



PITT-11-15-005

November 4, 2015

Project Number 112IC05958

Rebecca Bowen / Jason Ryndock / Frederick Sechler
PA Department of Conservation and Natural Resources
Bureau of Forestry, Ecological Services Section
400 Market Street
Harrisburg, PA 17105

**Subject: Request for Effects Determination Concurrence
PNDI File Number: 22275, Update 22275
Sunoco Pipeline, L.P. - Pennsylvania Pipeline Project Multiple Counties**

Dear Ms. Bowen / Mr. Ryndock / Mr. Sechler:

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 effects determination concurrence from the Pennsylvania Department of Conservation and Natural Resources (PA DCNR).

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 provided to the PA DCNR under the preliminary project name "Mariner East 2 Pipeline - Trans-Pennsylvania". The Mariner East 2 Project was described as traversing the state of Pennsylvania. The project was then split into two separate and independent projects; the PPP and the Ohio Pipeline Project (OPP) (Attachment 1). The initial PNDI response 22275 (Attachment 2) screened the original project route with a 1500 ft buffer on either side. The Updated PNDI response (Update 22275, Attachment 2) included all reroute areas outside of the initial project screening area including a large reroute south of Altoona.

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.

The botanical surveys for PPP included 23 AOCs (each AOC - consisting of at least one, and up to several, separate polygons) as directed by Mr. Jason Ryndock and Mr. Frederick Sechler of the PA DCNR, after their collaborative review of the Pennsylvania Natural Diversity Index (PNDI) database. The Botanical Survey Report (Attachment 3) summarizes the species biology and habitat preferences, methods, results, and conclusions of botanical surveys conducted from April 28, 2014 to September 16, 2015 to determine the presence or absence and extent of the SOSC listed on PNDI search receipt 22275 (Updated 22275) within the portions of the survey corridor that intersect with the assigned 23 AOCs of the Project. The surveys identified 63 SOSC populations of 12 distinct SOSC within the 23 AOCs that were traversed by the proposed Project route. A Serpentine Grassland Community of Concern (COC) was also identified within an AOC traversed by the Project.

The attached Conservation Plan (Attachment 4) provides SPLP's commitment to avoidance, minimization, and mitigation measures to prevent impacts to the listed SOSCs within the Project area. Proposed Project

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impacts were evaluated using both the current and proposed PA designations for the assigned state listed SOSC. Forty-seven populations of identified SOSC will not be impacted when evaluating using the current PA designations (PNHP 2015). When using the current PA status, two populations of PA Endangered (PE) SOSC, two populations of PA Threatened (PT) SOSC, and no populations of PA Rare (PR) SOSC are anticipated to be impacted. Forty-seven populations of identified SOSC will not be impacted when evaluating using the proposed PA designations. When using the proposed PA status, six populations of PE SOSC, no populations of PT SOSC, and eight populations of PR SOSC are anticipated to be impacted. Whether evaluating by current or proposed PA status the 2 state and federally listed Northeastern bulrush (*Scirpus ancistrochaetus*) populations identified during the 2014-2015 NE bulrush botanical survey will be avoided and will not be impacted by the Project. The Serpentine Grassland COC will not be impacted by the Project.

Significant effort was expended to utilize Best Management Practices (BMPs), such as temporary ROW “neck downs” or LOD reductions, HDD borings, and pipeline alignment rerouting, to avoid or minimize anticipated impacts to SOSC populations. Voluntary BMPs were utilized as often as practical to completely avoid or drastically reduce anticipated impacts to identified SOSC populations. Additional conservation measures such as topsoil segregation and replacement, “sod” excavation and replacement, and timber mat crossings will also be implemented to further avoid or minimize unavoidable anticipated impacts to specific SOSC populations. SPLP has utilized as many conservation measures as was practical to minimize total project impacts. Based on these avoidance, minimization, and mitigation measures, we do not anticipate significant impacts to any state-listed SOSC.

We hope this summary letter and the attached Botanical Survey Report assists you in completing an evaluation of the Project in relation to protected resources under PA DCNR-PNDI’s purview. We appreciate your timely review of this report and are requesting a no impact determination for the proposed Project.

If you have any questions or require additional information regarding the survey, report, or reference population identification, feel free to contact Preston Smith (preston.smith@tetratech.com) at (412) 921-8167 or Korey McCluskey (korey.mccluskey@tetratech.com) at (412) 920-8338.

Sincerely,
Tetra Tech, Inc.

A handwritten signature in black ink, appearing to read 'P. Smith'.

Preston Smith - Manager
Wetlands and Ecological Services Department

A handwritten signature in black ink, appearing to read 'K. McCluskey'.

Korey McCluskey
Senior Wetland Scientist

Attachments:

- PPP Project Overview Map (Attachment 1)
- PA DCNR Response Letters (Attachment 2)
- Botanical Survey Report (Attachment 3)
- Conservation Plan (Attachment 4)

CC: Chris Embry, Sunoco Logistics;
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File 112IC05958