



February 29, 2016

Pamela Shellenberger/Brian Scofield
U.S. Fish and Wildlife Service
110 Radnor Rd; Suite 101
State College, PA 16801

**Subject: Revised Bog Turtle Conservation Plan
Sunoco Pipeline, L.P. - Pennsylvania Pipeline Project Multiple Counties
(Formerly part of the Mariner East 2 Pipeline Project - Project #2014-0200)**

Dear Ms. Shellenberger/Mr. Scofield:

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). On behalf of SPLP, Tetra Tech is providing a revised Bog Turtle Conservation Plan for the Pennsylvania Pipeline Project to the U.S. Fish and Wildlife Service (Service)- Pennsylvania Field Office in response to discussions during a January 26, 2016 meeting and within the Service's February 16, 2016 correspondence. In those discussions, and in discussions between the Service and Gary Mowad of Gary Mowad Environmental Consulting, it was agreed that an interim revision of the October 2, 2016 conservation plan was in order to address the Service's meeting and letter comments. It was also agreed that submission of the revised conservation plan would precede field visits and in office meetings.

The bog turtle is documented as occurring, or assumed to occur, at several sites in and in the vicinity of the Project areas. Project-related coordination with the Service yielded information on known occupied bog turtle sites so that early planning for avoidance and minimization could be considered. Early in the project planning, SPLP went to great lengths to avoid and minimize direct and indirect impacts to bog turtles and their habitats as presented within the October 2, 2016 conservation plan. After review of that plan, the Service outlined its initial determination in regards to impacts to the bog turtle in a February 16, 2016 correspondence with Tetra Tech. In that letter, the Service provide concurrence with most of the survey findings and avoidance measures, but expressed the need for possible additional bog turtle survey, information, and avoidance and minimization. This revised conservation plan addresses that letter.

In regards to known occupied and assumed presence wetlands in and in the vicinity of the Project, the Project has been rerouted and redesigned to further reduce potential impacts to these wetlands. HDDs under C7, C8, and H1 have been eliminated and the direct impact of C44 avoided. Wetlands A55 and A54 have been combined to a single HDD so that the overall number of HDDs is reduced and activity in the area of these wetlands is minimized. Also, additional information is provided in the conservation plan in regards to two assumed presence wetlands (C37, C36) and one USFWS provided occupied wetland (C43). We feel that after further evaluation from the Service, concerns for direct and indirect impacts to the bog turtle will be alleviated in these areas (C37, C36, and C43) without the need for additional study.

The revised conservation plan also provides additional information in regards to directly impacted wetlands possessing bog turtle habitat that are potentially hydrologically connected to known occupied sites. The additional information provides detailed descriptions on the wetlands inputs and outputs, the quality of hydrological connections, as well as the quantity and quality of suitable bog turtle habitats at these wetlands. We feel that after further evaluation from the Service of this additional information, concerns for direct and indirect impacts to the bog turtle will be alleviated in these areas without the need for additional study.

Although we provide our determinations and conclusions within the revised conservation plan in regards to the wetlands discussed within the February 16, 2016 correspondence, SPLP welcomes the Service to field visit any of these areas to further discuss or collect additional information. Thank you for your assistance in this matter and we look forward to your review of the revised conservation plan. If you have any questions regarding this request, please feel free to contact me at 412.921.8167 or preston.smith@tetratech.com.

Sincerely,

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

Preston R. Smith
Manager, Wetlands and Ecological Services

Attachment:

Bog Turtle Conservation Plan

CC: Chris Embry, Sunoco Logistics;
Matt Gordon, Sunoco Logistics;
Monica Styles, Sunoco Logistics;
Gary Mowad, GMEC;
Brad Schaeffer, Tetra Tech;
Sandy Lare, Tetra Tech;
Robin Dingle, Tetra Tech;
File 112IC05958