



Gremminger and Associates, Inc.
 environmental planning and permitting consultants



June 19, 2017

GAI Project No. 217123

Mr. Joseph Ranson; Field Supervisor
 U.S. Fish and Wildlife Service
 Louisiana Ecological Services
 646 Cajundome Boulevard, Suite 400
 Lafayette, Louisiana 70506

This project has been reviewed for effects to Federal trust resources under our jurisdiction and currently protected by the Endangered Species Act of 1973 (Act). The project, as proposed,
 Will have no effect on those resources
 Is not likely to adversely affect those resources.
 This finding fulfills the requirements under Section 7(a)(2) of the Act.

Joseph Ranson
 Acting Supervisor
 Louisiana Field Office
 U.S. Fish and Wildlife Service

29 Jun 17
 Date

**Concurrence Request to Finding of "No Effect" to Federal Listed Species
 Pine Prairie Energy Center, LLC: Plains Pine Prairie 600 Pipeline Project
 Evangeline Parish, Louisiana**

Dear Mr. Ranson:

Gremminger and Associates Inc. (GAI) has been contracted by Pine Prairie Energy Center, LLC to obtain all environmental permits and clearances necessary to construct the above referenced pipeline project.

Based upon the results of GAI's field assessment of this project as discussed below, and on behalf of Pine Prairie Energy Center, LLC, the non-federal representative for the Federal Energy Regulatory Commission (FERC) in accordance with 18 CFR, Section 157.206 (d), GAI is soliciting concurrence from the U.S. Fish and Wildlife Service (USFWS) to our opinion of "no effect" to federally listed species.

PROJECT LOCATION AND DESCRIPTION

The project is the new construction of 4.6 miles of 24-inch diameter natural gas pipeline within a 75-foot wide construction easement. The proposed route commences at a proposed surface station located approximately 8.9 miles southeast of Oakdale in Evangeline Parish, Louisiana, and proceeds generally east before terminating at the Pine Prairie Energy Center located approximately 2.5 miles south of Pine Prairie, Louisiana.

The attached U.S. Geological Survey 7.5-minute topographic quadrangle maps (Figures 1 through 3) reference the project location.

SPECIES OF CONCERN

The USFWS - Information, Planning, and Conservation System (IPaC) was consulted for a determination of federal listed species of concern for the project location. Based upon the IPaC results, the species of concern for this location is the endangered red-cockaded woodpecker (*Picoides borealis*). IPaC noted no critical habitats in the project area.

FIELD ASSESSMENT RESULTS

A GAI biologist conducted a field assessment of the proposed project route for federally listed threatened and endangered species on April 28, 2017.

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A GAI biologist conducted a field assessment of the proposed project route for federally listed threatened and endangered species on April 28, 2017.

Based upon our field observations, the pipeline route transects the following habitats:

- Row planted pine silviculture consisting of seedling to approximately 50-foot in height (13-inch dbh) loblolly pines (*Pinus taeda*), commonly intermixed with American beautyberry (*Callicarpa americana*), sawtooth blackberry (*Rubus argutus*), pepper-vine (*Amphelopsis arborea*), and common greenbrier (*Smilax rotundifolia*);
- Mixed woods containing varying compositions of loblolly pine, red oak (*Quercus falcata*), water oak (*Quercus nigra*), sweetgum (*Liquidambar styraciflua*), American elm (*Ulmus americana*), Chinese tallow (*Triadica sebifera*), American hornbeam (*Carpinus caroliniana*), yaupon holly (*Ilex vomitoria*), American beautyberry, Alabama supple-jack (*Berchemia scandens*), grapes (*Vitis* spp.), greenbriers, needle-leaf rosettegrass (*Dichanthelium aciculare*), and spikegrass (*Chasmanthium sessiliflorum*);
- Mesic mixed woods characterized by water oak, American elm, sweetgum, American holly (*Ilex opaca*), large-flower magnolia (*Magnolia grandiflora*), American hornbeam, yaupon holly, arrow-wood (*Viburnum dentatum*), American beautyberry, giant cane (*Arundinaria gigantea*), poison ivy (*Toxicodendron radicans*), wood oats (*Chasmanthium latifolium*), Cherokee sedge (*Carex cherokeensis*), perennial ryegrass (*Lolium perenne*), greenbriers and grapes;
- Forested wetland habitat characterized by varying compositions of bald cypress (*Taxodium distichum*), water tupelo (*Nyssa aquatic*), overcup oak (*Quercus lyrata*), water oak, water hickory (*Carya aquatica*), American elm, sweetgum, red maple (*Acer rubrum*), lizard tail (*Saururus cernuus*), and giant cane (*Arundinaria gigantea*); and
- Scrub/shrub wetlands containing varying compositions of water oak, loblolly pine, sweetgum, green ash (*Fraxinus pennsylvanica*), red maple, Chinese tallow, arrow-wood, pepper-vine, lizard tail, and royal fern (*Osmunda regalis*).

The dominant habitat along the project route is row planted pine silviculture.

LISTED SPECIES DISCUSSION

The red-cockaded woodpecker is a small (8-inch) ladder-backed woodpecker that historically was dependent on mature, open pine woodlands. Fire suppression and logging practices have greatly reduced the optimal habitat available to this species throughout its range from eastern Texas to North Carolina. The species requires mature pine trees (preferably Longleaf) with red-heart disease to excavate a nest cavity within, and prefers areas where the understory canopy is open or <15- to 20 feet in height. Medium aged to mature pine stands are utilized for foraging. In Louisiana, most known colonies reside on managed public lands or private lands under cooperative management for the species. Based upon our field review of the proposed route, no supporting habitat for this species is transected by this project.

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CONCLUSION

No individual red-cockaded woodpeckers or potential supporting habitat were observed at the time of the field review. The habitats that will be disturbed by the proposed construction activities are not optimal and lack the characteristics known to potentially support the foraging and nesting habits of this species.

It is GAI's opinion that the project would have "no effect" to federal listed species, and respectfully request concurrence to this opinion.

CLOSING

Gremminger and Associates, Inc. and Pine Prairie Energy Center, LLC appreciate your effort to review and respond to this request for project clearance. If I can facilitate your review, or if you have any questions concerning this project, please contact Larry Gremminger or myself at (979) 865-4440.

Sincerely,

GREMMINGER AND ASSOCIATES, INC.



James E. Pittman III
Environmental Scientist

JEP:elg

Attachments: (as stated)