



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
646 Cajundome Blvd.  
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Lafayette, Louisiana 70506



December 21, 2009

Ms. Patricia Patterson  
Project Manager  
TRC  
Wannalancit Mills  
650 Suffolk Street, Suite 200  
Lowell, MA 01854

RE: ETC Tiger Pipeline Project

Dear Ms. Patterson:

Please reference the November 2009 document, received in this office on November 24, 2009, *Red-Cockaded Woodpecker Survey Report and Foraging Analysis; ETC Tiger Pipeline Company, LLC; ETC Tiger Pipeline Project; Panola County, Texas, Caddo, De Soto, Bienville, Jackson, Ouachita, Richland, and Franklin Parishes, Louisiana* by PBS&J, Houston, TX. In that survey report, PBS&J, on behalf of ETC Tiger Pipeline, LLC (ETC Tiger), requested concurrence from the U.S. Fish and Wildlife Service (Service) with their determination that the proposed ETC Tiger Pipeline Project by ETC Tiger is "not likely to adversely affect" the endangered red-cockaded woodpecker (RCW, *Picoides borealis*). The Service offers the following comments in accordance with provisions of the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

ETC Tiger proposes to construct, own, operate, and maintain a new 42-inch-diameter pipeline and associated pipeline support facilities to transport natural gas from Panola County, Texas to Richland Parish, Louisiana. This office is commenting only on the portion of the proposed project which takes place in Louisiana. In Louisiana, the proposed pipeline would cross Caddo, De Soto, Red River, Bienville, Jackson, Ouachita, Richland, and Franklin Parishes.

The proposed project would be located in the vicinity of habitat that may be inhabited by RCWs in Caddo, DeSoto, Bienville, Jackson, and Ouachita Parishes. RCWs nest in open, park-like stands of mature (i.e., greater than 60 years of age) pine trees containing little hardwood understory or midstory. RCWs excavate roost and nest cavities in large living pines (i.e., 10 inches or greater in diameter at breast height). The collection of cavity trees and the surrounding area within 200 feet of those trees are known as a cluster. Foraging habitat is defined as pine and pine-hardwood stands over 30 years of age that are located contiguous to and within one-half mile of the cluster boundary.

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According to information provided in the survey report, a 350-foot survey corridor was established, which followed the proposed construction right-of-way. Between the months of March and July 2009, RCW surveys were conducted within the survey corridor in all areas that were identified to be potential RCW foraging or nesting habitat. All surveys were conducted in accordance with the RCW Recovery Plan (USFWS 2003) protocol, but they were not conducted for the recommended 0.5-mile radius from the project centerline, except for one site (CA-202) located in Caddo Parish.

As shown in Table 1 on page 7 of the survey report, the following sites contain potential nesting habitat within the survey corridor: (1) CA-202; (2) BI-578; (3) JA-644, JA-645, JA-645.100, JA-646, JA-647; (4) JA-650, 650.001; (5) JA-713, OU-800, OU-800.1; and (6) OU-800, and OU-814. Transects were established in a north/south direction approximately 100 feet apart within the suitable nesting habitat found within these sites, and within a 0.5-mile buffer of the above-mentioned site in Caddo Parish (CA-202). Individual mature pines were examined for RCW cavities, start holes, and evidence of scaling the tree bark or creating resin wells. Based on the information given, there were no active or inactive RCW cavity trees observed and no evidence of any RCW activity. Additionally, no RCWs were seen or heard during the field surveys.

For sites 2-6 listed above, ETC Tiger conducted foraging analyses in lieu of physically surveying the 0.5-mile radius from the project centerline. For each site, a foraging analysis was used to determine if the foraging habitat within the 0.5-mile buffer around potential RCW nesting habitat would be altered in such a way as to limit the current or future viability of the site to support an RCW cluster (see Table 1 of the survey report). Assuming one RCW cluster per two hundred acres of habitat, site 2 would be eliminated from the analysis because it contained only 88.6 acres of suitable RCW habitat.

**TABLE 1 - Potential RCW Habitat Pre and Post Project (extrapolated from Table 1 of PBS&J RCW Survey Report)**

site	pre-project	acres of potential habitat / 200 ac	# of potential clusters X 75 ac	post-project		
	acres of potential habitat	# of potential clusters	standard managed stability = # acres required	acres of potential habitat	acres of potential habitat / # cluster	Maintain adequate foraging habitat?
3	208.28	1.04	78	198.24	190.62	yes
4	352.96	1.76	132	344.23	195.59	yes
5	563.15	2.82	211.5	550.43	195.19	yes
6	372.55	1.86	139.71	371.9	199.95	yes

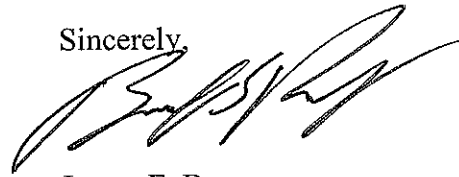
As illustrated in Table 1 above, site 3 could potentially support one RCW cluster, and would have over 190 acres per cluster of suitable habitat remaining post project. Site 4 could potentially support 1.8 RCW clusters and would have over 195 acres per cluster of suitable habitat remaining post project. Site 5 could potentially support 2.8 RCW clusters and would have over 195 acres per cluster of suitable habitat remaining post project. Lastly, site 6 could potentially support 1.9 RCW clusters and would have over 199 acres of suitable habitat remaining post project. In accordance with the RCW Recovery Plan (USFWS 2003), in all cases

the available foraging habitat would exceed the recommended "standard for managed stability" for private lands, which is a minimum of 75 acres per cluster (see Table 1 above).

Based on the information provided, the proposed project area may contain potential RCW foraging and nesting habitat; however, based on the survey, no current RCW nesting habitat would be impacted by the proposed project. Based on the foraging analyses, adequate foraging habitat would remain within the 0.5-mile buffers around potential RCW nesting habitat. Accordingly, the Service concurs with the determination that the proposed project by ETC Tiger is "not likely to adversely affect" the RCW.

We appreciate your cooperation in the conservation of threatened and endangered species. Please contact Monica Sikes if you have any questions or require additional information (337/291-3118).

Sincerely,



James F. Boggs  
Supervisor  
Louisiana Field Office

*Pon*

cc: FERC, Washington, DC (Attn: Project Manager for Docket No. CP09-460-000)  
Corps of Engineers, Regulatory Branch, Vicksburg District, MS  
Corps of Engineers, Regulatory Branch, Fort Worth District, TX  
LDWF, RCW Safe Harbor Program, Pineville, LA (Attn: Eric Baka)  
LDWF, Natural Heritage Program, Baton Rouge, LA (Attn: Gary Lester)