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## Wendy K. Schellhamer

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**From:** Dale Sparks [DSparks@environmentalsi.com]  
**Sent:** Thursday, October 11, 2012 11:08 AM  
**To:** Wendy K. Schellhamer; James X. McGinley  
**Cc:** Darwin Brack; Taina Pankiewicz; Virgil Brack  
**Subject:** FW: Tiffin to Easton I Bat Survey Concurrence

Wendy and Jim:

Please find attached concurrence from USFWS that the Tiffin-Easton line is not likely to adversely affect the Indiana bat.

Dale W. Sparks, Ph. D.  
Senior Project Manager  
Environmental Solutions & Innovations  
4525 Este Ave  
Cincinnati, OH 45232

513-451-1777 (Office)  
513-503-2667 (Mobile)

ESI has Moved. Our **NEW ADDRESS** is:

**Environmental Solutions & Innovations, Inc.**  
**4525 Este Avenue**  
**Cincinnati, OH 45232**

Our contact information (phone, fax, and email) remains the same

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**From:** [David Henry@fws.gov](mailto:David_Henry@fws.gov) [[mailto:David\\_Henry@fws.gov](mailto:David_Henry@fws.gov)]  
**Sent:** Thursday, October 11, 2012 10:32 AM  
**To:** Dale Sparks  
**Cc:** Virgil Brack  
**Subject:** Tiffin to Easton I Bat Survey Concurrence

Mr. Sparks,

This email provides U.S. Fish and Wildlife Service (Service) review of an Indiana bat (*Myotis sodalis*) survey report, dated 21 September 2012 for the Tiffin-Easton Pipeline Replacement Project in Seneca, Huron, Ashland, and Wayne Counties, Ohio, by Environmental Solutions and Innovations. The projects, as proposed, would involve replacement of 132 km of 8-inch pipeline in an existing right-of-way.

Mist net surveys for Indiana bats were conducted following Service guidance for minimal level of effort, and included 426 net-nights from July 8 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  
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December 6, 2012

File Code: 28.00

United States Fish and Wildlife Service  
Ecological Services  
4625 Morse Rd., Suite 104  
Columbus, OH 43230-6605

Reference: Sunoco Pipeline L.P. (as operator of Inland Corporation)  
Inland Tiffin to Easton Pipeline Project  
Seneca, Huron, Ashland, and Wayne Counties, OH

Subject: Response to United States Fish and Wildlife Service (USFWS),  
Ecological Services comments

STV Project No.: 38-15486

TAILS: 03E15000-2012-TA-0894

Dear Mr. Henry:

STV Energy Services, Inc. (STV) was retained by Sunoco Pipeline, LP, as operator of Inland Corporation (SPLP) to perform an environmental investigation associated with a proposed pipeline. SPLP proposes to install the Inland Tiffin to Easton pipeline. This new 12-inch line will be installed within the existing FM line right-of-way from former Inland Tiffin Junction to the Easton Junction, approximately 82 miles in length. 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.

STV submitted a request for review to U.S. Fish & Wildlife Service (USFWS) on June 1, 2012 and received a letter from your office on June 18th, 2012 (see attached) detailing action to be taken before and during construction of the proposed pipeline in efforts to minimize environmental impacts. The following is our response to each of the comments made by USFWS.

The USFWS stated that the Indiana bat's (*Myotis sodalis*) range is within project boundaries. Bat surveys were conducted by a USFWS qualified surveyor in July and August of this year. No Indiana bats were found on the Inland Tiffin to Easton Line during this survey. A clearance email was received October 11, 2012 stating the concurrence by USFWS with the Indiana bat surveys performed by ESI (see attached clearance).

The eastern massasauga (*Sistrurus catenatus*) also has a range that is within project boundaries. Snake surveys were conducted by a USFWS qualified surveyor in July and August of this year. No eastern massasauga were found on the Tiffin to Easton Pipeline

during this survey. A clearance email was received November 21, 2012 stating the concurrence by USFWS with the eastern massasauga surveys performed by ESI (see attached clearance).

The USFWS also stated that the rayed bean (*Villosa fabalis*) has a range within the project boundaries within Seneca County. There are 18 streams in the project area within Seneca County. Of these streams, eight are perennial, six are ephemeral, and four are intermittent. There are three perennial streams with the capability to provide habitat for this species; these streams will be directionally drilled. The remaining five streams do not have appropriate habitat for the rayed bean. The attached table includes a list of all perennial streams, a description of their habitat, and construction methodology for crossing. Photographs of the trenched stream crossings is also attached. Based on the lack of habitat in the perennial streams that are being trenched, we feel impacts to the rayed bean are unlikely, eliminating the need for presence/absence surveys.

The bald eagle (*Haliaeetus leucocephalus*), eastern prairie fringed orchid (*Platanthera leucophaea*) and the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*) are also known to have a range that includes the project boundaries. However, USFWS stated that these species are not expected to be in the project area, and therefore no impacts are expected.

As an additional protection measure to species of concern, SPLP will maintain Best Management Practices and Erosion and Sedimentation Control measures throughout the duration of construction. Additionally, the contractor will be required to have a frac-out contingency plan for directional drills.

STV requests your concurrence that no additional investigations are required for this project, and no moratoriums/time of year restrictions will be required to reduce impacts to species of concern. If you have any questions or require additional information, 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 style.

Wendy Schellhamer  
Environmental Operations Manager

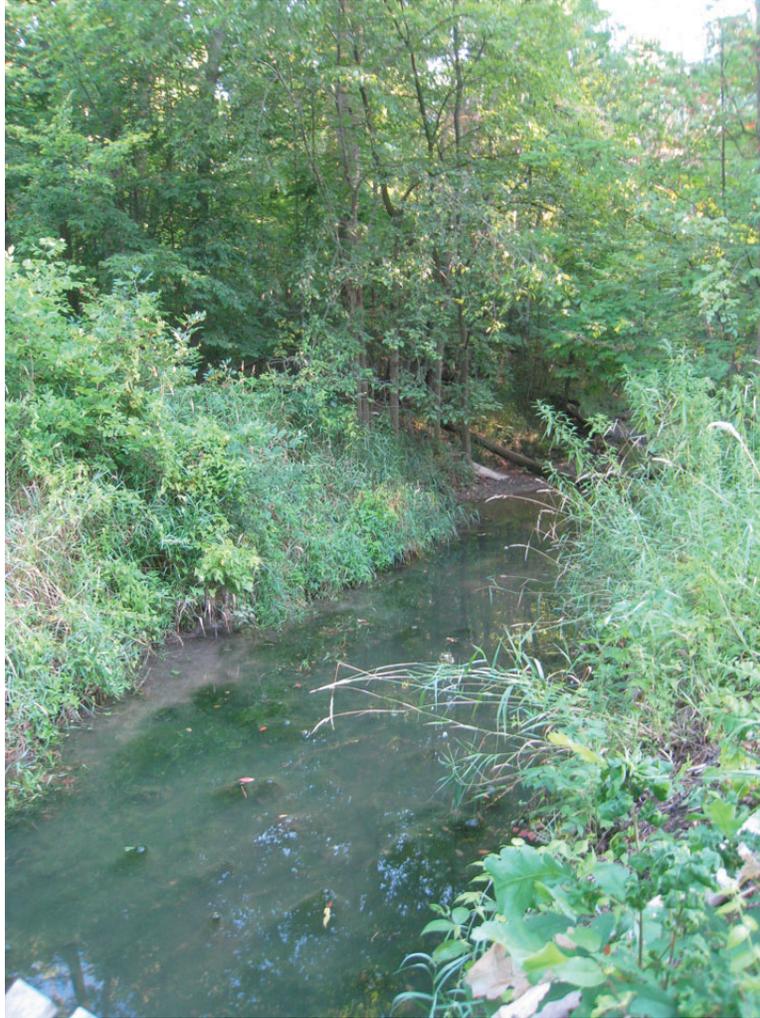
**SPLP - Allegheny Access**  
**Seneca County Perennial Stream Crossings**



**PHOTOGRAPH 1**

Photograph of CS-12, taken from right-of-way looking south.

**SPLP - Allegheny Access**  
**Seneca County Perennial Stream Crossings**



**PHOTOGRAPH 2**

Photograph of CS-13, taken from right-of-way looking north.

**SPLP - Allegheny Access**  
**Seneca County Perennial Stream Crossings**



**PHOTOGRAPH 3**

Photograph of DS-1, taken from right-of-way looking south.



**PHOTOGRAPH 4**

Photograph of DS-10, taken from right-of-way looking southwest.

**SPLP - Allegheny Access**  
**Seneca County Perennial Stream Crossings**



**PHOTOGRAPH 5**

Photograph of DS-14, taken from bridge adjacent to right-of-way looking north.

## Seneca County Perennial Stream Crossings

Crossing Number	Stream Name	Designated Use	QHEI/ HHEI Score	Rating	Crossing Methodology	Bed Composition	Stream Habitat Composition	Stream Attribute at Pipeline Crossing	Habitat for Rayed Bean Present?
1	DS19 Sandusky River	WWH, MWH, PWS, AWS, IWS, PCR	N/A	N/A	HDD	N/A	N/A	N/A	Y
2	DS1 Unnamed Tributary to Honey Creek	N/A	51	Class II	Open Trench	95% Muck/5% Woody Debris	Aquatic Macrophytes, Logs/Woody Debris	Flat flowing water	N
3	DS2 Rock Creek	WWH, AWS, IWS, PCR	N/A	N/A	HDD	N/A	N/A	N/A	Y
4	DS10 Rock Creek	WWH, AWS, IWS, PCR	N/A	N/A	Open Trench	40% Clay/40% Gravel/20% Cobble	Overhanging Vegetation, Aquatic Macrophytes, Logs/Woody Debris	Standing Water, Muddy	N
5	DS13 Honey Creek	WWH, AWS, IWS, PCR	N/A	N/A	HDD	N/A	N/A	N/A	N
6	DS14 Honey Creek	WWH, AWS, IWS, PCR	N/A	N/A	Open Trench	50% Sand/50% Gravel	Overhanging Vegetation, Aquatic Macrophytes, Logs/Woody Debris	Standing Water / Interstitial flow	N
7	CS12 Unnamed Tributary to Honey Creek	N/A	51.5	Fair	Open Trench	30% Gravel/30% Silt/20% Sand	Undercut Banks, Overhanging Vegetation, Aquatic Macrophytes, Backwater	Standing Water, Muddy	N
8	CS13 Unnamed Tributary to Honey Creek	N/A	48	Fair	Open Trench	30% Hardpan/30% Silt/20% Sand/20% Gravel	Overhanging Vegetation, Aquatic Macrophytes, Logs/Woody Debris	Standing Water	N



## Wendy K. Schellhamer

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**From:** Henry, David [david\_henry@fws.gov]  
**Sent:** Tuesday, December 11, 2012 1:41 PM  
**To:** Wendy K. Schellhamer  
**Subject:** Re: Sunoco Pipeline L.P - Inland Tiffin to Easton Pipeline Project

Ms. Schellhamer,

I have reviewed the additional information regarding potential rayed bean habitat in Seneca County for the Tiffin to Easton pipeline replacement. Based on the photos and descriptions of the perennial streams, it does not appear that any of the streams proposed for open trenching would support rayed bean. Therefore, no additional survey effort for federally listed mussels is necessary.

While directional drilling will generally result in less aquatic impacts than open cutting through a waterbody, the Service is concerned with the potential for frac outs within the Sandusky River, Rock Creek, and Honey Creek, which could negatively impact water quality and wildlife habitat. To avoid such a situation, we recommend that soil data be carefully examined prior to finalizing drilling plans to ensure that frac outs are not likely. Furthermore, test drilling should be completed ahead of time if soils are questionable. Finally, a contingency plan should be put in place to immediately quarantine frac out areas and remediate them.

Please contact me if you have any questions.

Sincerely,

David Henry

On Thu, Dec 6, 2012 at 11:59 AM, Wendy K. Schellhamer <[WENDY.SCHELLHAMER@stvinc.com](mailto:WENDY.SCHELLHAMER@stvinc.com)> wrote:  
> environment

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