



August 21, 2015

Gary Smith
PA Fish & Boat Commission
Bureau of Wildlife Habitat Management
Division of Environmental Services
450 Robinson Lane
Bellefonte PA 16823

**Subject: PFBC SIR # 41856
Request for a No Impact Determination for Timber Rattlesnakes
Sunoco Pipeline, L.P. - Pennsylvania Pipeline Project (Previously Part of
the Mariner East 2 Pipeline Project)**

Dear Mr. Smith:

Tetra Tech, Inc. (Tetra Tech) has been retained by Sunoco Pipeline, L.P. (SPLP) to conduct environmental field surveys and permitting services for the proposed Pennsylvania Pipeline Project (PPP) formerly part of the Mariner East 2 Pipeline Project (ME2). On behalf of SPLP, Tetra Tech is requesting a no impact determination from the Pennsylvania Fish & Boat Commission (PGC) for the PPP.

A Large Project Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Request including a large project form, project description, and preliminary project USGS topographic mapping was initially provided to the PGC under the preliminary project name "Mariner East 2 Pipeline - Trans-Pennsylvania" on December 12, 2013. We received a response letters dated January 27, 2014 and May 21, 2014 from PFBC. Those letters are included for reference as Attachment 1. The Mariner East 2 Project was originally going to encompass all of the project activities within the state of Pennsylvania (PA). After field activities began, the project was split into two separate and independent projects; the Ohio Pipeline Project (OPP) and the PPP. Initially, a 20-inch diameter pipeline would be installed within a 50-foot-wide right-of-way (ROW) from Houston, PA to Marcus Hook, PA (306 miles) and a second, up to 20-inch diameter pipeline, would be installed in the same ROW. The second line is proposed to be installed from SPLP's Delmont Station, Westmoreland County, Pennsylvania to the Marcus Hook facility, paralleling the initial line for approximately 255 miles. (Attachment 2).

PGC indicated that the timber rattlesnake (*Crotalus horridus*) was located within the vicinity of the Mariner East 2 Project. Nineteen areas that potentially contain suitable habitat were identified within in the mountainous parts of Indiana, Cambria, Blair, Huntingdon, Juniata, Perry, and Cumberland Counties. Habitat assessments and presence/absence surveys were conducted from May 2014 to July 2015 by PFBC approved timber rattlesnake biologists following protocols during the appropriate survey periods based on PFBC guidelines. Results for these surveys are included the attached Timber Rattlesnake Habitat Assessment and Presence/Absence Survey Report (Attachment 3).

Tetra Tech

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Gestation and den habitat was confirmed in 8 of the 19 survey areas. These habitats include 8 denning habitats and 15 gestation habitats. A total of 282 timber rattlesnakes were observed across 16 of the 19 survey areas. These results are summarized in Table 1. Five of the eight areas with confirmed denning habitat were determined to be within the Limit of Disturbance (LOD) and the proposed Project. Based upon these results, the project was shifted to avoid these areas. Similarly, six of the 15 confirmed gestation habitats were determined to be within the LOD of the proposed Project. However, avoidance of gestation habitats was considered to be unnecessary given additional mitigation measures presented in the attached Timber Rattlesnake Conservation Plan (Attachment 4). Monitoring for and relocation of timber rattlesnakes will also be an additional mitigation measure in 11 areas (see Attachment 4). As a general practice, following completion of construction, boulders and other rocky debris will be moved to the edge of the temporary cleared workspace during final cleanup activities to aid in providing habitat. These and other avoidance, minimization, and mitigation measures are discussed in detail in the attached Conservation Plan. Given these measures, impacts to timber rattlesnakes are expected to be minor and temporary.

PFBC identified the bog turtle as potentially occurring within the Project area. PFBC has delegated coordination/consultation of joint state/federally listed species impact reviews to the PA Field Office of the U.S. Fish and Wildlife Service (USFWS). Bog turtle surveys have been completed for the entire Project and coordination has been ongoing with USFWS.

PFBC also identified freshwater mussel species: yellow lampmussel (*Lampsilis cariosa*), rainbow mussel (*Villosa iris*), elktoe (*Alasmidonta marginata*), and triangle floater (*Alasmidonta undulata*); fish species: ghost shiner (*Notropis buchanani*) and brook stickleback (*Culaea inconstans*), and the Eastern red belly turtle (*Pseudemys rubriventris*) as potentially occurring within the Project area. These species will be addressed in a separate submittal, and at this time we would like review and determination concurrence in regards to only the Timber rattlesnake.

On behalf of SPLP, Tetra Tech would like to request the PFBC review of and concurrence with our no impacts determination for the timber rattlesnake. Thank you for your assistance in this matter. If you have any questions regarding this request, please feel free to contact me at 412.921.8167 or preston.smith@tetrattech.com.

Sincerely,

A handwritten signature in black ink, appearing to be 'P. Smith', written over a light blue horizontal line.

Preston R. Smith
Manager, Wetlands and Ecological Services Department



Attachments:

- PA Fish & Game Commission PNDI Response Package
- Pennsylvania Pipeline Project Map
- Timber Rattlesnake Habitat Assessment and Presence/Absence Survey Report
- Timber Rattlesnake Conservation Plan

CC: Chris Embry, Sunoco Logistics
Matt Gordon, Sunoco Logistics
Brad Schaffer, Tetra Tech
Sandy Lare, Tetra Tech
File 112IC05958