

# Appendix B

Subsection One: Human Health Risk Assessment  
Report  
**(submitted under separate cover)**

# Appendix B

Subsection Two: Site-Specific Ecological  
Risk Evaluation Memorandum

# Memo

**SUBJECT**

Site-Specific Ecological Risk Evaluation  
Former Defense Supply Center Philadelphia  
City of Philadelphia, Philadelphia County

**OUR REF**  
30062282

**DATE**

July 12, 2022

**COPIES TO**

**TO**

Russ Devan (PADEP)

[Redacted]  
[Redacted] (DLA)  
[Redacted] (USACE)  
[Redacted] (USACE)  
[Redacted] (Seres)  
[Redacted] (Seres)  
[Redacted]

**NAME**

[Redacted]

The ecological risk evaluation presented in the Combined Remedial Investigation Report and Cleanup Plan (RIR/CP) for the Former Defense Supply Center Philadelphia (DSCP) Land Recycling Program (Act 2) site (the Site), dated May 2022, has been updated via this memorandum to address the requirements for a Site-Specific Ecological Risk Assessment pursuant to Act 2. The area of the Site is shown on **Figure 1 (Attachment A)**.

This update has been developed in accordance with the guidelines set forth in Title 25 of the Pennsylvania Code (25 PA Code), Subchapter D (Site-Specific Standard), Sections 250.402 and 250.404, as they pertain to a release of liability using the Site-Specific Standard. This update also includes a screening of the Former DSCP Act 2 site for regulated wetlands. The findings presented herein supersede the ecological screening found in **Section 8.4** (Ecological screening) of the RIR/CP.

## Ecological Risk Assessment

The Site-Specific Ecological Risk Assessment is an eight-step process (see Pennsylvania Department of Environmental Protection [PADEP] Land Recycling Program Technical Guidance Manual [TGM], effective date March 27, 2021). The eight-step process is listed below:

Step 1 – Fundamental Components

Step 2 – Preliminary Exposure Estimate and Risk Assessment

Step 3 – Problem Formulation: Assessment Endpoint Selection and Testable Hypotheses

Step 4 – Problem Formulation: Conceptual Site Model, Measurement Endpoint Selection and Study Design

Step 5 – Site Assessment for Sampling Feasibility

Step 6 – Site Investigation

Step 7 – Risk Characterization

Step 8 – Risk Management

The following discussion details the implementation of Steps 1 and 2. As discussed herein there were no areas identified by the Pennsylvania Department of Conservation and Natural Resources (DCNR) and the Pennsylvania Fish & Boat Commission (PFBC) that required additional investigation or assessment beyond Step 2; therefore, based on the guidelines presented in the TGM, Steps 3 through 8 were not required.

### Step 1 – Fundamental Components

*Pennsylvania Natural Diversity Inventory Screening*

The Site has been developed for commercial purposes (Quartermaster Plaza) north of the Schuylkill Expressway (I-76) with a mix of the original buildings and new construction and a combination of new construction residential and commercial buildings to the south of I-76 (**Figure 2, Attachment A**). The majority of the Site is covered by structures and asphalt paved roadways and asphalt paved parking lots, with some limited landscaped areas or otherwise undeveloped areas, some covered with fill and debris.

The initial Pennsylvania Natural Diversity Inventory (PNDI) ecological risk screening was conducted using the Pennsylvania Natural Heritage Program (PNHP) website<sup>1</sup> for the area shown on **Figure 2, Attachment A**. The PNDI ecological risk screening identified two endangered species of potential concern in the southern area of the Site (south of I-76), as identified the DCNR. The identified species are listed below:

- Walter's Barnyard-grass (*Echinochloa walteri*)
- Mutiflowered Mud-plantain (*Heteranthera multiflora*)

The PFBC only made reference to a "Sensitive Species" within the area of the PNDI search.

The location of the identified species, with respect to the Site are shown on **Figures 3a and 3b (Attachment A)**. **Figure 3a** shows the area of the DCNR Threatened and Endangered Species, while **Figure 3b** shows the area of the PFBC Threatened and Endangered Species.

#### *Wetlands Screening*

Based on a review of the National Wetlands Inventory website<sup>2</sup>, there are no perennial surface waters on the Site. The only potential surface water feature observed on the Site (**Figure 2, Attachment A**) is a man-made stormwater retention basin located in the eastern most portion of the Pennsylvania Housing Authority (PHA) property which is identified as PUBFx (**Figure 4, Attachment A**). The PUBFx designation is defined below:

- **System – P (Palustrine)**: The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 parts per trillion (ppt). It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 hectares (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 feet (ft)) at low water; and (4) salinity due to ocean-derived salts less than 0.5 ppt.
- **Class - UB (Unconsolidated Bottom)**: Includes all wetlands and deep-water habitats with at least 25-percent cover of particles smaller than stones (less than 6 to 7 centimeters), and a vegetative cover less than 30-percent.
- **Water Regime – F (Semi-permanently Flooded)**: Surface water persists throughout the growing season in most years. When surface water is absent, the water table is usually at or very near the land surface.
- **Special Modifier – x (Excavated)**: This Modifier is used to identify wetland basins or channels that were excavated by humans.

A brief review of historical photographs of the stormwater retention basin are summarized below and presented on **Figure 5 (Attachment A)**:

<sup>1</sup> Pennsylvania Natural Heritage Program website: [www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)

<sup>2</sup> National Wetlands Inventory website: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>

- 1996:** The area of the current 2002 stormwater retention basin is covered with multiple structures.
- 2004:** The structures observed on the 1996 aerial photograph are no longer observed and the area is undeveloped.
- 2000:** The current (2022) stormwater retention basin is observed, and the PHA building is observed to the west.

## ***Step 2 – Preliminary Exposure Estimate and Risk Assessment***

Based on the findings of the initial PNDI ecological risk screening, there was a potential for two endangered species to exist in the area of the Site; therefore, additional DCNR and PFBC review was required to assess if there was a potential for adverse impact to the identified species. A submission was made to both DCNR and PFBC requesting a review of the project area. The receipt for this review is included herein as **Attachment B**.

The DCNR and PFBC responded as follows:

- **DCNR:** PNDI records indicate species or resources under DCNR's jurisdiction are located in the vicinity of the project. However, based on the information you submitted concerning the nature of the project, the immediate location, and our detailed resource information, DCNR has determined that no impact is likely. No further coordination with our agency is needed for this project.<sup>3</sup>
- **PFBC:** An element occurrence of a rare, candidate, threatened, or endangered species under our jurisdiction is known from the vicinity of the proposed project. However, given the nature of the proposed project, the immediate location, or the current status of the nearby element occurrence(s), no adverse impacts are expected to the species of special concern.<sup>4</sup>

Both the DCNR and PFBC determined that there is no likely impact to the identified species; therefore, no further action will be taken regarding ecological risk under the Site-Specific Standard. Copies of the DCNR and the PFBC determination letters are provided herein as **Attachment C**.

### *Summary of Findings*

A screening of the area of the Site identified two potential species of concern. Based on follow-up inquiries with both the DCNR and the PFBC, both agencies determined that there is no likely impact to the identified species. Based on a wetlands screening of the Site, a pond was identified in the area east of the PHA building that was originally constructed as a stormwater retention basin. Since there were no endangered species identified within the footprint of the stormwater retention basin, and there are no on-going or planned remedial actions for this area, the area of the stormwater basin will not be impacted by current and/or future remedial activities at the Site.

### *Conclusions*

The ecological risk assessment did not identify any species requiring additional assessment beyond Steps 1 and 2 in the TGM. Therefore, there are no known ecological risks with respect to the Site and the implementation of Steps 3 through 8 is not warranted.

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<sup>3</sup> DCNR Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review, Receipt Number 761506 (Final\_1), June 14, 2022

<sup>4</sup> PFBC Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species, PNDI Search No. 761506\_1, June 14, 2022

[REDACTED]  
Arcadis U.S., Inc.  
July 12, 2022



**Attachments**

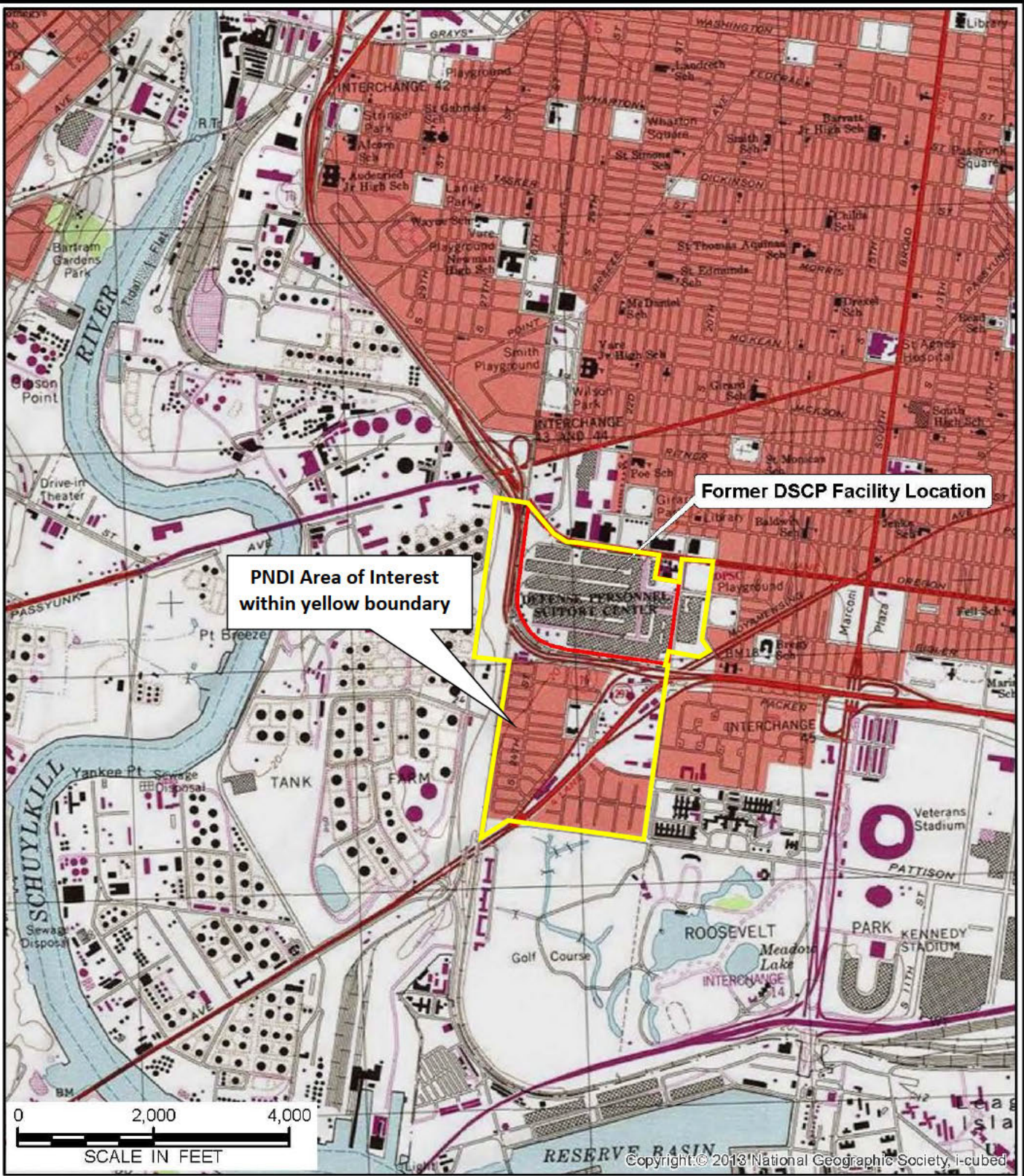
Attachment A – Figures

Attachment B – PNDI Review Receipt

Attachment C - DCNR and PFCB Determination Letters

# Attachment A

## Figures



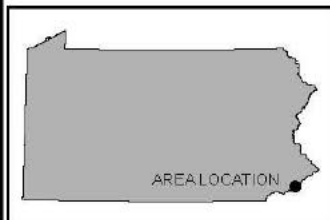
mxd 7/24/2020 6:10:36 PM Last save by

PATH:

**Legend:**

Former DSCP Site Location

Ref: Philadelphia  
7.5 Minute Series  
Quadrangle



PENNSYLVANIA

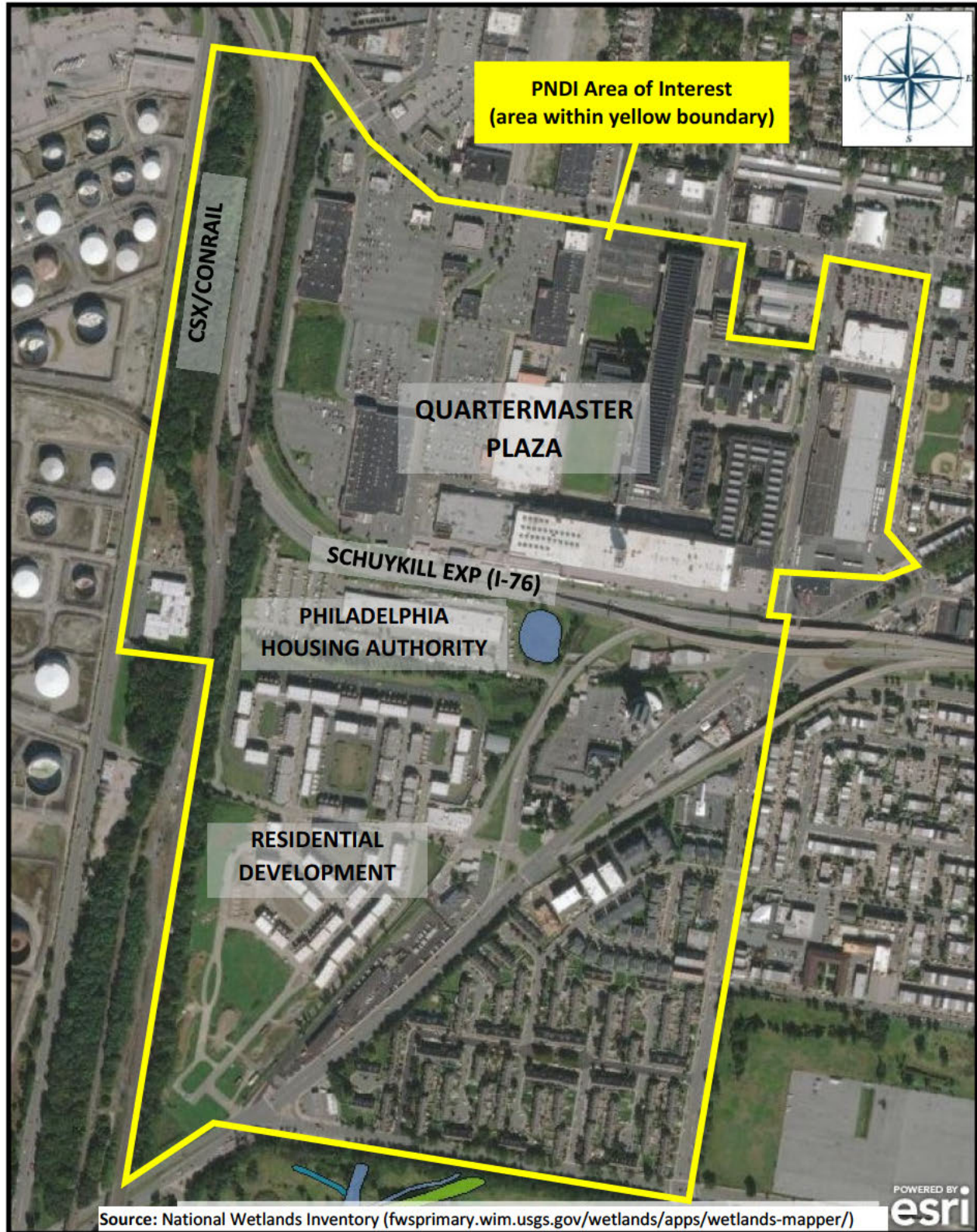
FORMER DEFENSE SUPPLY CENTER PHILADELPHIA  
DRAFT COMBINED REMEDIAL INVESTIGATION  
REPORT AND CLEANUP PLAN

**SITE LOCATION**

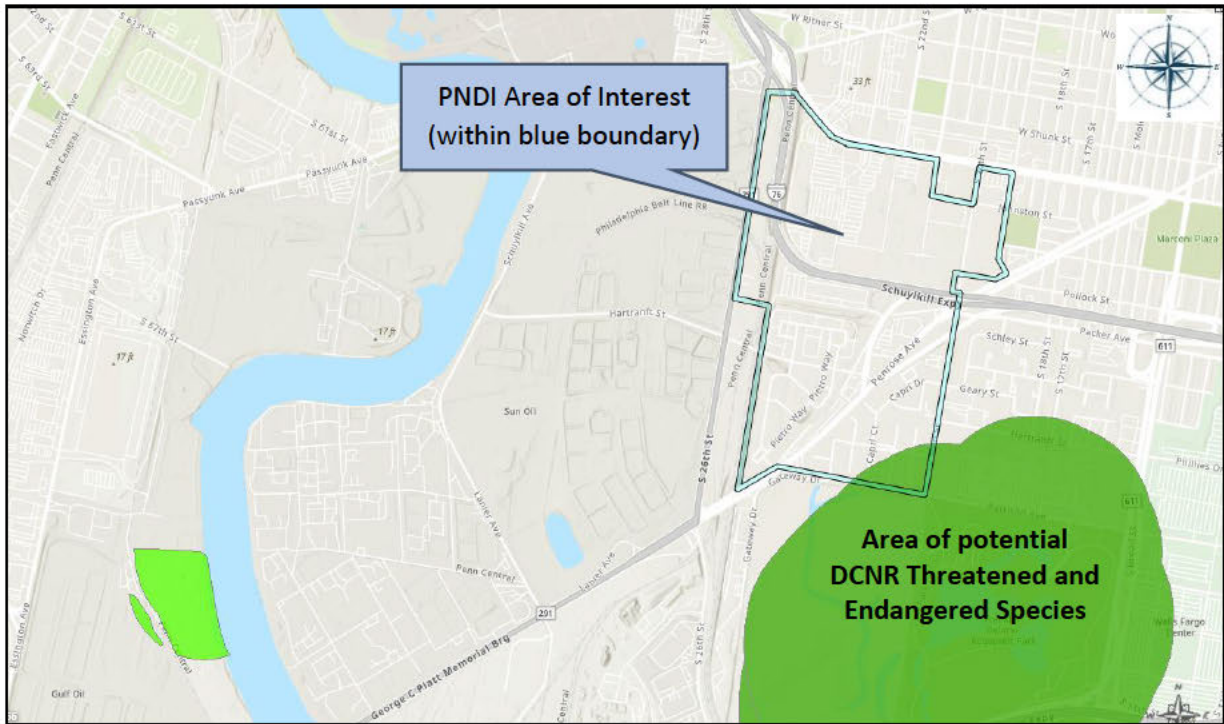
**ARCADIS** Design & Consultancy  
for natural and built assets

FIGURE

**1**

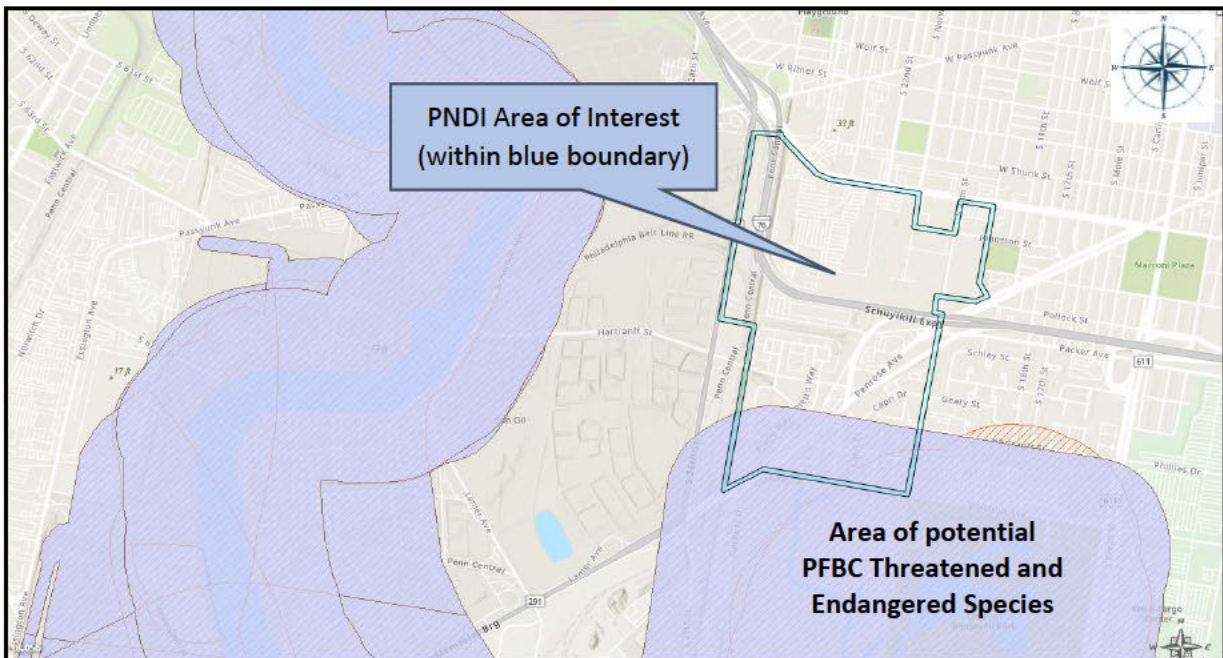


Former DSCP Act 2 Site  
Figure 2



**DCNR Threatened and Endangered Species**

**Figure 3a**



**PFBC Threatened and Endangered Species**

**Figure 3b**

**Legend:**



Former DSCP Act 2 Site boundary



Area of potential DCNR Threatened and Endangered Species



Area of potential PFBC Threatened and Endangered Species

Source: Pennsylvania Natural Heritage Program (<https://conservationexplorer.dcnr.pa.gov/content/map>)



Source: National Wetlands Inventory ([fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/](https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/))

PUBFX: Palustrine (P), Unconsolidated Bottom(UB), Sem-permanently Flooded (F), Excavated (x)

Stormwater Retention Basin  
National Wetlands Inventory Map  
Figure 4



1996 - Area of current (2022) stormwater retention basin developed with structures.<sup>(1)</sup>



2004 – Structures in area of current (2022) stormwater retention basin razed.<sup>(1)</sup>



2020 – Stormwater retention basin.<sup>(1)</sup>

(1) City of Philadelphia Open Maps (<https://openmaps.phila.gov>)

# Attachment B

**PNDI Review Receipt**

## 1. PROJECT INFORMATION

Project Name: **Former DSCP - Operations and Maintenance/Remediation**

Date of Review: **6/7/2022 03:56:38 PM**

Project Category: **Hazardous Waste Clean-up, Site Remediation, and Reclamation, Superfund site (State or Federal, proposed or designated)**

Project Area: **21.97 acres**

County(s): **Philadelphia**

Township/Municipality(s): **PHILADELPHIA**

ZIP Code:

Quadrangle Name(s): **PHILADELPHIA**

Watersheds HUC 8: **Schuylkill**

Watersheds HUC 12: **City of Philadelphia-Schuylkill River**

Decimal Degrees: **39.910735, -75.186779**

Degrees Minutes Seconds: **39° 54' 38.6444" N, 75° 11' 12.4026" W**

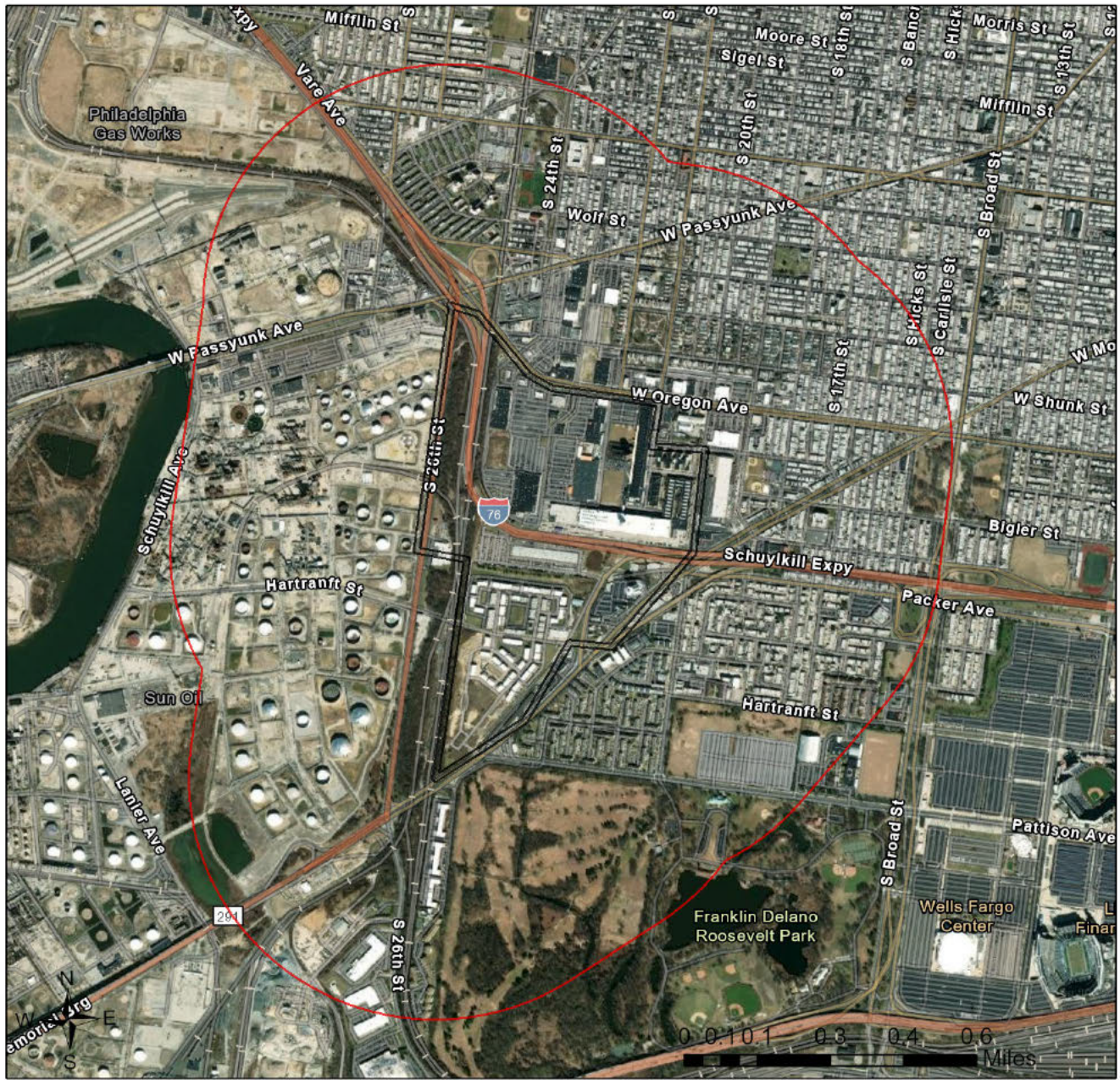
This is a draft receipt for information only. It has not been submitted to jurisdictional agencies for review.

## 2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	<b>Potential Impact</b>	<b>FURTHER REVIEW IS REQUIRED, See Agency Response</b>
PA Fish and Boat Commission	<b>Potential Impact</b>	<b>FURTHER REVIEW IS REQUIRED, See Agency Response</b>
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

### Former DSCP - Operations and Maintenance/Remediation

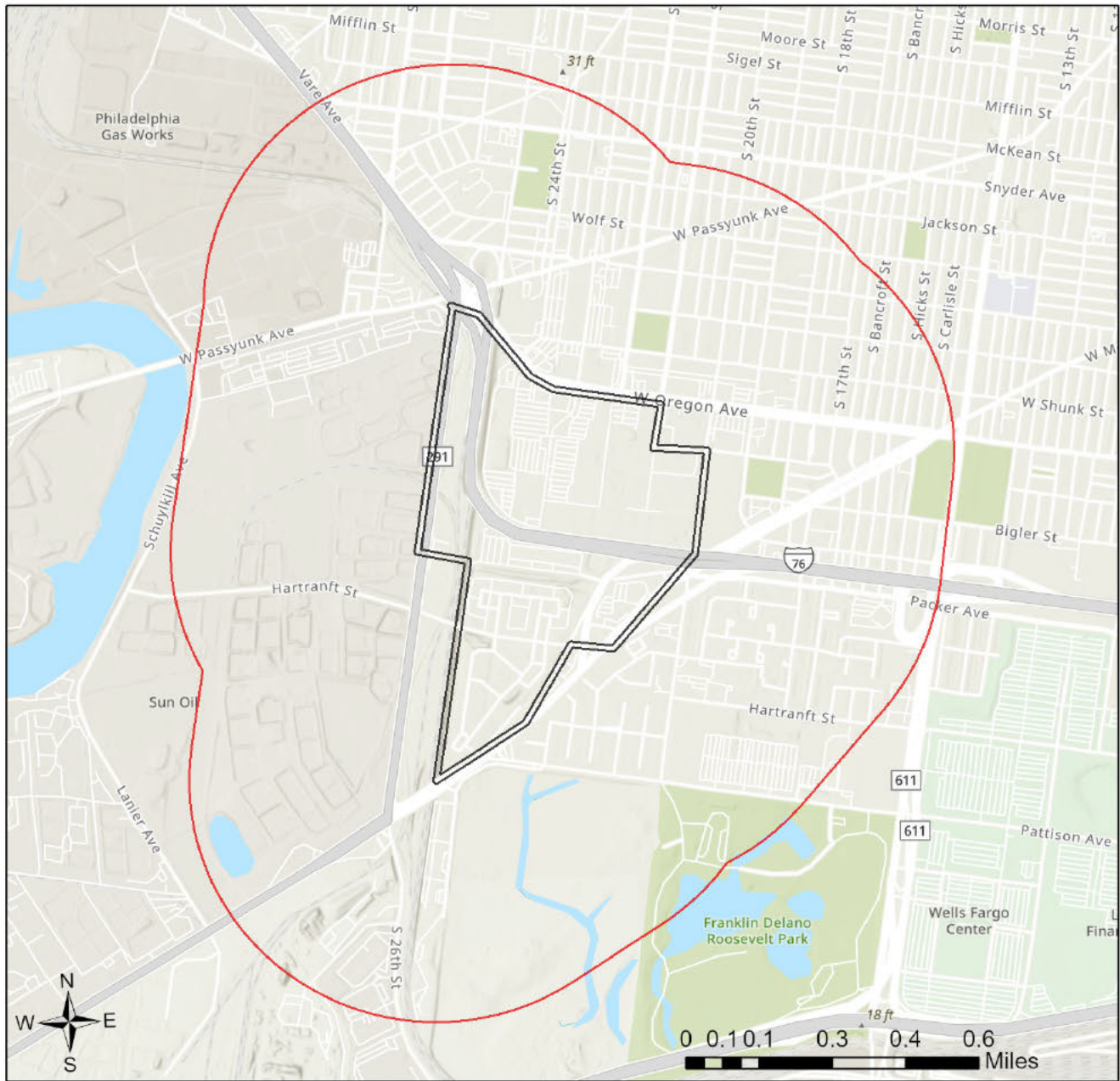


- Buffered Project Boundary
- Project Boundary



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

### Former DSCP - Operations and Maintenance/Remediation



- Buffered Project Boundary
- Project Boundary



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

## RESPONSE TO QUESTION(S) ASKED

**Q1:** Accurately describe what is known about wetland presence in the project area or on the land parcel by selecting ONE of the following. "Project" includes all features of the project (including buildings, roads, utility lines, outfall and intake structures, wells, stormwater retention/detention basins, parking lots, driveways, lawns, etc.), as well as all associated impacts (e.g., temporary staging areas, work areas, temporary road crossings, areas subject to grading or clearing, etc.). Include all areas that will be permanently or temporarily affected -- either directly or indirectly -- by any type of disturbance (e.g., land clearing, grading, tree removal, flooding, etc.). Land parcel = the lot(s) on which some type of project(s) or activity(s) are proposed to occur.

**Your answer is:** The entire project and associated discharge, plus a 300 feet buffer around the project area, all occur in or on an existing building, parking lot, driveway, road, road shoulder, street, runway, paved area, railroad bed, or crop agriculture field.

**Q2:** Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats?

**Your answer is:** Yes

### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

#### PA Game Commission

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

##### RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

**DCNR Species:** (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below. After desktop review, if a botanical survey is required by DCNR, we recommend the DCNR Botanical Survey Protocols, available here:

<https://conservationexplorer.dcnr.pa.gov/content/survey-protocols>)

Scientific Name	Common Name	Current Status	Proposed Status	Survey Window
Echinochloa walteri	Walter's Barnyard-grass	Endangered	Endangered	Flowers August - September
Heteranthera multiflora	Multiflowered Mud-plantain	Endangered	Endangered	Flowers July - early October

## PA Fish and Boat Commission

### RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

**PFBC Species:** (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

Scientific Name	Common Name	Current Status
Sensitive Species**		Threatened

## U.S. Fish and Wildlife Service

### RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

\* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

\*\* Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

## WHAT TO SEND TO JURISDICTIONAL AGENCIES

If project information was requested by one or more of the agencies above, upload\* or email the following information to the agency(s) (see AGENCY CONTACT INFORMATION). Instructions for uploading project materials can be found [here](#). This option provides the applicant with the convenience of sending project materials to a single location accessible to all three state agencies (but not USFWS).

\*If information was requested by USFWS, applicants must email, or mail, project information to [IR1\\_ESPenn@fws.gov](mailto:IR1_ESPenn@fws.gov) to initiate a review. USFWS will not accept uploaded project materials.

### Check-list of Minimum Materials to be submitted:

\_\_\_ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.

\_\_\_ A map with the project boundary and/or a basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)

**In addition to the materials listed above, USFWS REQUIRES the following**

\_\_\_ **SIGNED** copy of a Final Project Environmental Review Receipt

### The inclusion of the following information may expedite the review process.

\_\_\_ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)

\_\_\_ Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams.

#### 4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. Two review options are available to permit applicants for handling PNDI coordination in conjunction with DEP's permit review process involving either T&E Species or species of special concern. Under sequential review, the permit applicant performs a PNDI screening and completes all coordination with the appropriate jurisdictional agencies prior to submitting the permit application. The applicant will include with its application, both a PNDI receipt and/or a clearance letter from the jurisdictional agency if the PNDI Receipt shows a Potential Impact to a species or the applicant chooses to obtain letters directly from the jurisdictional agencies. Under concurrent review, DEP, where feasible, will allow technical review of the permit to occur concurrently with the T&E species consultation with the jurisdictional agency. The applicant must still supply a copy of the PNDI Receipt with its permit application. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. The applicant and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <https://conservationexplorer.dcnr.pa.gov/content/resources>.



## 5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.



# Attachment C

**DCNR and PFCB Determination Letters**

June 14, 2022

**PNDI Number:** [REDACTED]  
Version: Final\_1; 6/8/22

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Re: Former DSCP Philadelphia Act 2 Site  
Philadelphia Township, Philadelphia County, PA**

Dear Michael Cliggett,

Thank you for the submission of the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt Number [REDACTED] (**Final\_1**) for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

**No Impact Anticipated**

PNDI records indicate species or resources under DCNR's jurisdiction are located in the vicinity of the project. However, based on the information you submitted concerning the nature of the project, the immediate location, and our detailed resource information, DCNR has determined that no impact is likely. No further coordination with our agency is needed for this project.

**Recommended Best Management Practices:**

- Use a conservative approach to project design that minimizes permanent and temporary disturbances to soil and native vegetation. This will conserve habitat and limit opportunities for invasive plants.
- Clean boot treads, tools, construction equipment, and vehicles thoroughly (especially the undercarriage and wheels) before they are brought on site. This will remove invasive plant seeds and invasive earthworms/cocoons that may have been picked up at other worksites.
- Use clean project materials (e.g., weed-free straw) or materials native to the worksite to avoid introducing invasive species from contaminated sources.
- Revegetate or cover disturbed soil and stockpiles quickly to discourage the germination of invasive plants. Implement proper erosion control practices to stabilize soil and reduce runoff.
- Do not use seed mixes that include invasive species. More information about invasive plants in Pennsylvania can be found at the following link: <http://www.dcnr.pa.gov/Conservation/WildPlants/InvasivePlants/Pages/default.aspx>
- Use habitat appropriate seed mixes. For example, use a riparian seed mix when reseeding along a waterway. The Bureau of Forestry Planting & Seeding Guidelines can be found at the following link for recommendations: [http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr\\_20031083.pdf](http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr_20031083.pdf)
- Use native plants for landscaping, revegetation, and stormwater management. Do not use nonnative invasive species. Reduce the area of lawn and impermeable surfaces to the fullest extent practicable in favor of native gardens or habitat

**conserve                      sustain                      enjoy**

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P.O. Box 8552, Harrisburg, PA 17015-8552 717-787-3444 (fax) 717-772-0271

restoration (e.g., forest, meadow, wetland, etc.). More information about lawn conversion can be found at the following link: <https://www.dcnr.pa.gov/Conservation/Water/LawnConversion/Pages/default.aspx>

This response represents the most up-to-date review of the PNDI data files and is valid for two (2) years only. If project plans change or more information on listed or proposed species becomes available, our determination may be reconsidered. Should the proposed work continue beyond the period covered by this letter and a permit has not been acquired, please resubmit the project to this agency as an "Update" (including an updated PNDI receipt, project narrative, description of project changes and accurate map). As a reminder, this finding applies to potential impacts under DCNR's jurisdiction only. Visit the PNHP website for directions on contacting the Commonwealth's other resource agencies for environmental review.

**Should you have any questions or concerns, please contact Alexander Dogonniuck, Ecological Information Specialist, by phone (717-783-3913) or via email (c-adogonni@pa.gov).**

Sincerely,

[REDACTED]

Greg Podniesinski, Section Chief  
Natural Heritage Section



## Pennsylvania Fish & Boat Commission

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**Division of Environmental Services**  
Natural Diversity Section  
595 E Rolling Ridge Dr.  
Bellefonte, PA 16823  
814-359-5237

June 14, 2022

**IN REPLY REFER TO**  
SIR# 56305



**RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species  
PNDI Search No. 761506\_1  
Former DSCP Philadelphia Act 2 Site  
PHILADELPHIA County: Philadelphia City**

Dear 

This responds to your inquiry about a Pennsylvania Natural Diversity Inventory (PNDI) Internet Database search “potential conflict” or a threatened and endangered species impact review. These projects are screened for potential conflicts with rare, candidate, threatened or endangered species under Pennsylvania Fish & Boat Commission jurisdiction (fish, reptiles, amphibians, aquatic invertebrates only) using the Pennsylvania Natural Diversity Inventory (PNDI) database and our own files. These species of special concern are listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, and the Pennsylvania Fish & Boat Code (Chapter 75), or the Wildlife Code.

An element occurrence of a rare, candidate, threatened, or endangered species under our jurisdiction is known from the vicinity of the proposed project. However, given the nature of the proposed project, the immediate location, or the current status of the nearby element occurrence(s), no adverse impacts are expected to the species of special concern.

This response represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

**Our Mission:**

[www.fish.state.pa.us](http://www.fish.state.pa.us)

*To protect, conserve and enhance the Commonwealth's aquatic resources and provide fishing and boating opportunities.*

**If you have any questions regarding this review, please contact Josh Brown at 814-359-5129 and refer to the SIR # 56305.** Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,



Christopher A. Urban, Chief  
Natural Diversity Section

CAU/JRB/dn