

The technology for this alternative currently exists. This is a reliable alternative.

**10)d. Sewage Projects**

N/A. This project is not a sewage project.

**10)e. Other Related Projects**

**Preferred Design –**

The project area consists primarily of ROW for the existing SPLP pipeline. Existing ROW cannot be used for any environmental or recreational improvement project, or any other development project. The reroutes occur primarily in farmland with no proposed recreation or development projects.

**Minimal Degradation Alternative**

The project area for this alternative consists entirely of ROW for the existing SPLP pipeline. Therefore, this property cannot be used for any environmental or recreational improvement projects, or any other development projects.

**Non-Degradation Alternative**

This alternative does not require the acquisition of additional land.

**10)f. Water Pollution Controls**

**Preferred Design –**

An Erosion and Sedimentation Plan is being prepared for this project in accordance with the procedures outlined in the Ohio Dept. of Natural Resources Division of Soil and Water Conservation District "*Rainwater and Land Development*" Standards. Federal and local laws concerning pollution abatement will also be followed during construction.

All earth disturbance activity shall proceed in accordance with the following general sequence:

- Install stabilized construction entrance(s) as indicated on the Erosion and Sedimentation control drawings and as required to meet the work progress.
- Install/implement perimeter Silt Soxx and all other erosion and sediment control practices along the project corridor within 7 days of grubbing activities.
- Soil stockpiles and borrow areas (if required) to remain more than three (3) days shall be stabilized or protected with sediment trapping measures. Temporary protection and permanent stabilization shall be applied to all soil stockpiles on site and borrow areas or soils intentionally transferred off site. Soil stockpiles that are to remain in place for 21 days or more shall receive temporary seeding.

All disturbed vegetated areas shall be seeded and mulched and will resume their current land use upon completion of the project. The potential pollutants from this project may include leakage of the petroleum products being transported by the pipeline. The probability of leakage is unlikely due to the regular maintenance and inspections performed on the pipeline by the pipeline operators.

Appropriate on-site Best Management Practices shall be implemented. Construction operations shall be carried out in a manner that all erosion and water/air pollution is minimized. State, county, and local laws concerning pollution abatement, shall be followed. The type of measures employed prevent excessive erosion and sedimentation and facilitate construction by providing means of storm water handling, accelerated erosion control, and sediment pollution control, and include the following:

**Temporary Rock:** The Contractor is required to provide temporary rock construction  
**Construction Entrance:** Entrances at the points where construction traffic will drive onto existing roads and/or paved parking areas. The construction entrances will be constructed of six to ten inches of ODOT #2 (1.5 to 2.5 inch) coarse aggregate and shall be laid over stabilization geotextile fabric/filter cloth as shown on the detail on the drawings. The entrances shall be located as shown on the drawings and shall be maintained as indicated on the specifications on the drawings.

**Silt Soxx:** Silt Soxx will be used along the corridor and surrounding work areas or stockpiles to prevent soil laden runoff from exiting the corridor. The Silt Soxx are located in accordance with the plans, laid parallel to the contours of the ground surface, and staked as required by the manufacturer. Additional Silt Soxx will be installed in the area of stream and road crossings where required by existing conditions.

**Sediment Filter Bags:** Geotextile fabric-filter bags will be used to aid in stream bypassing and de-watering. The bags will be placed on top of staked hay bales to provide a larger discharge area. Hoses will be wired to the entrance of the bag to secure them in place. Bags will be replaced when they reach 2/3 capacity.

**Erosion Control Blankets:** Erosion control blanket shall be installed at all disturbed areas with slopes equal to or greater than 5H:1V and in critical areas (i.e. stream banks, berms, etc.) immediately upon final grading.

**Stockpiles:** Stockpiling will require sediment trapping measures. Temporary and permanent stabilization shall be applied to all soil stockpiles on site and borrow areas or soil intentionally transferred off site. Any stockpiles that will lie dormant for over 21 days shall be stabilized with seed and mulch.

**Dust Control:** Areas subject to blowing dust shall be controlled by sprinkling with water until the surface is wet. Sweeping of roads adjacent to work sites will be performed on a regular basis to reduce the instances of blown dust. All adjacent streets must be kept clear of debris. Inspected daily and cleaned when necessary.

**Temporary Seeding:** Temporary seeding shall be done on all finished grading areas to provide for stabilization. All disturbed areas that will lie dormant for a period of 21 days or more shall be stabilized with seeding and mulching or other approved means within 7 days. The goal of temporary stabilization is to provide cover, quickly. Areas within 50 feet of a stream must be stabilized within 2 days of inactivity. This is accomplished by seeding with fast-growing grasses then covering with straw mulch. Apply only mulch between November 1 and March 31. The specific temporary seeding materials, mixtures, planting dates, application rates, etc. are shown on the Erosion and Sedimentation Control Plan drawings (bound separately), prepared by STV.

**Diversion Berm:** Temporary diversion berms may be used to route clean runoff away from disturbed areas. The purpose may be to divert runoff to reduce the effective length of the slope or divert the runoff away from steep cut or fill slopes. The diversions for areas up to 10 acres shall be installed in accordance with the table in the detail drawings. For larger areas the flows shall be calculated using the Rational Method and the berms sized according to the flows.

**Rock Filter Outlet:** Rock Filter Outlets are small rock dams constructed in clean water swales, grassed waterways or diversions. They are used to reduce the velocity of concentrated flows at the discharge point of the diversion.

**Silt Fence:** Silt fence shall be used where runoff occurs as sheet flow or where flow through small rills can be converted to sheet flow. The Silt Fence are located in accordance with the plans, laid parallel to the contours of the ground surface, and staked as required by the specifications. Major factors that affect its use are slope, slope length, and the amount of drainage area from which the fence will capture runoff. Silt fence shall not be used in gullies, ditches or channels. Where large drainage areas are encountered temporary diversions shall be used.

**Storm Drain Inlet Protection:** Storm drain inlet protection shall be used where site runoff may enter closed conveyance systems through storm sewer inlets. Inlet protection shall be limited to areas draining less than 1 acre. It shall only be a primary means of protection where it is not possible to divert the storm drainage or if it is used for short time during the construction process.

**Trench Plugs:** Trench plugs shall be utilized in open trenches to prevent sediment-laden runoff from being conveyed along the trench line and to prevent the accumulation of subsurface flows. Trench plugs shall be spaced in accordance with the table on the detail drawings. Water that accumulates in the open trench shall be completely removed by pumping to a desilting bag, before the placement of the pipe and/or backfilling commences.

**Water Bars:** Water bars shall be used to reduce concentrated runoff and prevent erosion gullies from occurring. Water bars shall divert the runoff to silt soxx. Water bars shall be used at construction site ingress/egress points, on long sloping access roads, on temporary construction roads, or at utility right-of-ways which do not have a stable surface or where runoff would otherwise collect and cause erosion.

**Trenched Stream Crossings:** Trenched stream crossings shall be made using all necessary temporary erosion controls described in the E&S plan. The streams shall be piped as shown in the construction drawings. Dewatering shall be through a filter bag and all soil piles shall be

kept a minimum of 20 feet from the top of bank. Trenching shall not commence till the pipeline is 10 feet from the top of bank.

The Contractor shall be responsible to implement practices for the prevention of pollutants reaching the existing streams, ditches, drain tiles and other drainage ways. Prevention should include, but not be limited to, material handling and storage, clean up of the pollutant at the time of detection, and regular maintenance of erosion control devices.

**Minimal Degradation Alternative**

Water pollution controls for this alternative would be identical to those described for the Preferred Alternative.

**Non-Degradation Alternative**

Water pollution controls for this alternative would be identical to those described for the Preferred Alternative.

**10)g. Human Health Impacts**

**Preferred Design –**

Impacts to water resources will be temporary in nature and will not impact human health.

**Minimal Degradation Alternative**

Impacts to water resources will be temporary in nature and will not impact human health.

**Non-Degradation Alternative**

Increased truck traffic associated with this alternative has the potential to cause increased vehicular accidents and releases of product into streams and wetlands located adjacent to the highways.

**10)h. Jobs Created and Revenues Gained**

**Preferred Design**

Approximately 600 construction jobs will be created by this project. Increased tax revenues will be generated by construction workers patronizing local businesses.

Based on the 2010 Census Information, local economic data is published for Mogadore and Beaver, PA (northeast of Vanport, PA). Pertinent data for these cities is as follows:

Mogadore, OH:

- Median Value of owner-occupied housing: \$105,500

- Persons below poverty level: 3.6%
- Median household income: \$53,393
- Unemployment rate: (June 2012) 7.3%

Beaver, PA:

- Population change: 0.1% (from April 2010 to July 2011)
- Median Value of owner-occupied housing: \$113,600
- Persons below poverty level: 11.6%
- Median household income: \$47,928
- Unemployment rate: (June 2012) 6.9%

Property values will not be impacted by this project. Additional ROW will be purchased at fair market value. Any property damage incurred during construction will be mitigated.

The project will not impact any recreational or commercial opportunities, including tourism.

The project will have a positive impact on local businesses as construction workers will stay in local hotels and eat at local restaurants.

The project will not impact the aesthetics of the area as the pipeline will be constructed underground, and the area will be returned to pre-existing conditions.

#### **Minimal Degradation Alternative**

This alternative will result in the same impacts to jobs and the economy as the preferred alternative.

#### **Non-Degradation Alternative**

Minimal construction jobs would be created by this alternative. This alternative would result in an increase in trucking jobs.

### **10)i. Jobs and Revenues Lost**

#### **Preferred Design –**

The Preferred Alternative will not result in any loss of jobs, lost state or local tax revenues, or lowering of property values. Additionally, there will be no negative impacts to recreational and commercial opportunities. There are no negative impacts on the aesthetics of the project area since the pipeline will be constructed underground.

#### **Minimal Degradation Alternative**

This alternative will result in the same impacts to jobs and revenues as the Preferred Alternative.

### **Non-Degradation Alternative**

This Alternative will result in a loss of construction jobs, and the associated secondary impact to businesses from construction workers frequenting local establishments. There would be an increase in trucking jobs.

### **10)j. Environmental Benefits Lost or Gained**

#### **Preferred Design –**

This alternative results in temporary impacts. Following construction, topography will be graded to pre-existing conditions and the land will be reseeded. Therefore, this project will not impact stream's natural sediment-moving capabilities, or wetland's pollutant filtering capabilities. Wetlands and streams will be restored to pre-existing conditions. Further discussions regarding mitigation can be found below in 10k.

#### **Minimal Degradation Alternative**

This alternative would have the same environmental benefits as the Preferred Alternative.

#### **Non-Degradation Alternative**

Increased truck traffic associated with this alternative has the potential to cause increased vehicular accidents and releases of product into streams and wetlands located adjacent to the highways. Air and noise impacts will also be increased.

### **10)k. Mitigation Techniques**

A conference call was held between STV and OEPA on January 25, 2013 to discuss wetland and stream mitigation requirements. OEPA suggested the use of mitigation banks or payment into the Surface Water Improvement Fund (SWIF). A conference call was held on January 31, 2013 with representatives from the USACE Huntington and Buffalo Districts to determine their preference for mitigation. The SWIF is not approved by the USACE. Therefore, a combination of approved wetland mitigation banks (which provides forested wetland mitigation) and contributions to the SWIF will be used to provide mitigation for project impacts. STV will develop a comprehensive plan to address all wetland and stream impacts and will provide this information to OEPA.

For restoration of wetlands, the following seed mix (or suitable substitute) will be used:

Wet Mesic Prairie Mix- (Grasses and Sedges)  
(Provided by Spence Restoration Nursery)

14.4% Andropogon gerardii (Big Bluestem)  
1.8% Carex annectans xanthocarpa (Yellow fox sedge)  
1.8% Carex frankii (Frank's sedge)  
5.4% Carex vulpinoidea (Fox Sedge)

28.5% *Elymus canadensis* (Canada wild rye)

28.5% *Elymus virginicus* (Virginia wild rye)

1.8% *Glyceria striata* (Fowl Manna grass)

3.6% *Panicum virgatum* (Switchgrass)

14.4% *Sorghastrum nutans* (Indian grass)

**Minimal Degradation Alternative**

Mitigation for this alternative would be through the same mechanism as the Preferred Design.

**Non-Degradation Alternative**

This alternative would require no mitigation.

**ATTACHMENT 7**  
**Threatened/Endangered**  
**Species Coordination**



**ATTACHMENT 7  
THREATENED/ENDANGERED SPECIES COORDINATION**

Threatened/endangered species coordination was conducted early in the project between U.S. Fish & Wildlife Service (USFWS) and Ohio Department of Natural Resources (ODNR). A summary of species of concern identified by each agency and the resolution of potential impacts is presented in the following table. Copies of coordination between STV and the resource agencies is also attached. Full copies of the Indiana bat and Eastern Massasauga studies can be provided upon request.

Agency	Species of Concern	Resolution
ODNR	Indiana Bat	
USFWS		Survey done July and August 2012. No bats found. Concurrence received December 18, 2012.
ODNR	Eastern Massasauga	Three areas of suitable habitat were identified during habitat surveys. STV will directionally drill these areas to avoid potential impacts to the Eastern massasauga. Concurrence received from ODNR on this approach 1/23/13.
USFWS		Coordination with USFWS ongoing.
ODNR		No impact anticipated July 25, 2012
ODNR	Eastern Pondmussel	Coordination with ODNR ongoing.
ODNR	American emerald dragonfly, Frosted whiteface dragonfly, Brush-tipped emerald dragonfly, and Chalk-fronted corporal dragonfly	Coordination with ODNR ongoing.
ODNR	Northern Harrier	Coordination with ODNR ongoing.





June 1, 2012

United States Fish and Wildlife Service  
Endangered Species Section  
4625 Morse Road, Suite 104  
Columbus, Ohio 43230

Reference: Sunoco Pipeline, LP  
Mogadore-Vanport Line  
Brimfield, Suffield, Randolph, Atwater, Deerfield, Berlin, Ellsworth, Canfield,  
Boardman, Poland, Springfield, Townships; Portage and Mahoning Counties, OH  
Little Beaver, Darlington, South Beaver, Chippewa, Brighton Townships;  
Lawrence and Beaver Counties, PA;

Subject: Threatened/Endangered Species Project Review

STV Project No.: 38-15486

To whom it may concern:

STV Incorporated (STV) was retained by Sunoco Pipeline, LP (SPLP) to perform an environmental investigation associated with a proposed pipeline. SPLP proposes to install the Sunoco Mogadore-Vanport (size tbd) petroleum products line for approximately 74 miles from the existing facility in Mogadore, OH to the Vanport facility in Beaver, PA. A 9 mile section of existing 8-inch pipeline within the same ROW will also be replaced with 10-inch pipeline in conjunction with the installation of the new pipeline. This section is located in Mahoning County, OH. Land use within the project is a mix of agricultural land, forested land, herbaceous and scrub/shrub rangeland. Topographically the route is characterized by flat rolling fields and hills segueing to more pronounced slopes in Western PA.

The proposed alignment will be installed in existing Sunoco Pipeline, LP right-of-way (ROW). Temporary workspace for construction of the pipeline will be 75-100 feet with a final permanent ROW of 50 feet. Total impact acreage for construction is approximately 850 acres.

The purpose of this letter is to determine if there are any species of concern within the Sunoco Pipeline project area. The project location map is shown on the Akron East, Suffield, Atwater, Deerfield, Lake Milton, Canfield, Youngstown, Columbiana, New Middleton, East Palestine, New Galilee, Midland, and Beaver USGS topographical maps.

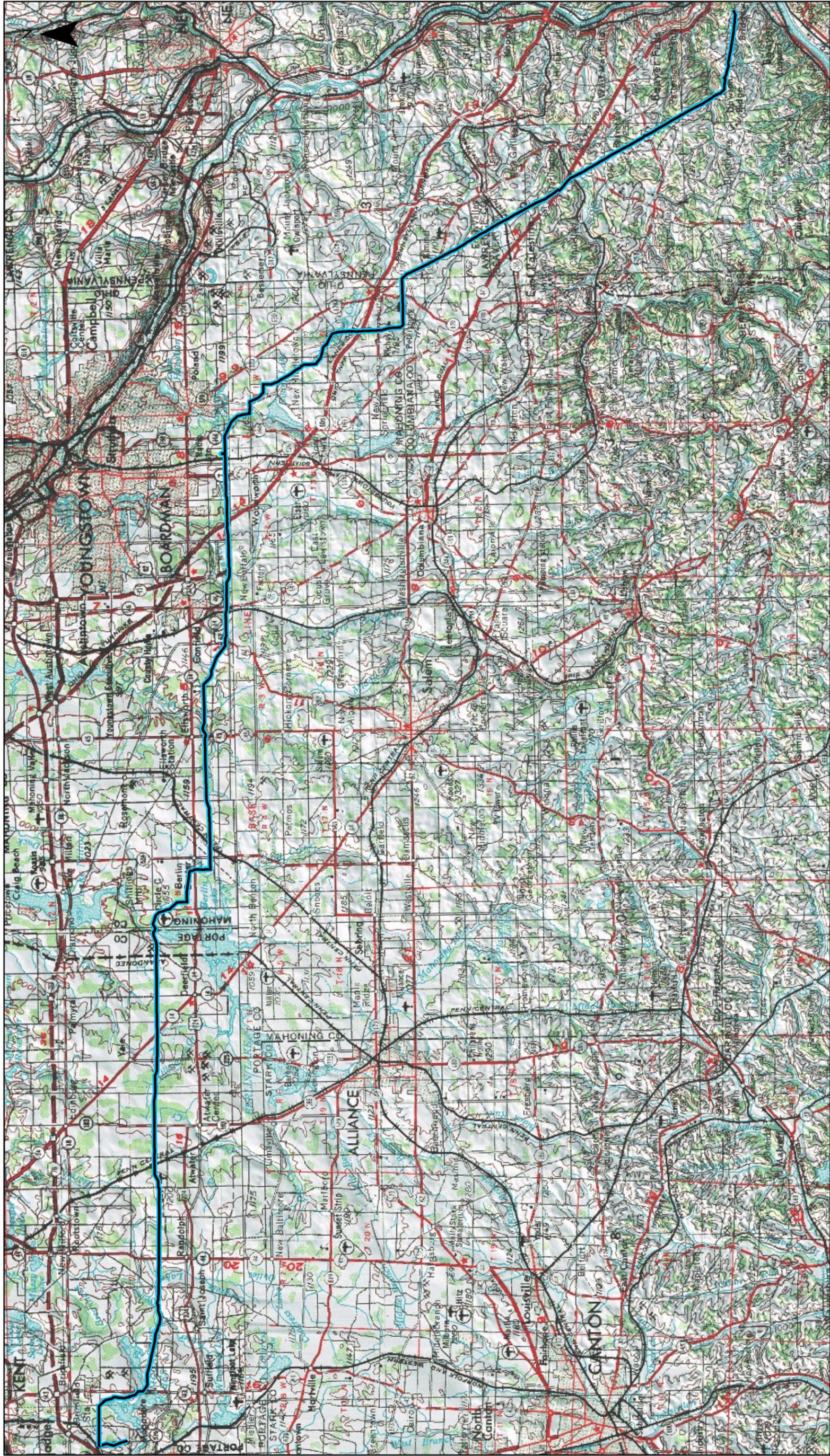
A project review letter was submitted in conjunction to the Region 5 office of the USFWS. Thank you for your prompt attention to this request. If you have any questions, please contact me at 610-385-8359.

Sincerely,

A handwritten signature in black ink that reads "Wendy K. Schellhamer". The signature is written in a cursive, flowing style.

Wendy Schellhamer  
Environmental Scientist





SCALE: 1:240,000 (or 1" = 20000')

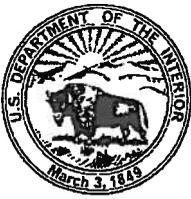
Mogadore to Vanport Alignment

SOURCE: Esri ArcGIS Online Map Service

CREATED BY: STV Incorporated, Energy Division

**FIGURE 1**  
**PROJECT LOCATION MAP**  
**MOGADORE to VANPORT**





# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Ecological Services  
4625 Morse Road, Suite 104  
Columbus, Ohio 43230  
(614) 416-8993 / FAX (614) 416-8994

June 18, 2012

STV

TAILS: 03E15000-2012-TA-0894

Attn: Wendy Schellhamer  
205 West Welsh Drive  
Douglassville, PA 19518-8713

Re: Inland Mogadore-Vanport Line  
STV Project: 38-15486  
Mahoning and Portage Counties, OH.

Dear Ms. Schellhamer:

This is in response to your June 1, 2012 letter requesting information regarding potential impacts to federally listed threatened and endangered species within the vicinity of the above referenced site. The project involves replacement of approximately 74 miles of 8-inch petroleum products pipeline with new 10-inch pipeline. The entirety of the project will occur in existing Sunoco Pipeline Right of Way. The land use within the project area consists of agricultural land, forested land, herbaceous and scrub/shrub rangeland.

There are no Federal wildlife refuges, wilderness areas, or Critical Habitat within the vicinity of this site.

We recommend that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat, such as forests, streams, and wetlands. Best construction techniques should be used to minimize erosion, particularly on slopes. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. In addition, we support and recommend mitigation activities that reduce the likelihood of invasive plant spread and encourage native plant colonization. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats. All disturbed areas in the project vicinity should be mulched and revegetated with native plant species. Staging areas should be kept well away from streams and wetlands, and construction areas should be quickly replanted with native vegetation following construction.

**BALD EAGLE COMMENTS:** The project lies within the range of the **bald eagle** (*Haliaeetus leucocephalus*), a species protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act. Due to the project type, location, and onsite habitat, this species would not be expected within the project area, and no impact to this species is expected. Relative to this species, this precludes the need for further action on this project as required by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act.

**ENDANGERED SPECIES COMMENTS:** The proposed project lies within the range of the **Indiana bat** (*Myotis sodalis*), a federally listed endangered species. Since first listed as endangered in 1967, their population has declined by nearly 60%. Several factors have contributed to the decline of the Indiana bat, including the loss and degradation of suitable hibernacula, human disturbance during hibernation, pesticides, and the loss and degradation of forested habitat, particularly stands of large, mature trees.

Fragmentation of forest habitat may also contribute to declines. During winter, Indiana bats hibernate in caves and abandoned mines. Summer habitat requirements for the species are not well defined but the following are considered important:

- (1) dead or live trees and snags with peeling or exfoliating bark, split tree trunk and/or branches, or cavities, which may be used as maternity roost areas;
- (2) live trees (such as shagbark hickory and oaks) which have exfoliating bark;
- (3) stream corridors, riparian areas, and upland woodlots which provide forage sites.

Should the proposed site contain trees or associated habitats exhibiting any of the characteristics listed above, we recommend that the habitat and surrounding trees be saved wherever possible. If the trees must be cut, further coordination with this office is requested to determine if surveys are warranted. Any survey should be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid Federal permit. Please note that summer surveys must be conducted between May 15 and August 15.

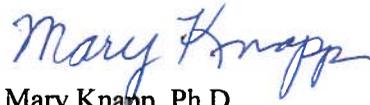
The portion of the project that crosses Boardman and Poland Townships in Mahoning County, lies within the range of the **eastern massasauga** (*Sistrurus catenatus*), a small, docile rattlesnake that is currently a Federal candidate species. Since designated as a candidate species in 1999, it has declined significantly throughout its range and populations in Ohio that were once throughout glaciated portions of the state, are now small and isolated. The species has been listed by the State of Ohio as endangered since 1996. Several factors have contributed to the decline of the species including habitat loss and fragmentation, indiscriminate killing, collection, gene pool contamination and incompatible land use practices.

Eastern massasaugas use both upland and wetland habitat and these habitats differ by season. During the winter, massasaugas hibernate in low wet areas, primarily in crayfish burrows, but may use other structures. Presence of a water table near the surface is important for a suitable hibernaculum. In the summer, massasaugas use drier, open areas that contain a mix of grasses and forbs such as goldenrods and other prairie plants that may be intermixed with trees or shrubs. Adjoining lowland and upland habitat with variable elevations between are critical for the species to travel back and forth seasonally. Should the proposed project area contain any of the habitat types or features described above, we recommend that a habitat assessment be conducted to determine if suitable habitat for the species exists within the vicinity of the proposed site. Please note that habitat assessments should only be conducted by approved eastern massasauga surveyors due to variable habitat types and cryptic nature of the species. Any habitat assessments or surveys should be coordinated with this office.

The proposed project lies within the range of the **Mitchell's satyr** (*Neonympha mitchellii*), a federally listed endangered butterfly and the **northern monkshood** (*Aconitum noveboracense*), a federally listed threatened species. Due to the project type, location, and onsite habitat, these species would not be expected within the project area, and no impacts to these species are expected.

Should additional information on listed or proposed species or their critical habitat become available or if new information reveals effects of the action that were not previously considered, our comments and recommendations may be reconsidered. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the Endangered Species Act of 1973 (ESA), as amended, and are consistent with the intent of the National Environmental Policy Act of 1969 and the U. S. Fish and Wildlife Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. If you have questions, or if we may be of further assistance in this matter, please contact David Henry at extension 27 in this office.

Sincerely,

A handwritten signature in blue ink that reads "Mary Knapp". The signature is written in a cursive style with a large initial "M".

Mary Knapp, Ph.D.  
Field Supervisor

cc: ODNR, DOW, SCEA Unit, Columbus, OH

[jrowan@normandean.com](mailto:jrowan@normandean.com)



## Gary Alt

---

**From:** Henry, David <david\_henry@fws.gov>  
**Sent:** Tuesday, December 18, 2012 7:06 AM  
**To:** Gary Alt  
**Subject:** Mogadore-Vanport Bat Survey

Mr. Alt,

This email provides U.S. Fish and Wildlife Service (Service) review of an Indiana bat (*Myotis sodalis*) survey report, dated October 2012 for the Mogadore-Vanport Pipeline Project in Mahoning and Portage Counties, Ohio, by Normandeau Associates. The projects, as proposed, would involve replacement of 96.9 km of 10-inch pipeline in an existing right-of-way.

Mist net survey for Indiana bats were conducted following Service guidance for minimal level of effort, and included 348 net-nights from July 18 to August 14, 2012. No Indiana bats were detected. We concur with the results of the mist-net survey and believe that the survey results and habitat information provided in the report, document the likely absence of Indiana bats in the project area. Negative Indiana bat mist-net survey results are valid for a period of 2 years. Therefore, no tree clearing should occur on the site after September 30, 2014 without further coordination with this office. However, if there is a Federal nexus for the project (Federal funding provided, Federal permits required to construct, etc.) then no tree clearing on any portion of the parcel should occur until consultation under section 7 of the Endangered Species Act of 1973, as amended, between the Service and the Federal action agency is completed. We recommend that the Federal action agency submit to this office a determination of effects to the Indiana bat for our review and concurrence.

Should additional information on listed species become available, or if new information reveals effects of the action that were not previously considered, this finding may be reconsidered. If project plans change, or if portions of the proposed project were not evaluated, it is our recommendation that the changes be submitted for our review. If you have questions, or if we may be of further assistance in this matter, please contact me.

Sincerely,

David C. Henry  
Wildlife Biologist  
US Fish & Wildlife Service  
Ohio Ecological Services Field Office  
4625 Morse Road, Suite 104  
Columbus, OH 43230  
Phone: 614-416-8993 x: 27  
Fax: 614-416-8994  
E-mail: [david\\_henry@fws.gov](mailto:david_henry@fws.gov)

