



Transcontinental Gas Pipe Line Company, LLC

Requirement G-6 – United States Fish and Wildlife Service

**Regional Energy Access Expansion Project
Regional Energy Lateral and Existing Compressor Station 515**

April 2021



Transcontinental Gas Pipe Line Company, LLC

**Requirement G-6.1 – United States Fish and Wildlife Service
Correspondences**

**Regional Energy Access Expansion Project –
Regional Energy Lateral and Existing Compressor Station 515**

April 2021



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.

Table 1. Project Facility Summary Table		
Project Component	County	Attachment B - Topographic Project Location Map
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. 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. I appreciate your assistance and thank you for your attention to this request.

Respectfully submitted,

TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC

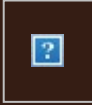
A handwritten signature in blue ink, appearing to read "Karen Olson", with a long horizontal line extending to the right.

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
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.

Shipment Detail

Tracking Number:	1Z8797VV0393892874
Ship To:	Fish Wildlife Serv PA Field Off US Dept of Interior 110 RADNOR RD ROOM 101 STATE COLLEGE, PA 16801 US
UPS Service:	UPS GROUND
Number of Packages:	1
Weight:	1.0 LBS
Delivery Location:	OFFICE THEES
Reference Number 1:	WILLIAMS 244-3A



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Kevin Clark WHM

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,

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.

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>
Sent: Monday, March 9, 2020 2:19 PM
To: Chris Sanders <sanders@batgate.com>
Cc: 'Olson, Karen' <Karen.Olson@williams.com>; 'Henry, Josh' <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>
Sent: Sunday, March 08, 2020 4:26 PM
To: Ryan Nelson <ryann@whmgroup.com>
Cc: 'Olson, Karen' <Karen.Olson@williams.com>; 'Henry, Josh' <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

From: Henry, Josh <Josh.Henry@williams.com>
Sent: Friday, March 6, 2020 4:48 PM
To: Ryan Nelson <ryann@whmgroup.com>; Olson, Karen <Karen.Olson@williams.com>
Cc: Chris Sanders (sanders@batgate.com) <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>
Sent: Friday, March 6, 2020 2:29 PM
To: Henry, Josh <Josh.Henry@williams.com>; Olson, Karen <Karen.Olson@williams.com>
Cc: Chris Sanders (sanders@batgate.com) <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 sm
2525 Green Tech Drive, Suite B
State College, PA 16803
Office – 814-689-1650 ext. 102
Mobile – 814-592-9848
ryann@whmgroup.com

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

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 sm
2525 Green Tech Drive, Suite B
State College, PA 16803
Office – 814-689-1650 ext. 102
Mobile – 814-592-9848
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.

Regional Energy Access Project - Tree Clearing Summary		
Project Component	County	Tree Clearing Estimate (acres)
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

U.S. Fish and Wildlife Service
Pennsylvania Field Office
110 Radnor Road, Suite 101
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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>
Sent: Friday, March 13, 2020 1:22 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

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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
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>
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>
Cc: 'Olson, Karen (Karen.Olson@williams.com)' <Karen.Olson@williams.com>; 'Henry, Josh' <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>
Cc: Olson, Karen (Karen.Olson@williams.com) <Karen.Olson@williams.com>; Henry, Josh <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>
Sent: Monday, May 04, 2020 4:00 PM
To: Ryan Nelson <ryann@whmgroup.com>
Cc: Olson, Karen (Karen.Olson@williams.com) <Karen.Olson@williams.com>; Henry, Josh <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

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@whmgroupp.com>
Sent: Monday, May 4, 2020 2:09 PM
To: Shellenberger, Pamela <pamela_shellenberger@fws.gov>
Cc: Olson, Karen (<Karen.Olson@williams.com> <Karen.Olson@williams.com>); Henry, Josh <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>
Sent: Friday, May 01, 2020 4:29 PM
To: Ryan Nelson <ryann@whmgroup.com>
Cc: Olson, Karen (Karen.Olson@williams.com) <Karen.Olson@williams.com>; Henry, Josh <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
<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: Thursday, April 30, 2020 4:45 PM
To: Shellenberger, Pamela <pamela_shellenberger@fws.gov>
Cc: Olson, Karen (Karen.Olson@williams.com) <Karen.Olson@williams.com>; Henry, Josh <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>
Sent: Monday, April 20, 2020 4:51 PM
To: Ryan Nelson <ryann@whmgroup.com>
Cc: Olson, Karen <Karen.Olson@williams.com>; Henry, Josh <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>
Sent: Friday, April 17, 2020 8:38 AM
To: Shellenberger, Pamela <pamela_shellenberger@fws.gov>
Cc: Olson, Karen <Karen.Olson@williams.com>; Henry, Josh <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 sm
2525 Green Tech Drive, Suite B
State College, PA 16803
Office – 814-689-1650 ext. 102
Mobile – 814-592-9848
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.

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). 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). 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).

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

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

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
A Member of Prima Terra Holdings, LLC
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Office – 814-689-1650 ext. 102
Mobile – 814-592-9848
ryann@whmgroup.com

Ryan Nelson

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
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WHM Consulting, LLC
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Transcontinental Gas Pipe Line Company, LLC

**Requirement G-6.2 – United States Fish and Wildlife Service
Summer Bat Acoustic Presence/Absence Survey Report**

**Regional Energy Access Expansion Project –
Regional Energy Lateral and Existing Compressor Station 515**

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-6.3.1 – United States Fish and Wildlife
Service – Phase 1 Hibernacula Search**

**Regional Energy Access Expansion Project –
Regional Energy Lateral and Existing Compressor Station 515**

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-6.3.2 – United States Fish and Wildlife Service –
Phase 1 Hibernacula Search - Addendum**

**Regional Energy Access Expansion Project –
Regional Energy Lateral and Existing Compressor Station 515**

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 – United States Fish and Wildlife Service 2020
Fall Bat Acoustic – Phase 2 Hibernacula Survey**

**Regional Energy Access Expansion Project
Regional Energy Lateral and Existing Compressor Station 515**

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-6.5 – United States Fish and Wildlife Service
2020 USFWS Northeastern Bulrush Survey Report**

**Regional Energy Access Expansion Project
Regional Energy Lateral and Existing Compressor Station 515**

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.