



January 15, 2016

John Taucher  
PA Game Commission  
Bureau of Wildlife Habitat Management  
Division of Environmental Planning & Habitat Protection  
2001 Elmerton Avenue  
Harrisburg, PA 17110

**Subject: PGC ID Number: 201312180001  
Request for Effects Determination Concurrence  
Sunoco Pipeline, L.P. - Pennsylvania Pipeline Project**

Dear Mr. Taucher:

Tetra Tech, Inc. (Tetra Tech) has been retained by Sunoco Pipeline, L.P. (SPLP) to conduct environmental field surveys and permitting services for the Pennsylvania Pipeline Project (PPP). On behalf of SPLP, Tetra Tech is requesting effects determination concurrence from the Pennsylvania Game Commission (PGC) for the PPP.

On December 12, 2013 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". The Mariner East 2 Project was described as traversing the state of Pennsylvania. However, after field activities began, the project was split into two separate and independent projects; the PPP and the Ohio Pipeline Project (OPP) (Attachment 1). The PPP involves the phased installation of approximately 561 miles of two parallel pipelines within a 306-mile, 50-foot-wide right-of-way (ROW) from Houston, Washington County, Pennsylvania to SPLP's Marcus Hook facility in Delaware County, Pennsylvania with the purpose of interconnecting with existing SPLP Mariner East pipelines. Initially, a 20-inch diameter pipeline would be installed within the ROW from Houston to Marcus Hook (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.

We received a response letter dated March 14, 2014 from PGC. That letter is included for reference as Attachment 2. PGC indicated that the following species were located within the vicinity of the Mariner East 2 Project: Allegheny woodrat (*Neotoma magister*) and Eastern small-footed bat (*Myotis leibii*).

PGC also provided details on areas to be surveyed for Eastern small-footed bat and Allegheny woodrat habitat. As a result of these correspondences with the PGC, Allegheny woodrat and eastern small-footed bat habitat surveys were performed by Wildlife Specialist's biologists. These surveys were completed for the areas initially provided by PGC as well as additional areas along the re-route south of Altoona. The final report summarizing the survey findings has been previously submitted to PGC.

During further coordination and project review, PGC requested the submittal of Conservation Plans for the Allegheny woodrat and eastern small-footed bat that outline SPLP's commitment to avoidance, minimization, and mitigation measures to prevent impacts to these species within the Project area. Attachments 3 and 4, the Allegheny Woodrat Conservation Plan for the PPP and the Eastern Small-footed Bat Conservation Plan for the PPP, respectively, includes these commitments. From the onset of the Project, SPLP has instructed project designers to consider environmental impacts in regard to all aspects of the proposed Project and to avoid and minimize wherever possible while allowing safe installation. Pipeline engineers were provided a list of restrictions, recommendations, and requirements to consider during the design phase. Major considerations were co-location with existing utility corridors, limiting the

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construction corridor to the minimum width practicable, and avoidance and minimization of sensitive habitats.

Evidence of woodrat presence was found at 4 areas, Jacks Mountain 2, Jacks Mountain 3, Blacklog Mountain, and Bowers Mountain 2. Following construction, SPLP will restore habitat in temporary workspaces and create new potential woodrat habitat in the form of rock structures at the four survey areas containing AC's following the criteria stated in the PGC's BMPs. Five rock structures are proposed to be built within the four areas containing delineated woodrat habitat and ACs. The structures will be constructed along temporary ROW's, access roads, or workspaces, or in areas adjacent to these spaces based on an evaluation of the impacted landscape, land availability, and land owner approval.

Habitat surveys for small-footed bats identified 1.7 acres of habitat within the proposed LOD. SPLP proposes to prevent small-footed bats from accessing summer roosting habitat within the Project LOD to avoid any chance of incidental take that could occur during construction activities. During construction, SPLP will seal off these areas using a geotextile material such as silt fencing, mesh screening, or other appropriate materials. Additionally, following the completion of construction, SPLP will construct new roosting structures as close to the areas of impacted areas as possible. SPLP will construct twenty new roosting structures along temporary Right of Ways (ROWs), access roads, or temporary workspaces, or in areas adjacent to these spaces based on an evaluation of the landscape. These structures will be monitored for use for a period of three years or until bats are seen emerging from the structures.

Based on the information provide herein, the previously provided survey reports, the attached conservation plans, what is known about the presence and/or potential presence of the Allegheny woodrat and the eastern small-footed bat in the vicinity of the project areas, and SPLP's commitments to the protection and conservation of these species, it is Tetra Tech's conclusion that the PPP is not likely to impact the Allegheny woodrat and eastern small-footed bat. On behalf of SPLP, Tetra Tech would like to request the PGC's concurrence with this determination to satisfy State permit requirements.

Thank you for your assistance in this matter and we look forward to your review and concurrence. If you have any questions regarding this request, please feel free to contact me at 412.921.8167 or [preston.smith@tetrattech.com](mailto:preston.smith@tetrattech.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Smith', with a long horizontal line extending to the right.

Preston R. Smith  
Manager, Wetlands and Ecological Services Department

Attachments:

- Pennsylvania Pipeline Project Maps
- PA Game Commission PNDI Response Package
- Allegheny Woodrat Conservation Plan
- Eastern Small-footed Bat Conservation Plan

CC: Christopher Embry, Sunoco Logistics  
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File 112IC05958