



United States Department of the Interior



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

January 8, 2021

Brad Schaeffer
Tetra Tech, Inc.
301 Ellicott Street
Buffalo, NY 14203

RE: USFWS Project #2021-0037
PNDI Receipt # 720866

Dear Mr. Schaeffer:

This responds to an email received December 8, 2020, requesting additional review and information about federally listed and proposed endangered and threatened species within the area affected by the proposed ME2 PPP request for restart/restoration of the wetland associated with the Horizontal Directional Drill (HDD) S3-0290 project located in Upper Uwchlan Township, Chester County, Pennsylvania. The proposed project is within the known 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.

In a letter dated October 15, 2020, the U.S. Fish and Wildlife Service (Service) provided our conclusion that the project would not cause negative effects to the bog turtle to the Pennsylvania Department of Environmental Protection (DEP) for a grout plan for the referenced HDD. Similarly, in a letter dated December 9, 2020, the Service determined that geophysical work related to the proposed restart of the HDD at wetland H17 is not likely to adversely affect the bog turtle.

You requested our review of the restart of this HDD and restoration of associated wetland impacts due to the installation of a containment structure, as these control measures will require additional impact of approximately 0.6 acres of wetland H17 (0.186 acres of PEM wetland, and 0.433 acres of PFO wetland).

The containment structure is to be installed at the location that has been determined to be the most likely place where an inadvertent return (IR) may occur in the future. The control measure is being installed to contain an IR should it occur. After drilling is complete, this portion of the wetland will be restored.

Phase 1 surveys were conducted in 2014 at wetland H17, the wetland that is being impacted by the restart/restoration work, and adjacent wetlands (C48, C47, C46 and C44). All of these wetlands were determined to contain potential bog turtle habitat. Therefore, Phase 2 surveys occurred in all of these wetlands in 2014. The Phase 2 surveys concluded probable absence, except for wetland C44, which our office determined to be hydrologically connected to a known bog turtle site (discovered by Skelly and Loy in the early 2000s).

Although 7 years have lapsed since Phase 2 surveys were conducted at these wetlands, due to the low population density at the wetland that is connected to C44, and the inferred absence of bog turtles in all of the other wetlands from the 2014 phase 2 surveys, we conclude that the restart/restoration work will not cause negative effects to the bog turtle. This letter solely addresses the restart/restoration work.

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

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 814-234-4090 x7459.

Sincerely,



Sonja Jahrsdoerfer
Project Leader

cc: Pat Green, Tetra Tech, Inc.

Brad.Schaeffer@tetrattech.com
Pat.Green@tetrattech.com