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January 14, 2011

Ms. Kathy Gipe
Pennsylvania Fish and Boat Commission
Division of Environmental Services
Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823

BELL BEND NUCLEAR POWER PLANT SIR #35087, SPECIES IMPACT REVIEW NORTHERN CRICKET FROG BNP-2011-004 Docket No. 52-039

References:

1) PAFBC-2010-283, Christopher Urban, PFBC, to Bradley Wise, "Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species, Update to SIR 27486", October 14, 2010

PPL Bell Bend, LLC is providing herein a response to the Commission's correspondence of October 14, 2010 (SIR 35087, update to SIR 27486)(Reference 1). Specifically, PPL is providing information requested by the Commission to aid in the assessment of potential impact to the newly listed as "endangered" Northern cricket frog (*Acris crepitans*).

This letter provides a brief introduction to important characteristics of the project as related to Northern cricket frog habitat and associated impacts at the Bell Bend Nuclear Power Plant (BBNPP) site. Additionally, this letter provides the Commission with two project topical reports on terrestrial fauna (including amphibians) and wetlands at the site, Enclosures 1 and 2 respectively.

These reports describe the methods and findings of surveys completed between 2007 and 2010, and include faunal observations as well as the locations, types, and characteristics of wetlands and streams at the BBNPP site. As described in the Terrestrial Fauna report, biologists evaluating the BBNPP site reported hearing the call of a Northern cricket frog twice on a single day in November, 2007. The species has not been seen or observed otherwise at the BBNPP site or adjacent lands associated with the Susquehanna Steam Electric Station and Riverlands Nature Preserve. On-going field work by Dr. Brian Mangan of Kings College, and the staff of Ecology III have failed to find this species on-site. The locations of the observations were in the western part of the watershed of Walker Run, as shown in Enclosure 1.

As part of project siting and design, BBNPP has undergone an extensive wetland avoidance and minimization program, including substantial redesign of major project elements in response and coordination with state and federal regulatory agencies, including the Commission. The development of the project proposes less than 2 acres of direct wetland impact within the 1,991 acres of land supporting project development. In addition to the direct wetlands impacts, vegetation management, primarily associated with transmission line right-of-way maintenance, will permanently convert approximately 9 acres of wetlands from a mixed forested/emergent/scrub community to a low-growing emergent/scrub community. A mitigation

program for BBNPP, developed in coordination with state and federal agencies, including the Commission, provides for stream and wetland restoration and creation to offset unavoidable impacts of the project. The Commission contacts for the BBNPP project have been Tom Shervinskie and Mark Hartle.

Should you have any questions or require additional information, please don't hesitate to Brad Wise of my staff at (610) 774-6508 or bawise@pplweb.com.

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Terry L. Harpster

TLH/kw

Enclosures: 1) A Field Survey of Terrestrial Fauna at the Proposed Bell Bend Nuclear Power Plant Site Luzerne Country, Pennsylvania, Rev. 4, December, 2010 (Provided on DVD)

 Wetlands Delineation and Exceptional Value Wetlands Analysis Report for the Proposed Bell Bend Nuclear Power Plant Site, Rev. 5, November, 2010. (Provided on DVD)

## cc: (w/ Enclosure)

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