts to the Southern Redbelly Dace and its habitat.

To date, four iterations of the Big Sewickley Creek water management plan (WMP) have been submitted for review. At our recommendation, you submitted an amended plan on March 10, 2022 following pass-by flow recommendations outlined in the Susquehanna River Basin Commission's *Low Flow Protection Policy* (Policy # 2003-01) utilizing stream discharge information derived from the United State Geological Service's (USGS) online StreamStats application. Due to ongoing concerns for potential impacts to instream habitat for the Southern Redbelly Dace, we requested that a similar analysis be performed employing the Tennant Method based on instream flow statistics calculated from decommissioned USGS gauge # 03086110. An additional WMP amendment describing the potential impact of the project utilizing these recommendations was submitted on July 15, 2022.

We have reviewed both the submitted plans and request that the recommendations outlined using the Tennant Method be applied to instream flow estimates provided by the USGS StreamStats online application for Big Sewickley Creek. The Tennant method recommends a pass by flow of 30% of the average daily flow (ADF) for the months of October through March and 50% of the ADF from April to September. This pass by flow recommendation is deemed to be protective of instream habitat minimizing decreases in wetted width. Please amend the WMP using the recommendation described above for our review and concurrence.

If approved, we request that a report detailing daily withdrawals be provided to this office on a monthly basis via email (<u>draab@pa.gov</u>). Additionally, we request that installation of pumps be coordinated with this office.

This response supersedes our letter of August 23, 2021 for PNDI # 734429 & 734425 and represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be reinitiated.

If you have any questions regarding this review, please contact Dakota Raab at 814-359-5117 or draab@pa.gov and refer to the SIR # 56633. Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,

Dakota Raab, Fisheries Biologist Resource Extraction Section

/DR/dn