

*Atlantic Sunrise Project – PA DEP Chapter 105 Joint Permit Application
Transcontinental Gas Pipe Line Company, LLC
Lancaster County*

**ATTACHMENT L -5
ENVIRONMENTAL ASSESSMENT ENCLOSURE D**

ENCLOSURE D PROJECT IMPACTS

A. Impacts on Designated Resources

Construction and operation of linear infrastructure Projects, including the proposed Atlantic Sunrise Project (Project) inevitably impact designated resources, including wetlands and watercourses. The Project has been designed to avoid and minimize impacts to environmental as well as recreational resources. The following discussion, as well as the Alternatives Analysis provided in **Attachment P-1**, details the Project's potential impacts and the avoidance and minimization measures that Transco has taken thus far and will take in during construction and operation of the Project to protect designated resources. Additionally, the Comprehensive Environmental Evaluation for the Central Penn Line provided in **Appendix L-1** presents a summary of the alternatives analysis for the Project as whole.

Transco has sited the proposed compressor, meter and regulating stations, and other minor aboveground appurtenances, such as main line valves (MLVs) and pig launcher and receiver facilities and communications towers, outside of wetlands and watercourses. Therefore, no direct impacts or losses to wetlands or watercourses are expected to result from construction and operation of the aboveground facilities.

Potential impacts associated with the Project on national and/or state forests, park lands, wildlife refuges, game lands, and/or wildlife sanctuaries were identified for the construction and operation of the Project within **Lancaster County**. Information regarding potential impacts to national, state, or local historic sites and cultural or archaeological landmarks within the Project area was coordinated through the Pennsylvania Historical Museum Commission (PHMC). Threatened and endangered species coordination effort was conducted through the applicable federal and state agencies. Field studies ~~were conducted on the portions of the line for which survey access was granted by landowners. Additional portions of the line, which are currently designated as no-access parcels, will be surveyed in the future. were conducted on all parcels.~~

A1. National, State or Local Park, Forest or Recreation Area

No impacts to National, State or Local Park, Forest or Recreation Areas are expected to occur within Lancaster County. Impacts to recreational resources such as hiking trails are discussed in Section B4b and e of this attachment.

A2. Natural, Wild, or Wilderness Area

One watercourse to be crossed by the Project, Tucquan Creek, is designated as scenic by the Pennsylvania Scenic Rivers Act. Transco is proposing to use a dam-and-pump method with a reduced construction right-of-way (ROW) of 75 feet to minimize impacts on the surrounding woody riparian vegetation at the Tucquan Creek crossing. To further reduce impacts, Transco has selected as its proposed crossing location a site that is within the footprint of an existing farm lane that crosses the waterway. Constructing the pipeline within the footprint of the farm lane will eliminate the need to clear riparian vegetation areas along the stream and will not require disturbance of the stream beyond the existing footprint of disturbance. Furthermore, the stream width at this location, while having perennial flow, is only 5 feet across, and, therefore construction will not adversely affect recreational navigation within the stream. The crossing will be restored to pre-construction conditions. Transco submitted a Memorandum to the Pennsylvania Department of Conservation and Natural Resources (PA DCNR) requesting a consistency determination with the Pennsylvania Scenic Rivers Act regarding the crossing at Tucquan Creek. Any related correspondence received from PA DCNR will be provided to Pennsylvania Department of Environmental Protection (PA DEP) upon receipt.

A3. National, State, or Local Historic Site

Section A6 provides a summary of potential impacts to historic, cultural and archaeological resources.

A4. National Natural Landmark

There will be no impacts to national natural landmarks as a result of the portion of the Project within Lancaster County.

A5. National Wildlife Refuge

There will be no impacts to national wildlife refuges as a result of the portion of the Project within Lancaster County.

A6. Cultural or Archeological Landmarks

On May 1, 2014, Transco met with staff of the PHMC to discuss the Project, cultural resource impacts, and proposed cultural resources investigations. Transco also requested that for the purpose of facilitating review of archaeological resources, a process developed for other natural gas Projects in Pennsylvania, aimed at providing regular Determinations of Eligibility for archaeological resources, be implemented. This process involves routine updates on the eligibility status of archaeological resources identified during Phase I surveys. Since this initial meeting, Transco's coordination and consultation with the PHMC has been on-going.

An open house for the Project in Lancaster County was held at Millersville University on June 11, 2014, and at the Acorn Farms Reception & Conference Center on July 29, 2014. Public comment was received from several landowners and interested members of the public concerning the increased potential for cultural issues in the Lancaster County portion of the Project, particularly with regard to 17th and 18th century Late Prehistoric, Protohistoric and Contact period resources, and the 19th/20th century historic-era occupation of the county. These concerns were examined and addressed during the cultural resources field reconnaissance and archival research conducted for the Project.

In addition to the open house, consultation was initiated with the Conestoga Area Historical Society and the Lancaster Historical Society concerning cultural resources in Lancaster County. Members of the Conestoga Area Historical Society expressed concerns for Native American archaeological sites and met with Transco to present results of their recent work in recording new archaeological sites, data which would be presented to the PHMC. The Lancaster Historical Society had no comment with regard to the proposed Project.

The Phase I archaeological field reconnaissance of the CPL-South study corridor in Lancaster County resulted in the identification of 86 archaeological resources. Site 36LA1566 (an historic-era cemetery) has been recommended by Transco for avoidance, and subsequently removed from the proposed LOD. Site 36LA0001 is listed on the NRHP and 36LA1541 was determined to be Potentially Eligible by the PHMC; both of these resources will be avoided by the HDD method of construction. The remaining 83 archaeological resources have either been

recommended as Not Eligible or not evaluated, generally isolated finds, by the PHMC, and no further investigation is necessary.

A total of 234 aboveground resources were identified during the Architectural History survey conducted for Project land requirements in Lancaster County; 120 of these resources are currently located within the Project, while an additional 114 resources were identified on parcels subsequently removed from the Project APE (due primarily to changes in the Project alignment). Four resources had been previously determined Eligible by PHMC, while an additional two resources were determined to be rural historic districts identified by Transco; only one of these rural historic districts were found to be Eligible by PHMC. Transco recommended 18 of the resources as Potentially Eligible and nine of the resources as Eligible for the NRHP. PHMC review concluded that 10 of the resources submitted as Potentially Eligible were not Potentially Eligible, and the additional eight Potentially Eligible resources were folded into rural historic districts. Transco submittal of the nine resources recommended as Eligible resulted in PHMC determination of seven Eligible resources and two Not Eligible resources. PHMC also determined there were no anticipated effects to the remaining 89 resources as a result of the Project.

The geomorphological desktop study identified two drainage crossings in Lancaster County which displayed a potential for deeply buried cultural deposits: the Conestoga River and Chiques Creek. Deep testing was completed on the west bank of the Conestoga River, and an HDD is planned for that section of the Project. Geomorphology field investigations determined that deep testing was not warranted for the east bank of the Conestoga River or Chiques Creek.

Attachments D-1 and D-2 provide a summary of consultation with PHMC and copies of correspondence, respectively.

A7. State Game Lands

There will be no anticipated impacts to state game lands as a result of the portion of the Project within Lancaster County.

A8. Federal, State, Local or Private Plant or Wildlife Sanctuaries

There will be no anticipated impacts to federal, state, local or private plant or wildlife sanctuaries as a result of the portion of the Project within Lancaster County.

A9. Areas Identified as Prime Farmland

In an effort to identify the extent and location of important farmlands, the Natural Resources Conservation Service (NRCS), in cooperation with other interested federal, state, and local government organizations, has inventoried land that can be used for production of the nation's food supply. Important farmlands consist of prime farmland, unique farmland, and farmland of statewide or local importance. It should be noted that not all important farmland soils are used for farming. NRCS makes important farmland designations based on soil properties, not on current or past use.

Unique farmland is land other than prime farmland that is used for the production of specific high-value food and fiber crops, (e.g., tree nuts, cranberries, and other fruits and vegetables). It has the unique combination of soil quality, growing season, moisture supply, temperature, humidity, air drainage, elevation, and aspect needed for the soil to economically produce sustainable high yields of these crops when properly managed.

Farmlands of statewide importance generally include those areas of soils that nearly meet the requirements for prime farmland and that economically produce high yields of crops when treated and managed according to acceptable farming methods. Farmland locations that are not identified as having national or statewide importance can be designated by local agricultural agencies as farmland of local importance for the production of food, feed, fiber, forage, and oilseed crops.

Agricultural lands crossed by the Project are primarily large tracts of row and field crops such as corn, soybeans, wheat, and hay. There are also several organic farms that will be affected in Lancaster County. Approximately 27.4 miles of the Project will cross Prime Farmlands or Farmlands of Statewide Importance in Lancaster County. Pipeline construction may result in temporarily removing farmland soils from agricultural production if construction occurs during the growing season. Pipeline construction and operation will not result in any long-term loss of prime and important farmland. Soils that are currently designated as prime farmland and

farmland of statewide importance will retain their designation both during and after construction. Effects on agricultural soils, including prime and important farmland soils, will be mitigated according to the Transco Agricultural Plan and the Transco Project-specific Upland Erosion Control, Revegetation, and Maintenance Plan (Transco Plan), provided respectively as Attachments 6 and 17 of the Transco Environmental Construction Plan (ECP) (**Attachment M**). While some short-term decreases in agricultural productivity may result because of the disturbance of soil during construction, those effects can be mitigated over time by the restoration measures previously discussed and by resumption of proper soil management by landowners.

Construction of the River Road Regulator Station will permanently affect approximately 2.0 acres of prime farmland and soils of statewide importance by converting them to nonagricultural land uses. The permanent loss of designated prime farmlands and farmlands of statewide importance at aboveground facilities cannot be mitigated.

Transco conducted title searches to identify all easements crossed by the Project. The Project crosses multiple agricultural conservation easements Lancaster County including NRCS Farm and Ranch Land Protection Program (FRPP) easements, Agricultural Security Areas (ASA), and Agricultural Conservation Easements.

A conservation easement is a type of contract that functions like a deed restriction and restricts real property to uses and improvements that are compatible with the stated conservation purposes of the conservation easement. The existence of a conservation easement recorded against the title to a tract of land does not necessarily prohibit all development of the land. A typical conservation easement, even if intended to protect agricultural use, may specifically allow one or more residences, farm buildings, driveways, aboveground and belowground utilities, and other structures, even though these activities and improvements will convert some of the land to nonproduction use and reduce some of the agricultural production potential of the property. Uses that are not prohibited by a conservation easement are also permitted.

Farm and Ranch Land Protection Program

The FRPP provided matching funds to help purchase development rights to keep productive farm and ranchland in agricultural uses. State, tribal, or local governments and non-

governmental organizations, as well as other entities that could become certified, had more flexibility and a shorter process to acquire easements (USDA n.d.). The Agricultural Act of 2014 repealed the FRPP; however, the Act does not affect terms or validity of any FRPP contract, agreement, or easement entered into prior to the date of enactment (February 7, 2014) or any associated payments required to be made in connection with an existing FRPP contract, agreement, or easement (USDA 2014).

To be eligible for the FRPP, lands must be privately owned, and:

- Contain at least 50 percent prime, unique, statewide or locally important farmland or contain historical or archeological resources or land that furthers a state or local policy that is consistent with FRPP purpose;
- Be subject to a pending offer by an eligible entity; and
- Be cropland, grassland, pastureland or forest land (forest land not more two-thirds of easement) that contributes to the viability of an agricultural operation or serves as a buffer to protect an agricultural operation from development.

Transco conducted title searches to identify all easements crossed by the Project facilities, including FRPP easements, and these easements are identified in Table L(d)-1.

**Table L(d)-1
 Properties with NRCS Easements Crossed by the Project in Lancaster County**

Facility / County	Tract	Easement Type	Mileposts
CPL South			
Lancaster	PA-LA-139-B.000	FRPP	12.7 – 12.7
Lancaster	PA-LA-372-B.000	FRPP	M-0164 0.0 – 34.5
Key:			
CPL = Central Penn Line			
FRPP = Farm and Ranchland Protection Program			

NRCS conservation easements are addendums to agricultural preservation easements granted either to the Commonwealth of Pennsylvania or to a county Agricultural Lands Preservation Board. All of the underlying easements, whether to the Commonwealth or to a county board contain a provision specifically permitting the landowner to continue to grant easements for natural gas pipelines across the preserved land. Each of the underlying easements for the properties listed above contain the following provision:

The granting of rights-of-way by the Grantor [the landowner] ... in and through the subject land for the installation, transportation, or use of lines for ...gas, oil or oil products is permitted. The term “granting of rights-of-way” includes the right to construct or install such lines.

In addition, the property owners for both of these tracts have entered into agreements to grant the rights-of-way needed for the Project. Each of these conservation easements also contain a paragraph about utilities which states:

*3. Utilities. The granting of rights of way by the Grantor.... in and through the subject land for the installation, transportation, or use of, lines forgas, oil or oil products is permitted, provided the location of activities and structures, permitted under this provision, is consistent with the agricultural viability and the protection of soils purposes as articulated in this Agricultural Conservation Easement. The granting of rights of way includes the right to construct or install such lines, provided any excavation of soils to install such lines is returned to the original topography promptly upon completion of the construction or installation, and methods are taken to control soil erosion. To the greatest extent practicable, such utility rights-of-ways shall be sited to protect the impact to prime, unique and important soils. **After the Agricultural Conservation Easement is recorded, granting of utility rights-of-way on the subject land may only occur through the condemnation process**, which is subject to the review by the Agricultural Lands Condemnation Approval Board in accordance with 3 P.S. Section 913, **unless the condemnation is exempt from review under that section.** If the proposed condemnation is exempt from review by the Agricultural Lands Approval Board [sic], **the Grantees shall give notice of this fact to the United States Department of Agriculture....***

Since the landowners of the three tracts with this provision in the conservation easements have all agreed to grant the rights-of-way for the Project, no condemnation will occur. Further, the granting of ROWs for federal natural gas pipeline projects approved by FERC is specifically exempted from review by the Agricultural Lands Condemnation Approval Board in accordance with 3 P.S. Section 913, which provides:

*3 P.S. §913(b). Approval required for condemnation by a political subdivision, authority, public utility or other body. --No political subdivision, authority, public utility or other body having or exercising powers of eminent domain shall condemn any land within any agricultural security area for any purpose, unless prior approval has been obtained from Agricultural Lands Condemnation Approval Board **The condemnation approvals specified by this subsection shall not be required for an underground public utility facility that does not permanently impact the tilling of soil or for any facility of an electric cooperative corporation or for any public utility facility the necessity for and the propriety and environmental effects of which has been reviewed and ratified or approved by the Pennsylvania Public Utility Commission or the Federal Energy Regulatory Commission, regardless of whether***

the right to establish and maintain such underground or other public utility facility is obtained by condemnation, or by agreement with the owner.

The Addendum to each of the conservation easements also requires the “Grantees” to provide notice to the USDA of the exemption of the tracts from review by the Agricultural Lands Condemnation Approval Board. “Grantees” is defined in each of the conservation easements as the county Agricultural Security Board. While Transco does not know if such notices were made to the USDA by the county Agricultural Security Boards, the USDA has been receiving notices regarding the Project since its inception, and has been on the list of stakeholders since May 2, 2014.

Agricultural Security Areas and Agricultural Conservation Easements

An Agricultural Security Area (ASA) is a unit of land of 250 or more acres reserved for agricultural production of crops, livestock, or livestock products that have been designated as such under Pennsylvania Code 1967 P. L. 992, No. 442 and 32 P. S. § § 5001–5012. ASA lands are provided protection from laws prohibiting agricultural activities. An ASA designation does not prohibit the landowner from developing oil or gas on the land. Therefore, construction and operation of the pipeline facilities will not affect the classification of the ASA parcels.

An agricultural conservation easement is a protection placed on a land that provides the landowner the right to prevent development or improvement of a parcel for any purpose outside of agricultural production (PFPA 2012). Such easements may be sold or donated by a landowner to the state, county, local government, or local land trust. For a parcel to qualify for an agricultural conservation easement, it must first be designated as an ASA. ASA lands are designated by local municipalities upon the request of landowners to promote permanent and viable farming operations. Owners of ASA lands may apply for the purchase of an agricultural conservation easement to receive preferential zoning treatment. The ASA designation does not restrict the use of the property, which can be developed in any manner authorized by local ordinances and regulations. The existence of utility facilities does not prevent land from being designated as an ASA or agricultural conservation easement.

Agricultural conservation easement programs are administered individually by local boards and staff within the 57 counties across Pennsylvania. Transco is currently consulting with the counties crossed by the Project to identify agricultural conservation easements within the

Project area. In addition, Transco has conducted title searches on all parcels crossed by the Project to identify easements. Agricultural conservation easement programs crossed by the Project include the Lancaster Agricultural Preserve, the Lancaster County Conservancy, and the Lancaster Farmland Trust. Agricultural conservation easements crossed by the Project are listed in Table L(d)-2.

Facility	Easement Type	Begin Milepost	End Milepost	Land Affected During Construction (acres)	Land Affected During Operation (acres)
CPL South					
Lancaster County					
PA-LA-002- B.000	ASA/Lancaster Agricultural Preserve	0.0	0.1	6.4	0.5
PA-LA-009- B.000	Lancaster Agricultural Preserve	0.5	0.7	5.9	1.6
PA-LA-018-B.000	ASA	0.6	1.9	7.5	2.8
PA-LA-050- B.000	ASA/Lancaster Agricultural Preserve	M-0184 0.0	M-0184 0.4	6.3	2.4
PA-LA-052- B.000	Lancaster Agricultural Preserve	M-0184 0.4	M-0184 0.9	6.9	2.7
PA-LA-071-B.000	Lancaster Farmland Trust	5.3	5.5	3.7	1.5
PA-LA-078- B.000	ASA/Lancaster Agricultural Preserve	6.2	6.6	7.9	2.9
PA-LA-083- B.000	Lancaster County Conservancy	6.9	7.0	0.7	0.2
PA-LA-084- B.000	Lancaster County Conservancy	7.0	7.0	0.4	0.1
PA-LA-095-B.100	Lancaster Farmland Trust/Lancaster County AG Preserve Board	7.9	8.1	3.3	1.4
PA-LA-099- B.000	Lancaster Agricultural Preserve	8.2	8.7	6.8	2.5
PA-LA-101-B.000	ASA	8.7	8.8	2.4	0.9
PA-LA-004-C.000	ASA	9	9.3	1.2	0.4
PA-LA-007-C.000	Lancaster Farmland Trust	10.4	10.8	5.7	2.1
PA-LA-115- B.000	ASA/Lancaster Farmland Trust	9.6	9.9	3.5	1.4
PA-LA-123- B.000	ASA/Lancaster Farmland Trust	10.3	10.6	4.8	1.9
PA-LA-124- B.000	ASA/Lancaster Farmland Trust	10.7	11.1	7.0	2.6
PA-LA-126- B.000	ASA/Lancaster Farmland Trust	11.2	11.3	1.9	0.8
PA-LA-139- B.000	ASA/FRPP	12.4	12.4	0.1	<0.1
PA-LA-140- B.000	ASA/FRPP	12.4	12.7	4.2	2.1
PA-LA-145- B.000	Lancaster Agricultural Preserve/ Lancaster Farmland Trust	M-0152 0.0	13.1	7.3	2.4
PA-LA- 187.000	Lancaster Agricultural Preserve	13.8	14.2	6.0	2.4
PA-LA- 191.000	Lancaster Agricultural Preserve	14.6	14.9	4.4	1.7
PA-LA-195.001	ASA	15.3	15.5	3.1	1.3
PA-LA- 202.000	ASA/Lancaster Agricultural Preserve	15.6	15.9	5.3	2.0
PA-LA- 205.000	Lancaster Agricultural Preserve	15.9	16.1	2.6	1.0
PA-LA-209.100	ASA/Lancaster Agricultural Preserve	16.1	16.3	1.3	0.8
PA-LA- 213.000	ASA/Lancaster Agricultural Preserve	M-0185 0.1	16.6	5.6	2.1

Facility	Easement Type	Begin Milepost	End Milepost	Land Affected During Construction (acres)	Land Affected During Operation (acres)
PA-LA-215.000	ASA	16.7	16.9	4.0	1.6
PA-LA-216.000	ASA	16.9	17.2	5.2	2.0
PA-LA- 224.000	Lancaster Agricultural Preserve	17.9	18.3	6.9	2.6
PA-LA- 225.000	ASA	18.3	18.8	8.6	3.3
PA-LA- 227.000	ASA/Lancaster Agricultural Preserve	18.8	19.3	7.6	2.9
PA-LA- 236.000	Lancaster Agricultural Preserve	19.3	19.6	3.8	1.5
PA-LA- 236.002	ASA/Lancaster Agricultural Preserve	19.6	19.9	4.0	1.5
PA-LA-251.000	Lancaster Agricultural Preserve & Lancaster Farmland Trust	21.1	21.5	6.3	2.2
PA-LA-254.000	ASA/Lancaster Agricultural Preserve & Lancaster Farmland Trust	21.9	22.1	3.8	1.6
PA-LA-294.100	Lancaster Agricultural Preserve	24.2	24.4	4.9	1.7
PA-LA-295.100	Lancaster Agricultural Preserve	24.45	24.45	0.4	0.2
PA-LA-334.000	ASA	29.7	29.9	3.8	1.3
PA-LA-357-B.100	ASA/Lancaster Agricultural Preserve	31.5	32.2	12.1	4.3
PA-LA-372- B.000	ASA/Lancaster Agricultural Preserve/FRPP	M-0164 0.0	34.5	7.5	2.8
PA-LA-374-B.000	ASA	34.45	34.58	1.6	0.7
PA-LA-375-B.000	Lancaster Agricultural Preserve	34.6	34.8	3.8	1.4
PA-LA-376- B.000	Lancaster Agricultural Preserve	34.8	35.1	4.1	1.6
PA-LA-377- B.000	ASA/Lancaster Agricultural Preserve	35.1	35.5	6.8	2.5
PA-LA-379- B.000	ASA/Lancaster Agricultural Preserve	35.5	35.6	1.8	0.7
PA-LA-381- B.000	ASA/Lancaster Agricultural Preserve	36.1	36.2	2.8	1.0

Transco will restore agricultural properties with conservation easements in accordance with the methods described the Transco Agricultural Plan provided as Attachment 6 of the Transco ECP (**Attachment M**).

B. Impacts on the Aquatic Environment

B1. Aquatic Habitats

All temporary impacts to aquatic resources are related to the construction of the pipeline. All permanent impacts to aquatic resources are related to the removal of vegetative cover for operation. No fill or impervious cover will be added to aquatic resources as part of this Project. Operational ROW will be maintained for a width of 10-feet at watercourse approaches and

through palustrine emergent (PEM) and palustrine scrub-shrub (PSS) wetlands, and for a width of 30-feet through palustrine forested (PFO wetlands). Transco is proposing the construction ROW widths to provide for safe and efficient construction of large-diameter pipeline facilities in accordance with Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1926.650-1926.652, Subpart P) and Interstate Natural Gas Association of America's (INGAA) workspace guidelines (INGAA 1999). Reductions of the construction ROWs will be made, where practicable, at various locations to address specific environmental or residential issues along the proposed pipelines. The impact analysis included in this section is related to resources associated with PA DEP Chapter 105 jurisdictional areas.

The proposed Project extends through 46 special protection watersheds (e.g., High Quality or Exceptional Value) and watersheds that are considered siltation impaired. As a result, an anti-degradation analysis was prepared for the Project and a detailed listing of each watershed, cause of siltation, and location it will be crossed is provided for Lancaster County within **Attachment M**. Additionally, the Comprehensive Environmental Evaluation for the Central Penn Line provided in **Appendix L-1** presents a summary of the anti-degradation consistency analysis for the Project as whole.

The Project will affect **48-57** streams, **50-62** floodways, and **16-19** wetlands within Lancaster County. Per PA DEP guidance, the installation of a pipe under streams is considered a **permanent impact**. Please note that the total count of wetlands affected is based on cover types, such that a single wetland complex could have multiple wetland counts. For example, a single wetland complex comprised of PEM, PSS, and PFO cover types was counted as three wetland crossings for the purpose of impact presentation in this Application. Tables summarizing the overall impacts on waterbodies and wetlands for the Project as a whole are included in the Comprehensive Environmental Evaluation for the Central Penn Line in **Appendix L-1**.

Through the implementation of the ECP, including the Best Management Practices (BMPs), water quality impacts are expected to be minimized to the extent practicable during construction, and no long term water quality impacts are expected to occur. Prior to conducting any in-stream work, all associated BMPs shall be installed and functional. BMPs will be installed at the edge of work areas, as necessary, to prevent siltation into wetlands in the vicinity of construction activities and will be maintained throughout the period of the construction activities. Wetland and watercourse boundaries will be clearly marked prior to construction activities.

Restoration of streams will involve, at a minimum, restoring each stream to pre-construction contours revegetating surface water banks and riparian areas in accordance with the **Riparian Area Impact Assessment and Restoration Plan for the Project area in Lancaster County** provided within **Appendix L-2**.

In wetland areas, restoration activities will involve returning wetlands to pre-construction contours and seeding in non-inundated areas with an approved wetland seed mix. In general, hydrologic conditions are not anticipated to be impacted as a result of Project construction.

Transco has incorporated the following avoidance and minimization measures to reduce impacts to aquatic resources.

Erosion and Sediment Controls

Construction activities can disturb surface soils and cause subsequent sediment transport into adjacent wetlands. Sedimentation will be minimized by the installation of temporary sediment

control measures between the upland construction areas and the wetlands. Permanent erosion controls, including slope breakers, trench breakers, and vegetative cover, will be used in adjacent upland areas to minimize long-term sedimentation into the wetlands. Energy dissipation devices may be installed at the down-slope end of slope breakers to minimize erosion of soil off the ROW into wetlands. Trench plugs will be installed in upland slopes adjacent to wetlands to prevent trench erosion. Trench plugs also will be spaced in accordance with the applicable state and federal regulations and installed at the edges of the wetland and on either side of watercourse crossings to prevent subsurface drainage along the pipeline.

To minimize erosion and promote revegetation within the wetland, removal of the root mats for woody vegetation will be allowed only directly over the trench area or where required to ensure safe working conditions. This serves to enhance regeneration of vegetation on the construction and permanent ROW. Permanent erosion control structures that could alter hydrology (e.g., slope breakers) will not be installed within wetlands, but these structures will be used in the adjacent upland areas to control erosion and sedimentation. Transco will employ BMPs as specified in erosion and sediment control permits and approved by PA DEP to further minimize the potential for soil compaction.

Turbidity and sedimentation could result from in-stream construction activities, trench dewatering, and/or construction-related stormwater runoff. In slow-moving waters, increases in suspended sediments could increase the biological oxygen demand and reduce levels of dissolved oxygen in localized areas during construction. Suspended sediments also could alter the chemical and physical characteristics of the water column on a temporary basis.

Transco will cross surface waters with flowing water present at the time of construction using dry-ditch construction methods to the greatest extent practicable. Dry-ditch crossing and trenchless watercourse crossing methods can dramatically reduce downstream sediment transport effects compared to wet open-cut crossings (Reid and Anderson 1999). Transco will employ BMPs as specified in its Erosion and Sediment Control General Permit 2 (ESCGP-2) application, which contains a site-specific erosion and sediment control plan to further minimize the potential for soil compaction (**see Attachment M - provided under separate cover**).

Transco will also install temporary equipment bridges across surface waters to reduce the potential for turbidity caused by movement of construction equipment and vehicular traffic. Equipment bridges will be constructed of timber mats or portable prefabricated bridges, depending on surface water conditions (e.g., if excessively soft soils are encountered in the surface water bed, or if high water flows occur, portable bridges will be used at minor surface water crossings). Typical drawings for equipment bridges are provided in Attachment 2 of the Transco ECP (**Attachment M**). Equipment bridges will be maintained until the pipe is installed and they are no longer needed. The bridges will then be removed. Equipment bridges will be designed to accommodate normal to high surface water flow and will be maintained to prevent flow restriction during the period of time the bridge is in use during construction.

To minimize sedimentation during pipeline construction across watercourses, trench spoil will be placed at least 10 feet away from water's edge, unless impractical due to topography, as specified in the Transco Project-Specific Wetland and Waterbody Construction and Mitigation Procedures (Procedures) (Attachment 18 of the Transco ECP [**Attachment M**]). Erosion controls will be placed around spoil piles to prevent sediment from flowing into surface waters. Additional Temporary Workspace (ATWS) will typically be set back 50 feet from the water's edge unless otherwise approved by Federal Energy Regulatory Commission (FERC) and the United States Army Corps of Engineers (USACE) (~~see Attachment P-1, Appendix P-1~~). ***Appendix P-1 to Attachment P includes a description of the LOD for each wetland and watercourse impact proposed for the Project within Lancaster County, including site-specific justification for the required LOD and pipeline siting considerations.***

Once the pipe is placed in the trench, the excavated material will be replaced immediately, and the surface water banks and bed will be restored to preconstruction contours. To stabilize the banks, the surface water banks and riparian areas will be revegetated using approved seed mixes and/or erosion control blankets or matting in accordance with the **Riparian Area Impact Assessment and Restoration Plan for Lancaster County within Appendix L-2.**

Compaction

Compaction of wetland soils and rutting within wetlands will be minimized by using low-ground-pressure equipment and temporary equipment mats. In general, rutting of soils, which is a sign of compaction, in wetlands or in other areas during wet conditions will be avoided or minimized

through the use of timber mats as deemed necessary during construction or by postponing work until soils have dried. In addition, Transco will minimize compaction of soils within agricultural lands, residential areas, and not saturated or inundated wetlands by stripping, segregating, and stockpiling topsoil separately from subsoil during construction. The Transco Procedures (ECP Attachment 18, provided within **Attachment M** of this Application) (Transco Procedures) and Agricultural and Construction Monitoring Plan (ECP Attachment 6, provided within **Attachment M** of this Application) indicate that the top 12 inches of topsoil from wetland and agricultural areas disturbed by trenching will be segregated from subsoil, except in areas where standing water is present, soils are saturated, or where shallow depth to bedrock conditions exist. These exceptions will be identified via visual assessment during grading and documented in the field with the Environmental and/or Agricultural Inspector. Immediately after backfilling is complete, the segregated topsoil will be restored to its original horizon location. Restoration of the soil surface elevations and contours and revegetation will be performed in accordance with Transco's ECP (**Attachment M**). Backfilling will occur to approximate grade; however, a soil crown may be placed above the trench to accommodate future soil settling.

If compaction occurs during construction, Transco will also use subsurface decompaction techniques, as described in the Transco Agricultural Construction and Monitoring Plan within Attachment 6 of Transco's ECP (**Attachment M**). Transco will employ BMPs as specified in erosion and sediment control permits and approved by the PA DEP to further minimize the potential for soil compaction.

Hydrology

Stream crossings are to be performed during low flow conditions with oversight from an environmental inspector. Storm event weather forecasts will be monitored prior to and during the stream crossing. The contractor will be required to maintain an adequate number of pumps on-site to facilitate an unanticipated increase in stream flow.

Per the Transco Procedures, provided as Attachment 18 of the ECP (**Attachment M**), the following additional measures for dam-and-pump *watercourse* crossings will be implemented:

- Use sufficient pumps, including on-site backup pumps, to maintain downstream flows;
- Pumps will be properly aligned to prevent surface water bed scour at the pump discharge;

- Dams will be constructed with materials that prevent sediment and other pollutants from entering the watercourse;
- Pump intakes will be screened to minimize entrainment of fish; and,
- Dams and pumps will be continuously monitored to ensure proper operation throughout the watercourse crossing.

Per the Transco Procedures, provided as Attachment 18 of the ECP (**Attachment M**), the following additional measures for flume crossings of watercourses will be conducted:

- Sand bags, sand bag and plastic sheeting diversion structures, or the equivalent will be used to develop an effective seal and to divert stream flow through the flume pipe;
- Flume pipes will remain in place until trenching, pipe laying, backfilling, and initial streambed restoration efforts are complete;
- Flume pipes will be properly aligned to prevent bank erosion and streambed scour; and
- All flume pipes and dams that are not part of the equipment bridge will be removed as soon as final cleanup of the streambed and bank is complete.

Permanent changes in surface and subsurface hydrology along the pipeline alignment through a wetland can have a long-term effect on hydrology and associated function and value. Trench plugs will be installed at the entrance and exit of the pipeline through each wetland to ensure that the subsurface hydrology remains intact. Restoration of each wetland will include returning contours to preconstruction levels (within 6 inches) and removing temporary erosion control measures.

Trench Dewatering

During construction, the open trench could accumulate water, either from the seepage of groundwater or from precipitation. This water must be removed from the trench to allow construction to proceed. During trench dewatering, water will be pumped from the trench and discharged into vegetated upland areas after first being filtered through a straw bale structure and/or filter bag. The rate of flow from the pump will be regulated to prevent scouring from runoff. Dewatering will be conducted in a manner designed to prevent the flow of heavily silt-

laden water directly into adjacent surface waters or wetlands and will be performed in accordance with the PA DEP and USACE permit requirements and the FERC Order.

Blasting

Transco anticipates the use of blasting in bodies of water or watercourses, however, Transco will not know for certain until construction activities commence. Watercourses with a higher potential for blasting are those with shallow depth to bedrock, as presented within Table L(d)-3. Transco's construction contractor will be required to demonstrate that blasting is necessary by first attempting to remove bedrock material using mechanical means, such as a hydraulic ram or splitter, rock trenching machine, or rock saw. Transco has submitted an Application for use of Explosives in Commonwealth Waters to the Pennsylvania Fish and Boat Commission (PFBC) for each proposed stream crossing in the event that blasting of bedrock is required to properly install the pipe.

Table L(d)-3 Watercourses with Shallow Depth to Bedrock Crossed by the Atlantic Sunrise Project in Lancaster County										
Waterbody ID	Waterbody Name ^a	Approximate Milepost ^b	Latitude	Longitude	Municipality	Stream Type	Crossing Length (feet)	Water Quality Classification ^c	Fishery Classification ^d	Crossing Method ^e
WW-T10-003A	UNT to Muddy Run	MOC-0147 0.59	39.85557	-76.26258	Drumore	Ephemeral	10.35	TSF, MF	Approved Trout Waters	II
WW-T31-3003	UNT to Back Run	30.13	40.14099	-76.46777	Rapho	Perennial	10.62	TSF, MF	N/A	II
WW-T31-3005	Brubaker Run	32.99	40.17062	-76.49677	Rapho	Perennial	10.65	TSF, MF	N/A	II
WW-T10-003	Muddy Run	MOC-0147 0.59	39.85550	-76.26253	Drumore	Perennial	12.80	TSF, MF	Approved Trout Waters	II
WW-T10-004	Tucquan Creek	MOC-0184 0.849	39.88144	-76.27503	Martic	Perennial	10.01	HQ-CWF, MF	Wild Trout Waters	II

a: UNT: Unnamed Tributary. UNT name was identified based on review of USGS topographical mapping.
 b: Milepost provided for access roads indicate the point at which the access road meets the proposed pipeline.
 c: PA Water Quality Classification Definition: TSF = Trout stocked fishery, MF = Migratory Fishery (Chapter 93 Pennsylvania Code). Water quality classifications were identified through a desktop review of available GIS data layers. A waterbody that was not assigned a water quality classification on the GIS data layer was given the same classification as the waterbody it drains into. All water quality classifications shown are designated uses, no existing uses are present in the Project area.
 d: N/A = Not Applicable, no state fishery classification; PA Fishery Classifications: Approved trout waters; Wild Trout Waters (PFBC 2014a, 2014b, and 2014c).
 e: II = Dry Crossing Method, including Flume, Dam and Pump, or Dry Open Cut for waterbodies that are dry at the time of crossing.

In general, if blasting is required at a watercourse crossing, the preparation of the rock for blasting (i.e., drilling shot holes) will not cause sufficient disturbance to displace aquatic organisms and will not increase surface water turbidity, since dry crossing methods will be utilized at each crossing. If in-water blasting is deemed necessary, Transco will implement its Blasting Plan, provided as Attachment 10 of the Transco ECP (**Attachment M**), and the site-specific blasting plan that will be produced for each area requiring blasting, which specifically addresses in-water blasting. In addition, Transco will obtain the required permits, licenses, and approvals and notify agencies in accordance with permit requirements. The Blasting Plan outlines proper precautions and necessary pre-blast planning to be implemented to minimize potential effects. Transco's contractor will also create a detailed, site-specific blasting plan for each area proposed for blasting; each site-specific blasting plan will be consistent with the provisions of the Project-specific Blasting Plan. Immediately following blasting, Transco will remove rock that impedes surface water flow. Furthermore, Transco will implement a two-foot depth of cover within consolidated rock to minimize the amount of blasting required and the duration of construction activity within the affected watercourse.

Spill Control

Inadvertent spills of fluids used during construction, such as fuels, lubricants, and solvents, could contaminate wetland soils and have adverse impacts on wetland vegetation. The Spill Plan for Oil and Hazardous Materials (Transco Spill Plan), provided as Attachment 9 of the Transco ECP (**Attachment M**), will be implemented to minimize the potential for spills and minimize effects from spills. In general, storage of equipment, hazardous materials, chemicals, fuels, lubricating oils, will occur at least 100 feet from wetlands, watercourses, and bodies of water. The Horizontal Directional Drill (HDD) Contingency Plan in Attachment 3 of the ECP (**Attachment M**) addresses inadvertent returns.

Fuel spills that occur during construction, although unlikely, could result in toxicity to aquatic organisms and associated modifications of aquatic habitat, as well as decreased oxygen concentrations. The Transco Spill Plan describes measures that will be implemented by Transco personnel and its contractors to prevent and, if necessary, control any inadvertent spill of hazardous materials that could affect water quality. The Transco Spill will be updated with site-specific information prior to the initiation of construction activities. Hazardous materials,

chemicals, lubricating oils, and fuels used during construction will be stored in upland areas at least 100 feet from surface waters unless otherwise approved by applicable regulatory agencies, and refueling of construction equipment will be conducted at least 100 feet from surface waters unless otherwise approved by applicable regulatory agencies. Additional precautions such as continual monitoring of fuel transfer and use of spill kits will be employed. Disposal of hazardous materials will also be conducted in accordance with the Transco Spill.

Revegetation

Some wetland vegetation will be cut, removed, or crushed during construction. After the completion of construction, wetland areas within the ROW will be restored to preconstruction contours and revegetated where standing water is not present to stabilize disturbed soils. For the pipeline construction ROW and ancillary facilities, Transco proposes to utilize either winter wheat or annual ryegrass as a nurse crop on the ROW from January 1 through May 15 and August 15 through December 31. During the summer months (May 15 through August 15), it is recommended that browntop millet be utilized as the nurse crop. The use of cereal (winter) rye is highly discouraged due to the allelopathic effects it could have on the establishment of the permanent crop. It is recommended that annual rye be planted at a nurse rate of 4 pounds per acre and winter wheat at a rate of 10 pounds per acre, individually. Browntop millet should be seeded at a rate of 5 pounds per acre.

Annual ryegrass, winter wheat, and browntop millet are intended to be a temporary cover to enhance soil stability. In wetland areas, restoration activities will involve returning wetlands to pre-construction contours and seeding in non-inundated areas with an approved wetland seed mix. The Seed mixes for the Project are included in the **Riparian Area Impact Assessment and Restoration Plan for Lancaster County (Appendix L-2)**, and in the **BMPs and Quantities Plan Set, included within Attachment M** of the revised Application. PEM wetlands, dominated primarily by low-growing sedges, rushes, and other herbaceous vegetation will revert to emergent vegetation following construction, resulting in no permanent change to wetland type. Wetland areas will not be amended with fertilizer, lime, or mulch unless required by applicable federal and state agencies.

Wetlands will be monitored post-construction in accordance with the Transco Procedures (Attachment 18 of the Transco ECP [**Attachment M**]). Revegetation will be considered

successful when the vegetative cover returns to at least 80 percent of the type, density, and distribution of the native vegetation in adjacent, undisturbed portions of the wetland. Within three years after construction, Transco will file a report with FERC identifying the status of the wetland revegetation efforts and documenting success as defined in the Transco Procedures.

For any wetland where revegetation is not successful at the end of three years after construction, Transco will develop and implement (in consultation with a professional wetland ecologist) a remedial revegetation plan to actively revegetate wetlands. Transco will continue revegetation efforts and file a report annually documenting progress in these wetlands until wetland revegetation is successful.

Additional avoidance and minimization measures are described in the Transco Procedures, which is included as Attachment 18 of the Transco ECP (**Attachment M**). To minimize adverse impacts at watercourse crossings, the Transco Procedures will be implemented during construction, post-construction restoration, and operation of the Project. In addition, construction activities at watercourse crossings will be performed in accordance with the USACE permit requirements, PA DEP permit requirements, and the FERC Order. The Transco Procedures also outline the plan for correction of deficiencies identified during post-construction monitoring.

Cleanup and Restoration

Upon completion of wetland crossings, Transco will promptly restore wetlands to their original configurations and contours and promptly stabilize disturbed adjacent upland areas. Final wetland elevations will be determined using civil survey (sub-centimeter accuracy) data collected prior to construction. Through these activities, Transco seeks to protect wetlands from sediment transport and restore as quickly as possible. Following construction, Transco will monitor disturbed wetlands and adjacent uplands until restoration and long-term stabilization is documented.

Upon completion of in-stream construction, Transco will restore the stream bed and banks to minimize erosion, washouts, and associated turbidity and sedimentation. Transco will stabilize the stream bed and banks to preconstruction contours such that they are similar to banks at the limits of disturbance. Transco will also utilize pre-construction photographs. Banks will be stabilized using geotextile fabric. **Appendix L-3**, Table 1 identifies each watercourse and the

stream restoration detail to be utilized on either bank. A typical detail for streambed restoration is included in the BMPs and Quantities Plan Set within **Attachment M**. The streambed will be restored to grade using native streambed material. To further stabilize the surface water banks, Transco will re-vegetate the banks and riparian areas using approved seed mixes in accordance with the Riparian Area Impact Assessment and Restoration Plan for Lancaster County within **Appendix L-2**. If inclement weather limits the effectiveness of reseeded efforts, temporary erosion control measures will be implemented to minimize erosion until conditions are suitable for reseeded. The temporary erosion control measures will be monitored and maintained until conditions are suitable for completion of restoration. No fertilizers, lime, or mulch will be utilized in riparian areas unless required in writing by the PA DEP and USACE permit requirements and the FERC Order.

Following construction, disturbed areas will be reseeded with approved seed mixes in accordance with the Transco Plan and Transco Procedures (Attachments 17 and 18 of the Transco ECP (**Attachment M**)), and the Riparian Area Impact Assessment and Restoration Plan for Lancaster County (**Appendix L-2**). Trees and other woody vegetation will be allowed to reestablish naturally within the temporary ROWs and other temporary workspaces that were cleared for construction of the pipeline. The use of soil conservation techniques will avoid and/or minimize erosion and runoff that could potentially affect surface water quality.

Temporary alteration of the ROWs and construction areas is expected to be relatively insignificant compared to the size of drainage areas and sub-watersheds of surface water systems across the Project area. Considering the Project's BMPs for erosion and sediment control measures provided in Attachment 2 of the Transco ECP (**Attachment M**), such as the use of slope breakers, silt fence, and sediment traps, site stabilization during construction, and revegetation, changes in the type of the vegetative cover and shading of surface waters will vary by crossing. Areas with forested riparian zones may experience temporary or permanent reduction/loss of shading and thermal effects in the vicinity of areas where tree clearing occurs. The construction ROWs will be as narrow as practicable to construct safely, and the area of increased light penetration and increased water temperatures will be limited to a relatively short length of the surface water; therefore, habitat changes within the channel will be minimal. In areas where the forested buffer can regenerate naturally (in the construction ROW outside the

permanent ROW), the effect will decrease over time as trees grow and mature and shading increases.

Wetlands

There are ~~1.0338~~ **1.0725** acres of temporary wetland impacts to PEM wetlands, and ~~0.2529~~ **0.0009** acre of temporary impacts to PSS wetlands, and **0.2528** acre of temporary impacts to PFO wetlands associated with the construction of the pipeline, which will be restored upon completion of construction, allowing the wetlands to revert to the pre-construction vegetation type. The Project will result in ~~0.1478~~ **0.1576** acre of permanent impacts to PEM wetlands and ~~0.2544~~ **0.2545** acre of permanent impacts to PFO wetlands. There are no **permanent impacts to PSS wetlands** as a result of this Project. There will be no fill placed in wetlands and no permanent loss of wetlands as a result of the Project. Construction workspace has been reduced to 75 feet at most wetland crossings, unless necessary due to site specific constraints. **Attachment P-1, Appendix P-1** provides a table of locations and justifications where ROWs in certain wetlands exceed the 75 foot maximum width recommended by the FERC. Permanent impacts to wetlands are associated with those wetlands located within the new permanent easement which is to be maintained during operation of the pipeline, as directed by the PA DEP. For PFO wetlands, this is considered to be a vegetative class change. Table L(d)-4 details the anticipated impacts to wetlands as a result of the Project.

Table L(d)-4
Wetland Impacts Associated with the Atlantic Sunrise Project in Lancaster County

Resource Name	Chapter 105.17 Wetland Classification	Wetland Cowardin Classification	Temporary Impact area (acres) ^a	Permanent Impact area (acres)	Latitude	Longitude
W-T62-001A	EV	PEM	<0.0001	0.0000	39.89275	-76.29153
W-T10-101A	Other	PEM	0.1117	0.0127	39.91224	-76.30853
W-T35-1001	Other	PEM	0.0509 0.0750	0.0105	39.93642 39.93640	-76.36305 -76.36306
W-T36-1002	Other	PEM	0.0296	0.0037	39.95156	-76.40374
W-T36-1004 / W-T36-1004-1 / W-T36-1004-2	Other	PEM	0.1049	0.0067	39.95635	-76.41463
W-T36-1005	Other	PEM	0.1124	0.0231	39.95727	-76.41778
W-T31-3003	Other	PEM	0.1771	0.0257	40.14494	-76.46730
W-T31-3006	Other	PEM	0.1237	0.0200	40.15320	-76.47622
W-T31-3004	Other	PEM	0.0559	0.0089	40.16494	-76.48574
W-T31-3002 / W-T31-3002-1	Other	PEM	0.1732	0.0266	40.17544	-76.50632
W-T31-3001	Other	PEM	0.0002	0.0004	40.17980	-76.51086
W-T30-4001	Other	PEM	0.0701	0.0095	40.20342	-76.52505
W-T81-001	Other	PEM	0.0228	0.0044	39.92510	-76.33125
W-T81-2001	Other	PEM	0.0242	0.0039	40.04301	-76.47381
W-T86-1001	Other	PEM	0.0160	0.0019	39.93620	-76.36550
Total PEM Wetland Impacts			1.0725 1.0338	0.1576 0.1478		
W-T87-1001	Other	PSS	0.0009	0.0000	39.92913	-76.33910
Total PSS Wetland Impacts			0.0000 0.0009	0.0000		
W-T10-003C	EV	PFO	0.0464	0.0458	39.85558	-76.26270
W-T62-001C	EV	PFO	0.0399	0.0429	39.89276	-76.29138
W-T10-101C	Other	PFO	0.1651 0.1652	0.1578 0.1577	39.91189	-76.30856
W-T32-2004	Other	PFO	0.0014	0.0080	40.02545	-76.45895
Total PFO Wetland Impacts			0.2528 0.2529	0.2545 0.2544		

Source: <http://www.pacode.com/secure/data/025/chapter105/s105.17.html>

<https://www.fws.gov/wetlands/Data/Wetland-Codes.html>

Key:

PEM = Palustrine Emergent

PSS = Palustrine Shrub-Shrub

PFO = Palustrine Forested

EV = Exceptional Value

a: Temporary impacts to PFO wetlands include temporal conversion from forested to scrub-shrub or emergent wetland. Within this wetland, a 30-foot-wide corridor centered over the pipeline will be permanently converted from forested to scrub-shrub or emergent wetland; the remainder of the wetland will be allowed to fully revert back to PFO.

Transco will use the conventional open-cut pipeline crossing method in wetlands where soils are unsaturated and able to support construction equipment at the time of crossing. This method requires segregation of topsoil from subsoil along the trench line. Where present, The Transco Procedures (ECP Attachment 18, provided within **Attachment M** of this Application) and Agricultural and Construction Monitoring Plan (ECP Attachment 6, provided within **Attachment M** of this Application) indicate that the top 12 inches of topsoil from wetland and agricultural areas disturbed by trenching will be segregated from subsoil, except in areas where standing water is present, soils are saturated, or where shallow depth to bedrock conditions exist. These exceptions will be identified via visual assessment during grading and documented in the field with the Environmental and/or Agricultural Inspector. Once this is done Transco will conduct trench excavation, pipe laying, backfilling, and grade restoration. Immediately after backfilling is complete, Transco will replace the segregated topsoil to its original horizon location and install applicable erosion control measures. Transco will use the conventional open-cut wetland construction method for crossing wetlands with saturated soils or soils unable to support construction equipment without considerable soil disturbance. Prior to crossing and movement of construction equipment through these wetlands, Transco will stabilize the ROW using equipment mats to allow for a stable, safe working condition and to prevent significant rutting/soil disturbance. Transco will temporarily store trench spoil in a ridge along the pipeline trench, leaving gaps as appropriate intervals to provide for natural circulation or drainage of water. Topsoil will not be segregated where standing water is present or soils are saturated.

While excavating the trench, Transco will attempt to assemble the pipeline in a staging area located in an upland area unless the wetland is dry enough to support skids and pipe. Transco will then move the pipe to the ROW. Pipe stringing and fabrication may occur within the wetland adjacent to the trench or adjacent to the wetland in an approved ATWS. After lowering the pipeline into the trench, Transco will work from equipment mats to perform backfilling, final cleanup, and grading.

Construction in inundated wetland areas may require the push-pull technique. The push-pull technique can be used in large inundated wetland areas (>300 feet crossing length) where sufficient water is present to float the pipeline in the trench and where grade elevation over the length of the push-pull area will not require damming to maintain adequate water levels for

flotation of the pipe. Transco will use this technique when inundated conditions prevent the use of conventional open-cut wetland construction techniques.

Operation of construction equipment through wetlands will be limited to only that necessary for each stage of pipeline installation (e.g., clearing, trenching). Topsoil segregation techniques will be used in wetlands that are not saturated or inundated to preserve the seed bank and to facilitate successful restoration. Wetland crossing methods will be determined based on site-specific conditions at the time of crossing. Wetlands with soils that can support construction equipment may be crossed using the conventional open-cut method, as described below, with the use of timber mats to prevent soil rutting. In forested wetlands, Transco will minimize tree clearing to the extent practicable while maintaining safe construction conditions. Typical drawings for the wetland crossings are provided in Attachment 2 of the Transco ECP (**Attachment M**).

Some wetland vegetation will be cut, removed, or crushed during construction. After the completion of construction, wetland areas within the ROW will be restored to preconstruction contours and revegetated with annual ryegrass where standing water is not present to stabilize disturbed soils. Annual ryegrass is intended to be a temporary cover to enhance soil stability. In wetland areas, restoration activities will involve returning wetlands to pre-construction contours and seeding in non-inundated areas with an approved wetland seed mix. PEM wetlands, dominated primarily by low-growing sedges, rushes, and other herbaceous vegetation will revert to emergent vegetation following construction, resulting in no permanent change to wetland type. Wetland areas will not be amended with fertilizer, lime, or mulch unless required by appropriate federal and state agencies.

Upon completion of wetland crossings, Transco will restore wetlands to their original configurations and contours and stabilize disturbed adjacent upland areas. Through these activities, Transco seeks to protect wetlands from sediment transport and restore native hydrophytic vegetation as quickly as possible. Following construction, Transco will monitor disturbed wetlands and adjacent uplands until restoration and long-term stabilization is documented per the requirements of the FERC Order and other applicable regulatory approvals.

Revegetation will be considered successful when the vegetative cover returns to at least 80 percent of the type, density, and distribution of the native vegetation in adjacent, portions of the wetland not disturbed by construction of the Project.

Additional wetland avoidance and minimization measures are described in the Transco Procedures, which is included as Attachment 18 of the Transco ECP (**Attachment M**) as well as the Alternatives Analysis for this application (**Attachment P-1**).

Compensatory Mitigation for Wetland Impacts

No permanent fill will be placed in wetlands as a result of this Project. Mitigation will be required for permanent conversion of vegetation cover type for PFO and PSS wetlands and for temporary conversion of vegetation cover type for PFO wetlands. The following impact mitigation ratios were determined in coordination with the PA DEP and USACE: 2.5:1 for EV PFO wetlands, 2:1 for non-EV PFO wetlands, 1.75:1 for EV PSS wetlands, and 1.5:1 for non-EV PSS wetlands.

The Project will result in 0.18 acre of impacts to EV PFO wetlands and 0.33 acre of impacts to non-EV PFO wetlands in Lancaster County. The Project will result in 0.51 acres of impacts to EV and non-EV PFO wetlands in Lancaster County (excluding temporary PSS wetland impacts). Of the 0.51 wetland impact acres, 0.33 are non-EV PFO impacts and 0.18 are EV PFO wetland impacts. No *permanent* non-EV or EV PSS impacts are anticipated in Lancaster County. Mitigation will be required for the 0.51-acre of wetland impacts within Lancaster County which will be compensated for at the Hibred Farms Mitigation Site as detailed in **Attachments Q-1 and Q-2**. Transco proposes to provide off-site mitigation for $[(0.33 \text{ acre} \times 2 \text{ ratio} = 0.66 \text{ acre}) + (0.18 \text{ acre} \times 2.5 \text{ ratio} = 0.45 \text{ acre}) = 1.11 \text{ acres}]$. The mitigation site will provide sufficient acreage to compensate for the above-listed impacts, with additional ecological benefits beyond the required mitigation. Some of the temporary and permanent PFO impact areas are also being replanted on-site, providing double mitigation for these areas.

The mitigation site is oversized to account for potential Project-related wetland impacts within parcels that currently do not have access for surveys. For mitigation planning purposes remote sensed features on the remaining no-survey parcels are included on

the impact table in Attachment E-3 and are depicted on the impact mapping in Attachment H-2. Remote sensed features are identified with an RS prefix (e.g., WW-RS-1009) within the impact tables and mapping.

Transco has provided a Mitigation Master Plan and a Site Specific Mitigation Plan for the Hibred Farms Permittee Responsible site in Lancaster County. Under the authorization of this Chapter 105 permit application, Transco is seeking authorization to construct the Mitigation Site for this Project. Impacts to regulated resources expected as a result of construction and use of this site for Atlantic Sunrise Project are included in this revised Application (see **Attachment E-2**).

The USACE Highway Methodology Workbook Supplement: Wetland Functions and Values (Supplement 1993) was used to evaluate the functions and values of the wetlands at the impact site and the PRM Sites. The Supplement is a qualitative approach to describing the physical characteristics of and identifying the functions and values exhibited by a wetland.

The Wetland Function-Value Evaluation Form in the Supplement was completed at the PRM Sites in order to capture the existing or pre-restoration conditions at the PRM Sites as well as the anticipated ecological lift the site will experience as a result of the restoration activities. The baseline conditions of the existing wetlands at the PRM Sites already represent a functional uplift with respect to the functions and values as compared to the impacted wetlands for which the PRM Sites will be providing mitigation. The functional uplift will further be improved through the proposed restoration efforts. The wetland functions and values assessments performed at the Project impact locations and the PRM Sites indicate that the mitigation site, once restored, will compensate for and replace the functions and values impacted as a result of the Project by providing improved wildlife habitat, flood flow alteration, and nutrient removal/retention (the top three functions and values lost as a result of Project construction) at comparatively high levels (see **Attachment Q-1**).

Hibred Farms PRM Site

The proposed mitigation addresses current impairments to the Hibred Farms PRM sites existing hydrology. Upon review of the 1939 aerial imagery, the PRM Site exists in its natural state as a mixed PEM, PSS, PFO wetland. By 1959, aerial imagery indicates clearly that an intensive

ditching system was installed to lower the water table in the area for agricultural practices. Since that time the main stem has continued to incise, creating a zone of depression adjacent to the incised channel, negatively affecting the hydrology of the wetlands on-site, while also creating instability and downstream sedimentation impacts. When compared to the bog turtle core habitat map, it can be seen that very little core habitat occurs adjacent to the main stem, further confirming the influence of the incision on the PRM Site's hydrology. Lastly these headcuts and the systems overall instability will continue to incise the side ditches, ultimately resulting in a reduction of core bog turtle habitat at the PRM Site.

The proposed mitigation addresses the incision of the main stem, stabilizing the stream, increasing stream and floodplain interaction, reducing downstream sedimentation, and raising the water table adjacent to the channel. This improved hydrology will enhance the bog turtle habitat on-site.

The proposed woody PSS species are non-aggressive species, many of which are currently present within the PRM Site. All selected species and planting rates were approved by the USFWS in consultation with bog turtle specialists from agencies in other states. In addition, species in adjacent bog turtle wetlands were inventoried as part of the species list selection. These plantings are proposed to be planted only in limited non-core habitat areas. Long-term, Transco is providing the long-term easement holder with a long-term maintenance and monitoring fund. This money can be used to ensure that there is no encroachment of any woody tree species into the core bog turtle habitat areas.

Overall the restored main stem improves the hydrology of the site, addresses the current causes of instability, and when combined with the structure of the Projects proposed long-term maintenance and management provides a sustainable enhancement to the existing bog turtle habitat on-site.

Watercourses and Bodies of Water

~~Forty-eight~~ **Fifty-seven** watercourses will be crossed during construction of the pipeline in Lancaster County. The centerline of the pipeline will cross each watercourse utilizing the construction method indicated in the table below. Temporary construction bridges will be used to cross the streams with equipment, as necessary, during construction. **Temporary stream**

impacts total ~~1.6485~~ **1.7512** acres of perennial streams, and approximately ~~0.3506~~ **0.3272** acre of intermittent and ephemeral streams. Permanent stream impacts are defined by the placement of the pipeline and permanent operation easement as directed by PA DEP, and total ~~0.2412~~ **0.2450** acre of perennial streams and ~~0.0451~~ **0.0463** acre of intermittent and ephemeral streams. Transco is proposing to cross all watercourses of the Project using either a dam-and-pump or flume construction method, except for the Conestoga River and one UNT to Conestoga River which will be crossed by HDD.

No fill or water obstructions will be added to streams as a part of this Project, therefore no loss of stream functions and values is expected to occur. Impacts are detailed in Table L(d)-5.

**Table L(d)-5
 Stream Impacts Associated with the Atlantic Sunrise Project in Lancaster County**

Resource ID	Resource Name	Chapter 93 Classification ^a	Stream Type	Stream PFBC Trout Status	Temporary Impact Dimensions (Length x Width)		Temporary Impact area	Permanent Impact Dimensions (Length x Width)		Permanent Impact area	Latitude	Longitude	Waterbody Crossing Method
					(Feet) ^b			(Feet) ^b					
WW-T10-001	UNT to Fishing Creek	HQ-CWF, MF	Perennial	Wild Trout Waters	82.60	24.45	0.0353	10.30	24.45	0.0056	39.83912	-76.25591	Flume
WW-T10-003	Muddy Run	TSF, MF	Perennial	Approved Trout Waters	104.05	43.25	0.0625	12.80	43.25	0.0099	39.85550	-76.26253	Dam-and-Pump
WW-T10-004	Tucquan Creek	HQ-CWF, MF	Perennial	Wild Trout Waters	65.96	4.99	0.0106	10.01	4.99	0.0011	39.88144	-76.27503	Dam-and-Pump
WW-T10-100	UNT to Climbers Run	CWF, MF	Perennial	None	88.07	12.13	0.0206	11.56	12.13	0.0030	39.91245	-76.30849	Dam-and-Pump
WW-T10-1003	UNT to Pequea Creek	WWF, MF	Perennial	None	85.99	5.11	0.0098	10.26	5.11	0.0012	39.93031	-76.35103	Dam-and-Pump
WW-T10-2002	UNT to Chiques Creek	WWF, MF	Perennial	None	86.20	21.07	0.0464	11.68	21.07	0.0048	40.05457	-76.48927	Dam-and-Pump
WW-T10-2004	Shawnee Run	WWF, MF	Perennial	None	96.44	24.02	0.0453	10.61	24.02	0.0055	40.04890	-76.48104	Dam-and-Pump
WW-T10-2005	UNT to Strickler Run	WWF, MF	Perennial	None	80.12 40.11	12.61	0.0116 0.0238	10.00	12.61	0.0029	40.03692 40.03696	-76.46132 -76.46127	Conventional Bore Dam-and-Pump
WW-T11-2001	Stamans Run	WWF, MF	Perennial	None	83.34	25.72	0.0504	10.42	25.72	0.0059	40.00033	-76.45297	Dam-and-Pump
WW-T11-2002	UNT to Stamans Run	WWF, MF	Perennial	None	94.36	11.68	0.0201	13.17	11.68	0.0026	40.01029	-76.45831	Dam-and-Pump
WW-T20-002	Climbers Run	CWF, MF	Perennial	None	83.58	24.86	0.0458	10.55	24.86	0.0057	39.91624	-76.31068	Dam-and-Pump
WW-T20-1001	Conestoga River	WWF, MF	Perennial	None	40.04	174.02	0.1613	10.01	174.02	0.0400	39.94399	-76.38196	HDD
WW-T20-1005	UNT to Indian Run	WWF, MF	Perennial	None	114.96	26.93	0.0627	10.50	26.93	0.0062	39.96712	-76.42772	Dam-and-Pump
WW-T24-1001	Witmars Run	WWF, MF	Perennial	None	89.30	8.90	0.0206	10.26	8.90	0.0021	39.98618	-76.44503	Dam-and-Pump
WW-T24-2001	Strickler Run	WWF, MF	Perennial	None	82.01	42.87	0.0814	10.46	42.87	0.0098	40.02600	-76.45894	Dam-and-Pump
WW-T24-3001	Little Chiques Creek	TSF, MF	Perennial	Approved Trout Waters, Trout Stocked Stream	80.90	15.78	0.0359	10.05	15.78	0.0037	40.18316	-76.51801	Dam-and-Pump

**Table L(d)-5
 Stream Impacts Associated with the Atlantic Sunrise Project in Lancaster County**

Resource ID	Resource Name	Chapter 93 Classification ^a	Stream Type	Stream PFBC Trout Status	Temporary Impact Dimensions (Length x Width)		Temporary Impact area	Permanent Impact Dimensions (Length x Width)		Permanent Impact area	Latitude	Longitude	Waterbody Crossing Method
					(Feet) ^b			(Feet) ^b					
WW-T24-3001A	UNT to Little Chiques Creek	TSF, MF	Perennial	Approved Trout Waters, Trout Stocked Stream	15.74	3.77	0.0010	0.0000	0.0000	0.0000	40.18322	-76.51788	Dam-and-Pump
WW-T30-4001	Shells Run	TSF, MF	Perennial	None	65.11	16.22	0.0245	10.00	16.22	0.0037	40.20334	-76.52487	Dam-and-Pump
WW-T31-002	UNT to Pequea Creek	WWF, MF	Perennial	None	83.55	19.87	0.0328	10.59	19.87	0.0047	39.91953	-76.31701	Dam-and-Pump
WW-T31-003	Pequea Creek	WWF, MF	Perennial	None	91.78	104.03	0.2059	10.19	104.03	0.0238	39.92076	-76.31997	Dam-and-Pump
WW-T31-3002	UNT to Little Chiques Creek	TSF, MF	Perennial	None	84.37	21.85	0.0274	10.76	21.85	0.0050	40.17472	-76.50572	Dam-and-Pump
WW-T31-3003	UNT to Back Run	TSF, MF	Perennial	None	83.97	10.63	0.0262	10.62	10.63	0.0026	40.14099	-76.46777	Dam-and-Pump
WW-T31-3004	Back Run	TSF, MF	Perennial	None	76.59	14.91	0.0246	10.97	14.91	0.0034	40.14477	-76.46731	Dam-and-Pump
WW-T31-3005	Brubaker Run	TSF, MF	Perennial	None	83.18	39.40	0.0553	10.65	39.40	0.0089	40.17062	-76.49677	Flume
WW-T31-3006	UNT to Brubaker Run	WWF, MF	Perennial	None	30.01	5.02	0.0118	5.00	5.02	0.0014	40.16498	-76.48578	Dam-and-Pump
WW-T31-3007	UNT to Back Run	TSF, MF	Perennial	None	75.17	65.15	0.0996	13.03	65.15	0.0150	40.15719	-76.48056	Dam-and-Pump
WW-T31-3008	UNT to Back Run	TSF, MF	Perennial	None	67.68	16.29	0.0263	10.00	16.29	0.0038	40.15315	-76.47603	Dam-and-Pump
WW-T31-3009	UNT to Back Run	TSF, MF	Perennial	None	81.43	5.05	0.0093	10.14	5.05	0.0012	40.14757	-76.46930	Dam-and-Pump
WW-T35-1002	UNT to Conestoga River	WWF, MF	Perennial	None	90.44	35.44	0.0373	39.03	35.44	0.0080	39.93644	-76.36094	Dam-and-Pump
WW-T35-1002A	UNT to Conestoga River	WWF, MF	Perennial	None	60.21 91.90	11.12	0.0098 0.0159	10.88	11.12	0.0024	39.93639	-76.36317	Conventional Bore Dam-and-Pump
WW-T36-1001A	UNT to Conestoga River	WWF, MF	Perennial	None	047.45	045.69	00.0437	12.03	45.69	0.0105	39.94444	-76.38330	HDD
WW-T36-1002A	UNT to Witmers Run	WWF, MF	Perennial	None	84.64	11.53	0.0338	10.44	11.53	0.0026	39.94926	-76.39939	Dam-and-Pump
WW-T36-1004	UNT to Witmers Run	WWF, MF	Perennial	None	81.77	18.53	0.0442	10.00	18.53	0.0043	39.95226	-76.40550	Dam-and-Pump

**Table L(d)-5
 Stream Impacts Associated with the Atlantic Sunrise Project in Lancaster County**

Resource ID	Resource Name	Chapter 93 Classification ^a	Stream Type	Stream PFBC Trout Status	Temporary Impact Dimensions (Length x Width)		Temporary Impact area	Permanent Impact Dimensions (Length x Width)		Permanent Impact area	Latitude	Longitude	Waterbody Crossing Method
					(Feet) ^b			(Feet) ^b					
WW-T36-1007	Indian Run	WWF, MF	Perennial	None	92.82	23.36	0.0500	11.19	23.36	0.0054	39.95996	-76.41894	Dam-and-Pump
WW-T42-2003	Chiques Creek	WWF, MF	Perennial	None	81.59	70.53	0.1429 0.1305	10.10	70.53	0.0162	40.06610	-76.49043	Dam-and-Pump
WW-T49-1001	UNT to Witmer Run	WWF, MF	Perennial	None	94.86	5.01	0.0109	10.02	5.01	0.0012	39.94813	-76.39660	Flume
WW-T65-001	UNT to Pequea Creek	WWF, MF	Perennial	None	101.77	11.00	0.0264	10.01	11.00	0.0025	39.92028	-76.31868	Dam-and-Pump
WW-T25-2001	UNT to Strickler Run	WWF, MF	Perennial	None	0.00	0.00	0.0000	19.26	17.82	0.0072	40.02514	-76.45585	Temporary Construction Crossing
WW-T42-2003	Chiques Creek	WWF, MF	Perennial	None	52.09	70.53	0.0124	0.00	0.00	0.0000	40.06623	-76.49063	Water Withdrawal
WW-T81-001	UNT to Pequea Creek	WWF, MF	Perennial	None	80.66	24.96	0.0508	10.94	24.96	0.0058	39.2484	-76.33119	Dam-and-Pump
WW-T81-2001	UNT to Strickler Run	WWF, MF	Perennial	None	93.30	4.92	0.0101	11.74	4.92	0.0011	40.03870	-76.46734	Flume
WW-T81-2003	UNT to Shawnee Run	WWF, MF	Perennial	None	72.51	6.72	0.0137	10.22	6.72	0.0015	40.04290	-76.47382	Flume
WW-T84-1001	UNT to Conestoga River	WWF, MF	Perennial	None	8.43	1.95	0.0002	0.00	0.00	0.000	39.93620	-76.36621	N/A
Perennial Stream Impacts							1.7512 1.6485	 	0.2450 0.2412	 			
WW-T10-003A	UNT to Muddy Run	TSF, MF	Ephemeral	Approved Trout Waters	47.68	11.46	0.0136	10.35	11.46	0.0026	39.85557	-76.26258	Dam-and-Pump
WW-T25-1001	UNT to Pequea Creek	WWF, MF	Intermittent	None	72.43	5.12	0.0083	10.28	5.12	0.0012	39.93053	-76.34426	Dam-and-Pump
WW-T31-002A	UNT to Pequea Creek	WWF, MF	Ephemeral	None	103.90	5.78	0.0119	11.59	5.78	0.0013	39.91946	-76.31694	Dam-and-Pump
WW-T31-3001	UNT to Little Chiques Creek	TSF, MF	Ephemeral	None	66.86 104.26	30.41 44.92	0.0431 0.0975	10.14 15.47	30.41 44.92	0.0070 0.0112	40.17991 40.17975	-76.51134 -76.51078	Dam-and-Pump
WW-T92-1002	UNT to Witmers Run	WWF, MF	Ephemeral	None	19.39 16.74	9.16	0.0033	0.00	0.00	0.0000	39.95196	-76.40444	Temporary Construction Crossing

**Table L(d)-5
 Stream Impacts Associated with the Atlantic Sunrise Project in Lancaster County**

Resource ID	Resource Name	Chapter 93 Classification ^a	Stream Type	Stream PFBC Trout Status	Temporary Impact Dimensions (Length x Width)		Temporary Impact area	Permanent Impact Dimensions (Length x Width)		Permanent Impact area	Latitude	Longitude	Waterbody Crossing Method
					(Feet) ^b			(Feet) ^b					
WW-T31-3002A	UNT to Little Chiques Creek	TSF, MF	Intermittent	None	63.36	3.17	0.0108	4.60	3.17	0.0007	40.17480	-76.50559	Dam-and-Pump
WW-T36-1006	UNT to Witmers Run	WWF, MF	Intermittent	None	81.15	36.73	0.0603	10.11	36.73	0.0084	39.95355	-76.40845	Dam-and-Pump
WW-T49-2001	UNT to Chiques Creek	WWF, MF	Ephemeral	None	70.33 84.49	15.39 17.14	0.0210 0.0253	10.54 10.59	15.39 17.14	0.0035 0.0039	40.05878 40.05876	-76.49356 -76.49350	Dam-and-Pump
WW-T62-001	UNT to Trout Run	HQ-CWF, MF	Intermittent	Class A Wild Trout	66.19	15.38	0.0224	10.00	15.38	0.0035	39.98267	-76.29137	Dam-and-Pump
WW-T65-1002	UNT to Pequea Creek	WWF, MF	Ephemeral	None	97.08	32.31	0.0583	12.33	32.31	0.0074	39.93013	-76.34808	Dam-and-Pump
WW-T92-1003	UNT to Witmer Run	WWF, MF	Ephemeral	None	85.65	21.48	0.0389	10.51	21.48	0.0049	39.95288	-76.40712	Dam-and-Pump
WW-T81-1001	UNT to Pequea Creek	WWF, MF	Ephemeral	None	35.63	6.70	0.0043	0.0000	0.0000	0.0000	39.92315	-76.33004	Dam-and-Pump
WW-T65-1005	UNT to Pequea Creek	WWF, MF	Intermittent	None	71.24	13.92	0.0177	10.43	13.92	0.0032	39.92907	-76.33922	Dam-and-Pump
WW-T86-1001	UNT to Conestoga River	WWF, MF	Intermittent	None	71.76	6.88	0.0095	11.01	6.88	0.0016	39.93632	-76.36545	Dam-and-Pump
WW-T85-1002	UNT to Conestoga River	WWF, MF	Intermittent	None	43.11	4.30	0.0038	10.77	4.30	0.0010	39.94289	-76.37870	HDD
Ephemeral and Intermittent Stream Impacts							0.3272 0.3506			0.0463 0.0454			

Source:
<http://www.pacode.com/secure/data/025/chapter93/chap93toc.html>
http://www.fishandboat.com/waters_trout.htm

a: CWF = Cold Water Fishery; MF = Migratory Fishes; WWF = Warm Water Fishery; TSF = Trout Stocked.
 b: Widths are reported as the maximum width for the feature. Stream lengths are reported on the impact maps as the sum of the permanent and temporary lengths.

Dam-and-Pump Crossing Method

The dam-and-pump method for crossing surface waters temporarily diverts flow around the construction workspace while maintaining downstream flow. Transco will install dams upstream and downstream of the proposed trench and then use pumps and hoses to convey flow around the in-stream workspace to create a dry work area. The pumped water will be discharged downstream of the construction workspace. Pumps will be sized to accommodate flow based on the size of the tributary watershed. Spare pumps will be on-site for use in case the in-use pump mechanically fails during construction. Once the dam-and-pump equipment is in place and active, Transco will excavate the trench and install the pipeline in the dry ditch.

Flume Crossing

When using a flume crossing, Transco will install flume pipe(s) over the crossing location prior to trenching. Transco will maintain these pipes until restoration of the watercourse is complete. Transco will use flumes of a size and quantity sufficient to maintain the maximum anticipated downstream flows per the applicable regulations. Transco will then thread the natural gas pipe under the flume pipe(s), and backfill the ditch while flows are maintained through the flume pipe(s) and downstream.

Unless otherwise approved, Transco will adhere to time of year restrictions on in-stream construction for those streams with trout designations as set by the PFBC. For streams identified by PFBC for having stocked sections within the Project, no in-stream work will occur from March 1 to June 15. For wild trout waters, no in-stream work will occur between October 1 through December 1, and, for Class A Wild Trout Streams, between October 1 and April 1. Transco has coordinated with the PFBC to confirm the time of year restrictions that are applicable to the streams crossed by the Project.

Horizontal Directional Drill Crossing Method (HDD)

The only HDD crossing proposed for the Project within Lancaster County is for the crossing of the Conestoga River. The HDD method allows for trenchless construction across an area by drilling a hole significantly below conventional pipeline depth, and pulling the pipe through the predrilled hole. HDD is typically used to install pipeline in areas where traditional open-cut excavations are not feasible due to sensitive resource areas or logistical reasons. While overall

disturbance within a sensitive area may be minimized by HDD, a greater amount of equipment staging is typically required. The amount of workspace at the drill entry and exit locations can vary significantly based on site-specific conditions. The entry side of the drill usually consists of the drilling rig and entry hole, control cab, drill string pipe storage, site office and storage trailers, power generators, bentonite storage, bentonite slurry mixing equipment, slurry pump, cuttings separation equipment, cutting return/settlement pit, water trucks and water storage, and the heavy construction equipment necessary to support the operation.

The exit side consists of the exit hole and slurry containment pit, cuttings return/settlement pit, cuttings separation and slurry reclamation equipment, drill string pipe storage, and heavy construction equipment necessary to support the operation. In addition to the drilling operations to be conducted within the exit side workspace, ATWS is often needed adjacent to the construction ROW to provide a straight corridor for handling pipe at HDD locations where the ROW changes direction. This allows the pipe to be prefabricated into one or more sections in preparation of the pull-back operation. Once assembled, the pipe is placed on rollers so it can be conveyed into the drill hole.

To facilitate HDD, an electric guide wire coil is typically placed along the ground surface between each HDD entry and exit point, where possible. This guide wire is used to assist in tracking the location of the down-hole drilling equipment and to determine steering inputs during advancement of the pilot bore. Wireline guidance systems typically require two guide wires for HDD crossings that parallel the centerline of an installation, with a variable spacing or offset on each side of the centerline, depending on the depth of the HDD installation.

Following completion of the pilot hole, reaming tools are used to enlarge the hole to accommodate the pipe diameter. The reaming tools are attached to the drill string at the exit point and then rotated and drawn back to incrementally enlarge the pilot hole. During this process, drilling mud consisting of bentonite clay and water is continuously pumped into the pilot hole to remove cuttings and maintain the integrity of the hole. When the hole has been sufficiently enlarged, a prefabricated segment of pipe is attached behind the reaming tool on the exit side of the crossing and pulled back through the drill hole towards the drill rig.

During construction, Transco will not clear any trees between the workspaces for HDD entry and exit sites. The only planned activity between HDD entry and exit points would be foot traffic to place electric guide wires that would be used to track the progress of the drilling operation. During operation Transco will not conduct any routine vegetation maintenance between HDD entry and exit sites.

If the HDD is unsuccessful, Transco will implement its HDD Contingency Plan for the Conestoga River, which is included in Attachment 3 of the Transco ECP (**Attachment M**). **County-Specific Impact Mapping (Attachment H-3) is included for the contingency crossing methods in the case of an unsuccessful HDD. These drawings include E&S BMPs that are specific to the contingency crossing method, which are also included within the E&S Plans within Attachment M. Additionally, the Chapter 105 Impact Table (Attachment E-2) included temporary watercourse, wetland, and floodplain impacts that would be associated with the use of the contingency crossing methods, which will allow for the implementation of the contingency crossing methods without requiring the processing of major permit amendments prior to the initiation of the crossing method.**

Watercourse Restoration and Compensatory Mitigation

Upon completion of in-stream construction, Transco will restore the stream bed and banks to minimize erosion, washouts, and associated turbidity and sedimentation. Transco will stabilize the stream bed and banks to preconstruction contours, such that they are similar to banks at the limits of disturbance. Transco will also use pre-construction photographs. Depending on surface water conditions, the banks and bed may be stabilized using erosion control fabric, clean fill or native cobbles, and/or permanent slope breakers. Banks will be stabilized using geotextile fabric. **Appendix L-3**, Table 1 identifies each watercourse and stream restoration detail to be utilized on either bank. A typical detail for streambed restoration is included in the BMPs and Quantities Plan Set within **Attachment M**. The streambed will be restored to grade using native streambed material. To further stabilize the surface water banks, Transco will revegetate the banks and riparian areas **in accordance with the Riparian Area Impact Assessment and Restoration Plan for Lancaster County within in Appendix L-2**. If inclement weather limits the effectiveness of reseeding efforts, temporary erosion control measures will be implemented to minimize erosion until conditions are suitable for reseeding. The temporary erosion control measures will be monitored and maintained until conditions are suitable for

completion of restoration. No fertilizers, lime, or mulch will be utilized in riparian areas unless required in writing by PA DEP and USACE permit requirements and the FERC order.

Following construction, disturbed areas adjacent to watercourses and bodies of water will be reseeded with approved seed mixes in accordance with the **Riparian Area Impact Assessment and Restoration Plan for Lancaster County within Appendix L-2**. Trees and other woody vegetation will be allowed to reestablish naturally within the temporary ROWs and other temporary workspaces that were cleared for construction of the pipeline. The use of soil conservation techniques will avoid and/or minimize erosion and runoff that could potentially affect surface water quality.

No permanent fill will be placed in any watercourses as a result of this Project, and no stream relocation is expected. Therefore, no stream mitigation is proposed for this Project.

Floodplains

Climbers Run, Conestoga River, Strickler Run, Back Run, Brubaker Run, Little Chicques Creek, Chicques Creek, UNT to Pequea Creek, UNT to Back Run, and Pequea Creek have Federal Emergency Management Agency (FEMA) designated floodplains that are located within the construction workspace. PA DEP defines a regulatory floodway as a 50-foot buffer, which is established 50 feet from the delineated boundary of streams that do not have FEMA mapped 100-year floodplains (32 P.S. § 679.302 Chapter 106). Temporary impacts to floodways are expected from construction activities, but there will be no permanent loss of flood storage capacity as all pre-construction surface elevations will be re-established during restoration. **Temporary floodway impacts will be 17.612419.4048 acres. Of the total temporary impacts, 10.510910.7656 acre will be to FEMA mapped floodplains. Permanent floodway impacts will be 1.76721.8628 acres as a result of operation of the pipeline ROW. Of the total permanent impacts 0.0.95870.8960 acre will be to FEMA mapped floodplains.** These impacts are associated with vegetation management only and do not represent a permanent modification of ground elevation or loss of flood storage capacity. Impact details are included in Table L(d)-6. As stated above, **A Riparian Area Impact Assessment and Restoration Plan for Lancaster County is provided in Appendix L-2. The Riparian Area Impact Assessment and Restoration Plan for Lancaster County** includes measures for replanting and reestablishing the riparian buffer within the regulated floodplain (FEMA mapped 100-year floodplain or 50-foot-

wide floodway if no FEMA-mapped floodplain is present, whichever is greater) (see **Appendix L-2**).

**Table L(d)-6
 Floodplain Impacts Associated With the Atlantic Sunrise Project in Lancaster County**

Resource ID	Resource Name	Floodway Type	Temporary Impact Dimensions (Length x Width) ^a		Temporary Impact area ^d (Acres)	Permanent Impact Dimensions (Length x Width) ^a		Permanent Impact area (Acres)	Latitude	Longitude
			(Feet)	(Feet)		(Feet)	(Feet)			
Floodway to WW-T30-4001	Floodway to Shells Run	Assumed 50 Feet	112.90	107.26	0.1377	89.19	10.00	0.0165	40.20334	-76.52487
Floodway to WW-T10-001	Floodway to UNT to Fishing Creek	Assumed 50 Feet ^b	168.21	102.68	0.2420	144.21	10.00	0.0255	39.83912	-76.25591
Floodway to WW-T10-003 / WW-T10-003A	Floodway to Muddy Run / UNT to Muddy Run	Assumed 50 Feet ^b	288.42	92.53	0.1511	186.34	10.00	0.0170	39.85550	-76.26253
Floodway to WW-T10-004	Floodway to Tucquan Creek	Assumed 50 Feet	116.11	111.00	0.1630	107.42	17.03	0.0234	39.88144	-76.27503
Floodway to WW-T10-100	Floodway to UNT to Climbers Run	Assumed 50 Feet	185.06	89.99	0.1818	101.94	10.00	0.0191	39.91245	-76.30849
Floodway to WW-T10-1003	Floodway to UNT to Pequea Creek	Assumed 50 Feet	138.48	100.00	0.2146	110.02	10.00	0.0236	39.93031	-76.35103
Floodway to WW-T10-2002	Floodway to UNT to Chiques Creek	Assumed 50 Feet	170.14	100.00	0.2139	130.12	10.00	0.0244	40.05457	-76.48927
Floodway to WW-T10-2004	Floodway to Shawnee Run	Assumed 50 Feet	77.14	100.00	0.2294	146.62	10.00	0.0265	40.04890	-76.48104
Floodway to WW-T10-2005	Floodway to UNT to Strickler Run	Assumed 50 Feet	506.90 116.38	128.59 100.68	0.1375 0.1948	112.82 108.66	10.00 10.00	0.0230 0.0218	40.03692 40.03696	-76.46132 -76.46127
Floodway to WW-T11-2001	Floodway to Stamans Run	Assumed 50 Feet	169.12	100.00	0.2147	139.62	10.00	0.0251	40.00033	-76.45297
Floodway to WW-T11-2002	Floodway to UNT to Stamans Run	Assumed 50 Feet	174.42	100.00	0.2489	143.66	10.00	0.0290	40.01029	-76.45831
Floodway to WW-T20-002	Floodway to Climbers Run	FEMA Detailed ^b	1403.96	302.38	3.6354	1280.78	194.35 194.34	0.3279	39.91624	-76.31068
Floodway to WW-T20-1001	Floodway to Conestoga River	FEMA Detailed	414.54	50.00	0.2137	412.11	10.00	0.0543	39.94399	-76.38196
Floodway to WW-T20-1005	Floodway to UNT to Indian Run	Assumed 50 Feet	198.57	100.00	0.2792	176.05	10.00	0.0332	39.96712	-76.42772
Floodway to WW-T24-1001	Floodway to Witmers Run	Assumed 50 Feet	140.31	100.00	0.2222	111.44	10.00	0.0232	39.98618	-76.44503
Floodway to WW-T24-2001	Floodway to Strickler Run	FEMA Detailed	227.63	157.35	0.3174	150.71	10.00	0.0244	40.02600	-76.45894
Floodway to WW-T24-3001	Floodway to Little Chiques Creek	FEMA Detailed ^b	220.05	157.87	0.3912	183.54	10.00	0.0381	40.18316	-76.51801
Floodway to WW-T31-002	Floodway to UNT to Pequea Creek	FEMA Detailed ^{b, c}	367.44	134.85	0.2814	148.60	10.00	0.0228	39.91953	-76.31701
Floodway to WW-T31-003	Floodway to Pequea Creek	FEMA Detailed	1129.03	447.20	2.9622 2.9977	1050.68	255.34 255.33	0.2143 0.2151	39.92043 39.92076	-76.32029 -76.31997
Floodway to WW-T31-3001	Floodway to UNT to Little Chiques Creek	Assumed 50 Feet	393.99 355.14	131.27 100.00	0.3791 0.3404	135.01 275.52	10.00	0.0235 0.0485	40.17991 40.17975	-76.51134 -76.51078
Floodway to WW-T31-3002	Floodway to UNT to Little Chiques Creek	Assumed 50 Feet ^b	232.27	100.00	0.2490	136.09	10.00	0.0246	40.17472	-76.50572
Floodway to WW-T31-3003	Floodway to UNT to Back Run	Assumed 50 Feet	152.03	100.00	0.2128	123.87	10.00	0.0248	40.14099	-76.46777
Floodway to WW-T31-3004	Floodway to Back Run	FEMA Detailed	197.34	100.00	0.0908	178.84	10.00	0.0115	40.14477	-76.46731
Floodway to WW-T31-3005	Floodway to Brubaker Run	FEMA Detailed	285.24	100.00	0.4760	278.40	10.00	0.0545	40.17062	-76.49677
Floodway to WW-T31-3006	Floodway UNT to Brubaker Run	Assumed 50 Feet	111.96	101.08	0.1238	110.00	10.00	0.0146	40.16498	-76.48578
Floodway to WW-T31-3007	Floodway to UNT to Back Run	Assumed 50 Feet	257.81	100.00	0.2306	190.91	10.00	0.0276	40.15719	-76.48056
Floodway to WW-T31-3008	Floodway to UNT to Back Run	FEMA Detailed	363.06	180.10	0.4056	274.08	10.00	0.0381	40.15315	-76.47603
Floodway to WW-T31-3009	Floodway to UNT to Back Run	Assumed 50 Feet	123.86	100.00	0.2055	109.98	10.00	0.0235	40.14757	-76.46930

**Table L(d)-6
 Floodplain Impacts Associated With the Atlantic Sunrise Project in Lancaster County**

Resource ID	Resource Name	Floodway Type	Temporary Impact Dimensions (Length x Width) ^a		Temporary Impact area ^d (Acres)	Permanent Impact Dimensions (Length x Width) ^a		Permanent Impact area (Acres)	Latitude	Longitude
			(Feet)	(Feet)		(Feet)	(Feet)			
Floodway to WW-T35-1002	Floodway to UNT to Conestoga River	Assumed 50 Feet	366.63	122.66	0.2697	171.18	10.00	0.0297	39.93644	-76.36094
Floodway to WW-T35-1002A	Floodway to UNT to Conestoga River	Assumed 50 Feet	199.27 235.46	55.00 100.00	0.0982 0.1985	156.27	10.00	0.0214	39.93639	-76.36317
Floodway to WW-T36-1001A	Floodway to UNT to Conestoga River	Assumed 50 Feet ^b	356.35	50.00	0.1167	146.09	10.00	0.0213	39.94444	-76.38330
Floodway to WW-T36-1002A	Floodway to UNT to Witmers Run	Assumed 50 Feet	151.44	100.00	0.2161	134.09	10.00	0.0272	39.94926	-76.39939
Floodway to WW-T36-1004	Floodway to UNT to Witmers Run	Assumed 50 Feet ^b	178.68	119.08	0.2312	129.35	10.00	0.0249	39.95226	-76.40550
Floodway to WW-T36-1006	Floodway to UNT to Witmers Run	Assumed 50 Feet	162.28	100.00	0.2272	156.02	10.00	0.0265	39.95355	-76.40845
Floodway to WW-T36-1007	Floodway to Indian Run	Assumed 50 Feet	194.50	100.00	0.2493	145.72	10.00	0.0266	39.95996	-76.41894
Floodway to WW-T42-1005	Floodway to UNT to Witmers Run	Assumed 50 Feet	46.61	5.63	0.0040	0.00	0.00	0.0000	39.94889	-76.39599
Floodway to WW-T42-2003	Floodway to Chiques Creek	FEMA Detailed	666.13	175.00	1.6298 1.6264	641.02	10.00	0.1301	40.06610	-76.49043
Floodway to WW-T92-1002	Floodway to UNT to Witmers Run	Assumed 50 Feet ^b	224.26	79.31	0.2297	83.35	10.00	0.0165	39.95196	-76.40444
Floodway to WW-T61-001	Floodway to UNT to Muddy Run	Assumed 50 Feet	76.06	14.04	0.0159	0.00	0.00	0.0000	39.86218	-76.27387
Floodway to WW-T62-001	Floodway to UNT to Trout Run	Assumed 50 Feet	136.75	100.00	0.1090	121.16	10.00	0.0126	39.89267	-76.29137
Floodway to WW-T25-1001	Floodway to UNT to Pequea Creek	Assumed 50 Feet	138.96	118.06	0.2091	113.88	10.00	0.0239	39.93053	-76.34426
Floodway to WW-T65-1002	Floodway to UNT to Pequea Creek	Assumed 50 Feet	194.11	100.00	0.2372	156.52	10.00	0.0273	39.93013	-76.34808
Floodway to WW-T49-1001	Floodway to UNT to Witmer Run	Assumed 50 Feet	134.46	100.00	0.2173	106.76	10.00	0.0231	39.94813	-76.39660
Floodway to WW-T92-1003	Floodway to UNT to Witmer Run	Assumed 50 Feet	170.91	100.12	0.2181	136.57	10.00	0.0255	39.95288	-76.40712
Floodway to WW-T53-1001	Floodway to UNT to Indian Run	Assumed 50 Feet	100.14	26.99	0.0416	0.00	0.00	0.0000	39.96813	-76.42843
Floodway to WW-T49-2001	Floodway to UNT to Chiques Creek	Assumed 50 Feet	541.03 737.32	75.00 111.42	0.1696 0.2620	135.17 130.82	10.00	0.0264 0.0252	40.05878 40.05876	-76.49356 -76.49350
Floodway to WW-T24-3001A	Floodway to UNT to Little Chiques Creek	Assumed 50 Feet	209.18	23.55	0.0836	0.00	0.00	0.0000	40.18322	-76.51788
Floodway to WW-T31-003	Floodway to Pequea Creek	FEMA Detailed	115.12	50.75	0.0718	0.00 96.31	0.00 67.85	0.0000 0.0419	39.92043	-76.31842
Floodway to WW-T31-003	Floodway to Pequea Creek	FEMA Detailed	95.71	66.89	0.0362	0.00	0.00	0.0000	39.92043	-76.32029
Floodway to WW-T25.2001	Floodway to UNT to Strickler Run	Assumed 50 Feet	143.57	24.31	0.0307 0.0021	0.00 135.24	0.00 21.35	0.0000 0.0321	40.02514	-76.45586 -76.45585
Floodway to WW-T25-4002	Floodway to Shells Run	Assumed 50 Feet	343.36	39.24	0.1239	0.00	0.00	0.0000	40.19440	-76.52621
Floodway to WW-T42-2003	Floodway to Chiques Creek	FEMA Detailed	25.57	10.00	0.0038	0.00	0.00	0.0000	40.06623	-76.49063
Floodway to WW-T81-1001	Floodway to UNT to Pequea Creek	Assumed 50 Feet	144.38	109.43	0.1893	99.06	10.00	0.0218	39.92315	-76.33004
Floodway to WW-T81-001	Floodway to UNT to Pequea Creek	FEMA Detailed	87.69	33.45	0.0139	14.79	10.00	0.0028	39.92484	-76.33119

**Table L(d)-6
 Floodplain Impacts Associated With the Atlantic Sunrise Project in Lancaster County**

Resource ID	Resource Name	Floodway Type	Temporary Impact Dimensions (Length x Width) ^a		Temporary Impact area ^d (Acres)	Permanent Impact Dimensions (Length x Width) ^a		Permanent Impact area (Acres)	Latitude	Longitude
			(Feet)	(Feet)		(Feet)	(Feet)			
Floodway to WW-T81-2001	Floodway to UNT to Strickler Run	Assumed 50 Feet	160.32	100.00	0.2066	138.43	10.00	0.0291	40.03870	-76.46734
Floodway to WW-T81-2003	Floodway to UNT to Shawnee Run	Assumed 50 Feet ^b	181.47	100.00	0.2008	110.81	10.00	0.0196	40.04290	-76.47382
Floodway to WW-T87-001	Floodway to UNT to Pequea Creek	Assumed 50 Feet	90.47	24.51	0.0264	0.00	0.00	0.0000	39.92819	-76.33562
Floodway to WW-T65-1005	Floodway to UNT to Pequea Creek	Assumed 50 Feet	150.78	109.40	0.2054	115.71	10.00	0.0232	39.92907	-76.33922
Floodway to WW-T86-1001	Floodway to UNT to Conestoga River	Assumed 50 Feet	131.10	100.00	0.1781	114.31	10.00	0.0223	39.93632	-76.36545
Floodway to WW-T84-1001	Floodway to UNT to Conestoga River	Assumed 50 Feet	113.72	62.15	0.1031	96.45	18.91	0.0223	39.93620	-76.36621
Floodway to WW-T85-1002	Floodway to UNT to Conestoga River	Assumed 50 Feet	123.94	50.00	0.0977	115.72	10.00	0.0247	39.94289	-76.37870
Floodway to WW-T88-003	Floodway to UNT to Shells Run	Assumed 50 Feet	75.27	12.47	0.0155	0.00	0.00	0.0000	40.20576	-76.52446
Floodway to WW-T88-002	Floodway to Conestoga River	FEMA Detailed	433.40	195.16	0.5178	0.00	0.00	0.0000	39.96269	-76.36478
Floodway Impacts					19.4048 17.6124	-	1.8628 1.7672			

a: Widths are reported as the maximum width for the feature. Stream lengths are reported on the impact maps as the sum of the permanent and temporary lengths.
 b: Multiple streams are included in these calculations as the floodways overlap.
 c: Includes both FEMA Detailed and Assumed 50 Foot Buffers.
 d: See Attachment E-2 footnotes for a description of temporary impacts in the floodway associated with access roads.

B1a. Food Chain Production

Most of the watercourses crossed by the Atlantic Sunrise Project are minor and intermediate streams, which have food chains that are driven by detrital input from riparian vegetation, rather than phytoplankton. Therefore, temporary increases in sediment load will not have an adverse effect on the trophic structure of the streams. It is unlikely that temporary increases in turbidity will have an adverse effect on aquatic biota of the area, especially since many of these watercourses may already be turbid and/or are subjected to higher turbidity levels from precipitation-based run-off. As such, the existing in-stream communities are adapted to living in turbid conditions. Oxygen levels will begin to return to normal within hours of the completion of in-stream construction as the sediment settles. Effects will generally be limited to the short period of in-stream construction, and conditions are expected to return to normal following stream restoration activities. To minimize these effects, Transco will implement BMPs to control erosion and sediment run-off from workspaces.

In particular, the following measures specific to watercourse crossings will be implemented, as appropriate:

- Sediment barriers will be installed across the entire construction ROW at all watercourse crossings where necessary to prevent the flow of sediments into the watercourse. In the travel lane, these may consist of removable sediment barriers or drivable berms. Removable sediment barriers may be removed during the construction day, but will be re-installed after construction has stopped for the day or when heavy precipitation is imminent;
- Where watercourses are adjacent to the construction ROW, sediment barriers will be installed along the edge of the construction ROW as necessary to contain spoil and sediment within the construction ROW;
- Trench plugs will be used at all watercourse crossings as necessary to prevent diversion of water into upland portions of the pipeline trench and to keep any accumulated trench water out of the watercourse, unless otherwise approved by the on-site environmental inspector to allow natural flow of water into the watercourse; and
- Applicable watercourse setbacks will be maintained until construction-related ground-disturbing activities are complete. The setback distances vary based on the type of activity being performed, but all will be clearly marked in the field with signs and/or highly visible flagging prior to pipeline construction.

B1b. General Habitat (including Nesting, Spawning, Rearing, Resting, Migration, Feeding, and Escape Cover)

Within the Atlantic Sunrise Project area throughout Pennsylvania, general temporary construction-related impacts on wildlife species will be related to habitat disturbance and human activities, while permanent impacts are those associated with the conversion of forest habitats to open or scrub-shrub areas because of construction and maintenance of the permanent ROW. Indirect impacts on wildlife include those associated with increased human activity. Construction of the Project likely will result in the temporary displacement of or stress on animals in areas adjacent to construction and cause movement of some wildlife away from the Project area. Stress on wildlife could affect general health, reproduction, and viability of young, depending on the sensitivity of a particular species, season of the year, and other factors. Other temporary impacts on wildlife species include those from pipeline trenching activities and associated spoil piles, which could result in a short-term barrier to movement to some species. During clearing and grading activities, more mobile wildlife species (e.g., larger mammals, birds, and reptiles) will be able to avoid the construction area, and many are expected to leave the area during construction. Construction activity will be temporary and will stay in a given area for only a few weeks, at most. Habitat recovery will occur to the maximum extent possible, aided by the use of the impact minimization and restoration measures outlined in the ECP (**Attachment M**).

Direct and long-term impacts on wildlife habitat resulting from construction and operation of the proposed Project will include the clearing of uplands, wetlands, and riparian areas required for temporary workspace and new permanent easement. Where feasible, Transco has routed the pipeline to follow existing corridors (and thus follow existing forest edges). The direct removal of vegetation has the potential to reduce the amount of available habitat, food resources, and cover. An important effect of vegetation removal is habitat fragmentation. Habitat fragmentation occurs as larger areas of habitat are reduced and/or split into smaller non-contiguous areas by development. Besides the direct loss of habitat, habitat fragmentation can also cause change in habitat vegetation composition (which could include the introduction of noxious and/or invasive species). It is not anticipated that wildlife populations that utilize the Project area will be permanently adversely affected by the proposed Project. While temporary impacts on food, cover, and water sources may occur, none of the species located within the Project area are

specialized in such a way that construction of the Project will inhibit the overall fitness or reproductive output of the populations as a whole.

Temporary habitat alteration at the crossing location, and increased suspended solids concentrations and sedimentation downstream from the crossing may temporarily degrade fish spawning and nursery areas, resulting in a temporary reduction in reproductive potential. Transco expects these effects to be temporary in nature because the suspended sediments will be flushed by the existing currents or settle out, and aquatic communities will subsequently recolonize the affected area.

Permanent impacts to spawning, however, are not anticipated as a result of this Project. Impacts to spawning should be mitigated by Project construction outside of the restricted October 1 through December 31 time period for Wild Trout streams and from October 1 through April 1 for Class A Wild Trout Streams. There are no Class A Wild Trout streams crossed by the Project within Lancaster County. Transco has coordinated with the PFBC to confirm the time of year restrictions that are applicable to the streams crossed by the Project.

B1c. Habitat for Threatened and Endangered Plant and Animal Species

Transco has consulted with the PA DCNR, PA Game Commission, PFBC, and United States Fish and Wildlife Service (USFWS) regarding federal and state-listed threatened and endangered species in the Project area. A summary of this correspondence is included in **Attachment G** of this permit application package.

B1d. Environmental Study Areas

The Project will not affect any locations in which environmental studies are known to be taking place.

B1d1. Sanctuaries

The Project will not affect sanctuaries in Lancaster County.

B1d2. Refuges

The Project will not affect refuges in Lancaster County.

B2. Water Quantity and Streamflow

B2a. Natural Drainage Patterns

It is anticipated that the Project will not impact natural drainage patterns. The stormwater management controls included in the Project (discussed in **Attachment M ECP**) have been designed to maintain natural or current drainage characteristics, as appropriate.

B2b. Flushing Characteristics

It is not anticipated that the Project will impact flushing characteristics.

B2c. Current Patterns

The Project may have minor, localized temporary effects on current patterns in the immediate vicinity of the proposed stream crossings during construction but will be minimized where possible through the appropriate implementation of BMPs based upon calculations completed in accordance with PA DEP Chapter 102. Permanent impacts to current patterns are not anticipated as all disturbed areas will be restored to pre-construction conditions.

B2d and e. Groundwater Discharge for Baseflow and Natural Recharge Area for Ground and Surface Waters

The Project is not expected to impact any potable water intakes or public water supplies which rely on groundwater recharge. Transco identified potable and non-potable surface water intake structures in proximity to the Project using eMapPA. Across the Project, nineteen surface water intakes were identified less than 3 miles downstream of Project watercourse crossings using eMapPA. Of the 19 surface water intakes identified, the primary uses were identified as agriculture (12), commercial (1), industrial (2), mineral (1), and oil/gas (3). Based on their primary uses, it is unlikely that the 18 non-commercial surface water intakes are used for potable water. Transco verified that these 18 intakes are not listed in Pennsylvania's Drinking Water Reporting System, indicating these intakes are not public water supplies and are, therefore, not used as community potable water sources. The single commercial surface water intake is located in Wyoming County.

Through a file review with the PADEP Southcentral Regional Office (PADEP 2015), Transco identified a potable water intake on the Susquehanna River approximately 1.9 miles from MP

22.0 of CPL South (see the Pennsylvania Project Location Map, **Attachment I-2**). The intake is operated by the City of Lancaster. PADEP records identify this operator as a community water supplier serving a population of 120,000. CPL South crosses Shawnee Run (WW-T10-2004 / WW-RS-2003) and an unnamed tributary to Shawnee Run (WW-RS-2002) within 3 miles upstream of the City of Lancaster intake. Transco proposes to complete these watercourse crossings using the flume method.

In addition to public water supplies within three miles downstream from the Project, Transco additionally solicited public water supplies with Zone A Source Water Protection Areas (SWPAs) crossed by the Project. The PADEP Southcentral Regional Office indicated that the Project crosses within 0.25 miles of five Zone A SWPAs within Lancaster County, as identified in Table L(d)-7 and shown on the Project Location Map (Scheetz 2015). Zone A SWPAs are located within 0.25 miles on either side of a river or stream, from 0.25 miles downstream of the potable water intake to all upstream reaches that flow to the intake within five hours, given an average flow velocity.

Table L(d)-7
Source Water Protection Areas Within 0.25 Mile of the Project within Lancaster County

Surface Water Intake PWSID	Operator	Surface Water Source(s)	Distance from Crossing to Intake (river miles downstream)	Source Water Protection Plan
1230004	Chester Water Authority	Octoraro Reservoir, Susquehanna River	>11	No
7360058	City of Lancaster Water Authority	Susquehanna River, Conestoga Creek	2	NP
7360123	Columbia Water Authority	Susquehanna River	>5.8	NP
7360124	Elizabethtown Area Water Authority	Conewago Creek, Back Run, Raw Reservoir, Cornwall Quarry	>6.1	Yes
7360136	Safe Harbor Power Corporation	Susquehanna River	>7.3	NP

Table L(d)-7
Source Water Protection Areas Within 0.25 Mile of the Project within Lancaster County

Surface Water Intake PWSID	Operator	Surface Water Source(s)	Distance from Crossing to Intake (river miles downstream)	Source Water Protection Plan
Key:				
NP = Not provided by PWS operator				
PWSID = Public water system identification number				

Transco corresponded directly with the water intake operators, as summarized in Table L(d)-8. Through correspondence with the Chester, City of Lancaster, Columbia, and Elizabethtown Area Water Authorities, Transco obtained the location of their surface water intakes, which are located on the Susquehanna River, downstream from the Project (Sabler 2015, Katzenmoyer 2015, Lewis 2015, Bixler 2015). Transco was unable to obtain the surface water intake location from Safe Harbor Power Corporation, and assumes it is located in the vicinity of the power generation facility located at the confluence of the Susquehanna and Conestoga Rivers.

Table L(d)-8
Lancaster County Water Intake Operator Communication Summary

Date	Communication Initiated	Result
Chester Water Authority		
January 28, 2015	Transco completed a phone conversation with Patricia Sabler, Chief of Treatment and Pumping at Chester Water Authority	Ms. Sabler provided the location of the surface water intake to be on the Susquehanna River, in Lancaster PA.
October 17, 2016	Transco provided the Notification Plan to the Chester Water Authority for comment	Transco did not receive a response Pending
December 8, 2016	Transco contacted the Chester Water Authority by phone regarding the Notification Plan	Transco received a return phone call, and provided a copy of the Notification Plan via e-mail
December 27, 2016	Transco received comments from the Chester Water Authority via e-mail, provided updated emergency contact information	Transco updated the Notification Plan accordingly
City of Lancaster Water Authority		
January 21, 2015	Transco completed a phone conversation with George Craddick, staff at the City of Lancaster Water Authority	Mr. Craddick provided the location of the surface water intake to be on the Susquehanna River, in Lancaster PA.
January 21, 2015	Transco contacted the Water Authority's director, Charlotte Katzenmoyer by phone for additional information	Transco did not receive a response from Mrs. Katzenmoyer

**Table L(d)-8
 Lancaster County Water Intake Operator Communication Summary**

Date	Communication Initiated	Result
October 17, 2016	Transco provided the Notification Plan to the City of Lebanon Water Authority for comment	Transco did not receive a response Pending
December 8, 2016	Transco contacted the Water Authority by phone regarding the Notification Plan	Transco determined that Barbara Humboldt was the new Director of Public Works, and updated the Notification Plan accordingly
Columbia Water Authority		
January 21, 2015	Transco contacted David Lewis, General Manager at the Columbia Water Authority by phone	Transco did not receive a response from Mr. Lewis
February 12, 2015	Transco contacted Mr. Lewis by phone	Transco received a voicemail from Mr. Lewis identifying the location of the surface water intake to be on the Susquehanna River, in Lancaster PA
October 17, 2016	Transco provided the Notification Plan to the Columbia Water Authority for comment	Transco received comments on the Notification Plan from Mr. Lewis, and updated the plan accordingly. Pending
Elizabethtown Area Water Authority		
January 21, 2015	Transco contacted Mike Skelly at Elizabethtown Area Water Authority by phone	Mr. Skelly requested additional information regarding the Project
January 21, 2015	Transco provided Mr. Skelly with the requested Project information via e-mail	Transco did not receive a response
February 11, 2015	Transco contacted Steve Bixler at Elizabethtown Area Water Authority by phone	Mr. Bixler provided the surface water intake location
February 11, 2015	Transco contacted Mike Skelly by e-mail	Mr. Skelly provided the Source Water Protection Report via e-mail
October 17, 2016	Transco provided the Notification Plan to the Elizabethtown Area Water Authority for comment	Transco did not receive a response Pending
December 8, 2016	Transco contacted the Water Authority by phone.	The receptionist notified Transco that the Operations Manager is now Del Becker, and Transco updated the plan accordingly. Mr. Becker stated that the Water Authority had no comments on the plan.
Safe Harbor Power Corporation		
January 21, 2015	Transco contacted Mike Denlinger at the Safe Harbor Power Corporation by phone. On February 11, 2015 Mr. Denlinger requested additional information by e-mail.	Transco provided the additional requested information on February 11, 2015. Transco did not receive a response from Safe Harbor Power Corporation.
October 17, 2016	Transco provided the Notification Plan to the Safe Harbor Power Authority for comment	Transco did not receive a response Pending
December 12, 2016	Transco contacted the Safe Harbor Power Corporation by phone regarding the Notification Plan.	Transco was referred by Mr. Denlinger to Ron Wagner, who confirmed receipt of the plan and stated that Safe Harbor had no comments

Transco has prepared notification plans to be used in the event of a spill upstream from the each of the water intakes. These plans detail Transco's procedures in the event of a spill, including emergency response and reporting. Transco has provided a copy of the corresponding notification plan to each operator.

Potential impacts to the water intakes will be avoided by implementing Transco's Spill Plan (ECP Attachment 9, provided within **Attachment M** of this Application) and the notification plans in the event of a spill upstream from the intakes. Transco will follow the spill prevention practices enumerated in the Spill Plan, which include proper container and tank storage and inspection instructions, loading/unloading procedures, and spill response kit specifications. Refueling and transferring of liquids will occur only in pre-designated locations that are on level ground and at least 100 feet from any wetland or waterway, thereby preventing contamination of watercourses. As stated in the Spill Plan, Transco will maintain and immediately respond to spills as appropriate to the situation, with responses ranging from the use of absorbent pads to the employment of an emergency spill response contractor.

Transco will avoid potential impacts to distal public water supplies within Lancaster County by using dry-ditch crossing methods and implementation of all erosion and sediment control plans as specified in the Transco Procedures.

During construction, Transco will adhere to all measures in the Transco Procedures (ECP Attachment 18, provided within **Attachment M** of this Application), which will minimize sedimentation and turbidity, minimize streambed and bank disturbance, and limit the time it takes to complete in-stream construction. Transco will cross watercourses with flowing water present at the time of construction using dry-ditch or trenchless construction methods to the greatest extent practicable. To minimize sedimentation during pipeline construction across each watercourse, trench spoil will be placed at least 10 feet away from water's edge, unless impractical due to topography. Erosion controls will be placed around spoil piles to prevent sediment from flowing into watercourses.

B2f. Storm and Flood Water Storage and Control

It is not anticipated that the Project will adversely impact storm and flood water storage and control. Transco has developed a Post Construction Stormwater Management Plan in

accordance with PA DEP Chapter 102 to prevent impacts to stormwater discharges and control. There will be no loss of flood storage capacity within designated floodways as pre-construction surface contours will be restored.

B3. Water Quality

B3a. Preventing Pollution

Construction activities can disturb surface soils and cause subsequent sediment transport into adjacent wetlands. Sedimentation will be minimized by the installation of temporary sediment control measures between the upland construction areas and the wetlands. Permanent erosion controls, including slope breakers, trench breakers, and vegetative cover, will be used in adjacent upland areas to minimize long-term sedimentation into the wetlands. Energy dissipation devices may be installed at the down-slope end of slope breakers to minimize erosion of soil off the ROW into wetlands. Trench plugs will be installed in upland slopes adjacent to wetlands to prevent trench erosion and siltation

To minimize erosion and promote revegetation within the wetland, removal of the root mats for woody vegetation will be allowed only directly over the trench area or where required to ensure safe working conditions. This serves to enhance regeneration of vegetation on the construction and permanent ROW. Permanent erosion control structures that could alter hydrology (e.g., slope breakers) will not be installed within wetlands, but these structures will be used in the adjacent upland areas to control erosion and sedimentation. Transco will employ BMPs as specified in erosion and sediment control permits and approved by PA DEP to further minimize the potential for soil compaction.

Turbidity and sedimentation could result from in-stream construction activities, trench dewatering, and/or construction-related stormwater runoff. In slow-moving waters, increases in suspended sediments could increase the biological oxygen demand and reduce levels of dissolved oxygen in localized areas during construction. Suspended sediments also could alter the chemical and physical characteristics of the water column on a temporary basis.

Transco will cross surface waters with flowing water present at the time of construction using dry-ditch construction methods to the greatest extent practicable. Dry-ditch crossing methods

can dramatically reduce downstream sediment transport effects compared to wet open-cut crossings. Transco will employ BMPs as specified in Transco's Erosion and Sediment Control General Permit 2 (ESCGP-2) application, which contains site-specific erosion and sediment control plan to further minimize the potential for soil compaction.

Transco will also install temporary equipment bridges across surface waters to reduce the potential for turbidity caused by movement of construction equipment and vehicular traffic. Equipment bridges will be constructed timber mats or portable prefabricated bridges, depending on surface water conditions (e.g., if excessively soft soils are encountered in the surface water bed, or if high water flows occur, portable bridges will be used at minor surface water crossings). Typical drawings for equipment bridges are provided in Attachment 2 of the Transco ECP (**Attachment M**). Equipment bridges will be maintained until the pipe is installed and they are no longer needed. The bridges will then be removed. Equipment bridges will be designed to accommodate normal to high surface water flow and will be maintained to prevent flow restriction during the period of time the bridge is in use during construction.

To minimize sedimentation during pipeline construction across each watercourse, trench spoil will be placed at least 10 feet away from water's edge, unless impractical due to topography, as specified in the Transco Procedures (Attachment 18 of the Transco ECP (**Attachment M**)). Erosion controls will be placed around spoil piles to prevent sediment from flowing into surface waters. ATWS will typically be set back 50 feet from the water's edge unless otherwise approved by applicable regulatory agencies.

Once the pipe is placed in the trench, the excavated material will be replaced immediately, and the surface water banks and bed will be restored to preconstruction contours. To stabilize the banks, the surface water banks and riparian areas will be revegetated using approved seed mixes and/or erosion control blankets or matting **in accordance with the Riparian Area Impact Assessment and Restoration Plan for Lancaster County within Appendix L-2.**

B3b. Sedimentation Control and Patterns

The Project ECP and associated plans describe techniques that will be used to minimize erosion and release of sediments during and following Project construction. The ECP is included as **Attachment M**.

Post-construction stormwater management measures will also be implemented for water quality in areas where it is required. For the pipeline portion of the Project, no new impervious surfaces are proposed. The Post Construction Stormwater Management Plan is designed to manage stormwater runoff associated with new impervious areas (gravel) for the proposed aboveground facilities. With the implementation of the E&S Pollution Control Plan and the stormwater management measures, water quality impacts are not anticipated.

B3c. Salinity Distribution

This section is not applicable to the proposed Project in **Lancaster County**.

B3d. Natural Water Filtration

Watercourses and wetlands in the Project area have some function in water filtration; however, impacts to these features will be temporary and natural water filtration capabilities will be restored.

B4. Recreation

B4a and b. Game and Non-Game Species

Within the Atlantic Sunrise Project area throughout Pennsylvania, construction of the pipeline facilities will negatively affect wildlife and wildlife habitat short-term within the immediate vicinity of open land along the pipeline route, which predominantly consists of existing ROWs. Effects will include disturbance due to clearing and trench excavation. This will affect less mobile species, including those that hide within burrows along the route, to a greater degree than those that can quickly flee the Project area. Following construction activities, the existing ROWs will be restored to preconstruction conditions to the extent practicable, and it is expected that wildlife will quickly return to the vicinity of the ROWs, using them as corridors for travel, refuge, foraging, and nesting. Following construction, these ROWs will be maintained in a manner similar to current conditions.

Construction within forested land will cause temporary effects on local wildlife populations, because forested habitat will be converted to successional stages of open herbaceous and scrub-shrub habitat for several years to decades until a mature forest community redevelops.

During this time there is a risk of intrusion by invasive or noxious species. To mitigate against this risk, Transco will manage invasive and noxious species according to the Noxious and Invasive Management Plan included as Attachment 11 of the ECP (**Attachment M**).

Some wildlife species that rely on forested habitat may be negatively affected by the temporary loss of forest. Removal of vegetation within forested land could cause long-term displacement of some local wildlife populations. However, any such impacts, while adverse, are expected to be highly localized and unlikely to have any population-level impacts based on the presence of suitable adjacent habitat for use. In addition, other wildlife species that prefer open land and scrub-shrub habitat will benefit from the temporary habitat conversion. As referenced in **Attachment L**, Enclosure C, Section A2a through A2g, Transco is developing a Memorandum of Agreement (MOA) with the USFWS addressing conservation measures for migratory birds in the Project area. The MOA includes compensatory mitigation for removal of upland forest and forest fragmentation.

Transco does not expect significant direct mortality of wildlife to occur as a result of construction activities. Transco anticipates that the majority of wildlife will disperse from the vicinity of construction activities in response to disturbance from construction vehicles and equipment. Construction vehicles will adhere to low speed limits along all access roads to avoid wildlife mortality.

Following construction, the temporary workspaces outside the aboveground facility fence lines will be maintained in a manner similar to preconstruction conditions. Therefore, effects on wildlife in agricultural lands and open lands that are within temporary workspaces for aboveground facilities will be temporary, and these habitats are expected to recover within weeks to months following construction.

B4c. Fishing

Temporary impacts to streams during construction activities may temporarily affect fishing opportunities; however, no permanent impacts are anticipated within **Lancaster County**.

B4d and e. Hiking and Observation (wildlife)

Enola Low-Grade Trail

The proposed pipeline alignment crosses the Enola Low-Grade Trail at approximate MP 7.1 in Lancaster County. Transco proposes to construct the pipeline parallel to and adjacent with an existing overhead transmission line at this crossing. This will minimize long-term alteration of the surrounding landscape. Transco met with Martic Township officials in February and July 2015 to identify suitable measures to minimize disturbance to the Trail and its use. Transco's site-specific crossing plan includes details on the measures that Transco will implement to minimize impacts on recreational use of the Enola Low-Grade Trail, and this plan is provided in **Appendix L-4**.

Camp Andrews

The pipeline alignment is located 0.2 mile northeast of Camp Andrews at approximate MP 0.0 in Lancaster County. Due to the distance between CPL South and Camp Andrews, construction and operation of CPL South will not directly affect the current use of this area.

Conestoga Trail

The pipeline alignment crosses the Conestoga Trail at MP 8.2 in Lancaster County. Transco is requesting a new permanent ROW where the Project crosses the Trail; however, current land use at the trail crossing is agricultural, so there will be no permanent effects on the Conestoga Trail. Transco's site-specific crossing plan includes details on the measures that Transco will implement to minimize impacts on recreational use of the Conestoga Trail, and this plan is provided in **Appendix L-4**.

B4f. Other

Transco has initiated coordination with PFBC regarding the need to prepare site-specific Aids to Navigation (ATON) plans for each of the crossings which have been identified by PFBC as being recreationally navigable. Within the Project limits of Lancaster County, these include: Pequea Creek, Conestoga River, Chiques Creek and Little Chiques Creek. Transco prepared and submitted ATON plans in accordance with PFBC guidelines including the use of buoys, signage, and portage, as necessary. Transco submitted the ATON plans to PFBC on October 4, 2016, **which were subsequently approved by the PFBC on January 20, 2017. A copy of**

the ATON applications and PFBC approval is included within Appendix L-6. and will provide copies of the ATON approvals to PA DEP as received. Transco is currently coordinating with the PFBC on the new crossings associated with the recent MOCs that are included within this revised application and will forward any additional ATONs upon receipt of the PFBC's authorization of those additional crossings. Transco will implement the approved plans during construction in order to minimize impacts to recreational boaters within the Project area.

B5. Upstream and Downstream Property

The implementation of the Project-specific ECP will minimize the impacts to properties upstream and downstream of the Project. The ECP is included in Section M.

B6. Other Environmental Factors

Selection of the proposed pipeline route was partially based on landowner preference, as well as avoidance of environmental impacts to resources such as watercourses and wetlands. The route minimized impacts to these features as much as possible and still fulfills the purpose and needs of the Project. Specific routing criteria is discussed in the Alternatives Analysis (**Attachment P-1**).

C. Environmental Impacts on Other Adjacent Land and Water Resources

Construction impacts to adjacent properties and water resources will be minimized through the use of the Project-specific ECP. This plan will conform to federal, state, and local regulations and prevent movement of sediment off the construction site. Stormwater generated on-site during construction will also be managed and released in a manner that conforms to applicable federal, state, and local regulations.

D. Cumulative Environmental Impacts

Cumulative effects may result when the environmental effects associated with construction and operation of a proposed Project are added to the environmental effects of other Projects or activities occurring in the same area. The United States Environmental Protection Agency (USEPA) guidelines state:

“Cumulative impacts result when the effects of an action are added to or interact with other effects in a particular place and within a particular time. It is the combination of these effects, and any resulting environmental degradation, that should be the focus of cumulative impact analysis. While impacts can be differentiated by direct, indirect, and cumulative, the concept of cumulative impacts takes into account all disturbances since cumulative impacts result in the compounding of the effects of all actions over time.” (USEPA 1999).

To identify and assess potential cumulative effects of the Project, Transco is considering other past, present, and reasonably foreseeable Projects and other human-related activities near the Project facilities. The Comprehensive Environmental Evaluation for the Central Penn Line provided in **Appendix L-1** includes a summary of cumulative impacts for the Project as whole.

The existing conditions in the Project area reflect changes from past and present activities. Although much of the area is rural and relatively undeveloped, substantial alterations to the natural environment have occurred due to agriculture, mining, transportation Projects, and other development. The potential for cumulative effects from the Project exists for the following resources: groundwater, consumptive water use, surface water, vegetation, wildlife (federally and state-protected species of flora and fauna), cultural resources, socioeconomics, geology, soils, land use, air quality, and noise.

Transco has identified past, present, and reasonably foreseeable Projects and other human-related activities occurring in the vicinity of the Project (within 10 miles) that may result in cumulative effects when combined with the effects of the Project. Transco consulted with the affected municipal and county planning agencies to identify Projects in the vicinity of the Project. Transco also identified other activities, such as residential Projects located within a 0.5-mile radius of the Project, as well as transportation and energy development Projects located within a 10-mile radius of the Project.

The assessment of cumulative effects assumes that Project effects are minimized by the successful implementation of the environmental protection and mitigation measures described

in the Transco ECP and compliance with applicable standard practices and federal, state, and local regulations and permit requirements.

The assessment area for potential cumulative effects includes the area directly affected by construction of the Project facilities in addition to the anticipated area of effect the Project may have on each resource. This assessment area varies for each resource, based on the potential for effects to extend beyond the area of direct effect. For example, effects on air quality have the potential to extend beyond the Project boundaries, but effects on geologic and soil resources would likely not extend beyond the construction boundaries. Cumulative effects are considered in the context of the appropriate geographic area of potential effect (e.g., watershed boundaries for water quality and use, and county boundaries for socioeconomics).

Water Use and Quality

This section addresses past, present, and reasonably foreseeable actions that, when taken into consideration with the Project, could result in cumulative effects on water quality and use. Potentially affected water resources include groundwater, surface water crossings, groundwater and surface water withdrawals, watercourses, and wetlands. The geographic area considered in the evaluation includes the watershed basin within the Project effect area. Potential cumulative effects resulting from construction activities and operations and maintenance have been considered as part of this analysis.

This analysis considered effects from other Projects within the same watershed (8-digit Hydrologic Unit Code [HUC]) and within 10 miles of the Project activities. The Project pipeline facilities cross two major watershed subregions (i.e., 4-digit HUCs) as defined by the United States Geological Survey (USGS) (USGS 2013): the Susquehanna River subregion in Pennsylvania and the Potomac River subregion in Virginia. The Project pipeline facilities cross four major watershed basins (i.e., 6-digit HUCs): the Upper Susquehanna, the Lower Susquehanna, and the West Branch Susquehanna in Pennsylvania, and the Potomac in Virginia. The Project pipeline facilities cross eight watershed subbasins (i.e., 8-digit HUCs): the Upper Susquehanna-Lackawanna, the Upper Susquehanna-Tunkhannock, the Lower Susquehanna, the Lower Susquehanna-Swatara, the Lower Susquehanna-Penns, the Middle West Branch Susquehanna, and the Lower West Branch Susquehanna in Pennsylvania, and the Middle Potomac-Anacostia-Occoquan in Virginia.

Shallow (perched) aquifers could sustain effects from temporary changes in overland water flow and recharge caused by clearing and grading of the ROWs and temporary workspaces. In forested areas, water infiltration, which is normally enhanced by vegetation, will be reduced until vegetation is reestablished. In areas where groundwater is encountered within the open trench, dewatering may result in a minor, temporary fluctuation in local groundwater levels. On occasion, blasting can cause adverse effects on groundwater flow and potentially reduce or eliminate the amount of groundwater supplied to nearby wells and/or springs.

To minimize potential effects associated with construction, Transco will implement mitigation measures during construction, including those described in the Transco Plan and the Transco Procedures, state-guidelines, and public and private well monitoring pre- and post-construction upon landowner request. For instance, waterbars will direct stormwater runoff from the construction ROW to well-vegetated areas or in accordance with state BMPs. Transco will also use sediment control measures such as filter bags, silt fences, and dewatering structures during dewatering and hydrostatic test water discharge activities. Where blasting is required, Transco will develop a site-specific blasting plan in addition to the general Blasting Plan provided in Attachment 10 of the Transco ECP (**Attachment M**) prior to blasting activities, and will conduct full-scale blast tests where recommended by Transco's Project Engineer. If any wells are affected by construction activities, Transco will repair them and/or compensate landowners for Project-related damage to wells.

Implementation of the comprehensive BMPs presented in Attachment 2 of the Transco ECP (**Attachment M**) will ensure the Project-related effects on groundwater are temporary and occur within or very near the construction ROW. Based on Transco's review, none of the Projects identified will overlap the construction ROW during the time of the Project's influence on groundwater. Therefore, the Project will not cause a significant measurable cumulative effect on groundwater resources when considered in addition to other past, present, and reasonably foreseeable actions.

Surface water resources may be affected during various stages of construction. Clearing and grading of stream banks, in-stream trenching, trench dewatering, and backfilling, could result in temporary modification of aquatic habitat, increased sedimentation, turbidity, decreased

dissolved oxygen concentrations, releases of chemical and nutrient pollutants from sediments, thermal effects, modification of riparian areas, and introduction of chemical contaminants such as fuel and lubricants.

The Project facilities cross or are located within two major watershed sub-regions as defined by the USGS (USGS 2013b). Transco will use watercourse crossing methods based on site-specific conditions and resource sensitivity, which include dry-ditch, trenchless, and open-cut. Transco has routed the proposed pipeline facilities to avoid and minimize effects on watercourses and bodies of water to the greatest extent practicable while maintaining engineering standards and safety. Transco completed field routing surveys within a 600-foot-wide study corridor to identify a preferred alignment that, among other factors, avoided and minimized watercourse effects. Environmental criteria used during the routing surveys specific to watercourses included: (1) crossing watercourses at 90 degree angles to minimize in-stream disturbance whenever practicable; and (2) avoiding or minimizing crossings of major watercourses and bodies of water). Construction of the Project across watercourses may result in temporary adverse effects as a result of in-stream construction activities or construction on slopes adjacent to stream channels. Clearing and grading of stream banks, blasting, in-stream trenching, trench dewatering, and backfilling could result in temporary modification of aquatic habitat, increased sedimentation, turbidity, decreased dissolved oxygen concentrations, releases of chemical and nutrient pollutants from sediments, thermal effects, modification of riparian areas, and introduction of chemical contaminants such as fuel and lubricants.

Transco developed the ECP (**Attachment M**), including the Transco Procedures (Attachment 18 of the Transco ECP), in part to address temporary watercourse effects associated with construction of the Project. The Transco ECP is intended to satisfy the watercourse restoration requirements of resource protection agencies with applicable federal jurisdiction over areas affected by the Project. Construction activities at stream crossings will also comply with any additional measures detailed in applicable federal stream crossing permits.

Drilling for natural gas reserves in Pennsylvania is currently underway in several of the counties affected by the Project. Effects from drilling activities are associated with well pad development and improvement of existing dirt and paved roads. Similarly, several gathering line and natural gas well interconnect pipeline construction Projects were recently completed or are ongoing

within the same watersheds crossed by the Project in Pennsylvania. Information on the exact locations and construction schedules for these Projects was not readily available; however, based on the general location of these Projects and the ongoing nature of their development, the potential exists for cumulative effects on surface waters affected within the same watersheds crossed by the Project.

Implementation of the Transco Procedures will limit the effects of crossings in duration and distance and limit the effect of construction activities to the stream being crossed. None of the other activities identified during the cumulative effect analysis will also affect the same watercourses in the same timeframe as the Project; therefore Transco believes there will be no significant measurable cumulative effects on these resources.

Surface water withdrawals will be required for hydrostatic testing and HDD activities for the Project in Lancaster County. All water withdrawals will be completed in compliance with Susquehanna River Basin Commission (SRBC) dockets. Three water withdrawal sites are planned for Lancaster County: (1) Chickies Creek, (2) Conestoga River (Primary), and (3) Pequea Creek. The SRBC approved the dockets for these water withdrawal locations on September 8, 2016. The location of the water withdrawal equipment relative to wetlands, streams, floodways, and floodplains are captured in the revised Application (see Attachment H-2), as well as the erosion and sediment control plans (Attachment M).

Water withdrawals from Chickies Creek, Conestoga River (Primary), and Pequea Creek will be completed in compliance with the SRBC dockets. The SRBC docket and metering plans provide details regarding the methods to be used to withdraw water. The equipment will remain in place only as long as is necessary to complete the water withdrawals. All equipment will be overland and temporary, and no earth disturbance is anticipated with the installation, operation, and removal of the withdrawal equipment and piping. The intake structure and piping will be located in the floodway. The pump and other equipment will be kept out of the floodway.

No piping will be placed in existing stream culverts. Cross sections, profiles, and

hydraulic analysis of piping to be placed in stream channels was completed for the SRBC dockets. The information is provided in Appendix L-4.

To conduct the hydrostatic testing for the Project facilities, Transco will obtain applicable regulatory approvals for water withdrawals, which will be based on regulatory withdrawal rates, volumes, and passby flow restrictions, prior to commencing surface water withdrawals. Up to 61 million gallons of water is anticipated to be withdrawn from surface watercourses within the Project area for use in hydrostatic testing. Transco will use withdrawal methods that will not reduce water flow to a point that will substantially affect base flow conditions, fish habitat and other aquatic wildlife or recreational uses. Transco will coordinate with local and state agencies, as necessary, to conduct water withdrawals in a manner that will not reduce water availability to a point that will affect public usage. Transco does not anticipate any significant water quality effects resulting from discharge of hydrostatic test water. New pipeline facilities will consist of new steel pipe, coated internally, that will be free of chemicals and lubricant, and Transco does not propose to use antifreeze or any chemical additives for drying or other purposes.

Transco will consult with the PADEP for a PAG-10 Hydrostatic Test Water Discharge Permit. In addition, Transco received water withdrawal permits on September 8, 2016 from the Susquehanna River Basin Commission for Chiques Creek in West Hempfield Township, the Conestoga River (Primary and Secondary) in Conestoga Township, Pequea Creek in Martic Township, Lancaster County. Site Plans and Cross Sections of the withdrawal locations is found in **Appendix L-5** and **Appendix L-6**.

HDDs will require the use of water during operation of the drill to cool the drill head, seal the walls of the hole, and process returns. For specific watercourse crossings, where feasible and approved by the applicable regulatory agencies, Transco will draw the required water from the watercourse that is being crossed via HDD. Withdrawal locations will be selected to minimize effects on watercourses in a similar manner as described above. Where drawing water from the watercourse is unavailable, Transco will obtain water from an approved off-site source.

The state water withdrawal permitting processes ensure that concurrent Projects involving water withdrawals from the river basins crossed by the Project do not exceed acceptable levels or result in significant cumulative effects. Based on the temporary, localized effect of drawdown

due to the relatively small quantities of water required for the Project, Transco expects that the hydrostatic testing and construction dewatering activities planned for the Project will not contribute to measurable cumulative effects on these water resources.

There will be no permanent loss of wetland area from construction of the Project. Transco is proposing compensatory off-site mitigation for Project-related impacts to PFO wetlands for temporal conversion of PFO wetlands within the temporary construction easement and permanent conversion of PFO wetlands to PEM wetlands within a 15-foot wide operation and maintenance corridor on either side of the pipeline centerline within the permanent easement. Off-site mitigation will also provide compensation for temporal conversion of PSS wetlands to PEM wetlands within a 10-foot wide operation and maintenance corridor centered over the pipeline within the permanent easement.

Transco has routed the proposed pipeline facilities and associated workspaces to avoid and minimize effects on wetlands while maintaining engineering standards and safety. Transco completed field routing surveys within a 600-foot wide-corridor to identify proposed pipeline alignments that, among other factors, avoided or minimized wetland effects to the extent practicable. Environmental criteria used during the routing surveys specific to wetlands included: (1) minimizing effects at wetland crossings to the maximum extent practicable; and (2) avoiding or minimizing effects on forested wetlands.

Transco will implement the measures in its Procedures to minimize effects on wetlands from Project activities during the construction, post-construction restoration, and operation phases of the Project. In addition, the Project construction activities at wetland crossings will be performed in accordance with applicable federal regulatory requirements, such as the use of specialized construction techniques designed to minimize effects and reduce workspace area. Implementing these measures will help to limit adverse effects on wetlands from the Project to the construction ROW in each wetland. The Transco Procedures will result in no net loss of wetlands, although there will be some conversion of wetland value and type.

Based on the above analysis, Transco believes there will be no significant measurable cumulative effects from the Project on wetlands.

Fish, Vegetation and Wildlife

This section addresses past, present, and reasonably foreseeable actions that, when taken into consideration with the Project, could result in cumulative effects on fish, vegetation and wildlife. The geographic area considered in the evaluation of potential vegetation effects included the ecosystem within 0.5 mile of the Project effect area.

The majority of effects associated with Project pipeline construction will be temporary disturbances associated primarily with clearing the construction workspace of vegetation. Temporary effects will either be short-term, where restoration to preconstruction conditions will be completed following construction, or long-term, where restoration to preconstruction conditions will take place over several growing seasons and may result in a permanent change in the vegetation structure. Long-term, temporary disturbances will be associated primarily with areas where forested land is cleared within temporary workspaces. Construction of the new aboveground facilities and expansion of some existing facilities will result in the permanent loss of vegetation communities that are cleared and replaced with impervious surfaces or converted from upland forest to open land. A summary of the temporary and permanent land that will be disturbed by the Project is provided as **Attachment J**.

Following construction, temporary workspaces on open land and agricultural land will be restored according to the Transco Plan (**Attachment M**). During operation, Transco will maintain additional 50-foot-wide permanent ROWs along the CPL North and CPL South. In accordance with the Transco Plan, maintenance will include mowing the permanent ROW no more than once every 3 years. However, a 10-foot-wide corridor centered over the pipeline will be maintained annually in an herbaceous state that facilitates visual inspections. This maintenance will result in permanent conversion of existing upland and wetland forested areas to herbaceous or scrub-shrub vegetation communities.

Transco will implement specific measures to reduce these effects, including: (1) minimizing the footprint of the proposed work activities and the duration of disturbances to the extent practicable, (2) protecting topsoil in agricultural areas and mitigating subsoil compaction, (3) adhering to the Noxious and Invasive Species Management Plan (Attachment 11 of the Transco ECP (**Attachment M**)), (4) co-locating with existing ROWs to the extent practicable, (5) installing erosion controls to prevent the loss of soils and reseeded to stabilize the soils and

speed revegetation, and (6) monitoring the success of revegetation efforts and taking appropriate action to address areas that have not been fully revegetated with native seed mix.

The development Projects identified during the cumulative effects analysis are relatively small and in various stages of planning and completion. Therefore, Transco believes there will be no significant measurable cumulative effects on vegetation.

Also reviewed were past, present, and reasonably foreseeable actions that, when taken into consideration with the Project, could result in cumulative effects on wildlife, including threatened and endangered species and fisheries. The geographic area considered in the evaluation includes vegetative habitats that are used by wildlife (breeding grounds, migratory routes, range, etc.) within the Project area. These include forested areas, herbaceous habitats, wetlands, and other similar vegetative habitats used by wildlife and protected species. Potential cumulative effects resulting from construction activities and operation and maintenance have been considered as part of this analysis.

Construction of the Project facilities has the potential to negatively affect wildlife and wildlife habitat within the immediate vicinity of the pipeline route and locations of the aboveground facilities. Effects may include disturbance due to clearing and trench excavation. Transco does not expect significant direct mortality of wildlife to occur as a result of construction activities. Transco anticipates that the majority of wildlife will disperse from the vicinity of construction activities in response to disturbance from construction vehicles and equipment, but limited mortality of slow-moving or sessile organisms could occur within the footprint of the aboveground facilities, partly as a result of construction vehicle traffic. Noise and ground disturbance generated by pipeline construction activities may temporarily affect wildlife behavior in the immediate vicinity of the facilities.

Following construction activities, the existing ROWs will be restored to preconstruction conditions to the extent practicable, and it is expected that wildlife will quickly return to the vicinity of the ROWs, using them as corridors for travel, refuge, foraging, and nesting. Following construction, these ROWs will be maintained in a manner similar to current conditions. Transco will also restore temporary workspaces outside agricultural areas using an herbaceous seed mix that will minimize competition with native woody plant species while offering additional wildlife

habitat and food sources, or another type of seed mix agreed upon with the applicable agencies and the landowner. Habitat fragmentation and conversion of forested lands will occur as a result of this Project and the other Projects that involve clearing of forested land during construction and/or operation. However, Transco has sought to avoid and minimize forest clearing, to the extent practicable, through co-location with other utility corridors and long-term maintenance of ROW widths in forested wetlands. Restoration of vegetation in Project construction areas will be ensured by adherence to the Transco Plan and Procedures (Attachments 17 and 18 of the Transco ECP (**Attachment M**)), and other applicable federal permit conditions.

Other than the occasional presence of vehicles during inspections and maintenance, Transco does not anticipate any other disturbance to wildlife along the pipeline ROWs during operation. Similarly, operation of the aboveground facilities is not expected to adversely affect wildlife populations.

Because the pipeline ROW will be revegetated and useable by wildlife following construction, and important habitats have been avoided to the greatest extent practicable, long-term effects on wildlife habitats will be minimized and avoided. Transco expects that similar restoration activities would be employed for the Projects identified in the cumulative effects analysis as well, along with the implementation of BMPs and other effect avoidance measures. Based on this, Transco believes there will be no significant measurable cumulative effects of the Project on wildlife.

Transco completed surveys for threatened and endangered species through the Project area and developed suitable avoidance, minimization, and mitigation measures to prevent adverse effects. Transco believes that through these agency consultations cumulative effects have been appropriately addressed.

Transco consulted with the PFBC to identify both game and non-game fishery species and determine fishery classifications for watercourses crossed by the proposed pipeline. Due to the Project route and location and the presence of downstream dams, Transco determined that consultation with NOAA Fisheries was not necessary for the Project.

Construction of the Project may include temporary effects on watercourses and associated fisheries crossed by the Project. Temporary effects on fisheries include disturbance of watercourse banks, removal of bank vegetation, and in some instances, modification of flow during dry-crossing construction. Transco will minimize effects resulting from construction through adherence to the Transco Procedures in the ECP (**Attachment M**). Transco is also consulting with the PFBC on these and other fishery effect minimization and mitigation measures. No watercourses or fishery resources will be affected by construction of new and modified existing aboveground facilities. Transco does not anticipate that the operation and maintenance of the pipeline or aboveground facilities will have adverse effects on fishery resources.

The Project effect on fisheries will be similar to that described for surface waters. Implementation of the Transco Procedures will limit the effects of crossings in duration and distance and limit the effect of construction activities to the stream, and fishery, being crossed. None of the other activities identified in the cumulative effects analysis will also affect the same streams or fisheries within the same timeframe as the Project; therefore, there is no potential for cumulative effect on these fisheries.

Cultural Resources

Transco has consulted with the PHMC and applicable Tribal Historic Preservation Offices regarding potential effects on cultural resources resulting from the Project. Beginning in May 2014, and continued surveys into 2016 in Pennsylvania. Transco completed surveys for cultural resources through the majority of the Project area and developed suitable avoidance, minimization, and mitigation measures to prevent adverse effects (see **Attachment D-1 and D-2**). Use of avoidance and mitigation measures would be expected to prevent adverse effects. Transco believes that through these agency consultations cumulative effects have been appropriately addressed.

Land Use, Recreation and Aesthetics

The geographic area considered in the evaluation of land use includes the community, metropolitan area, county, state, or region within the Project effect area. For recreation, the geographic area considered in this analysis includes rivers, lakes, geographic areas, or land management units within the Project effect area. For visual resources, the geographic area

would be the viewshed within 0.5 mile of the Project study area. Potential cumulative effects resulting from construction activities and operations and maintenance have been considered as part of this analysis.

The primary pipeline-related effects on existing land uses for the Project will be associated with vegetation clearing during construction. Agricultural lands crossed by the Project include large tracts of row and field crops such as corn, soybeans, wheat, and hay. No commercial silviculture (i.e., timber production) operations have been identified along the pipeline route. A majority of the commercial and industrial land crossed by the Project is not currently in use and is located within contractor/pipe yards. Open land (e.g., nonforested and undeveloped land not classified for another use, including land maintained as utility ROWs) is also crossed by the Project.

Transco will allow forested areas affected within the temporary construction ROWs and other temporary workspaces to revert to forest through natural successional processes after construction. Within the permanent ROW, Transco will maintain currently forested upland areas in an herbaceous vegetation state to facilitate inspection and operation of the Project facilities.

Transco will acquire road and railroad crossing permits from the appropriate state or local jurisdiction, as required by state and/or local road encroachment permits and regulations. By complying with these permits, Transco will not permanently affect any roads or railroads. Transco proposes to construct its pipeline facilities within or adjacent to existing utility corridors where practicable. Where co-located with existing corridors, Transco will seek to overlap the construction ROWs with existing utility ROWs to minimize new disturbance.

Transco identified public land, conservation land, recreational areas, and other designated or special use areas in the vicinity of the Project and obtained additional information for these areas by consulting with federal, state, county, and local agencies and private landowners; reviewing aerial photographs and maps of the Project area; and through field surveys conducted in 2014 through 2016. Transco has coordinated with appropriate federal, state, and municipal agencies on proposed crossings on public lands to minimize effects on recreation.

Land use effects resulting from transportation and residential/commercial developments in the vicinity of the Project are expected to be minimal due to the scope and nature of the work (as in

the case of the transportation Projects) or because of the minimal or lack of activity (as in the residential/commercial developments). Land use effects associated with other natural gas pipelines would be similar to those for the Project, with similar mitigation measures and effect avoidance measures being implemented. Based on the above analysis, Transco believes there will be no significant measurable cumulative effects of the Project on land use.

Visual effects associated with construction activities will result from the removal of vegetation, particularly in forested areas. These effects will be observed where the pipeline parallels or crosses roads and where vegetation is removed between the ROWs and residences. Potential mitigation measures may include planting visual screens along roadways and in residential areas in coordination with regulatory agencies, as necessary. While temporary visual effects on the landscape will occur during Project construction due to clearing, grading, and construction activities, Transco will restore disturbed areas in accordance with the Transco Plan and Transco Procedures (Attachments 17 and 18 of the Transco ECP (**Attachment M**)).

In summary, Transco believes there will be no significant measurable cumulative effects of the Project on land use, recreation, or visual resources.

E. Other Impacts to Water Resources Required to fulfill the Purposes of the Project

As described in **Attachment J** – Project Description, the Atlantic Sunrise Project involves water obstructions and encroachments in 10 counties: Clinton, Lycoming, Susquehanna, Wyoming, Luzerne, Columbia, Northumberland, Schuylkill, Lebanon and Lancaster counties. **This permit application package identifies all the water obstructions and encroachments required in Lancaster County, PA on parcels that are accessible to date.** Transco is submitting separate applications that will identify the water obstructions and encroachments in the other counties, as applicable.

F. References

Interstate Natural Gas Association of America (INGAA). 1999. Temporary Right-of-Way Width Requirements for Pipeline Construction. Available at:
<http://www.ingaa.org/File.aspx?id=19105>. Accessed on April 25, 2014.

Lewis, David. 2015. Columbia Water Authority, Columbia Pennsylvania. General Manager. Personal communication via e-mail. February 12, 2015.

Pennsylvania Department of Environmental Protection. 2015. Southcentral Regional Office. In-person file review. February 18, 2015.

Pennsylvania Farmland Preservation Association (PFPA). 2012. Agricultural Conservation Easements. Available at: <http://pafarmland.org/index.php/calendar/conservation>. Accessed on September 26, 2014.

Pennsylvania Fish and Boat Commission. 2014a. *Class A Wild Trout Waters*. Bureau of Fisheries website: <http://www.fish.state.pa.us/classa.pdf>. Accessed February 2015 and reviewed with PFBC.

Pennsylvania Fish and Boat Commission. 2014b. *Regional Listings of Approved Trout Waters*. Available from <http://www.fish.state.pa.us/fishpub/summary/troutwaters.html>. Accessed February 2015 and reviewed with PFBC.

Pennsylvania Fish and Boat Commission. 2014c. *Stream Section That Supports Natural Reproduction of Trout*. March 2015. Available from: http://www.fish.state.pa.us/trout_repro.htm. Accessed February 2015 and reviewed with PFBC.

Reid, S.M., and P.G. Anderson. 1999. Effects of sediment released during open-cut pipeline water crossings on stream and river ecosystems. *Canadian Water Resources Journal* 24:23-39.

Scheetz, Lynne. 2015. PADEP South Central Regional Office. Personal Correspondence via e-mail. January 13, 2015.

The Pennsylvania Code. Title 25 Environmental Protection, Chapter 93. Water Quality Standards. Available online at http://www.pacode.com/secure/data/025/chapter_93/chap93toc.html/. March 2014.

U.S. Department of Agriculture (USDA). n.d. Farm and Ranch Lands Protection Program. Available at:

<http://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/easements/farmranch>.

Accessed March 15, 2015.

U.S. Department of Agriculture (USDA). 2014. Conservation Reserve Program. Available online at: <http://www.fsa.usda.gov/FSA/webapp?area=home&subject=copr&topic=crp>.

Accessed on October 16, 2014.

United States Geological Survey (USGS). 2013. Watershed Boundary Dataset Facts. Available at: http://nhd.usgs.gov/wbd_facts.html. Accessed on July 10, 2014.