



# United States Department of the Interior



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

January 19, 2018

Kevin Moore  
Specialty Granules, LLC  
13424 Pennsylvania Ave., Suite 303  
Hagerstown, MD 21742

RE: USFWS Project #2010-1050  
PNDI Receipt#635546-FINAL

Dear Mr. Moore:

Thank you for your letter received on December 21, 2017, providing the U.S. Fish and Wildlife Service (Service) with information regarding Specialty Granules' proposed Charmian Facility Pitts Quarry Expansion project located in Hamilton Township, Adams County, 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. The proposed project is located within the range of the federally listed as threatened bog turtle (*Clemmys muhlenbergii*), endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*).

## Bog turtle

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.

To determine the potential effects of the proposed project on bog turtles and their habitat, Andy Brookens, a recognized qualified bog turtle surveyor, conducted a Phase 1 bog turtle habitat assessment on December 16, 2015. Following the methods described under "Bog Turtle Habitat Survey" (Phase 1 survey) of the Guidelines for Bog Turtle Surveys (revised April 2006), Mr. Brookens determined that none of the wetlands occurring within 300 feet of the project

boundaries have the combination of hydrology, soils, and vegetation characteristic of suitable bog turtle habitat. We agree with his habitat determination and conclude that implementation of the proposed project will not affect the bog turtle.

#### Indiana bat & northern long-eared bat

Indiana and northern long-eared bats hibernate in caves and abandoned mines during the winter months (November through March), and use a variety of forested upland and wetland habitats during the spring, summer, and fall. Indiana bats usually roost in dead or living trees with exfoliating bark, crevices or cavities. Female Indiana 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.

#### *Winter*

To determine potential effects on hibernating bats, Western EcoSystems Technology Inc. (West) surveyed the project area for potential bat hibernacula following the Pennsylvania Game Commission's and the Service's habitat assessment protocols. The survey documented one potential bat hibernacula in the project area. West completed fall mist-net at the entrance of the potential hibernacula on three non-consecutive nights between October 7 and 14, 2017. They did not detect Indiana bats or northern long-eared bats; therefore, the Service does not expect adverse effects to hibernating bats from the proposed project.

#### *Spring, Summer, and Fall*

Both Indiana and northern long-eared bats use trees as maternity sites during the spring and summer months. The Service recommends confining any tree removal activities to the winter months (November 15 through March 31) to avoid killing or injuring breeding bats (for trees that are greater than or equal to 3 inches in diameter at breast height). Removing trees during the winter months reduces the risk of inadvertently killing roosting, nursing and/or young bats residing in nursery trees. Further coordination with this office will be necessary if you are unable to implement this seasonal restriction for tree removal.

*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 Brian Scofield of my staff at 814-234-4090.

Sincerely,

Patrice Ashfield.  
Acting, Field Office Supervisor