



# Pennsylvania Fish & Boat Commission

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Division of Environmental Services  
Natural Diversity Section  
450 Robinson Lane  
Bellefonte, PA 16823-9620  
June 9, 2011

established 1866

IN REPLY REFER TO SIR# 36442

SHARON KROCK  
SCHNABEL ENGINEERING  
510 EAST GAY STREET  
WEST CHESTER, PA 19380

JUN 13 2011

**RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species  
PNDI Search No. 20110323289571  
THIRD STREET DAM/BRIDGE  
MEDIA Township, DELAWARE County, Pennsylvania**

Dear Ms. KROCK:

The staff of the Natural Diversity Section reviewed your recent correspondence regarding the above-referenced project. Based on records maintained in the Pennsylvania Natural Diversity Inventory (PNDI) database and our own files, the eastern redbelly turtle (*Pseudemys rubriventris*, PA threatened) is known from the vicinity of the proposed project site.

Without a detailed habitat assessment, we are concerned that eastern redbelly turtles could be using the area for overwintering (brumation). Any dewatering or disturbance to the sediments during the brumation of the turtles could cause harm or even death to turtles that are in a dormant state and unable to move away. Therefore, I recommend that no construction be conducted in the water during the overwintering period of the redbelly turtle (October 15 through April 15). Any **construction activities affecting the waterway should take place between April 15 and October 15 in order to allow turtles to avoid the project area while they are active.** Any turtles found within the staging area of the project should be safely moved outside the work zone in appropriate habitat. Provided that the overwintering season can be avoided as recommended, best management practices are followed, and an approved strict erosion and sedimentation control plan is maintained, then I do not anticipate the proposed activity to have any significant adverse impacts to the eastern redbelly turtle or any other rare or protected species under Pennsylvania Fish & Boat Commission jurisdiction.

Note that this office performed no field inspection of the project area. Consequently, comments in this letter are not meant to address other issues or concerns that might arise concerning matters under Pennsylvania Fish and Boat Commission jurisdiction or that of other authorities. Please contact Bob Morgan at 814-359-5129 if you have any additional concerns regarding this response and **refer to the SIR number at the top of this letter.** Thank you for your cooperation and attention to this matter of threatened and endangered species conservation.

Sincerely,

  
Christopher A. Urban, Chief  
Natural Diversity Section

CAU/RTM/mr

**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.*