



BUREAU OF FORESTRY

February 28, 2013

PNDI Number: 22137

Laura Quinn-Willingham
US Nuclear Regulatory Commission
Laura.quinn-willingham@nrc.gov (hardcopy will not follow)

Re: Docket No. 52-039
Bell Bend Nuclear Power Plant and Alternative Sites:
Bell Bend Site – Salem Township, Luzerne County, PA
Montour Site – Derry Township, Montour County, PA
Humboldt Site – City of Hazleton, Luzerne County, PA
Seedco Site – Coal Township, Northumberland County, PA

Dear Ms. Quinn-Willingham,

Thank you for the submission of the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt Number 22137 for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

No Impact Anticipated

PNDI records indicate species or resources under DCNR's jurisdiction are located in the vicinity of the project. However, based on the information you submitted concerning the nature of the project, the immediate location, and our detailed resource information, DCNR has determined that no impact is likely. Please see below for voluntary avoidance and conservation measures, and more information about the species occurrences known within the vicinity of the proposed project and alternative sites. No further coordination with our agency is needed for this project.

Bell Bend Site

PNDI records indicate there are no plant species or geologic features of concern in your project area; however, there are two terrestrial invertebrates of concern previously found onsite.

Euphydryas phaeton (Baltimore Checkerspot, S3) is a butterfly species of concern known from previous surveys to be found onsite. It inhabits moist areas such as wet meadows, bogs, and marshes. The larvae of this species use Turtlehead, Hairy Beardtongue, English plantain, Foxglove and White Ash as host plants; adult food sources are nectar from Milkweed, Virburnums and Wild Rose.

Poanes massasoit (Mulberry Wing, S2) is another butterfly species of concern known from previous collection on the project area. Habitat includes freshwater marshes or bogs. The larvae of this species use *Carex stricta* and other sedges as host plants; adult food source is flower nectar.

As a voluntary conservation measure, DCNR suggests using these host and food species in your eventual revegetation plan; this would provide additional habitat for these species. Because these species utilize bog and wet, marshy areas as habitat, DCNR suggests avoiding and minimizing impacting wetlands onsite.

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Montour Site

PNDI records indicate there are no plant species or geologic features of concern known within the project area; however, there three plant species are known within the project vicinity.

Dichanthelium villosissimum var. *villosissimum* (Long-haired Panic-grass; Currently Tentatively Undetermined, Proposed State-listed Endangered) is a plant species that can be found in dry woods and serpentine barrens. This occurrence of Long-haired Panic-grass was observed nearby along a disturbed field edge in 1994.

Rotala ramosior (Tooth-cup, State-listed Rare) is a plant that inhabits wet sandy shores and swampy, open ground; it flowers July through September. Toothcup was found nearby in 2004 along a shoreline.

If *Rotala ramosior* or its critical habitat is found onsite, DCNR suggests voluntarily avoidance or minimization. Because of its proposed status of Endangered, if critical habitat for *D. villosissimum* var. *villosissimum* will be disturbed, DCNR highly suggests a voluntary botanical survey be conducted during the appropriate time of year to determine the presence or absence of this species within the project area. Survey protocol information can be found at <http://www.gis.dcnr.state.pa.us/hgis-er/Login.aspx>. Please contact our office is you desire more information about this occurrence.

Humboldt Site

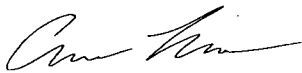
PNDI records indicate one resource of concern within the Humboldt Site boundary; the community Scrub Oak Shrubland (S3) is known within the Humboldt alternative site. DCNR recommends voluntary avoidance and minimization of impacts to this community. Please see <http://www.naturalheritage.state.pa.us/factsheets/16086.pdf> for more information on Scrub Oak Shrublands.

Seedco Site

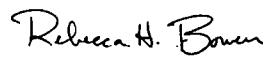
PNDI records indicate there are no resources of concern within the Seedco site boundary; however, there is a rare moth, *Hypagyrtis ester* (Ester moth, S2S3) known in the project vicinity. The Ester moth was found near strip mines with patches of pines and scrubby grasslands. The most common habitat type for Ester moths is presumably in or near pines, as their larvae feed only on pine; it is most common in July and August.

This response represents the most up-to-date review of the PNDI data files and is valid for two years only. If project plans change or more information on listed or proposed species becomes available, our determination may be reconsidered. For PNDI project updates, please see the PNHP website at www.naturalheritage.state.pa.us for guidance. As a reminder, this finding applies to potential impacts under DCNR's jurisdiction only. Visit the PNHP website for directions on contacting the Commonwealth's other resource agencies for environmental review. Should you have any questions or concerns, please don't hesitate to contact me at 717.705.2823 or c-arohrbau@pa.gov.

Sincerely,



Andrew Rohrbaugh, Environmental Review Manager
Bureau of Forestry, Ecological Services Section
Pennsylvania Natural Heritage Program



Rebecca H. Bowen, Section Chief
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