



December 2, 2016

**By FEDERAL EXPRESS**

Mr. Edward J. Muzic, P.E.  
Civil Engineer Manager  
Department of Environmental Protection  
Waterways and Wetlands – South Central Regional Office  
909 Elmerton Avenue  
Harrisburg, PA 17110

Re: DEP File E07-459  
Technical Deficiency Response  
Chapter 105 Dam Safety and Waterway Management Joint Permit Application  
Sunoco Pipeline L.P. – Pennsylvania Pipeline Project (Mariner East II)  
Allegheny, Blair, Frankstown, Juniata, and Woodbury Townships, Blair County

Dear Mr. Muzic:

On behalf of our client, Sunoco Pipeline L.P. (SPLP), Tetra Tech, Inc. provides the following responses to the Pennsylvania Department of Environmental Protection (DEP) Technical Deficiency letter dated September 6, 2016, regarding the above-referenced Chapter 105 Joint Permit Application (Joint Permit Application) for the Pennsylvania Pipeline Project (Project or PPP as defined in the application). SPLP has had minor revisions to the proposed workspaces since submittal of the original application. These revisions have occurred as result of preparing a response to these technical deficiencies, landowner requests, further reduction of impacts to aquatic resources, or minor limit of disturbance (LOD) changes to facilitate construction. The supporting attachments represent a revision of the Joint Permit Application that not only addresses the DEP's technical deficiencies, but also provides revised sections that reflect the most current Project areas. The attachment includes all necessary components of a complete application, however, it excludes previously submitted aquatic resource reports. Please consider the previously submitted aquatic resource reports as part of this application revision. We are providing two hard copies and three CDs of the revised application.

For ease of your review, each DEP item is set forth verbatim below, followed by a narrative response with supporting attachments.

**Comments and Responses to September 6, 2016 Technical Deficiency Letter**

BL 1	Comprehensive Environmental Evaluation - The following technical deficiencies are related to the overall project comprised by the 17 Chapter 105 Water Obstruction and Encroachment permit applications associated with this pipeline. Please provide the Department with a Comprehensive Environmental Evaluation of the Entire Pipeline Project as a Whole (“Comprehensive Environmental Evaluation”) which at a minimum includes the following:	NA – Heading
BL 1.a	Use the Environmental Assessment Form (3150-PM- BWEW0017, 2/2013) as a guide and provide a detailed narrative and other appropriate documentation that comprehensively evaluates the project as a whole under each of the categories therein (Part 1 – Resource Identification; Part 2 – Project Description – including all the analyses listed in the form, as well as in 25 Pa. Code §§ 105.13(e)(1)(vii-x), (2), (3), (g), and (j); and 25 Pa. Code § 105.15.	A Comprehensive Evaluation of Compliance and an evaluation of Resources Identification and Project Impacts for the Project as a whole have been added to the application materials and is located in Attachment 11, Parts 1 and 2. This Comprehensive Evaluation of Compliance references application materials that apply to each requirement pursuant to 25 Pa. Code § 105.18a and associated referenced regulations, including 25 Pa. Code §§ 105.13(e)(1)(vii-x), (2), (3), (g), and (j); and 25 Pa. Code § 105.15.
BL 1.b	The Comprehensive Environmental Evaluation should also provide a detailed narrative and other appropriate documentation that comprehensively evaluates the project as a whole for compliance with the requirements associated with the Department’s review of the application listed in 25 Pa. Code § 105.14 in its entirety, with particular emphasis on:	A Comprehensive Evaluation of Compliance for the entire Project has been added to the application materials and is located in Attachment 11. This Comprehensive Evaluation of Compliance references application materials that apply to each requirement pursuant to 25 Pa. Code § 105.18a and associated referenced regulations, including 25 Pa. Code § 105.14.

BL 1.b.i	Antidegradation Analysis - Prepare and submit an analysis and information that addresses consistency with State antidegradation requirements contained in Chapters 93, 95 and 102 (relating to water quality standards; wastewater treatment requirements; and erosion and sediment control) and the Clean Water Act (33 U.S.C.A. § § 1251—1376) for this entire project and other potential or existing projects. 25 Pa. Code § 105.14(b)(11).	An Antidegradation Analysis consistent with 25 Pa. Code § 105.14(b)(11) has been prepared and is provided in Attachment 11, Enclosure E, Part 5.
BL 1.b.ii	Secondary Impact Analysis – Prepare and submit an analysis and information that addresses secondary impacts associated with but not the direct result of the construction or substantial modification of the water obstruction or encroachment in the areas of the entire project and in areas adjacent thereto and future impacts associated with water obstructions or encroachments, the construction of which would result in the need for additional dams, water obstructions or encroachments to fulfill the project purpose. 25 Pa. Code § 105.14(b)(12).	A secondary impact analysis consistent with 25 Pa. Code § 105.14(b)(12) has been prepared and is provided as part of the Resource Identification and Project Impacts in Attachment 11, Enclosure E, Part 2.
BL 1.b.iii	Project Wide Cumulative Impacts Analysis. Prepare and submit an analysis and information that addresses the cumulative impact for this entire project and other potential or existing projects. As part of this analysis please evaluate whether numerous piecemeal changes associated with all the chapter 105 applications related to this pipeline project may result in a major impairment of the wetland resources. The analysis must be undertaken for each alternative prepared for the proposed pipelines and facilities of Mariner East II, on a	A stand-alone Cumulative Impacts Analysis has been added to the application materials and is located in Attachment 11, Enclosure E, Part 6.

	statewide basis and must be completed for the entire project, as a whole referencing each of the applications for the entire project. 25 Pa. Code §§ 105.14(b)(14); and 105.15.	
BL 1.b.iv	Comprehensive Evaluation of Compliance with 25 Pa. Code § 105.18a. Prepare and submit an analysis and information that evaluates the project as a whole with all the requirements found in 25 Pa. Code § 105.18a for each wetland or wetland complex in or along the project area as a whole. 25 Pa. Code § 105.18a.	A Comprehensive Evaluation of Compliance for the Project has been added to the application materials and is located in Attachment 11. This Comprehensive Evaluation of Compliance cross-references the application materials that address each requirement in 25 Pa. Code § 105.18a.
BL 1.b.v	Comprehensive Alternatives Analysis, Avoidance and Minimization and Mitigation. The applicant needs to demonstrate, that the alternatives chosen for the entire project will avoid cumulative impacts to the maximum extent practicable, and where such impacts are not avoidable, describe in detail with appropriate supporting documentation, how such impacts will be minimized and mitigated to the satisfaction of the Department. [25 Pa Code §§ 105.1, 105.13(e)(1)(viii)-(x); 105.14(b); and 105.15-105.20a.]	A comprehensive Alternatives Analysis has been added to the application materials to address this comment and is located in Attachment 11, Enclosure E, Part 3. A Cumulative Impacts Analysis has been added to the application materials to address this comment and is located in Attachment 11, Enclosure E, Part 6. An Impact Avoidance, Minimization, and Mitigation Procedures document has also been added to address this comment, located in Attachment 11, Enclosure E, Part 4.
BL 2	The HDD Inadvertent Return Contingency Plan includes profiles identifying Geotechnical profiles; however, no analysis has been provided on the risk of an inadvertent return occurring. Provide an analysis on the risk of an inadvertent return occurring for all proposed HDD crossings. Include in-depth detail, discussion, and data in the analysis of the risk of a return occurring. [25 Pa. Code §§105.14(b)(7), 105.18a(b)(3), 105.18a(b)(4), 105.18a(b)(5), 105.14(b)(4), 105.14(b)(11)]	The revised Inadvertent Return Assessment, Prevention, Preparedness and Contingency Plan (IR Plan) IR Plan provided in Attachment 12, Tab 12C includes an IR risk assessment for each of the Horizontal Directional Drills (HDDs).

BL 2.a	Provide information/details on previous HDD activities on the prior Mariner East pipeline project where IRs occurred. At a minimum this should include, a topographic map with locations and latitude/longitude of each occurrence, description of event, amount of discharge, whether the discharge entered waterways and/or wetlands, mitigation/clean-up measures taken, etc.	An HDD Risk Assessment is included as part of the revised IR Plan provided in Attachment 12C. The assessment discusses previous inadvertent returns (IR) and provides the data and analysis requested.
BL 2.b	A stand-alone attachment should be created to address the pre-boring geologic evaluation of the existence and potential to impact local drinking water supplies or aquifers around the boring location. The plan needs to include what measures will be employed to verify that no supplies or aquifer are impacted (i.e. pre and post water quality and quantity analysis). The plan should specify what notifications and remediation measures will be employed if there are impacts.	Water supply impacts have been analyzed and addressed within three supplemental plans to the PPC Plan: the Water Supply Assessment, Preparedness Prevention and Contingency Plan, the IR Plan, and Void Mitigation Plan for Karst Terrain and Underground Mining. These supplemental plans are provided in Attachment 12. The Water Supply Plan provides for the assessment of the existing public and private water supplies in or along the Project, as well as identifies prevention and preparedness measures to be implemented to protect those supplies. The IR Plan outlines the preconstruction activities implemented to ensure sound geological features are included in the drill profile, the measures to prevent impact, and the preparedness plan if an impact were to occur. These plans are provided in Attachment 12.
BL 3	EV wetlands are defined as EV waters by Chapter 93. Therefore, explain the measures the applicant will implement to comply with the antidegradation requirements of the Department's water quality standards program.[25 Pa Code §93.4c(b); §93.4c(b)(2); §93.1 (defn. of surface water of exceptional ecological significance); §105.14(b)(11); §105.18a(a)(4); 24 Pa.B. 922 (February 12, 1994)(Incorporation of the	An Antidegradation Analysis, provided in Attachment 11, Enclosure E, Part 5, fully explains the measures that SPLP will implement to comply with the antidegradation requirements of DEP's water quality standards program.

	Department's Existing Wetlands Protection Program into Water Quality Standards Program)].	
BL 4	The application states that the second pipeline will be 16 inches in diameter, while other applications related to this project state that the second pipeline could be up to 20 inches in diameter. Which is correct? [25 Pa. Code §105.13(e)(1)(iii)(A)]	In previous submissions and coordination documents, the diameter of the second pipeline had not yet been determined by engineering, but SPLP understood the maximum possible size would be 20 inches in diameter. SPLP has completed the initial engineering details for the necessary capacities of the second line and has determined that the second pipe will be 16 inches in diameter. The application has been revised to reference a 16-inch pipeline.
BL 5	List the types and amounts of emissions to satisfy question 13.0.1 of the General Information Form. [1300-PM-BIT0001 5/2012 Instructions]	Question 13.0.1 of the General Information Form (GIF) in Attachment 1 has been revised to address this comment. The overall Project will involve operational emissions, but no operational emissions will be emitted in Blair County.
BL 6	The Application and GIF have different titles for M.L. Gordon. An application shall be signed by the owners of the dam or reservoir, water obstruction or encroachment, or the persons exercising primary responsibility for the dam or reservoir, water obstruction or encroachment. In the case of a partnership, one or more members of the partnership authorized to sign on behalf of the entire partnership shall sign the application. In the case of a corporation, it shall be signed by the president, vice president or other responsible official empowered to sign for the corporation. Provide consistent titles for Mr. Gordon and demonstrate that he is authorized to sign the Application. [25 Pa. Code §§105.13(i) and 25 Pa. Code §§106.12(f)]	The Application has been revised to provide a consistent title for M.L. Gordon. A "Delegation of Authority" letter authorizing Mr. Gordon to sign the Application on behalf of the partnership is provided with the Joint Application Form of the Application.

BL 7	Provide a PNDI search clearance letter from the Pennsylvania Game Commission for threatened and endangered species under their jurisdiction. [25 Pa. Code §§105.15(a), 105.14(b)(4), 105.16(c)(3)]	The Pennsylvania Game Commission (PGC) provided clearance by letter dated June 8, 2016. A copy of this letter is provided in Attachment 6.
BL 8	Provide clearance or approval from the Pennsylvania Historical and Museum Commission (PHMC) for cultural, archeological, and historic resources for the proposed water obstructions and encroachments and areas necessary to construct the water obstructions and encroachments. [25 Pa. Code §§105.13(e)(1)(x), 105.14(b)(5), 105.15(a), 105.14(b)(4)]	<p>While DEP is required to consider potential impacts to historic resources under 25 Pa. Code Chapter 105 when DEP conducts reviews of a water obstruction, encroachment or dam permit application, none of the regulations or guidance referenced in DEP’s comment require SPLP to provide clearance or approval from the PHMC as part of a Chapter 102 or Chapter 105 permit application. Furthermore, as noted in a letter from Alexandra C. Chiaruttini, Esq., DEP’s Chief Counsel concerning the SPLP Pennsylvania Pipeline Project, “the [Pennsylvania] History Code does not authorize our agency or any Commonwealth agency to stop the processing of permits solely due to possible or actual presence of archaeological or historic resources, unless the agency’s enabling legislation contains specific statutory authorization for such action. DEP does not have such authorization here.” A copy of the February 1, 2016, letter from Ms. Chiaruttini is provided in Attachment 4. See also Pennsylvania History Code §508(a)(4). Accordingly, SPLP requests that DEP continue its review of SPLP’s applications.</p> <p>SPLP will continue to work with the PHMC to ensure that impacts to cultural resources are avoided where possible. In addition, SPLP has included with its Chapter 102 application a Cultural Resources Unanticipated Discovery Plan to be implemented during construction that outlines the protocols SPLP will follow if SPLP unexpectedly encounters archaeological or historic resources, including</p>

		notification to DEP and PHMC and cessation of earth disturbance.
BL 9	The project description provided in the Cultural Resource Notice states that the second pipeline is to be installed within 5 years of the first pipeline. The project description provided in the application does not discuss this timeframe. Regarding this item: Revise the application to discuss if the pipelines will be installed at the same time, or on different schedules. [25 Pa. Code §§105.13(e)(1)(iii)(A), 105.13(e)(1)(iii)(B), 105.301(7), 105.15(a), 105.14(b)(4), 105.18a, 105.21(a)(1), 105.13(e)(1)(ix)]	The Project Description in Attachment 9 to the Application has been updated to reflect the timing of the installation of the 20-inch and the 16-inch pipeline. The two pipelines will be installed during the same time period. The 20-inch pipeline would be installed first, followed by the 16-inch line. For safety purposes, the installation would be staggered by what is estimated to be no more than 60 days. At some HDDs with longer drills, however, the time period between installation of the two pipelines may exceed 60 days. Both pipelines will be installed within the same limit of disturbance so there would be no additional, temporary disturbance resulting from a second separate installation. Any temporary stabilization required would be implemented in accordance with Project's E&S Plans.
BL 9.a	If the pipelines are proposed to be installed at separate times, revise the application to clearly indicate this, and to identify the permanent and temporary impacts from the second pipeline installation. Please be advised that if issued the permit may expire before construction is completed on any second line.	The Project Description in Attachment 9 to the Application has been updated to reflect the timing of the installation of the 20-inch and the 16-inch pipeline and any permanent and temporary impacts from the second pipeline installation.
BL 9.b	If the pipelines are proposed to be installed at separate times, revise your alternatives analysis to evaluate the feasibility of installing the two pipelines concurrently with one another to avoid and minimize impacts.	Both pipelines would be installed during the same construction period, as described above. Accordingly, the Alternatives Analysis has not been revised to evaluate this issue.
BL 9.c	You may need to revise your fee calculation spreadsheets to account for the additional,	The 20-inch pipeline would be installed first, followed by the 16-inch line. Any temporary stabilization required



	temporary disturbance resulting from a second, separate installation.	would be implemented in accordance with the Project’s E&S Plans. Both pipelines will be installed within the same limit of disturbance as set forth in the permit application, so there will be no “additional, temporary disturbance resulting from a second separate installation” as the Comment incorrectly indicates. Therefore, no revision of the fee calculation spreadsheet is necessary.
BL 9.d	Your Erosion and Sedimentation Control Permit Application (ESG 05 000 15 001) should also reflect the two construction sequences if two separate construction periods are proposed.	The 20-inch pipeline would be installed first, followed by the 16-inch line, within the same limits of disturbance. Installation would be staggered by what is estimated to be no more than 60 days. At some HDDs with longer drills, however, the time period between installations of the two pipelines may exceed 60 days. Any temporary stabilization required would be implemented in accordance with the Project’s E&S Plans.
BL 10	Provide a detail that shows how flumes or other in-stream supports are used for temporary stream crossings as mentioned in the Temporary Stream Crossing detail and identify where each method will be used. [25 Pa. Code §§105.13(g)]	Temporary crossings of streams are accommodated by installation of the timber mat, culvert, or railcar equipment bridges as detailed by the standard typical drawings and notes for these types of crossings provided within the E&S Plan (Attachment 12). The contractor may choose from these temporary crossing methods.
BL 11	Provide site plans that depict proposed work for each ATWS within a floodway or floodplain. These plans should include at a minimum the duration of proposed activities, the expected layout, E&S controls, and size or quantity of materials or structures proposed. [25 Pa. Code §105.13(e)(1)(i)(C)]	The E&S Plan in Attachment 12 has been revised to identify the proposed work. The associated erosion and sediment controls used to minimize the potential for discharge of fill material to the stream are provided on the plan drawings and/or as referenced to the E&S plan standard typical details. The duration of ATWS use will be consistent with the duration of construction.
BL 12	A number of drawings in the package, for example the auger bore drawings, state that the plans are for permitting purposes only. The plans, specifications and reports in the application are part of a permit	The “permitting purposes” language has been removed. All drawings and maps provided in the application are considered to be final plans.

	once a permit is issued and must be followed. Remove this language from the plans and provide final plans. [25 Pa. Code §§105.13(e), 105.44(a)]	
BL 13	The auger bore drawings reference cathodic protection being installed. Provide plans and/or details for any proposed cathodic protection and identify on the plans where and which type of cathodic protection is proposed to be installed. [25 Pa. Code §§105.3(4), 105.11(a), 105.13(e)(1)(i)(C)]	The Project Description provided in Attachment 9 includes a narrative outlining SPLP's cathodic protection plans. A typical cathodic test station detail has been added to the E&S Plan Sheets in Attachment 12.
BL 14	Where cathodic protection is proposed to be installed in wetlands or other areas where vegetation is proposed to be undisturbed or replanted, identify how this cathodic protection will be maintained and replaced without vegetative disturbance. [25 Pa. Code §§105.15(a), 105.13(e)(1)(ix), 105.18a]	The Project Description provided in Attachment 9 includes an updated narrative outlining SPLP's cathodic protection plans.
BL 15	For all Bore and HDD locations, identify where all pipe pull back, or assembly, or other areas where the pipe will be laid out, and where all construction and staging areas are located. Identify any temporary crossings or impacts for these areas to streams, wetlands, and floodways. Revise the application accordingly to include these impacts, including site-specific plans depicting the impacts and proposed temporary matting. [25 Pa. Code §§105.13(e)(1)(i), 105.13(e)(1)(iii)]	To reduce overall impacts to the landscape and, in particular, wetlands and streams, pullback areas are sited within the same workspaces designed for the open cut installation of the pipeline to the maximum extent practicable. Pullback areas not proposed within the workspaces needed to install the pipelines via open cut are accommodated by adding Additional Temporary Workspace (ATWS), as shown on the Aerial Site Plans (Attachment 7). Although avoided to the maximum extent practicable, if streams and wetlands are crossed by the pullback activity within the ATWS, then temporary crossings or impacts, such as temporary bridges, are identified on the Aerial Site Plans and site-specific E&S Plan sheets. Additional temporary matting and bridges to accommodate the pullback activity including pipe layout and assembly in the open cut areas are also identified on

		E&S Plan sheets. Temporary bridges and matting will be installed and restored in accordance with the standard typical details provided within the E&S Plan in Attachment 12. The impacts of these activities occur within the permanent and temporary workspaces within the LOD.
BL 16	The site plan sheets and E&S plan sheets identify the floodway which appears to be measured from the centerline of the stream as opposed to measuring from the top of bank for the 50-foot assumed floodway boundary. Provide floodway boundaries on all plan drawings that adhere to the definitions in Chapter 105 by providing the FEMA mapped floodway boundary, in areas absent a FEMA mapped floodway, the floodway boundary measured 50 feet landward from the top of bank, or in areas absent a FEMA mapped floodway a floodway boundary with evidence provided that the assumed 50 feet floodway is not accurate. [25 Pa. Code §§105.13(e)(1)(i)(A), 105.1]	In absence of a FEMA NFHL Floodway, the PA 50-foot floodways have been created by buffering the stream on each side of its centerline by one-half the bank width of the stream at the crossing plus 50 feet. For example, a stream that has a 5-foot bank width would be buffered by 52.5 feet on each side the stream's centerline, to ensure both the bank width and the 50-foot setback from the bank was encapsulated within the Chapter 105 floodway, as per the definitions identified in Chapter 105. FEMA NFHL data was downloaded and re-analyzed for this Project on September 27, 2016. The 105 and 102 E&S Plans have been checked to assure consistent presentation of these areas.
BL 17	The Typical Wetland Crossing detail on the E&S plans indicates soil will be stockpiled in the wetland along the trench. Revise the detail to include a means of separating the stockpiled soil from the wetlands, such as geo-fabric and matting, to ensure that stockpiled soil will be completely removed and impacts will be minimized. [25 Pa. Code §§105.423, 105.18a(a), 105.18a(b), 105.15(a), 105.14(b)(4), 105.14(b)(11), 105.14(b)(13)]	The standard typical detail has been revised to show topsoil segregation. The standard typical detail also notes that topsoil and wetland spoils are to have a physical separation to ensure full restoration and to minimize impacts.
BL 18	The typical wetland crossing details shown on the E&S plans indicates trench breakers are to be	The standard typical detail on the E&S plans has been revised to better detail ditch trench plug

	<p>installed in the trench in the wetlands; however it is not clear what trench breakers are or whether trench plugs are intended. Revise this detail to identify whether Trench Plugs are intended by this term or provide a detail for trench breakers. In addition, if trench plugs are proposed to maintain wetland hydrology, revise the detail to include trench plugs within the wetland for long wetland crossings and specify the distance increments. Furthermore, the E&amp;S plan drawings depict trench plugs which are inconsistent with the detail. Revise the site plans to be consistent with the detail. [25 Pa Code §105.18a(a)(1) &amp; §105.18a(a)(3) &amp; §105.18a(a)(4) &amp; §105.18a(a)(5) &amp; §105.18a(b)(2) &amp; §105.18a(b)(3) &amp; §105.18a(b)(4) &amp; §105.18a(b)(5) &amp; §105.15(a)(1) &amp; §105.14(b)(4) &amp; §105.14(b)(11) &amp; §105.14(b)(13) &amp; §105.13(e)(1)(i)]</p>	<p>installation. Additionally, the trench plugs have been moved to the outside of the wetland boundaries and a note added that additional trench plugs will be installed for long open-cut wetland crossings. The project's Environmental Compliance Program team will ensure appropriate spacing.</p>
BL 19	<p>Installation of the trench plugs as depicted in the Trench Plug Detail is likely to result in adverse impacts to the hydrology of waters of the Commonwealth. Provide a revised detail showing the trench plug continuing to the bottom of the trench instead of ending at the top of the bedding material. [25 Pa. Code §§105.18a, 105.15(a)]</p>	<p>The typical standard trench plug detail provided within the E&amp;S Plan provided in Attachment 12 has been revised to show the trench plug continuing to the bottom of the trench.</p>
BL 20	<p>The Typical Wetland Crossing detail on the E&amp;S plans states that the detail does not apply to active cultivated or rotated cropland. Revise the detail to apply to all wetland crossings or provide a separate detail for wetland crossings in active cropland. [25 Pa. Code §§105.18a, 105.15(a)]</p>	<p>The note for this standard typical detail has been removed so that the detail is applicable to all wetland crossings.</p>
BL 21	<p>Provide a description of the expected duration each temporary stream crossing will remain in place. If</p>	<p>The temporary stream crossings will remain in place for no greater than one year.</p>

	the temporary stream crossing will be in place for greater than one year, then a risk analysis will be necessary. [25 Pa. Code §§105.13(1)(iii)(A), 105.14(b)(1), 105.14(b)(3)]	
BL 22	Identify the proposed provisions for shut-off in the event of break or rupture for each crossing. Provide locations and description of how this action will be completed in the event a break or rupture occurs. [25 Pa. Code § 105.301(9)]	The revised Project Description provided in Attachment 9 discusses block valves, their location, and the siting criteria that provides shutoff provisions. Valves are shut off remotely or manually. Block valves are also depicted on the aerial site plans provided in Attachment 7, Tab 7A.
BL 23	Provide the letters of approval from Altoona Water Authority and Huntingdon Area Water and Sewage Authority and update Question 16.0.2 of the GIF. [1300-PM-BIT0001 5/2012 Instructions]	The water suppliers listed in question 16.0.2 of the GIF are those preliminarily identified as potential temporary water suppliers to facilitate hydrostatic testing. The PPC Plan in Attachment 12, Tab 12A has been supplemented with a Water Supply Plan (Attachment 12, Tab 12B), which addresses all correspondence with water and sewer authorities, including letters to the Altoona Water Authority and Huntingdon Area Water and Sewage Authority. The GIF question has been updated, and final agreements between the contractor and the water supplier can be supplied once they are in place. The Project does not require any permanent water supplies.
BL 24	A water obstruction and encroachment permit may be required for the proposed water withdraws and discharges. [25 Pa. Code §§105.3(a)(4), 105.11(a), 105.13(e)(1)(i), 105.13(e)(1)(iii), 105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(6), 105.301(1), 105.301(7), 105.301(5), 105.301(3), 105.151(1), 105.151(3), 105.161(a)(3), 105.161(4)]	Water withdrawals in Blair County will use temporary and above-ground equipment. Water withdrawal locations are labeled on the Chapter 105 drawings. Additional details, including specific equipment configurations are included in the Chapter 102 E&S drawing details, which are referenced in the Chapter 105 drawings. All encroachments and obstructions (e.g., pump pad) are identified on the Chapter 102 drawings and included within the limit of disturbance.  SPLP has obtained the Project's DEP PAG-10 General NPDES Discharge Permits (Authorization ID No.

		<p>PAG1106869 and PAG1105897) to allow discharge of hydrostatic test waters. The permit application captures the details of the mainline and HDD testing discharges including discharge capacity, methods, and structures. All discharge structures are located within the LOD.</p> <p>In addition to the information provided in the PAG-10 permit application, all discharge outfall locations are shown on the Chapter 105 drawings. Supporting information such as typical discharge details are included in the Chapter 102 E&amp;S drawings, which are referenced in the Chapter 105 drawings.</p>
BL 24.a	Provide plans and cross sections indicating pipe size, placement, and locations for all wetlands, streams, floodways and floodplains where the proposed water withdrawal and discharge piping is to be installed	<p>All discharge outfall locations and temporary withdrawal locations are shown on the Chapter 105 drawings. Supporting information such as typical intake and discharge details are included in the Chapter 102 E&amp;S drawings which are referenced in the Chapter 105 drawings.</p> <p>Per a conference call with DEP on September, 27 2016, it was agreed that call-out notes will be added on Chapter 102 drawings to refer to typical discharge structure details instead of supplying full cross sections at each outfall location.</p> <p>Chapter 102 E&amp;S drawing details include typical withdrawal cross-section details for the Frankstown Branch Juniata River 2 withdrawal location and site-specific withdrawal cross-section details for the Frankstown Branch Juniata River 3 withdrawal location. Chapter 102 E&amp;S drawings are referenced in the Chapter 105 drawings. Water withdrawal activities for Frankstown Branch Juniata River 3 are being permitted through the SRBC. The surface water withdrawal docket</p>

		<p>for this water source is expected in December 2016. A copy of the approved docket will be made available to DEP.</p> <p>The locations of wetlands, streams, floodways, and floodplains in relation to the outfall locations are captured on the Chapter 102 and 105 drawings.</p>
BL 24.b	Revise the impact tables to include these impacts.	All encroachments and obstructions for proposed water withdrawal and discharge piping are included within the Project limits of disturbance, and impacts are reflected in Tables 2, 3, and 4 provided in Attachment 11.
BL 24.c	Provide a description and plans of how the water will be discharged or withdrawn, the discharge capacity, the withdraw rate, the methods to be utilized, what equipment and structures are proposed to be placed and utilized in waters of the commonwealth, the length of time obstructions will remain in place.	<p>Frankstown Branch Juniata River 2 and Frankstown Branch Juniata River 3 are the only water withdrawals planned to be used in Blair County. Water withdrawals from both locations will use temporary and above-ground equipment. These water withdrawal locations are labeled on the Chapter 105 drawings. Additional details, including specific equipment configurations are included in the Chapter 102 E&amp;S drawing details, which are referenced in the Chapter 105 drawings. All encroachments and obstructions (e.g., pump pad) are identified on the Chapter 102 drawings and included within the limit of disturbance.</p> <p>Withdrawal rates from Frankstown Branch Juniata River 2 will be limited to 600 gpm. Duration of use for Frankstown Branch Juniata River 2 is expected to be a few weeks. Equipment will be removed from the floodway when not in use and in the event of any flooding. This water source is planned as the source of water to drill and hydrotest one HDD.</p>

		<p>Water withdrawal activities for Frankstown Branch Juniata River 3 are being permitted through the SRBC. The surface water withdrawal docket for this water source is expected in December 2016. A copy of the approved docket will be made available to DEP. Withdrawal rates from Frankstown Branch Juniata River 3 will be limited to approved SRBC docket conditions. Frankstown Branch Juniata River 3 is expected to be used intermittently over a period of a few months. Equipment will be removed from the floodway when not in use and in the event of flooding. This water source is planned as the source of water to drill and test four HDDs and conduct mainline hydrostatic testing. HDD drilling/testing will be completed weeks to months prior to the mainline hydrostatic testing.</p> <p>Regarding discharges, SPLP has obtained the Project's DEP PAG-10 General NPDES Discharge Permits (Authorization ID No. PAG1106869 and PAG1105897) to allow discharge of hydrostatic test waters. The permit application captures the details of the mainline and HDD testing discharges including discharge capacity, methods, and structures. All discharge structures are located within the LOD. The length of time the structures will be used is also captured in the PAG10 permit application. Once the permit is obtained, the permit application number will be added to the GIF.</p> <p>In addition to the information provided in the PAG-10 permit application, all discharge outfall locations are shown on the Chapter 105 drawings and supporting information such as typical discharge details are included</p>
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		in the Chapter 102 E&S drawings which are referenced in the Chapter 105 drawings.
BL 24.d	Provide cross sections, profiles, and hydraulic analysis for all piping placed in existing stream culverts and along and within stream channels.	Water withdrawals in Blair County will use temporary and above-ground equipment. Water withdrawal locations are labeled on the Chapter 105 drawings. Additional details, including specific equipment configurations are included in the Chapter 102 E&S drawing details, which are referenced in the Chapter 105 drawings. All encroachments and obstructions (e.g., pump pad) are identified on the Chapter 102 drawings and included within the limit of disturbance. Piping will be placed in an existing culvert draining to Frankstown Branch Juniata River (S-L77). Capacity calculations are included in Attachment 12 (see Attachment 8 of the E&S Narrative).
BL 24.e	Revise the Environmental Assessment to discuss the impact of the water obstructions and water withdraws from the obstructions on the resources. Where approval is being obtained from the Susquehanna River Basin Commission (SRBC), provide approval from the SRBC for the water withdraws if available.	The Environmental Assessment (see Attachment 11, Enclosures C and D, and also Enclosure E, Part 2 for a Project-wide Resource Identification and Project Impacts) were updated to capture the impacts of the water obstructions and withdrawals on Frankstown Branch Juniata River (2). The area of the impacts at each withdrawal point will be contained to the LOD. No impacts are associated with the temporary piping and intake screens for the water withdrawal. Temporary above-ground piping will be placed through an existing 30-inch culvert for a road crossing. Supporting calculations are included in Attachment 8 of the Chapter 102 Erosion and Sedimentation Control Plan. Water withdrawal activities for Frankstown Branch Juniata River (2) will be below SRBC's permitting thresholds; therefore, no docket is required through the

		<p>SRBC. Proper monitoring of the withdrawal activities will be conducted while the water source is used.</p> <p>The Environmental Assessment has been updated to capture the impacts of the water obstructions and withdrawals on Frankstown Branch Juniata River (3). The area of the impacts at each withdrawal point will be contained to the LOD. No impacts are associated with the temporary piping and intake screens for the water withdrawal.</p> <p>Water withdrawal activities for Frankstown Branch Juniata River (3) are being permitted through the SRBC. The surface water withdrawal docket for this water source is expected in December 2016. A copy of the approved docket will be made available to DEP.</p>
BL 24.f	Provide documentation of submission of proposed water obstructions and encroachments for these activities to each jurisdictional (PHMC, USFWS, PAFBC, PGC, DCNR) agency and provide clearance from these agencies.	<p>SPLP previously submitted a final request for determination letter from USFWS, PFBC, DCNR and PGC where the Project was described consistent with the attached Application, the consultation history was summarized, and survey reports and mapping (including GIS files) were provided referencing the most current alignment. Copies of these final requests have been submitted, and clearances from all four agencies have been obtained and the conditions of those clearances outlined within the revised Project Description located in Attachment 9. Copies of the submissions are located in Attachment 6.</p> <p>While DEP is required to consider potential impacts to historic resources under 25 Pa. Code Chapter 105 when DEP conducts reviews of a water obstruction,</p>

		<p>encroachment or dam permit application, none of the regulations or guidance referenced in DEP’s comment require SPLP to provide clearance or approval from the PHMC as part of a Chapter 102 or Chapter 105 permit application. Furthermore, as noted in a letter from Alexandra C. Chiaruttini, Esq., DEP’s Chief Counsel concerning the SPLP Pennsylvania Pipeline Project, “the [Pennsylvania] History Code does not authorize our agency or any Commonwealth agency to stop the processing of permits solely due to possible or actual presence of archaeological or historic resources, unless the agency’s enabling legislation contains specific statutory authorization for such action. DEP does not have such authorization here.” A copy of the February 1, 2016, letter from Ms. Chiaruttini is provided in Attachment 4. See also Pennsylvania History Code §508(a)(4). Accordingly, SPLP requests that DEP continue its review of SPLP’s applications.</p> <p>SPLP will continue to work with the PHMC to ensure that impacts to cultural resources are avoided where possible. In addition, SPLP has included with its Chapter 102 application a Cultural Resources Unanticipated Discovery Plan to be implemented during construction that outlines the protocols SPLP will follow if SPLP unexpectedly encounters archaeological or historic resources, including notification to DEP and PHMC and cessation of earth disturbance.</p>
BL 25	The E&S and Impact/Subtraction plans depict the Blair/Cambria county boundary west of wetland L70 while the Impact and Aquatic Resource	Impacts to Wetland W70 were previously presented in the Blair County application. However, the application documents have been revised to reflect those impacts in

	<p>Delineation plans depict the county boundary within wetland L70. The E&amp;S plan drawings identify that a temporary impact to wetland Q51 will occur in Blair County. However, all other plan sheets depict this wetland to be in Cambria County. Revise and clarify the plan drawings, impact tables, impact calculations, etc. to accurately reflect the county boundary and the impacts to wetlands L70 and Q51 within Blair County. In addition, it is recommended that the Cambria County application be evaluated and revised for consistency as necessary. [25 Pa. Code §§105.13(e)(1)(i)(B), 105.15(a), 105.21(a)(1)]</p>	<p>the Cambria County application. The county boundary shapefile that comes with all ArcGIS licenses is different than the boundaries recognized by Pennsylvania. The county boundaries now represent the data available from the Pennsylvania Spatial Data Access (PASDA) website, and matches the county boundaries within the E&amp;S plan, Chapter 102 application, and Aquatic Resource Reports. Wetland Q51 was noted as occurring in Blair County but the new has been revised to occur entirely in Cambria County.</p>
BL 26	<p>The E&amp;S and Impact plan drawings depict additional wetlands North of Stream S-L94 which are not depicted on the Aquatic Resource Delineation plan drawings. Revise the aquatic resource delineation to delineate and provide data sheets for this wetland. [25 Pa. Code §§105.13(e)(1)(i)(B), 105.15(a), 105.21(a)(1), 105.13(e)(1)(x)(A), 105.451]</p>	<p>Although the additional wetlands North of Stream S-L94, which are an extension of Wetland L70, are outside the standard survey area, the Supplemental information provided in Attachment 11, Enclosure A includes this resource.</p>
BL 27	<p>Provide a plan for the “stream restoration” referenced in the site specific drawings. In addition, clarify whether this plan will be utilized at additional stream crossings and identify each crossing where the plan will be utilized. [25 Pa. Code §§105.13(e)(1)(i)(G), 105.13(e)(1)(i)(C), 105.311(2), 105.15(a), 105.14(b)(4)]</p>	<p>Stream restoration has been incorporated into the site specific drawings. For those crossings where site specific drawings are not provided, the typical stream crossing will be implemented.</p>
BL 28	<p>Stream S-Q58 is identified as perennial and flowing into S-L83 which is identified as ephemeral. This appears to be inconsistent. Please clarify if S-L83 is</p>	<p>The main channel is perennial S-Q58. Stream S-L83 is ephemeral and drains to S-Q58. The resource names and flow paths have been updated with the new designations and the application has been updated and supplemented</p>

	perennial or intermittent. [25 Pa. Code §§105.21(a)(1), 105.15(a), 105.14(b)(4)]	with an aquatic resources addendum report, provided in Attachment 11, Enclosure A.
BL 29	Stream S-Q59 starts and ends within the Aquatic Resource Survey area. The plan maps, photographs and narrative do not give justification or appear to depict why they start/end. Revise the application to delineate the stream S-Q59, at a minimum, within the entire Survey Area, and ensure that the floodways and proposed floodway impacts are fully identified and depicted. Provide color photographs which depict the resource and surrounding area sufficiently, including photographs of start/end locations. [25 Pa. Code §§105.13(e)(1)(i)(A), 105.13(e)(1)(iv)]	Stream S-Q59 was reexamined and photographed to verify that the resource was accurately depicted and/or recorded. The application has been supplemented with an aquatic resource addendum provided in Attachment 11. The stream length and stop and start points were verified based on additional field work. Additional photographs and narrative are provided within the addendum report.
BL 30	Table 3 identified the Centerline Crossing of the Stream at HDD/Bore for streams which are proposed for open cut/dry crossing. Revise the impact table to be accurate and consistent for the following streams: S-M35, S-M67, S-M72, S-M73, S-M74, S-M75, S-M76, S-M77, S-M78, S-M80, S-Q59. [25 Pa. Code §§105.21(a)(1), 105.15(a)]	Table 3 of Attachment 11 has been revised to ensure that data presented within the Centerline Crossing at HDD/Bore column is accurate and consistent for all streams referenced in the Comment.
BL 31	Revise E&S Plan Drawing ES-3.21 to accurately depict the wetland M-49 boundary, consistent with the delineation and other plan drawings. [25 Pa. Code §§105.13(e)(1)(i)(A), 105.13(e)(1)(i)(C), 105.21(a)(1)]	E&S Plan drawing ES-3.21 has been updated to accurately depict the Wetland W-M49 boundary consistently with the Chapter 105 permit application.
BL 32	Three streams are depicted around stream S-BB49; however, the western most stream does not have a stream identifier number. In addition, stream S-BB49 and S-KP1 are identified with swapped identifiers on the plan drawings. Revise the impact plans and impact table to accurately identify the	Stream crossing S-BB49 has been split into two different crossings, Streams S-BB49a and S-BB49b, so that each crossing is accurately represented in the impact plans and impact table. Previously, the impacts for both stream crossings were combined into the totals for Stream S-BB49.

	stream with the appropriate identifiers and include stream identifiers for all proposed streams to be impacted. [25 Pa. Code §§105.13(e)(1)(i)(A), 105.21(a)(1)]	The labels for Streams S-BB49a, S-BB49b, and S-KP1 have been revised on the impact plans and impact table accordingly.
BL 33	Wetland W-L59 is identified on the impact plan drawings and impact table as having a temporary crossing impact with temporary matting. However, the E&S plan sheet ES-3.34 does not depict impacts to this wetland. Revise the application documents to be consistent and avoid and minimize impacts to the extent practicable. [25 Pa. Code §§105.13(e)(1)(i), 105.21(a)(1), 105.13(e)(1)(viii)]	The E&S Plan ES-3.34 has been updated to show timber mats across the span of Wetland L-L59.
BL 34	The E&S plan drawing ES-3.34 labels streams S-L80 and S-L79 differently than the rest of the application and does not identify how any of these streams will be crossed. It is unclear whether an existing culvert is present. Revise the application to identify these streams accurately and consistently and identify the stream crossing method. Alternatively, if an existing culvert or obstruction is to be utilized, revise the application to clearly identify this and provide supporting color photographs. [25 Pa. Code §§105.13(e)(1)(i)(C), 105.21(a)(1), 105.13(e)(1)(iv)]	Streams S-L80 and S-79 have been revised to show floodways and temporary impacts to them. Stream S-L81 was mislabeled on the E&S Sheet and has been corrected to be S-L80. Also, a temporary equipment bridge is not shown on the E&S sheet for the temporary crossing of S-L80 due to the presence of an existing culvert.
BL 35	Wetlands W-BB107 & W-BB108 are proposed to be temporarily impacted with timber matting; however, the E&S plan sheet ES-3.42 does not depict temporary matting to be used. Revise the E&S plan drawing to depict the temporary matting for the proposed temporary impacts. [25 Pa. Code §§105.13(e)(1)(i)(C), 105.21(a)(1), 105.422]	Timber matting has been added to protect Wetlands W-BB107 and W-BB108.

BL 36	Stream S-M65 is identified on plan drawing sheet 28 and the impact table as having floodway impacts proposed. However, these impacts are not depicted on the plan drawings. Revise the application to be consistent and accurate and remove the identifiers of proposed impacts if none are proposed. [25 Pa. Code §§105.13(e)(1)(i)(A), 105.13(e)(1)(i)(C), 105.21(a)(1), 105.15(a)]	Stream S-M65 shares a floodway with Stream S-L77 and the impacts to the shared floodways of all identified streams are presented in Table 3 of Attachment 11. Stream S-M65 has been removed from Table 3 due to the impacts being limited to only the floodway of Stream S-L77.
BL 37	For wetland BB124, the impact plan sheet 28 is inconsistent with the E&S plan drawing ES-3.44 and the site specific drawing. Revise the impact plan sheet to accurately delineate the ATWS for the pipe pull back area and to depict the proposed temporary workspace in the wetland along the proposed right of way (ROW). In addition, revise the impact table to accurately reflect the proposed impacts as needed. [25 Pa. Code §§105.13(e)(1)(i)(C), 105.21(a)(1), 105.13(e)(1)(i)(B), 105.15(a), 105.13(c)(2)]	The E&S Plan located in Attachment 12 has been updated to reference the site-specific drawings and eliminate any inconsistencies between the two drawing sets. The impact table has been revised accordingly.
BL 38	For wetland BB124, the E&S plan sheet ES-3.44 is not consistent with the site specific drawing for this area. The timber mat placement along the ROW is inconsistent and the timber mat placement in the ATWS for the pipe pull back area is inconsistent. Revise the plan sheets to be accurate and consistent. Include the extent and nature of the proposed permanent and temporary impacts. In addition, revise the impact table to accurately reflect the proposed impacts as needed. [25 Pa. Code §§105.13(e)(1)(i)(C), 105.21(a)(1), 105.13(e)(1)(i)(B), 105.15(a), 105.422]	The E&S Plan Sheet ES-3.44 has been revised to depict the ATWS for the pipe pull back area and to depict the proposed temporary workspace in the wetland along the proposed ROW consistently with the Chapter 105 application. The impact table has been revised accordingly.

BL 39	Stream S-L75 on Sheet 30 of 50 does not identify permanent stream impacts; however, there are two stream crossings proposed in addition to the floodway crossings. Revise the Table 3 and any plan sheets that incorrectly list the impacts to Stream S-L75. [25 Pa. Code §§105.13(e)(1)(i), 105.21(a)(1), 105.15(a)]	The stream channel itself will be crossed with a temporary bridge and a bore. However, the floodway impact was inadvertently left out as the crossing method. The impact tables and site plans have been revised to accurately list the impacts to the stream
BL 40	The August 2015 Aquatic Resource Delineation delineates wetland W-L54 as being open ended to the west where the pipeline route is now proposed. The March 2016 Aquatic Resource Report Addendum delineates the same boundaries of wetland W-L54 except that is the wetland is not identified as open ended. While the March 2016 Addendum identifies the Addendum’s study area next to this wetland, no data sheets or photographs are provided to document that this area is not a wetland. Aerial photographs indicate saturated and inundated conditions in the area of the proposed pipelines. Provide wetland determination data sheets and color photographs for this area and revise the wetland delineation accordingly as needed if the wetland(s) continue. In addition, if additional area of wetland is delineated, revise all components of the application to accurately reflect the changes. [25 Pa. Code §§105.13(e)(1)(i), 105.13(e)(1)(x)(A), 105.451, 105.21(a)(1), 105.13(e)(1)(iv), 105.15(a)]	The open ended notation on the wetland was inadvertently omitted within the Addendum Report. The wetland continues beyond the study area . Please refer to the Figure from the August 2015 Aquatic Resources Report where this wetland was fully discussed and identified.
BL 41	Revise the application to clarify how trench plugs are to be installed along the bore path for stream S-L75 as depicted on E&S plan ES-3.46. [25 Pa.	The trench plugs on E&S Plan Sheet ES-3.46 have been revised to be moved out of the bore pit near Stationing 6541+00.



	Code §§105.14(b)(4), 105.13(e)(1)(i)(C), 105.301(10), 105.15(a)]	
BL 42	Revise Impact Table 3 to identify the “Length of Centerline Stream Crossing at HDD/Bore” and “Stream Permanent Impact” for stream S-L75. [25 Pa. Code §§105.15(a), 105.21(a)(1)]	Table 3 of Attachment 11 has been revised to identify these impacts to Stream S-L75.
BL 43	The site specific plan drawing, S-L72-S-BB96-C-101, is not consistent with the proposed impacts on the E&S Plan drawings, sheets ES-3.46 & ES-3.47. Revise these plan drawings to be consistent and accurate in depicting the proposed impacts. [25 Pa. Code §§105.13(e)(1)(i), 105.301(3), 105.21(a)(1)]	E&S Sheets ES-3.46 and ES-3.47 have been updated to be consistent with the proposed impacts on the site specific plan drawing from the Chapter 105 Permit Application. Timber mats have been revised and added.
BL 44	Revise Impact Table 3 to identify the proposed temporary stream crossing of stream S-M32 as identified on the E&S plan sheet ES-3.51. [25 Pa. Code §§105.15(a)]	The stream crossing method of Stream S-M32 has been updated on Table 3 and the E&S Plan in Attachment 12. This stream will be crossed by the HDD in this area and a temporary equipment bridge to facilitate water withdrawal activities.
BL 45	The Submerged Lands License Agreement for Frankstown Branch Juniata River (S-L77, S-M31, and S-BB48 Sheets 28, 33, and 20 of Tab 7A respectively) identifies a 50-foot permanent right-of-way; however, the three plan sheets only depict Permanent Easements. Correct the plan sheets, impacts tables, and fees calculation worksheet to reflect the right-of-way licensed by the SLLA. [25 Pa. Code §§105.13(e)(1)(i)(C)]	The SLLA is an authorization to occupy submerged lands owned by the Commonwealth of Pennsylvania and is independent of the ROW, permanent easement, or size of the pipe. The permanent easement on the Joint Application site plans has been removed so that the Project’s temporary and permanent impacts are consistent with the LOD. The LOD identifies the permanent and temporary workspaces necessary for the construction, operation, and maintenance of the Project in waters of the Commonwealth. Valerie Marx at the DEP Bureau of Waterways Engineering and Wetlands has been contacted to determine the course of action for updating the information contained within the SLLA.
BL 46	The Submerged Lands License Agreement for Frankstown Branch Juniata River (S-L77, S-M31,	The SLLA is an authorization, per linear foot, to occupy submerged lands owned by the Commonwealth of

	and S-BB48 Sheets 28, 33, and 20 of Tab 7A respectively) indicates the crossings will be two parallel 20-inch lines; however, the project description and permit submission indicate one 20-inch line and one 16-inch line. Correct the submission to reflect the pipelines licensed by the SLLA. [25 Pa. Code §§105.13(e)(1)(iii)(A)]	Pennsylvania and is independent of the ROW, permanent easement, or size of the pipe. Valerie Marx at the DEP Bureau of Waterways Engineering and Wetlands has been contacted to determine the course of action for updating the SLLA with the finalized pipeline sizes.
BL 47	The water withdrawal for Stream S-L77 on Sheet 28 of Tab 7A is not located within the approved SLLA area and therefore requires a separate SLLA. Provide information for the SLLA. [25 Pa. Code §§105.31(b)(3), 105.31(c)(2)]	DEP has agreed to allow SPLP to work directly with Valarie Marx at the DEP to facilitate obtaining the appropriate SLLAs for the Project. The SLLA information for the withdrawal at this location will be submitted to Ms. Marx when it is ready and DEP copied on the correspondences.
BL 48	Revise E&S plan sheet ES-3.51 to identify the floodway boundary of stream S-M31. [25 Pa. Code §§105.13(e)(1)(i)(A)]	The floodway boundary for Stream S-M31 has been added to Sheet ES-3.52.
BL 49	Table 3 identifies the bank to bank width for stream S-M31 as 150 feet; however, it also identifies the Length of Centerline Stream Crossing at HDD/Bore as 141. These are inconsistent as the length of the pipeline crossing cannot be less than the bank to bank width. Revise and clarify the impact table to be consistent and accurate with the plans. [25 Pa. Code §§105.15(a), §105.21(a)(1)]	The data for stream bank width was collected at a slightly wider section of stream S-M31, and the crossing width was not updated for the bore. The attached revised permit application documents reflect the accurate bank width at the centerline crossing and are consistent with the impact calculations.
BL 50	Revise the impact table to separately identify the impact from the proposed travel lane on wetlands K67 and K68 and streams S-K90, S-K9, and S-K93. It is unclear if the proposed impacts are permanent or temporary. Clarify if the proposed impacts are permanent or temporary and identify the purpose of the travel lane. [25 Pa. Code §§105.13(e)(1)(i), 105.13(e)(1)(iii), 105.15(a)]	This comment is applicable to the Huntingdon County application. Table 3 of Attachment 11 has been revised to separately identify the impacts from the ROW-Travel LOD in a separate row for each resource and to indicate that the impacts are temporary. The purpose of the travel lane is to facilitate the continuous construction sequence and not cause a construction move around that would

		result in equipment “backtracking” and allow for a safer installation of the pipeline.
BL 51	It appears the road adjacent to wetland L40 is proposed to be bored. Clarify if the road is proposed to be bored, and identify the bore pits on the plan drawings. [25 Pa. Code §§105.13(e)(1)(i), 105.21(a)(1)]	The road is proposed to be bored, as presented on the submitted aerial site plans. The bore pits have been added to the revised aerial site plans provided in Attachment 7, Tab 7A.
BL 52	It appears impacts to wetland L40 could be further minimized by incorporating it into the bore. Revise the application to include boring under wetland L40 and if this is not practicable, revise the alternatives analysis to provide detailed documentation and evidence as to why this is not a practicable alternative to further avoid and minimize impacts. [25 Pa. Code §§105.14(b)(7), 105.18a(b)(3)]	The Alternatives Analysis provided in Attachment 11, Enclosure E, Part 3 has been revised to include a discussion on the limitations of trenchless methods and presents an attached trenchless feasibility assessment. The crossing at L40 was specifically evaluated and determined to not be technically feasible for HDD and potentially feasible for a bore. Further evaluation indicated that the additional cost associated with the bore extension and move around was not commensurate with the temporary impact proposed. Move arounds are of significant burden to the Project and are discussed with the revised Alternatives Analysis.
BL 53	Plan sheet 34 depicts stream S-M38 as being crossed by HDD and open cut in the floodway. Table 3 and E&S plan drawing ES-3.53 depict the floodway being entirely crossed by HDD. Revise the application to be consistent and accurate. [25 Pa/ Code §§105.13(e)(1)(i)(C), 105.21(a)(1), 105.301(3)]	Stream S-M38 is crossed by an existing access road where S-M38 is culverted. S-M38’s floodway is impacted by Permanent ROW, ROW-Travel and Clearing LOD, ATWS, and Temporary ROW. It is also directly crossed by an HDD and the Travel and Clearing LOD. All of these impacts are accounted for with Table 3 of Attachment 11. The E&S Plan and the aerial site plans located in Attachment 7, Tab 7A have been updated to depict consistent information.
BL 54	The E&S plan drawings, plan sheets ES-3.74 through ES-3.76, indicate no improvements are proposed to the road for the resource crossings. However the impact plan drawings and impact	The E&S Plan is correct and no improvements, wetland matting, or bridges are proposed. The road is in good condition and the wetlands were found to be adjacent to the LOD and the streams to be crossed are already

	<p>tables indicate temporary crossings and bridges are proposed. Revise the application accordingly to be accurate. If temporary crossings are proposed, revise the E&amp;S plan drawings to depict the impacts. If an existing road with existing obstructions crossing streams and wetlands is proposed to be utilized with no improvements proposed to the road, then provide color photographs of the resources and existing road crossings. Note: the provided photographs do not depict or clearly depict these crossings. [25 Pa. Code §§105.13(e)(1)(i)(C), 105.13(e)(1)(iii)(A), 105.13(e)(1)(iv), 105.15(a), 105.21(a)(1)]</p>	<p>culverted. Photographs of the existing crossing are provided within the supplemental wetland delineation information provided in Attachment 11. Impact to these resources have been removed from the aquatic resource tables found in Attachment 11.</p>
BL 55	<p>The proposed temporary access road depicted on plan sheets 34 through 39 deviates from the visible gravel road on the aerial photography, and appears to differ from the path on the E&amp;S plan drawings. Revise the application materials to be consistent and accurate. [25 Pa. Code §§105.13(e)(1)(i)(C), 105.21(a)(1)]</p>	<p>The aerial site plans provided in Attachment 7, Tab 7A, and the E&amp;S Plan provided in Attachment 11 have been revised to update the limits of disturbance so that they are accurate and consistent with the alignments of the road.</p>
BL 56	<p>Streams S-STV2 and S-BB71 appear to flow into each other, yet one is identified on Table 3 as UNT to Robinson Run and the other as UNT to Frankstown Branch of the Juniata River. Revise and clarify this information to be accurate and consistent. [25 Pa. Code §§105.13(e)(1)(i)(A), 105.21(a)(1), 105.15(a)]</p>	<p>Table 3 has been revised to reflect that the two streams are UNT to Robinson Run.</p>
BL 57	<p>Stream S-M34 is identified on Table 2 as a permanent floodway impact but plan sheet 40 depicts temporary floodway impacts. Revise and clarify the application to be accurate and consistent.</p>	<p>The impacts to stream S-M34 were incorrectly identified as permanent on Table 2, and should have been recorded as temporary. Table 3 of Attachment 11 has been updated to show the impacts as temporary.</p>

	[25 Pa. Code §§105.13(e)(1)(i)(C), 105.13(e)(1)(iii)(A), 105.21(a)(1), 105.15(a)]	
BL 58	Streams S-BB44 and S-L58 both propose dry crossings, which are described as using bypass pumps to maintain water flow. These streams are substantially larger than the other streams using the dry crossing method. Provide specifications that demonstrate how successful the bypass methods will be (ie. what type of coffer dam will be used, how many and what size pumps will be used, what is the duration of the pumping, what effect the pumping will have on aquatic life, etc.) [25 Pa. Code §§105.13(e)(1)(i), 105.15(a), 105.14(b)(4)]	The standard method depicted on the site-specifics maybe the pump bypass, however, as noted, the contractor has available one of four crossing methods to facilitate the crossing within the allowable time frames and the conditions of maintaining a dry crossing while maintaining stream flow. The durations of the stream crossings are indicated within the E&S Plan notes and details and within the Impact Avoidance, Minimization, and Mitigation Procedures provided in Attachment 11, Enclosure E, Part 4. With implementation of the duration restrictions and BMP crossing methods the impacts will be minor and temporary as described in Attachment 11, Enclosure D and Attachment 11, Enclosure E, Part 2.
BL 59	The Preface and Section 5 of the PPC plan state that spill prevention or notification is not required; however, spill prevention is described in Section 3.0 of the PPC plan. Furthermore, Section 5.3 of the PPC plan does not require notification of downstream users. Provide information that supports the statements that spill prevention and downstream user notification are not required. [25 Pa. Code §§105.21(a)(1), 105.13(g), §91.33(b)]	The PPC Plan has been revised to provide notification of downstream users. In addition, to supplement the PPC Plan, a Water Supply Assessment, Prevention, Preparedness, and IR Plan is provided in Attachment 12 which provide the appropriate notification procedures.
BL 60	The stream designations should not be described as “drains to.” The following streams are inaccurately identified according to Chapter 93:	The "drains to" designation was used to indicate that the crossed portion of the stream has not been formally classified in Chapter 93. However, SPLP understands that this designation is unnecessary under Chapter 93. Table 3 has been revised with a footnote to clarify that that the “drains to” is only a qualifier to help identify where and where not the designated section of the Chapter 93 classification is crossed.

BL 60.a	The unnamed tributaries to Dry Run are either listed as draining to TSF or draining to WWF; however, Dry Run is designated WWF, MF by Chapter 93. Identify why these streams are designated in such a way. [25 Pa Code §§105.15(a), 105.21(a)(1)]	These streams were listed as a TSF in error and have been corrected to reflect the WWF classification of Dry Run throughout the revised application materials.
BL 60.b	Streams S-L96, S-L97, and S-L98 are listed as an unnamed tributaries to Blair Run which is not listed in Chapter 93; however, the identified streams are tributary to Blair Gap Run via the stream locally known as Blair Run. Clarify the stream names. [25 Pa Code §§105.15(a), 105.21(a)(1)]	The United States Geologic Survey (USGS) topographic maps depict Blair Run as a stream with headwaters not far from the alignment of S-L96, which is eventually a tributary to the Hollidaysburg Reservoir, whose outflow meets with Blair Gap Run, approximately 2 linear miles north/northeast. The stream names are accurate according to USGS. However, all classifications are applied to this stream that Chapter 93 lists in Blair Gap Run.
BL 61	In accordance with the definition of Wild Trout Streams in Chapter 105 and PAFBC regulations, streams which drain to stream reaches on the list of streams which support natural trout reproduction are also wild trout. Therefore, revise Table 3 to identify all streams which flow into streams on this PAFBC list as wild trout, or Trout Natural Reproduction. Please note that the Frankstown Branch of the Juniata River and the Little Juniata River are on this list. [25 Pa. Code §§105.1, 105.15(a), 105.21(a)(1); 58 Pa Code §57.11(b)(4)]	Table 3 of Attachment 11 has been revised to indicate which streams are tributaries to Wild Trout Streams or where PAFBC has determined there is a naturally reproducing trout population based on DEP guidance, PAFBC shapefiles, webpages, and/or communications.
BL 62	Provide site specific cross sections for the streams and wetlands which depict the existing and proposed conditions of the streams and wetlands, proposed pipes and depths, the existing stream bed and banks dimensions. [25 Pa. Code §§105.13(e)(1)(i)(G), 105.14(b)(4), 105.301(3), 105.301(4), 105.301(5)]	The site- specific cross sections are located in Attachment 7, Tab 7G for intermittent and perennial stream crossings that do not have site-specific (Attachment 12), HDD (Attachment 7, Tab 7B), or bore (Attachment 7, Tab 7C) drawings prepared which contain profile information. All existing bank and wetland dimensions are provided within the aquatic resource tables provided in Attachment

		11. Typical cross-sectional details are provided within the E&S Plan Sheets that accommodate the lesser and more minor stream crossings (e.g., those designated ephemeral). All bed and bank and wetland contours are to be restored to the existing condition in accordance with the Impact Avoidance, Minimization, and Mitigation Procedures provided in Attachment 11, Enclosure E, Part 4.
BL 63	The Mitigation Plan states that the excavated stream banks will be reseeded; however the E&S detail for bank restoration does not indicate this. Revise the Bank Restoration Detail to be consistent and include the native seeding mixture to be utilized. [25 Pa. Code §§105.13(e)(1)(ix), 105.14(b)(4), 105.21(a)(1)]	The bank restoration details have been revised to indicate that stream banks will be reseeded in accordance with the approved seed mixes.
BL 64	The E&S plan details for temporary stream crossings and plan drawings state timber mats or temporary equipment bridge may be utilized but only depicts a timber mat bridge. Provide details for the proposed temporary equipment bridge(s) which depict the size, shape, and span of the structure. Provide separate details depicting the timber mat and other bridge structure crossing's cross sections. In addition, revise the E&S plan and/or other plan drawings to identify the method of each temporary stream crossing proposed at each location. [25 Pa. Code §§105.13(e)(1)(C), 105.13(e)(1)(i)(G), 105.13(e)(1)(iii)(A), 105.151(1), 105.21(a)(1)]	The E&S plans (Attachment 12) have been revised to identify that a temporary equipment bridge will be installed or temporary timber matting for wetland will be installed. The contractor is then obligated to utilize any of the approved methods for these crossing types provided within the E&S Notes and Details. Exact dimensions will be dictated by the location and method chosen.
BL 65	The Typical Wetland Crossing detail on the E&S plans indicates trench breakers are to be installed in the trench in the wetlands; however it is not clear what trench breakers are or if trench plugs are what	The wetland standard typical crossing detail ES-0.15 has been updated to include trench plugs within the wetland for long open-cut wetland crossings. Also, the E&S plan

	is intended by this term. Revise this detail to identify if trench plugs are intended by this term or provide a detail for trench breakers. [25 Pa. Code §§105.13(e)(1)(i), 105.301, 105.21(a)(1)]	drawings have been revised to be consistent with the detail.
BL 66	Trench plugs are proposed to be located at wetland/upland interfaces. Additional trench plugs may be necessary along the length of the crossing due to the length and/or slope to maintain hydrology throughout the wetland. Review and revise the application and plans accordingly. Some additional guidance is available in the PA E&S Control BMP Manual. [25 Pa. Code §§105.13(e), 105.18a ]	The wetland standard typical crossing detail has been updated to include trench plugs within the wetland for long open-cut wetland crossings. Also, the E&S plan drawings have been revised to be consistent with the detail.
BL 67	The site specific Bore Plan for wetland M35 depicts temporary workspaces inside the wetland. However, the site plan drawing and E&S plan drawing do not depict any workspaces in the wetland. Revise the Bore Plan drawing to be consistent with the rest of the plans, and depict the proposed bore pits, trench plugs, and other proposed work. [25 Pa. Code §§105.13(e)(1)(i)(C), 105.13(e)(1)(i)(G), 105.301(2), 105.301(5), 105.21(a)(1)]	There are no temporary workspaces inside wetland M35. The bore plan for wetland M35 and the E&S drawing have been checked and updated to be consistent.
BL 68	There are plan sheets in Tab 7A with streams that do not show enough information beyond the temporary right-of-way (ie. Floodway delineation, stream orientation, and hydrologic connections) to properly evaluate the proposed impacts. Provide a better depiction of the streams outside of the proposed temporary rights of way. [25 Pa. Code §§105.13(e)(1)(i)(A)]	The plans in Attachment 7, Tab 7A provide the delineation of resources beyond the LOD. Delineations were performed on a 200-foot-wide survey corridor. Reroutes and Project changes were also field-delineated and delineations occurred beyond the Project areas to capture adjacent resources.



BL 69	<p>The ATWS area in the floodways of Streams S-L75 and S-L76 on Sheets 29 and 30 of Tab 7A is designated for spoil; however a plan depicting the location of the spoil in conjunction with E&amp;S controls could not be found. Provide plans that demonstrate proper measures to minimize the potential for discharge of fill material to the stream. [25 Pa. Code §§105.13(g)]</p>	<p>A standard typical detail has been added to the E&amp;S Plan sheet set located in Attachment 12 to depict protection measures to be implemented when spoil is located within floodways, floodplains, or wetlands. Where applicable, standard typical details for stream crossings found within the E&amp;S Plan located in Attachment 12 also depict protection measures for spoil.</p>
BL 70	<p>The ATWS area in the floodway of Stream S-M32 Sheet 33 of Tab 7A is designated for spoil; however a plan depicting the location of the spoil in conjunction with E&amp;S controls could not be found. Provide plans that demonstrate proper measures to minimize the potential for discharge of fill material to the stream. [25 Pa. Code §§105.13(g)]</p>	<p>A standard typical detail has been added to the E&amp;S Plan sheet set located in Attachment 12 to depict protection measures to be implemented when spoil is located within floodways, floodplains, or wetlands. Where applicable, standard typical details for stream crossings found within the E&amp;S Plan located in Attachment 12 also depict protection measures for spoil.</p>
BL 71	<p>It appears that the temporary road will run in and along Stream S-BB70 on Sheet 37 of Tab 7A instead of across or parallel to it. Whenever possible, the temporary crossing should cross the stream in a perpendicular fashion. Correct the plan to avoid the increased impact. [25 Pa. Code §§105.13(e)(1)(viii)]</p>	<p>The alignment of the road has been field surveyed and the stream runs parallel to the road not in it. The Project maps, plans, and impacts have been adjusted accordingly including the aerial site plans provided in Attachment 7, Tab 7A.</p>
BL 72	<p>Temporary road stream crossing details utilizing culverts are provided on E&amp;S plans ES-0.09 and ES-0.11; however, the E&amp;S plans and impact plans do not identify that any of these crossings are to be used. Revise the E&amp;S plans to remove these proposed crossing methods if not proposed to be utilized, or identify where the proposed crossing methods will be utilized. [25 Pa. Code §§105.13(e)(1)(i)(C), 105.151(1), 105.21(a)(1), 105.13(e)(1)(iii)(A)]</p>	<p>The E&amp;S plans (Attachment 12) have been revised to identify that a temporary equipment bridge will be installed at the location. The contractor is then obligated to utilize any of the approved methods for these crossing types provided within the E&amp;S Notes and Details, including a culverted crossing.</p>

BL 73	Revise the stream Bank Restoration Detail to clearly indicate that the existing bank slope and grade and elevation are to be restored, to identify a biodegradable erosion control blanket to be utilized, and to specify the native plantings to be used. In addition, some stream banks are likely to be a-typical, like vertical banks, or very low banks, or eroding banks. Provide plans and details for how banks of a-typical conditions will be restored. [25 Pa. Code §§105.13(e)(1)(i)(G), 105.13(e)(1)(ix), 105.1, 105.13(e)(1)(x), 105.15(a)(1), 105.14(b)(4), 105.16(d)]	The E&S Plan provided in Attachment 12 was revised to indicate that the existing stream bank slope and grade and elevation will be restored. In addition, the E&S plan identifies the biodegradable erosion control blanket to be utilized and the native plantings to be used. The BMPs for restoring streams are also discussed within the Impact Avoidance, Minimization, and Mitigation Procedures found in Attachment 11, Enclosure E, Part 4 and are consistent with the E&S Plan.
BL 74	Provide plans or a detail for the restoration of stream beds at open cut stream crossings. This should include replacement of native stream bed material and assurance that no significant changes in bed grade occur. [25 Pa. Code §§105.13(e)(1)(i)(G), 105.13(e)(1)(ix), 105.1, 105.13(e)(1)(x), 105.15(a)(1), 105.14(b)(4), 105.16(d)]	Native stream bed material will be separated from other spoil for reinstallation after restoration (see the E&S Plan provided in Attachment 12). An evaluation was done for sheer stress of flow against restored native material. If the evaluation indicated that the stream will not be stable with native material, then rip rap will be used. In these cases, native stone will be used for the top six inches of rip rap. Also, the BMPs for stream bed restoration are discussed within the Impact Avoidance, Minimization, and Mitigation Procedures found in Attachment 11, Enclosure E, Part 4 and are consistent with the E&S Plan.
BL 75	Provide a description of the expected duration each temporary stream crossing will remain in place. [25 Pa. Code §§105.13(1)(iii)(A)]	The temporary stream crossings will remain in place for no greater than one year.
BL 76	The length of Centerline crossing for wetland L54 does not appear to be correct. The HDD crossing of PPP 1 scales closer to 780 feet rather than 724 feet. Clarify this discrepancy and make any	Table 2 of Attachment 11 and the aeriels site plans in Attachment 7, Tab 7A accurately identifies the crossing lengths of the HDD under wetland L54.

	necessary corrections to reported impacts. [25 Pa. Code §§105.21(a)(1)]	
BL 77	<p>Revise the application plans to include all avoidance and minimization measures for identified species of concern associated with water obstructions and encroachments from the Pennsylvania Game Commission, Pennsylvania Fish and Boat Commission, Pennsylvania Department of Conservation and Natural Resources, and the U.S. Fish and Wildlife Service. Ensure any seed mixtures, matting, or other specified items are included in the plans and/or E&amp;S plans. In addition, revise the Environmental Assessment to discuss the avoidance and minimization measures and clearances received. [25 Pa. Code §§105.15(a), 105.14(b)(4), 105.16(c)(3)]</p>	<p>To ensure contractor compliance, SPLP has developed a state-of-the-art web-based mapping applications that is required to be used by the contractor to determine all special environmental restrictions such as Pennsylvania Natural Diversity Inventory (PNDI) and trout stream restrictions. All of the restrictions and avoidance measures committed to and approved by PNDI agencies are included in the Project Description within a summary table and within the PNDI agency final determination letters and accepted Conservation Plans included in Attachment 6, Tab B. The same notes in the Project Description are reflected within the E&amp;S Plan notes. Trout stream restrictions and other sensitive species restrictions are also noted on aerial site plans and E&amp;S Plans. SPLP will implement a comprehensive Environmental Training and Inspection program designed specifically to ensure contractors are appropriately notified and are adhering to such restrictions. The Environmental Assessment has been revised to discuss the avoidance and minimization measures and clearances received.</p>
BL 78	<p>Stream S-M35 does not directly cross the proposed ROW and pipelines and flows in and along the proposed ROW and pipelines for some distance and is not consistent with the typical details. Provide site specific plan drawings, cross sections and profiles which depict the existing, proposed, and restoration conditions. Note: if stream relocation is proposed, the requirements of 25 Pa. Code Chapter 105 Subchapter E. must be provided and met. [25</p>	<p>Site Specific Plans located in Attachment 7, Tab 7D have been revised to address complex aquatic resource crossings including Stream S-M35 and provide existing condition, E&amp;S Plan, and restoration plan drawings.</p>

	Pa. Code §§105.13(e)(1)(i), 105.301(1), 105.301(4), 105.301(5), 105.301(8)]	
BL 79	Multiple streams which begin within the proposed ROW or immediately adjacent to it are proposed to be crossed by the proposed pipelines. Revise the application to discuss and provide plans outlining how source(s) of the streams will be protected and maintained. Revise the Environmental Assessment and Mitigation Plan to discuss the impacts to the streams both within the ROW and the downstream affects to the resources and properties. Provide compensatory mitigation for streams in which flow will be adversely affected. Provide this information for the following streams, at a minimum: S-M77, S-M71, S-M68, S-M67, S-BB42, S-BB96, S-L69, and S-L67. [25 Pa. Code §§105.13(e)(1)(ix), 105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(12), 105.14(b)(3), 105.15(a)(1), 105.16(d)]	As described within the enclosures of the Comprehensive Environmental Evaluation provided in Attachment 11, impacts to water resources, including S-M77, S-M71, S-M68, S-M67, S-BB42, S-BB96, S-L69, and S-L67 have been minimized to the maximum extent practicable. Where planned, the crossing and restoration of all Project streams will use temporary equipment bridge installation and dry crossing trenching methods as outlined and described within the E&S Plan provided in Attachment 12 and the Impact Avoidance, Minimization, and Mitigation Procedures provide in Attachment 11, Enclosure E, Part 4. These methods are designed in accordance with the DEP E&S Manual to maintain flow, protect sources, and minimize direct and secondary impacts to on-site and offsite resources. Similarly, adjacent resources are protected from secondary impacts through implementation of the E&S Plan in areas outside of aquatic resources. The Comprehensive Environmental Evaluation demonstrates that when implementing these methods along with site restoration, impacts to water resources are temporary and minor. The Environmental Assessment has been revised to discuss the avoidance and minimization measures and clearances received.
BL 80	The following items pertain to inconsistencies with stream resource identification. [25 Pa. Code §§105.21(a)(1), 105.13(e)(1)(A)]	NA – Heading
BL 80.a	The Aquatic Resources report on page 3-31 and page 4 of Table 1 indicate that S-BB44 is 35 feet bank to bank; however, Table 3 of Section 11	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.

	indicates the width is 40 feet. Clarify this discrepancy.	
BL 80.b	The Aquatic Resources report on page 3-30 and page 4 of Table 1 indicate that S-BB42 is 6 feet bank to bank; however, Table 3 of Section 11 indicates the width is 8 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.c	The Aquatic Resources report on page 3-30 and page 4 of Table 1 indicate that S-BB49 is 4.5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 6 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.d	The Aquatic Resources report on page 3-30 and page 4 of Table 1 indicate that S-BB48 is 80 feet bank to bank; however, Table 3 of Section 11 indicates the width is 85 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.e	The Aquatic Resources report on page 3-30 and page 4 of Table 1 indicate that S-BB47 is 3.5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 4 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.f	The Aquatic Resources report on page 3-31 and page 4 of Table 1 indicate that S-BB43 is 2 feet bank to bank; however, Table 3 of Section 11 indicates the width is 3 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.g	The Aquatic Resources report on page 3-31 and page 4 of Table 1 indicate that S-BB88 is 4 feet bank to bank; however, Table 3 of Section 11 indicates the width is 5 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.

BL 80.h	The Aquatic Resources report on page 3-31 and page 4 of Table 1 indicate that S-BB89 is 2.5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 3 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.i	The Aquatic Resources report on page 3-31 and page 4 of Table 1 indicate that S-BB80 is 6.5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 8 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.j	The Aquatic Resources report on page 3-31 and page 4 of Table 1 indicate that S-BB79 is 3 feet bank to bank; however, Table 3 of Section 11 indicates the width is 4 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.k	The Aquatic Resources report on page 3-32 and page 4 of Table 1 indicate that S-BB91 is 5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 7 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.l	The Aquatic Resources report on page 3-32 and page 4 of Table 1 indicate that S-BB92 is 6.5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 8 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.m	The Aquatic Resources report on page 3-32 and page 4 of Table 1 indicate that S-BB95 is 2 feet bank to bank; however, Table 3 of Section 11 indicates the width is 3 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.n	The Aquatic Resources report on page 3-33 and page 4 of Table 1 indicate that S-L68 is 2 feet bank	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource

	to bank; however, Table 3 of Section 11 indicates the width is 3 feet. Clarify this discrepancy.	reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.o	The Aquatic Resources report on page 3-34 and page 5 of Table 1 indicate that S-M31 is 143 feet bank to bank; however, Table 3 of Section 11 indicates the width is 150 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.p	The Aquatic Resources report on page 3-35 and page 5 of Table 1 indicate that S-BB78 is 5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 7 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.q	The Aquatic Resources report on page 3-35 and page 5 of Table 1 indicate that S-BB77 is 4.5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 6 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.r	The Aquatic Resources report on page 3-35 and page 5 of Table 1 indicate that S-BB76 is 3 feet bank to bank; however, Table 3 of Section 11 indicates the width is 4 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.s	The Aquatic Resources report on page 3-35 and page 5 of Table 1 indicate that S-BB75 is 3 feet bank to bank; however, Table 3 of Section 11 indicates the width is 4 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.t	The Aquatic Resources report on page 3-35 and page 5 of Table 1 indicate that S-BB74 is 6 feet bank to bank; however, Table 3 of Section 11 indicates the width is 8 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.

BL 80.u	The Aquatic Resources report on page 3-36 and page 5 of Table 1 indicate that S-BB73 is 3.5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 5 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.v	The Aquatic Resources report on page 3-36 and page 5 of Table 1 indicate that S-BB72 is 6 feet bank to bank; however, Table 3 of Section 11 indicates the width is 2 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.w	The Aquatic Resources report on page 3-36 and page 5 of Table 1 indicate that S- BB70 is 3.5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 5 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.x	The Aquatic Resources report on page 3-36 and page 5 of Table 1 indicate that S- BB71 is 2 feet bank to bank; however, Table 3 of Section 11 indicates the width is 3 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.y	The Aquatic Resources report on page 3-37 and page 5 of Table 1 indicate that S-BB69 is 5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 8 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.z	The Aquatic Resources report on page 3-37 and page 5 of Table 1 indicate that S-BB68 is 2.55 feet bank to bank; however, Table 3 of Section 11 indicates the width is 3 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.aa	The Aquatic Resources report on page 3-37 and page 5 of Table 1 indicate that S-BB67 is 6 feet	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource



	bank to bank; however, Table 3 of Section 11 indicates the width is 8 feet. Clarify this discrepancy.	reports were estimated. Table 3 now has a footnote to include this explanation.
BL 80.bb	The Aquatic Resources report on page 3-37 and page 5 of Table 1 indicate that S-BB66 is 5 feet bank to bank; however, Table 3 of Section 11 indicates the width is 6 feet. Clarify this discrepancy.	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 81	Provide site-specific plans and cross sections depicting the size and height for the proposed “Block Valve Settings”, their limits of disturbance, permanent access roads, and all other permanent grading and structures located in waters of the Commonwealth and floodplains. This should include plans depicting the size and height of structures located in the floodway and floodplain. The original revision submitted November 25, 2015 removed the block valve setting on Sheet 34 from the floodplain; however, the March 25, 2016 and subsequent May 31, 2016 submissions both depict the area within the floodplain. [25 Pa. Code §§105.13(1)(i), 25 Pa. Code §§106.12(d)(2)]	This comment is in reference to the Juniata River West block valve proposed in Frankstown Township. Since such activities and structures within the floodway portion of the overall floodplain are already regulated under the Chapter 105 Rules and Regulations, the Chapter 106 requirements are basically limited to the floodway fringe area (located along the outside of the floodway, but within the 100 year floodplain). A small portion of the temporary workspace (limits of disturbance) for the Juniata River West block valve would be located outside of the floodway area, but within the 100-year floodplain area (floodway fringe); however construction in this workspace would be temporary, and restored to original grade. The PCSM Plan is provided for this Block Valve in Attachment 12 along with the E&S Plan. The mechanical drawings provide the dimensions of the installed facilities above ground. The design plans are provided as well as photographs of what the typical layout will be.
BL 81.g	For buildings subject to § 106.31(c) (relating to hydraulic capacity), an evacuation plan which fully explains the manner in which the site will be safely evacuated before or during a flood event. [25 Pa. Code §§106.12(d)(5)]	There are no buildings to be constructed that will have occupants in Blair County and no above ground structures in Chapter 106 areas in Blair County and therefore 106.31(c) is not applicable.

BL 81.h	Provide a Floodplain management analysis and a consistency letter from the appropriate municipalities for all proposed access roads, structures, and grading in floodplains. [25 Pa. Code §§106.12(d)(1)]	This comment is in reference to the Juniata River West block valve proposed in Frankstown Township. A floodplain management analysis was sent to Frankstown Township in November 2015. Frankstown Township issued a consistency determination on November 16, 2015. As discussed in the Frankstown Township letter, the Project appears to be consistent with the floodplain ordinance since SPLP will be applying for water obstruction and encroachment permits for the temporary construction impacts located within the floodplains of the Township. In addition to the above, detailed design drawings will be provided to the municipality (per the Township's request) once SPLP receives all required agency approvals for the Project.
BL 82	Revise the application to clarify if the exceptional value wetland analysis included all factors listed in 25 Pa Code §105.17(1). If the analysis did not consider all factors, revise it to analyze all factors and update the application. [25 Pa. Code §§105.13(e)(1)(x)(B), 105.17(1)]	The Exceptional Value Wetland analysis is now detailed in Attachment 11, Enclosure E, Part 2 and specifically indicates that the Exceptional Value Wetland analysis included all factors listed in 25 Pa. Code § 105.17(1), including a thorough and detailed analysis of public and private water supply well proximity to the Project; proximity, presence and habitat potential for protected species (dependent on wetland habitats); proximity of wetlands to naturally reproducing trout waters; proximity of wetlands to sections of streams designated "wild" and/or "scenic"; proximity of wetlands to streams designated as "Exceptional Value" in Chapter 93; and proximity of wetlands located in areas designated by DEP as "natural" and/or "wild" within Lands owned by the Commonwealth.
BL 83	The Department has identified that at least the following wetlands which are exceptional value and	All of these wetlands have been designated as Exceptional Value based on further analysis of their proximity to

	<p>which have not been identified as such in the application: L61, M57, M56, Q52, M55, BB120, M79, M49, BB58, BB51, BB56, BB108, BB124, Q60, and BB101. Also, wetland BB52 appears likely to be EV based on a review of aerial mapping and what appears to be stream and wetland presence outside of the survey area. This wetland should be evaluated to determine if it continues and is in or along the reach of a wild trout stream or tributary thereto. Revise the application accordingly to identify Exceptional Value wetlands. [25 Pa. Code §§105.13(e)(1)(x)(B), 105.17(1)]</p>	<p>streams that drain to reaches with PAFBC-designated naturally reproducing trout populations. The aquatic resource impact tables provided in Attachment 11 have been revised to reflect this information.</p>
BL 84	<p>The Mitigation Plan states that for HDD crossings, a telemetry guidance system will be used.</p>	<p>NA – Heading</p>
BL 84.a	<p>Revise the application to identify what type of telemetry guidance system will be utilized; specifically if it will utilize cables, wires, or other obstructions placed or strung across waters of the Commonwealth. [25 Pa. Code §§105.13(e)(1)(iii), 105.13(e)(1)(i), 105.301(7)]</p>	<p>Telemetry guidance systems for HDDs can include a cable, wire, or other obstructions to be placed in waters of the Commonwealth.</p>
BL 84.b	<p>If cables, wires, or other obstructions will be utilized across waters of the Commonwealth revise the application to identify these temporary impacts, include them in the impact tables. Provide plan drawings and cross sections depicting the obstructions, and provide information on the purpose, function, and length of time they will be installed. [25 Pa. Code §§105.13(e)(1)(i), 105.301(3), 105.301(5), 105.15(a), 105.13(e)(1)(iii)]</p>	<p>When used, the HDD cable will be aligned along the proposed pipeline centerline (above the drill path); accordingly, the impact calculations and application fees are already accounted for within the application. For HDDs of waters of the Commonwealth where a telemetry guidance system will consist of cables, wires, or other obstructions to be placed in waters of the commonwealth, and as required based on SPLP’s coordination with PA Fish and Boat Commission (PAFBC), an Aids to Navigation (ATON) Plan has been prepared and provided in Attachment 7B. This plan explains the use and placement of this telemetry guidance system, includes</p>

		plan and profile drawings, and describes the length of time it will be present in the resource.
BL 84.c	If cables or other obstructions are proposed over streams, an Aids-To-Navigation (ATON) Plan may be required by the PA Fish and Boat Commission; therefore, if cables or other obstructions are proposed, provide approved ATON plans along with approvals and/or documentation from the PA Fish and Boat Commission documenting where ATON plans are not applicable. Contact Thomas Burrell with the Pennsylvania Fish and Boat Commission at 717.705.7838 regarding ATON requirements. [25 Pa. Code §§105.14(b)(6), 105.21(a)(2), 105.14(b)(2)]	For HDDs of waters of the Commonwealth where a telemetry guidance system will consist of cables, wires, or other obstructions to be placed in waters of the commonwealth, and as required based on SPLP's coordination with PA Fish and Boat Commission, an Aids to Navigation (ATON) Plan has been prepared and provided in Attachment 7B.
BL 85	The impacts described under Section 5.0 of the Mitigation Plan are inconsistent with the impacts provided in the impact tables in the Environmental Assessment. Revise this inconsistency to state the correct impact totals throughout the application. [25 Pa. Code §§105.15(a), 105.21(a)(1), 105.13(e)(1)(i)(ix)]	These documents have been adjusted to avoid inconsistencies, and the impacts are now represented in Attachment 11, Enclosure D – Project Impacts, Enclosure E, Part 2 – Project-wide Resource Identification and Project Impacts, and also, the Compensatory Mitigation Plan in Enclosure F.
BL 86	Provide information about the pump size, flow rate, and duration of use for those open cut crossings (dry crossings) that will use the typical bypass pump-around method. Provide justification for why larger streams do not utilize the proposed flume option. How will aquatic life be able to pass throughout the stream safely? [25 Pa. Code § 105.401(4), 105.13(g)]	The contractor has available one of four crossing methods to facilitate the crossing within the allowable time frames and the conditions of maintaining a dry crossing while maintaining stream flow. The durations of the stream crossings are indicated within the E&S Plan notes and details and within the Impact Avoidance, Minimization, and Mitigation Procedures provided in Attachment 11, Enclosure E, Part 4. With implementation of the duration restrictions and BMP crossing methods the impacts will be minor and temporary as described in Attachment 11, Enclosure D and Attachment 11, Enclosure E, Part 2.

BL 87	<p>The application states that the period of instream work to install the proposed pipeline(s) will be less than 24 hours in minor waterbodies and 48 hours for crossing of “intermediate” (10-30’ across) waterbodies. Describe how these timeframes coincide with the hydrostatic testing procedures outlined in the project description. Do the trenches remain open during testing? To facilitate the further understanding of your project, revise your application to discuss the estimated time installation will take in crossings of wetlands and larger watercourses. [25 Pa. Code § 105.13(e)(1)(iii)]</p>	<p>For the open cut crossings of larger waters, the E&amp;S Plan notes and details provided in Attachment 12 and Impact Avoidance, Minimization, and Mitigation Procedures (Attachment 11, Enclosure E, Part 4) have been revised to indicate that in-stream work to occur in minor water bodies (&gt;10 feet wide) within 24 hours, and in major water bodies (10 to 100 feet wide) within 48 hours. Open-cut wetlands are tested along with the mainline testing and testing would be when the mainline is ready. Stream and wetland crossings are immediately backfilled and prior to testing.</p>
BL 88	<p>Public water supplies are located within in the vicinity of the proposed pipeline. The application states that there will not be any impacts the water supplies as a result of the pipeline. Provide the supporting documentation that led to this conclusion. Locate the public drinking water supplies in the vicinity of the proposed pipeline. Additionally, we recommend that you contact any public water supplier in order to help determine if your project will impact the public water supplier and subsequently provide documentation of interactions, through correspondence, with each supplier. Ensure all Public water supplies in the vicinity of the proposed pipeline are identified within the location map. Enclosed are instructions on how to utilize DEP’s eMapPA to identify public water supplies in the vicinity of your project. [25 Pa. Code §§105.13(e)(1)(ii) &amp; 105.13(e)(1)(x) &amp; 105.14(b)(5)]</p>	<p>Water supply impacts have been analyzed and addressed within three supplemental plans to the Preparedness, Prevention, and Contingency Plan (PPC Plan), the Water Supply Plan, the IR Plan, and the Void Mitigation Plan for Karst Terrain and Underground Mining. These plans address the elements of this comment, and are provided in Attachment 12.</p>

BL 88.a	Upon identification of public drinking water supplies, revise questions 14.0, 15.0, and 16.0 of the General Information Form accordingly. [General Information Form Instructions]	The responses to questions 14, 15, and 16 of the General Information Form in Attachment 1 have been revised to address this comment.
BL 88.b	Upon identification of public drinking water supplies, revise the Environmental Assessment Form and associated enclosures accordingly to discuss the resources and impacts from water obstructions and encroachments on the public water supplies. [25 Pa. Code §§105.15(a), Environmental Assessment Form Instructions]	Attachment 12, Tab 12B provides a new Water Supply Assessment, Preparedness, Prevention and Contingency Plan, which discusses the potentially affected resources and impacts from water obstructions and encroachments on public water supplies.
BL 88.c	Upon identification of public drinking water supplies, revise the Alternatives Analysis and Mitigation Plan accordingly to avoid and minimize impacts to public water supplies and provide a detailed discussion on alternative routes, designs and methods documenting that there is no practicable alternative to further avoid and minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.13(e)(1)(ix), 105.14(b)(5)]	The Alternatives Analysis in Attachment 11, Enclosure E, and the Impact, Avoidance, and Minimization, Mitigation Procedures in Attachment 11, Enclosure E, Part 4 have been revised to provide a detailed discussion of alternative routes, designs and methods and to demonstrate that there is no practicable alternative to further avoid and minimize impacts.
BL 89	The application does not identify if the resources proposed to be affected are part of or located along a private water supply, including surface and groundwater sources. Revise the application and the Environmental Assessment to identify if any of the proposed resources are part of or located along a private water supply. [25 Pa. Code §§105.15(a), Environmental Assessment Form Instructions]	Water supply impacts have been analyzed and addressed within three supplemental plans to the Preparedness, Prevention, and Contingency Plan (PPC Plan): the Water Supply Plan, the IR Plan, and the Void Mitigation Plan for Karst Terrain and Underground Mining. These supplemental plans are provided in Attachment 12.
BL 89.a	If private water supplies are identified, revise Enclosures C and D of the Environmental Assessment to identify them and discuss the	Water supply impacts have been analyzed and addressed within three supplemental plans to the PPC Plan: the Water Supply Plan, the IR Plan, and the Void Mitigation

	impacts on them from the proposed water obstructions and encroachments	Plan for Karst Terrain and Underground Mining. These supplemental plans are provided in Attachment 12.
BL 89.b	Provide procedures that will be followed to investigate and resolve impacts to private water supplies should they occur as a result of the proposed activities. These procedures should discuss, at a minimum, how private water supply owners will be alerted in the event of an inadvertent return and how impacts will be resolved and/or mitigation.	Attachment 12, Tab 12B includes a Water Supply Assessment, Prevention, Preparedness, and Contingency Plan that addresses potential impacts and describes the procedures to prevent and prepare for resolution of water supply impacts should they occur, including notification procedures.
BL 90	Section F, Attachment 11, EA Form, Page 2, item 7 states, “Is the water resource part of or located along a private or public water supply?” The Applicant checked “No”. However, no documentation validating this statement is provided in the application. The Department is concerned that private and perhaps public water supply wells are located along crossed stream and wetland water resources and/or along the length of the HDD operations. The applicant needs to propose measures to protect all water uses, both surface intakes and groundwater sources, located along and/or downstream of the proposed work areas. Special attention needs to be applied to the potential unplanned impacts that HDD and inadvertent releases (IR) may have on groundwater sources. In addition, where a structure or activity is in a wetland, the applicant must demonstrate that this project will not cause or contribute to the pollution of groundwater or surface water resources or diminution of resources sufficient to interfere with their uses, including use as a public or private	Water supply impacts have been analyzed and addressed within three supplemental plans to the PPC Plan, the Water Supply Plan, the IR Plan, and the Void Mitigation Plan for Karst Terrain and Underground Mining. These plans are provided in Attachment 12 and the EAF revised accordingly. These plans provide instructions and procedures to facilitate the avoidance and minimization of impacts and provides the framework to investigate and resolve impacts caused by spills, releases, and other pollution events should they occur. Applicable public private downstream user information is compiled within the Water Supply plan and identification, notification, and testing procedure for private wells discussed.

	<p>water supply. Your assessment needs to include identification, notification and consultations with water suppliers and/or well owners. A notification contact list needs to be included in your PPC Plan and Inadvertent Release Plan. [25 Pa Code §105.13; §105.14(b)(4); §105.14(b)(5); §105.18a(5); §105.18a(b)(5); §91.33(b)].</p>	
BL 91	<p>Based on the information in the application, it appears that wetland functions and values are present in multiple wetlands which have not been identified in the functions and values assessments and descriptions table (ex. wildlife habitat, groundwater discharge/recharge, flood flow alteration, and nutrient removal). Based on the information provided, the functions and values have been applied inconsistently across the wetlands. Re-evaluate and revise the functions and values assessments and descriptions for all wetlands. [25 Pa. Code §§105.13(e)(2), 105.13(e)(3), 105.14(b)(13), 105.15(a), 105.18a(a)(1), 105.18a(b)(1), 105.14(b)(4)]</p>	<p>Functions and values have been evaluated consistently throughout all wetlands within the Project area and all applicable functions and values at each wetland have been identified. An updated function and values assessment is included in Attachment 11, Enclosure C.</p>
BL 92	<p>Revise the description of wetland functions and values to not only include the principle functions and values, but all the functions and values the wetlands provide. [25 Pa. Code §§105.13(e)(2), 105.14(b)(13), 105.15(a)]</p>	<p>All functions and values have been evaluated for all wetlands. The Principal Functions and Values are identified on the Wetland Function-Value Evaluation for Exceptional Value wetlands. In many cases, all functions and values may be Primary; however, secondary functions and values are also identified for each wetland.</p>
BL 93	<p>Provide an assessment of the functions and values of any additional Exceptional Value wetlands and wetland with impacts over 1 acre. [25 Pa. Code §§105.13(e)(3), 105.15(a)]</p>	<p>Detailed functions and values assessments have been included for all Exceptional Value wetlands regardless of acreage.</p>



<p>BL 94</p>	<p>Enclosure C of the Environmental Assessment discusses the various sections in terms relative to the existing pipeline ROW; however, the proposed ROW does not fully overlap the existing ROW but abuts/parallels the existing ROW. Revise Enclosure C to discuss the functions, habitat, and other factors in Enclosure C outside of the existing ROW and in areas of proposed impact and the overall resources. [25 Pa. Code §§105.13(e)(1)(x), 105.15(a), 105.14(b)(4)]</p>	<p>Attachment 11, Enclosure C has been revised to clarify that there are Project areas that do not completely overlap the existing ROW. The Application, including Enclosure C, discusses all temporary and permanent impacts upon resources as a result of the entire Project, including resources inside and outside the ROW.</p>
<p>BL 95</p>	<p>Revise Enclosures C &amp; D to discuss the watercourses and wetlands proposed to be impacted and the impacts on them, and not discuss the impacts in general terms of the overall project or general type of impacts. [25 Pa. Code §§105.13(e)(1)(x), §105.15(a)]</p>	<p>Enclosure C of the Environmental Assessment has been revised to provide more detailed discussion of the existing aquatic resources and wetland functions and values within the proposed ROW. Enclosure D of the Environmental Assessment has been revised to provide more detailed discussion of the impacts to existing aquatic resources and wetland functions and values within the proposed ROW.</p>
<p>BL 96</p>	<p>Sections D.4 D.1, B.1, and B.1, D.1, D.4, and D.5 of Enclosure C of the Environmental Assessment identifies trails, State Game Lands, watersheds, and observation and habitat areas which are not located in Blair County. Revise the Environmental Assessment to identify areas in Blair County in the vicinity of the proposed project. [25 Pa. Code §§105.21(a)(1), §105.15(a), 105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(5)]</p>	<p>Enclosures C and D have been revised to only include locations in the county, and exclude locations that are not in the county. A new Attachment 11, Enclosure E, Part 4 - "Comprehensive Environmental Evaluation" provides the comprehensive list and evaluation of such locations and impacts Project-wide, to address DEP comments to provide Project-wide evaluations.</p>
<p>BL 97</p>	<p>The application states that topsoil will be segregated. Provide a revised Enclosure D of the Environmental Assessment that explains how the topsoil depth will be determined in the field. [25 Pa. Code §§105.15(a), 105.15(b), and Environmental Assessment Instructions]</p>	<p>Topsoil depth varies considerably from site to site and within the site. Accordingly, topsoil depth will be determined in the field by experienced construction contractors by and/or the EI through visual observation.</p>

BL 98	Update and revise section A.3 of Enclosure D of the Environmental Assessment to discuss any avoidance and minimization measures relative to clearance for the Pennsylvania Historical and Museum Commission. [25 Pa. Code §§105.13(e)(1)(x), 105.15(a), 105.14(b)(5), Environmental Assessment Form Instructions]	Enclosure D in Attachment 11 has been updated with avoidance and minimization measures relative to PHMC consultations to-date.
BL 99	Revise section A.7 of Enclosure D of the Environmental Assessment to discuss the impacts on the Game Lands crossed in Blair County by the water obstructions and encroachments, and provide documentation of coordination and approval from the Pennsylvania Game Commission. As Necessary, provide any supporting documentation and/or coordination materials for the approval from the Game Commission. [25 Pa. Code §§105.21(a)(1), §105.15(a), 105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(5)]	Enclosure D discusses the impacts of the water obstructions and encroachment on state game lands. The PGC coordination is not complete, in addition the PGC has indicated that they will not provide a license without DEP Chapter 105 and 102 approvals.
BL 100	Section A.3 of Enclosure D of the Environmental Assessment identifies the Allegheny Portage Railroad of the Pennsylvania Canal in Cumberland County, when it is located in Blair County. Revise this section to be accurate. [25 Pa. Code §§105.21(a)(1), §105.15(a), 105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(5)]	Section 11 of the EAF, Enclosure D has been revised to address this comment.
BL 101	Revise Enclosure D of the Environmental Assessment to explain, on an individual crossing and cumulative basis, why open cut pipe installation combined with permanent ROW maintenance will not result in an adverse impact to exceptional value wetlands or a significant adverse impact to other wetlands. The analysis should	The Alternatives Analysis provided in Attachment 11, Enclosure E, Part 3 demonstrates SPLP's efforts to avoid and minimize impact to all wetland to the maximum extent practicable. The county-specific Project impacts provided in Attachment 11, Enclosure D and the Project-wide impacts provided in Attachment 11, Enclosure E, Part 2 demonstrate that the impacts to aquatic resources

	include a discussion of potential temporary or permanent impacts to hydrology as a result of the open cut, as well as a loss of woody species in forested/scrub shrub areas. Provide a plan to minimize the risk of permanent impacts to wetland hydrology for each wetland where an impact may occur. [25 PA Code §§105.13(e)(1)(ix) & 105.18a]	will be minor and temporary. The project's E&S Plan provided in Attachment 12 and Impact Avoidance, Minimization, and Mitigation Procedures provided in Attachment 11, Enclosure E, Part 4, and Compensatory Mitigation Plan provided in Attachment 11, Enclosure F provide the plans and BMPs that minimize the risk of permanent impacts to wetland hydrology and ensure the impacts are minor and temporary in regards to construction and operations and maintenance of the permanent ROW. Attachment 11, Enclosure E, Part 6 also provides a Cumulative Impacts Assessment.
BL 102	Section B.2.a of Enclosure D of the Environmental Assessment states the natural drainage patterns of the wetlands and small or headwater streams will be maintained. However, no information has been provided including detailed contours or cross sections depicting the drainage patterns, cross section, or what the drainage patterns are in the wetlands in their existing conditions. Explain how the final "restored" wetland elevations and natural drainage patterns of wetlands and streams will be determined. [25 Pa. Code §§105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(11), 105.15(a), 105.18a(a), 105.18a(b)]	Site Specific Plans located in Attachment 7, Tab 7D have been revised to address complex aquatic resource crossings. As recommended by the DEP at a September 12, 2016 technical deficiency meeting, several cross sectional typical details are provided within the E&S Plan Sheets to accommodate the variety of typical stream and wetland crossings.
BL 103	Revise Section B.1.c. of Enclosure D of the Environmental Assessment to discuss any avoidance and minimization measures, including commitments to implementing the measures. It currently states that clearances are being worked on. [25 Pa. Code §§105.15(a), 105.14(b)(4), 105.21(a)(1)]	Enclosure D of Attachment 11 has been revised to address the comment and discuss the commitments implementing the avoidance and minimization measures. All clearances and conservation plans for threatened and endangered species on the Project have been received from the regulating agencies. The final avoidance and minimization commitments are detailed in the Project

		Description as well as within the PNDI documents presented in Attachment 6.
BL 104	Revise section B.4 d. of Enclosure D of the Environmental Assessment to discuss specific hiking trails which will be temporarily closed and identify their locations within the project boundary. If hiking trails within the project boundary are associated with proposed water obstructions or encroachments, provide a discussion on the impact to the trail, the length of time it is proposed to be closed, plans for signage and detours, and correspondence from any agencies or trail organizations regarding coordination of the closure. [25 Pa. Code §§105.21(a)(1), §105.15(a), 105.13(e)(1)(x), 105.14(b)(5)]	Enclosures C and D of Attachment 11 have been revised to address specific hiking trails crossed by the Project, whether they are associated with aquatic resources/obstructions/ encroachments, and impacts including impact avoidance/minimization measures during construction.
BL 105	Revise section A.9 of Enclosure D of the Environmental Assessment to discuss and identify impacts to preserved farms and/or farms with agriculture preservation easements or restrictions. Discuss how the minimization measures would affect preserved farms and how they will be affected, such as not being able to replant an orchard or vineyard. [25 Pa. Code §§105.13(e)(1)(x), 105.15(a), 105.14(b)(5), 105.14(b)(4), Environmental Assessment Form Instructions]	Impacts of the Project, which includes an evaluation of water resource impacts, on these designations are provided in Attachment 11, Enclosure D, A.11 and Enclosure E, Part 2.
BL 106	Revise the Environmental Assessment to discuss the impacts to each wetland where a vegetative class change is proposed (ex. PFO to PSS). The discussion should be specific to the wetland and its functions and values. [25 Pa. Code §§105.14(b)(4),	All impacts to PSS classifications, Project-wide, will be replanted or allowed to revert to PSS wetlands; therefore there will be no conversion of PSS to PEM. In Blair County a single wetland will have 0.06 acre of unavoidable permanent PFO to PEM conversion. The Environmental Assessment has been revised to discuss the

	105.14(b)(13), 105.14(b)(11), §105.15(a), 105.18a(b), 105.18a(a)]	impacts to each wetland where a vegetative class change is proposed; the discussion is specific to the wetland, its functions and values, and acreage affected.
BL 107	Section A.4.a. of Enclosure C of the Environmental Assessment mentions that the project crosses the Tussey Mountain Important Bird Area (IBA), but Enclosure D does not discuss the impacts that water obstructions or encroachments may have on this area. The project also intersects the Allegheny Front IBA in Blair County. Revise enclosure D of the environmental assessment to discuss the impacts the proposed water obstructions and encroachments will have on these areas. In addition, identify if/how the recommendations in the USFWS letter dated 6/24/16 are being addressed. [25 Pa. Code §§105.21(a)(1), §105.15(a), 105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(5)]	Enclosure D of Attachment 11 has been revised to address impacts on the Tussey Mountain Important Bird Area. In addition, to address the June 24, 2016 USFWS recommendations, a Migratory Bird Conservation Plan was submitted to the USFWS in correspondence dated July 15, 2016 that demonstrates how the Project has implemented many of the plan recommendations. That correspondence and plan are included in Attachment 6, Tab 6B.
BL 108	A wetland function and evaluation form is provided for wetland W-BB101; however, this wetland is not identified as an impact in this application. Revise and clarify the application to be accurate and consistent. [25 Pa. Code §§105.13(e)(3), 105.14(b)(13), 105.14(b)(4), 105.15(a), 105.18a(a)(1), 105.21(a)(1)]	This function and value form was intended for an earlier version of the application package. The application was revised to reflect that there would be no impact to wetland W-BB101, but the form was inadvertently left in the revised application package. This form has been removed from the application package.
BL 109	Wetlands are located in mapped soils with shallow bedrock and restrictive soil layers (i.e. fragipans), and the application's data sheets and functions and values assessment identifies shallow rock layers, shallow bedrock, and/or restrictive soil layers are present. Also, based on the functions and values descriptions wetlands may contain groundwater	Impacts to wetland hydrology associated with open-cut construction vary depending on the wetlands primary source of hydrology, the wetlands position relative to the water table, and the underlying geology/soils (i.e., confining layer and/or fragipans to maintain hydrology). A restrictive layer is a layer in the soil/substratum profile that could slow or prevent the infiltration of water,

	<p>discharges, such as springs or may be concave and not connected to groundwater.</p>	<p>potentially resulting in a perched water table. Restrictive layers could include, but are not limited to, consolidated bedrock, fragipans, dense glacial till, layers of silt or substantial clay content, strongly contrasting soil textures (e.g., silt over sand), or cemented layers, such as ortstein.</p> <p>In order to minimize impacts to wetlands that depend on a restrictive layer for hydrology, SPLP has conducted a thorough review the mapped soil units in combination with field data to determine if the soil unit has the potential to support fragipan wetlands and if the field data indicated that there was a refusal when characterizing the soils. Refusal is the depth at which a layer inhibiting the ability to dig deeper was reached. Refusal is not always indicative of a hydrologically restrictive layer (e.g., high gravel/cobble content, dense tree roots), but could be indicative of a shallow restrictive layer. A refusal layer may still be permeable; whereas, a restrictive layer is impermeable by definition.</p> <p>SPLP has evaluated the potential for all wetlands to contain fragipan soils or other confining layers through an investigation of the USDA soil series as well as field data collected during wetland delineations and functions and value assessments. A licensed professional geologist (PG) will be present to evaluate each wetland that is found to have a potential confining layer during trenching. During trenching of these wetlands, the PG will advise on the segregation of confining layers for proper restoration of subsurface conditions. At wetlands determined to require confining layer restoration, the PG will be on-site during subsurface soil backfilling to ensure proper soil layer restoration. PGs may advise on</p>
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		bentonite or bentonite sandbag layering along the entire or portions of the trench line at the appropriate height if an identified confining layer cannot be segregated and/or restored properly. This combined with implementation of standard utility wetland crossing methods described more fully in the Impact Avoidance, Minimization and Mitigation Procedures in Attachment 11, Enclosure E, Part 4, will ensure that hydrology is maintained post-construction.
BL 109.a	For each wetland to be impacted, identify the locations of restrictive layers which contribute to and/or maintain the wetlands' hydrology. [25 Pa. Code §§105.15(a), 105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(13), 105.18a(a), 105.18a(b)]	An evaluation of soils where fragipan soils are located was completed and wetland data was evaluated for wetlands in those areas to identify site specific information to determine if a fragipan was present. Additionally, site specific soil information from wetland data forms for other wetlands within the Project area was reviewed to identify wetlands that had a restrictive layer. That evaluation has been included as part of the Functions and Values table and is located in Attachment 11, Enclosure C.
BL 109.b	Identify and provide a discussion on any potential permanent impacts to wetland hydrology from excavation or alteration from construction of the proposed project. Provide a plan, plan sheets, cross sections, and other details which demonstrate that impacts to the wetlands' hydrology from alteration of restrictive layers have been avoided and minimized. [25 Pa. Code §§105.15(a), 105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(13), 105.18a(a), 105.18a(b)]	See response to comment 109.
BL 109.c	The Soil Survey mapping indicates that a confining layer and/or fragipan may be present within wetland W-BB124. In addition, the wetland	See response to comment 109. In addition, a site-specific plans for W-BB124, W-BB60, and W-BB51 are provided in Attachment 12 within the E&S Plan sheet set.

	<p>functions and values assessments identify that wetlands W-BB60 and W-BB51 contain fragipans. Revise the application to identify the location and depth of any confining/limiting layers and/or fragipans for these wetlands and include the data in the application. Provide detailed site specific plans, specifications, cross sections, construction sequencing, and restoration plans to ensure that the hydrology of the wetland(s) is/are maintained in the wetlands. [25 Pa. Code §§105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(13), 105.15(a), 105.18a(a)(1), 105.18a(a)(3), 105.18a(a)(4), 105.301(4), 105.301(5)]</p>	
BL 109.d	<p>Wetland W-L70 is a forest pool based on the information provided in the application. Provide site specific information on the hydrology and soils and data on why the wetland maintains standing water. Provide site specific construction plans, cross sections, and restoration details to ensure that the hydrology and functions and values of the wetland is not altered and continues to maintain inundation and seasonal hydrology. [25 Pa. Code §§105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(13), 105.15(a), 105.18a(a)(1), 105.18a(a)(3), 105.18a(a)(4), 105.301(4), 105.301(5)]</p>	<p>See response to comment 109. In addition, a site-specific plan for W-L70 is provided in Attachment 12 within the E&amp;S Plan sheet set.</p>
BL 110	<p>Revise Enclosures C&amp;D to assess the condition and discuss the condition of and impacts to forested and scrub shrub riparian areas. Revise the enclosures to discuss the primary impacts and secondary impacts, as well as consideration of antidegradation on watercourses for each watercourse crossing from the riparian vegetation impacts. [25 Pa. Code</p>	<p>Attachment 11, Enclosure E, Part 2 discusses primary and secondary impacts to forested and scrub-shrub riparian areas; and Attachment 11, Enclosure E, Part 5 has been expanded to include an analysis of Chapter 105 antidegradation requirements related to forested riparian buffer impacts along watercourses crossed by the Project.</p>



	§§105.15(a), 105.13(E)(1)(x), 105.14(b)(4), 105.14(b)(11), 105.14(b)(12), 105.14(b)(14)]	
BL 110.a	In general, the Department recommends evaluating the riparian areas from the top of bank landward 100ft, and if the area utilized is less than 100ft justification should be given as to why. [25 Pa. Code §§105.15(a), 105.13(E)(1)(x), 105.14(b)(4), 105.14(b)(11), 105.14(b)(12), 105.14(b)(14), Riparian Forest Buffer Guidance, Document # 394-5600-001]	Riparian areas have been evaluated for each from 100 feet from each bank according to DEP's recommendation. The analysis discussing the effects of the Project on the riparian areas is provided in Attachment 11, Enclosure E, Part 2 (Project-wide Resource Identification and Project Impacts).
BL 110.b	To avoid and minimize the impacts to the watercourses, provide a plan to replace the vegetation lost in both permanent and temporary ROW and workspaces. Alternatively, where it cannot be replaced and provided protection from clearing during the proposed project's operation and maintenance, provide an explanation as to why it cannot be replaced. [25 Pa. Code §§105.15(a), 105.13(E)(1)(x), 105.14(b)(4), 105.14(b)(11), 105.14(b)(12), 105.14(b)(14), 105.1, 105.14(b)(7)]	Except at above ground facilities including valve and pump stations, all previously vegetated temporary and permanent workspaces are restored to a vegetated state in accordance with the E&S Plan provided in Attachment 12. Also the BMPs for restoring and maintenance of these areas are discussed within the Impact Avoidance, Minimization, and Mitigation Procedures found in Attachment 11, Enclosure E, Part 4.
BL 110.c	Revise the application plan drawings and project description, to clearly and specifically state if vegetation clearing, cutting, removal, or other alteration is proposed as part of the proposed projects' construction, operation, and maintenance. Revise the plan drawings to clearly indicate all locations where maintenance clearing, cutting, removal, or other alternation is not part of proposed maintenance activities. [25 Pa. Code §§105.13(e)(1)(ix), 105.14(b)(4), 105.14(b)(12), 105.14(b)(13), 105.14(b)(14), 105.11(d)]	SPLP did not revise the plan drawings. Instead, SPLP revised both the Project Description located in Attachment 9 to define the terms used within the plan drawings such as "Permanent Access Road," "Permanent ROW," "Temporary ROW," and "Additional Temporary Workspace" and the aerial site plans located in Attachment 7, Tab 7A to more clearly depict these designated areas. The Impact Avoidance, Minimization, and Mitigation Procedures in Attachment 11, Enclosure E, Part 4 details the construction, operation, and maintenance procedures in these designated areas.

		<p>As depicted on the aerial site plans, the DEP Chapter 105 jurisdictional areas defined as “Permanent Impact” are areas where the “Permanent ROW”, “Permanent Access Road”, “ROW-Travel and Clearing LOD”, “Station-LOD”, and “Block Valve Setting-LOD” intersect waters of the Commonwealth. These areas will receive both direct and indirect impacts resulting from the placement or construction of a water obstruction or encroachment and include areas necessary for the operation and maintenance of the water obstruction or encroachment located in, along or across, or projecting into a watercourse, floodway or body of water. These “Permanent Impacts” areas are proposed for permanent vegetation clearing, cutting, grubbing, removal, and maintenance. However, wetlands will not be cut or mowed during general operation and maintenance.</p> <p>As depicted on the aerial site plans, the DEP Chapter 105 jurisdictional areas defined as “Temporary Impacts” are areas where “Temporary ROW”, Additional Temporary Workspace (“ATWS”), “ROW-Travel LOD”, and “Temporary Access Road” intersect waters of the Commonwealth. These areas will receive both direct and indirect impacts resulting from the construction of a water obstruction or encroachment located in, along or across, or projecting into a watercourse, floodway or body of water that are restored upon completion of construction. These “Temporary Impacts” areas are proposed for temporary vegetation cutting, clearing, grubbing, and removal. These areas will be allowed to revert; no future maintenance or operations will occur.</p>
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		<p>The “Permanent Easement” depicted on the aerial site plans identifies the limits of SPLP’s agreement with the affected landowner, and is an independent designation from proposed “Permanent Impacts” and “Temporary Impacts”. In areas not identified as “Permanent Impacts” or “Temporary Impacts” within the “Permanent Easement”, no permanent or temporary vegetation cutting, clearing, grubbing, removal, and/or maintenance is proposed. The “Permanent Easement” is depicted on the aerial site plans in response to previous DEP requests to show the limits of the permanent easement in areas where “Permanent Impacts” and “Temporary Impacts” are not proposed, and does not represent a DEP Chapter 105 jurisdictional area.</p>
<p>BL 111</p>	<p>To aid in evaluating the condition of and change in condition to watercourses and wetlands as discussed in other comments, the Department recommends utilizing the Draft Pennsylvania Riverine Condition Level 2 Rapid Assessment Protocol and the Draft Pennsylvania Wetland Condition Level 2 Rapid Assessment Protocol. These protocols are not for identifying the functions and values of the resources, but rather are utilized to assess the current and proposed conditions of the resources. [25 Pa. Code §§105.14(a), 105.14(b)(4), 105.14(b)(13), 105.14(b)(12), 105.15(a), 105.13(e)(1)(x)]</p>	<p>Conditions of the waterbodies and wetlands have been documented in the Aquatic Resource Reports and Addendums, and within the functions and value assessments. Wetland and stream restoration will be performed at each wetland according to Impact Avoidance, Minimization, and Mitigation Procedures provided in Attachment 11, Enclosure E, Part 4. Each procedure and method of crossing is provided and designed to ensure wetland hydrology, vegetation, soils, and functions and values are restored and each stream bed and bank are restored. Project Impacts are discussed within Attachment 11, Enclosure D and Enclosure E, Part 2 and demonstrate that unavoidable impacts to aquatic resources are temporary and minor.</p>
<p>BL 112</p>	<p>The Mitigation Plan appears to indicate that streams and wetlands which will be crossed by HDD are not proposed to have vegetative impacts</p>	<p>SPLP did not revise the plan drawings. Instead, SPLP revised both the Project Description located in Attachment 9 to define the terms used within the plan</p>

	<p>either during construction or during operation and maintenance of the proposed pipelines. However, it is unclear on the plan drawings and in the application narrative precisely if vegetation cutting, clearing, removal, or grubbing is or is not part of the proposed construction, operation, and maintenance. Where Horizontal Directional Drill (HDD) and Bore crossings of resources are proposed a Permanent Easement is identified and impacts are identified as permanent only for the pipe size itself, and at other resource crossings a permanent ROW is identified and impacts are identified as permanent for the entire ROW. No explanation has been provided in the application for this different nomenclature.</p>	<p>drawings such as “Permanent Access Road,” “Permanent ROW,” “Temporary ROW,” and “Additional Temporary Workspace” and the aerial site plans located in Attachment 7, Tab 7A to more clearly depict these designated areas. The Impact Avoidance, Minimization, and Mitigation Procedures in Attachment 11, Enclosure E, Part 4 details the construction, operation, and maintenance procedures in these designated areas.</p> <p>As depicted on the aerial site plans, the DEP Chapter 105 jurisdictional areas defined as “Permanent Impact” are areas where the “Permanent ROW”, “Permanent Access Road”, “ROW-Travel and Clearing LOD”, “Station-LOD”, and “Block Valve Setting-LOD” intersect waters of the Commonwealth. These areas will receive both direct and indirect impacts resulting from the placement or construction of a water obstruction or encroachment and include areas necessary for the operation and maintenance of the water obstruction or encroachment located in, along or across, or projecting into a watercourse, floodway or body of water. These “Permanent Impacts” areas are proposed for permanent vegetation clearing, cutting, grubbing, removal, and maintenance. However, wetlands will not be cut or mowed during general operation and maintenance.</p> <p>As depicted on the aerial site plans, the DEP Chapter 105 jurisdictional areas defined as “Temporary Impacts” are areas where “Temporary ROW”, Additional Temporary Workspace (“ATWS”), “ROW-Travel LOD”, and “Temporary Access Road” intersect waters of the Commonwealth. These areas will receive both direct and indirect impacts resulting from the construction of a water</p>
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		<p>obstruction or encroachment located in, along or across, or projecting into a watercourse, floodway or body of water that are restored upon completion of construction. These “Temporary Impacts” areas are proposed for temporary vegetation cutting, clearing, grubbing, and removal. These areas will be allowed to revert; no future maintenance or operations will occur.</p> <p>The “Permanent Easement” depicted on the aerial site plans identifies the limits of SPLP’s agreement with the affected landowner, and is an independent designation from proposed “Permanent Impacts” and “Temporary Impacts”. In areas not identified as “Permanent Impacts” or “Temporary Impacts” within the “Permanent Easement”, no permanent or temporary vegetation cutting, clearing, grubbing, removal, and/or maintenance is proposed. The “Permanent Easement” is depicted on the aerial site plans in response to previous DEP requests to show the limits of the permanent easement in areas where “Permanent Impacts” and “Temporary Impacts” are not proposed, and does not represent a DEP Chapter 105 jurisdictional area.</p>
BL 112.a	<p>Revise the application plan drawings and application narratives, including but not limited to the project description and mitigation plan, to clearly and specifically state if vegetation clearing, cutting, removal, or other alteration is or is not proposed as part of the proposed projects’ normal construction, operation, and maintenance. [25 Pa. Code §§105.13(e)(1)(ix), 105.14(b)(4), 105.14(b)(12), 105.14(b)(13), 105.14(b)(14), 105.11(d)]</p>	<p>SPLP did not revise the plan drawings. Instead, SPLP revised both the Project Description located in Attachment 9 to define the terms used within the plan drawings such as “Permanent Access Road,” “Permanent ROW,” “Temporary ROW,” and “Additional Temporary Workspace” and the aerial site plans located in Attachment 7, Tab 7A to more clearly depict these designated areas. The Impact Avoidance, Minimization, and Mitigation Procedures in Attachment 11, Enclosure E,</p>

		<p>Part 4 details the construction, operation, and maintenance procedures in these designated areas.</p> <p>As depicted on the aerial site plans, the DEP Chapter 105 jurisdictional areas defined as “Permanent Impact” are areas where the “Permanent ROW”, “Permanent Access Road”, “ROW-Travel and Clearing LOD”, “Station-LOD”, and “Block Valve Setting-LOD” intersect waters of the Commonwealth. These areas will receive both direct and indirect impacts resulting from the placement or construction of a water obstruction or encroachment and include areas necessary for the operation and maintenance of the water obstruction or encroachment located in, along or across, or projecting into a watercourse, floodway or body of water. These “Permanent Impacts” areas are proposed for permanent vegetation clearing, cutting, grubbing, removal, and maintenance. However, wetlands will not be cut or mowed during general operation and maintenance.</p> <p>As depicted on the aerial site plans, the DEP Chapter 105 jurisdictional areas defined as “Temporary Impacts” are areas where “Temporary ROW”, Additional Temporary Workspace (“ATWS”), “ROW-Travel LOD”, and “Temporary Access Road” intersect waters of the Commonwealth. These areas will receive both direct and indirect impacts resulting from the construction of a water obstruction or encroachment located in, along or across, or projecting into a watercourse, floodway or body of water that are restored upon completion of construction. These “Temporary Impacts” areas are proposed for temporary vegetation cutting, clearing, grubbing, and</p>
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		<p>removal. These areas will be allowed to revert; no future maintenance or operations will occur.</p> <p>The “Permanent Easement” depicted on the aerial site plans identifies the limits of SPLP’s agreement with the affected landowner, and is an independent designation from proposed “Permanent Impacts” and “Temporary Impacts”. In areas not identified as “Permanent Impacts” or “Temporary Impacts” within the “Permanent Easement”, no permanent or temporary vegetation cutting, clearing, grubbing, removal, and/or maintenance is proposed. The “Permanent Easement” is depicted on the aerial site plans in response to previous DEP requests to show the limits of the permanent easement in areas where “Permanent Impacts” and “Temporary Impacts” are not proposed, and does not represent a DEP Chapter 105 jurisdictional area.</p>
BL 112.b	<p>Revise the plan drawings to clearly indicate all locations where maintenance clearing, cutting, removal, or other alternation is not part of proposed maintenance activities.[25 Pa. Code §§105.13(e)(1)(ix), 105.13(e)(1)(i), 105.14(b)(4), 105.14(b)(12), 105.14(b)(13), 105.14(b)(14), 105.11(d)]</p>	<p>See response to BL 112.b. In addition, maintenance activities are discussed within the Impact Avoidance, Minimization, and Mitigation Procedures located in Attachment 11, Enclosure E, Part 4.</p>
BL 112.c	<p>If construction, normal operation, or normal maintenance activities will require the clearing, cutting, removal, or other alteration of the vegetation in or adjacent to the wetland and streams the application must be revised to identify and discuss in detail the primary impacts and secondary impacts to these resources from the proposed</p>	<p>As explained in the Project Description (Attachment 9), construction and normal operation and maintenance activities will require the clearing, cutting and mowing of vegetation along areas of the ROW in and adjacent to wetlands and streams. Normal operations and maintenance activities will not involve the removal/denuding of vegetation along the ROW.</p>

	<p>project. The applications Environmental Assessment should be revised to discuss the resources and the impacts thereto. Compensatory mitigation may be necessary and required to compensate for impacts to these resources. [25 Pa. Code §§105.15(a), 105.13(e)(1)(x), 105.14(b)(4), 105.14(b)(12), 105.14(b)(13), 105.14(b)(14), 105.14(b)(11), 105.13(e)(1)(ix), 105.15(a), 105.18a(a), 105.18a(b)]</p>	<p>Attachment 11, Enclosure E, Part 2 (Project-wide Resource Identification and Project Impacts) discusses direct and secondary impacts to such vegetation as a result of construction and operation/maintenance activities. The permanent impacts to wetland vegetation (i.e., permanent conversion of vegetation cover type) due to normal operation and maintenance activities have been accounted for in the calculation of wetland impacts (Attachment 11, Table 2) and are being mitigated for in the Compensatory Mitigation Plan (Attachment 11, Enclosure F).</p>
BL 113	<p>The Mitigation Plan implies through mention of “No Mow” signs that PSS and PFO wetlands which will be crossed by open cut methods are not proposed to have vegetative impacts after they are re-vegetated following construction during the operation and maintenance of the proposed pipelines. However, it is unclear on the plan drawings and in the application narrative precisely if vegetation cutting, clearing, removal, or grubbing is or is not part of the proposed operation, and maintenance of the proposed pipelines.</p>	<p>The majority of wetland areas will be restored using standard restoration measures outlined within the Impact Avoidance, Minimization, and Mitigation Procedures in Attachment 11, Enclosure E, Part 4. These procedures also detail construction, operation, and maintenance procedures in wetlands. The procedures document also includes a “Special Plantings” section that identifies all PFO and PSS impact areas that will be restored through PSS and PFO plantings as well as how these areas are protected during operation.</p>
BL 113.a	<p>Revise the application plan drawings and application narratives, including but not limited to the project description and mitigation plan, to clearly and specifically state if vegetation clearing, cutting, removal, or other alteration is or is not proposed as part of the proposed projects’ normal construction, operation, and maintenance. [25 Pa. Code §§105.13(e)(1)(ix), 105.14(b)(4), 105.14(b)(12), 105.14(b)(13), 105.14(b)(14), 105.11(d)]</p>	<p>The Project Description located in Attachment 9 has been revised to define the nomenclature of the terms discussed below, and the aerial site plans located in Attachment 7, Tab 7A have been revised to more clearly depict these designated areas. The Impact Avoidance, Minimization, and Mitigation Procedures in Attachment 11, Enclosure E, Part 4 details the construction, operation, and maintenance procedures in these designated areas.</p> <p>As depicted on the aerial site plans, the DEP Chapter 105 jurisdictional areas defined as “Permanent Impact” are areas where the “Permanent ROW”, “Permanent Access</p>



		<p>Road”, “ROW-Travel and Clearing LOD”, “Station-LOD”, and “Block Valve Setting-LOD” intersect waters of the Commonwealth. These areas will receive both direct and indirect impacts resulting from the placement or construction of a water obstruction or encroachment and include areas necessary for the operation and maintenance of the water obstruction or encroachment located in, along or across, or projecting into a watercourse, floodway or body of water. These “Permanent Impacts” areas are proposed for permanent vegetation clearing, cutting, grubbing, removal, and maintenance. However, wetlands will not be cut or mowed during general operation and maintenance.</p> <p>As depicted on the aerial site plans, the DEP Chapter 105 jurisdictional areas defined as “Temporary Impacts” are areas where “Temporary ROW”, Additional Temporary Workspace (“ATWS”), “ROW-Travel LOD”, and “Temporary Access Road” intersect waters of the Commonwealth. These areas will receive both direct and indirect impacts resulting from the construction of a water obstruction or encroachment located in, along or across, or projecting into a watercourse, floodway or body of water that are restored upon completion of construction. These “Temporary Impacts” areas are proposed for temporary vegetation cutting, clearing, grubbing, and removal. These areas will be allowed to revert; no future maintenance or operations will occur.</p> <p>The “Permanent Easement” depicted on the aerial site plans identifies the limits of SPLP’s agreement with the affected landowner, and is an independent designation from proposed “Permanent Impacts” and “Temporary</p>
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		Impacts”. In areas not identified as “Permanent Impacts” or “Temporary Impacts” within the “Permanent Easement”, no permanent or temporary vegetation cutting, clearing, grubbing, removal, and/or maintenance is proposed. The “Permanent Easement” is depicted on the aerial site plans in response to previous DEP requests to show the limits of the permanent easement in areas where “Permanent Impacts” and “Temporary Impacts” are not proposed, and does not represent a DEP Chapter 105 jurisdictional area.
BL 113.b	Revise the plan drawings to clearly indicate all locations where maintenance clearing, cutting, removal, or other alternation is not part of proposed maintenance activities.[25 Pa. Code §§105.13(e)(1)(ix), 105.13(e)(1)(i), 105.14(b)(4), 105.14(b)(12), 105.14(b)(13), 105.14(b)(14), 105.11(d)]	See response to 113.a. In addition, maintenance activities are discussed within the Impact Avoidance, Minimization, and Mitigation Procedures located in Attachment 11, Enclosure E, Part 4.
BL 113.c	If construction, normal operation, or normal maintenance activities will require the clearing, cutting, removal, or other alteration of the vegetation in or adjacent to the wetlands the application must be revised to identify and discuss in detail the primary impacts and secondary impacts to these resources from the proposed project. The applications Environmental Assessment should be revised to discuss the resources and the impacts thereto. Compensatory mitigation may be necessary and required to compensate for impacts to these resources from these impacts. [25 Pa. Code §§105.14(b)(4), 105.14(b)(12), 105.14(b)(13), 105.14(b)(14),	As explained in the Project Description (Attachment 9), construction and normal operation and maintenance activities will require the clearing, cutting and mowing of vegetation along areas of the ROW in and adjacent to wetlands and streams. Normal operations and maintenance activities will not involve the removal/denuding of vegetation along the ROW. Attachment 11, Enclosure E, Part 2 (Project-wide Resource Identification and Projects Impacts) discusses direct and secondary impacts to such vegetation as a result of construction and operation/maintenance activities. The permanent impacts to wetland vegetation (i.e., permanent conversion of vegetation cover type) due to normal operation and maintenance activities have been accounted

	105.15(a), 105.11(d), 105.13(e)(1)(ix), 105.18a(a), 105.18a(b)]	for in the calculation of wetland impacts (Attachment 11, Table 2) and are being mitigated for in the Compensatory Mitigation Plan (Attachment 11, Enclosure F).
BL 114	The Mitigation Plan and Environmental Assessment state that conversion of Palustrine Forested Wetlands (PFO) is proposed to occur, that there will be a functional loss, but the loss is de minimus.	Comment is addressed below.
BL 114.a	Revise the Mitigation plan to replant the PFO wetlands in the permanent and temporary ROW with native trees if possible, and if not possible provide specific details and documentation on why this is not possible. [25 Pa. Code §§105.13(e)(1)(viii), 105.1, 105.14(b)(4), 105.14(b)(13), 105.18a(a), 105.18a(b)]	In conventional lay areas, the pipelines will be trenched to achieve 4 feet of cover. Trees are excluded from the permanent ROW to allow aerial safety inspections, as well as provide access for repair and prevent the pipelines from being compromised by tree growth. However, please refer to the Impact Avoidance, Minimization, and Mitigation Procedures (Attachment 11, Enclosure E, Part 4) that demonstrates additional efforts to maximize PFO restoration within the permanent ROW.
BL 114.b	Based on the Mitigation Plan, PSS wetlands are acceptable in the permanent ROW. Therefore, if replanting of PFO wetlands in the permanent or temporary ROW is not possible, revise the mitigation plan to replant converted PFO wetlands in the ROW with shrubs. [25 Pa. Code §§105.13(e)(1)(viii), 105.1, 105.14(b)(4), 105.14(b)(13), 105.18a(a), 105.18a(b)]	The application has been revised to include restoration plantings in PSS and PFO areas within the permanent ROW to reduce the amount of permanent vegetation covertype conversion in these areas. The total acreage of PFO located in the proposed permanent ROW in Blair County is 0.025 acre across two wetlands. However, Sunoco evaluated the opportunity to restore these PFO areas with trees to restore the functions and values of PFO. As a result, Sunoco proposes to replant 0.006 acre of PFO in the permanent ROW with trees. The remaining 0.019 acre of PFO conversion in the permanent ROW is within 10 feet of the pipelines and is not feasible to replant. Therefore, there will be a permanent conversion of PFO to PEM wetlands in Blair County that is limited to 0.019 acre. Given this size of the conversion

		area and the location centered on the pipeline initial conversion will be to PEM. The application has been revised to include restoration plantings in these areas and the details are provided within the E&S Plan provided in Attachment 12 and in the Impact Avoidance, Minimization, and Mitigation Procedures provided in Attachment 11, Enclosure E, Part 4.
BL 114.c	The application does not evaluate the cumulative conversion of PFO wetlands for the entire project. The applications for Blair, Huntingdon, Juniata, Perry, Cumberland, York, Dauphin, Lebanon, Lancaster, and Berks Counties within the Department's Southcentral Region propose a conversion on approximately 0.528 acre of PFO wetlands. Based on the Department's review of the impacts for PFO wetlands, compensatory mitigation is required to offset the identified PFO functional impacts of conversion to PSS. Revise the application to assess the impact to the effected forested wetlands, evaluate the cumulative effect on all counties of the proposed project, and provide compensatory replacement for the lost functions and values. [25 Pa. Code §§105.13(e)(1)(ix), 105.13(e)(1)(viii), 105.14(b)(4), 105.14(b)(12), 105.14(b)(13), 105.14(b)(14), 105.15(a), 105.18a(a), 105.18a(b), 105.20a(a)(2)]	A stand-alone alternatives analysis document, which evaluates the cumulative conversion of PFO wetlands for the entire project, has been added to the application materials and is located in Attachment 11, Enclosure E, Part 3. The stand-alone compensatory mitigation plan has been revised and is located in Attachment 11, Enclosure F.
BL 115	The application states that temporarily impacted Palustrine Scrub Shrub (PSS) and PFO wetlands will be replanted with native trees and shrubs, PSS wetlands in the permanent ROW will be planted with wetland shrubs, and PFO wetlands in the permanent ROW will be allowed to revert to	The planting plans for the restoration of PSS and PFO areas is provided in the Impact Avoidance, Minimization, and Mitigation Procedures provided in Attachment 11, Enclosure E, Part 4 and in the E&S plans in Attachment 12. The procedures provide for the locations, species to

	<p>PSS/PEM wetlands. Provide planting plans and details for these areas and for the replanting of PFO areas in the permanent and temporary ROWs. The planting plans must identify the locations of the plantings and wetlands, the species to be planted, the planting density, the proposed size of the plantings, planting timing, goals and objectives for success, and a monitoring plan to ensure re-establishment. [25 Pa. Code §§105.13(e)(1)(ix), 105.18a(a),105.18a(b), 105.20a]</p>	<p>be planted, density, size, timing, goals, and objectives, and monitoring for successful restoration.</p>
BL 116	<p>Section 2.2.2.1 of the Mitigation Plan, Construction in Wetlands with Unsaturated Soils, conflicts with the rest of the application, which identifies that all wetland crossings will be crossed with mats or pads. Crossing unsaturated wetlands without timber mats would contribute to soil compaction, rutting, and disturbance of the cut vegetation's roots. Therefore, revise the Mitigation Plan to identify that all wetland crossings shall use mats or pads. [25 Pa. Code §§105.21(a)(1), 105.13(e)(1)(ix), 105.15(a), 105.18a(a), 105.18a(b), 105.422]</p>	<p>The Impact Avoidance, Minimization, and Mitigation Procedures provided in Attachment 11, Enclosure E, Part 4 has been revised to indicate that temporary wetland matting will be used along the travel lane where any staging or work areas are proposed in wetlands regardless of the wetlands saturated condition.</p>
BL 117	<p>Section 2.2.2.1 of the Mitigation Plan identifies that wetlands will be reseeded with a native wetland seed mixture; however, the mixture is not specified nor is it proposed on the plans. Revise the application to identify the seed mixture to be used and revise the E&amp;S plans to indicate its use for wetland restoration in the Typical Wetland Restoration detail. [25 Pa. Code §§105.13(e)(1)(ix), 105.14(b)(4), 105.14(b)(13)]</p>	<p>The Impact Avoidance, Minimization, and Mitigation Procedures provided in Attachment 11, Enclosure E, Part 4, and the E&amp;S plans in Attachment 12 includes the details for standard and site-specific (including restored PSS and PFO habitats ) wetland restoration, as well as invasive species control, monitoring, and reporting.</p>
BL 118	<p>The HDD list at the end of the Inadvertent Return Contingency Plan in the Mitigation Plan identifies</p>	<p>The table in the Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan has been</p>

	HDD crossings with notes as “Drive Through – Travel Only” which are not identified on the plan drawings or applications as being “Drive Through – Travel Only”. Revise this information to be accurate and consistent with the rest of the application. [25 Pa. Code §§105.21(a)(1), 105.13(e)(1)(i), 105.13(e)(1)(iii)]	updated to contain this information. The revised plan is provided in Attachment 12.
BL 119	The application contains HDD Inadvertent Return Contingency Plans in multiple sections of the application, such as the Mitigation Plan and different species conservation plans. However, the Contingency Plans are not all consistent in terms of agency notifications, and the PAFBC Law Enforcement is not identified as being notified as required in the PAFBC PNDI clearance letter. Also, the HDD table is not included in all versions of the Contingency Plan. Revise the HDD Inadvertent Return Contingency Plans to all be consistent, include the appropriate jurisdictional agencies, and provide documentation that revised plans have been sent to all jurisdictional agencies. [25 Pa. Code §§105.21(a)(1), 105.13(e)(1)(ix), 105.14(b)(4)]	The contingency plan has been revised and re-titled to be Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan (IR Plan). This revised IR Plan is located in Attachment 12, Tab 12C. Note that the older version of this plan is still contained within the application in connection with the documentation of early agency coordination efforts. The PAFBC, PGC, DCNR, and USFWS have been sent the revised IR Plan and copies of this correspondence is provided in Attachment 6, Tab 6B.
BL 120	The Alternatives Analysis states that the Alternatives Analysis is meant to be a summary of major actions taken to avoid/minimize impacts. The Alternatives Analysis must be a detailed analysis of alternatives, including alternative locations, routings, or designs to avoid or minimize adverse impacts and document and provide evidence that there is no practicable alternative which would not involve a wetland or that would have less adverse impact on a wetland. In addition, for the project to	Wetlands M49 and M79 are proposed to be crossed using HDD methods. Therefore, there will be no disturbance in these wetlands and impacts to the wetlands will be avoided. The wetland acreage impacts that are listed in the wetland impacts table (Attachment 11, Table 2), represents calculations of the pipe width multiplied by the length of the crossing under the wetland per DEP’s guidance, and not actual disturbance.

	<p>be water dependent as stated in the Alternatives Analysis, it must be based on the demonstrated unavailability of any alternative route location, or design or use of location, route or design to avoid or minimize adverse impacts. Revise the Alternatives Analysis to provide a detailed analysis of alternative routings, locations, and designs to avoid and minimize impacts and provide detailed documentation and evidence that there are not practicable alternatives which would further avoid and minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a(a)(2), 105.18a(a)(3), 105.18a(b)(2), 105.18a(b)(3)]. In addition, address the following specific comments regarding the Alternatives Analysis:</p>	
BL 120.a	<p>The Alternatives Analysis states that the Cresson-Altoona Southern Bypass route avoids environmental impacts and cultural/historic resources. No information on what environmental impacts were avoided is provided. Based on the provided information it appears that the route could also avoid the Allegheny Portage Railroad to the North of the existing ROW. Provide a detailed alternatives analysis which contains evidence and documentation on potential and avoided impacts for the existing alignment, proposed alignment, and other alignments which documents that impacts cannot be further avoided and minimized. Other alignments discussed and evaluated should include, but not be limited to, north of the Allegheny Portage Railroad site, other alignments generally along the new route, generally following the</p>	<p>The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.</p>

	<p>existing Sunoco pipeline, and alternate routed around large wetland complexes. Particular attention should be paid to High Quality and Exceptional value streams and wetlands along the routed. Provide details, maps, documentation and other evidence to support the analysis. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a(a)(2), 105.18a(a)(3), 105.18a(b)(2), 105.18a(b)(3), 105.14(b)(5)]</p>	
BL 120.b	<p>Revise the Alternatives Analysis to discuss, evaluate, and provide a detailed analysis on alternative routes to avoid and minimize impacts to High Quality Streams and watersheds.[25 Pa. Code §§105.14(b)(7), 105.13(e)(1)(viii)]</p>	<p>The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.</p>
BL 120.c	<p>Revise your alternatives analysis to discuss routing alternatives that were considered as alternatives to impacts Exceptional Value wetlands. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a(a)]</p>	<p>The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.</p>
BL 120.d	<p>Some portions of the proposed ROW and pipelines directly abuts the maintenance corridor of the existing Sunoco pipeline; however, in other portions the proposed ROW has partial or near complete overlap with the existing maintenance area and pipeline. No discussion on this is provided in the alternatives analysis, and it appears that more overlap of the proposed ROW and the existing Sunoco Maintenance corridor is practicable and would further avoid and minimize impacts. Revise the application accordingly to avoid and minimize impacts by locating the proposed ROW with overlap of the existing maintenance corridor, or provide a detailed analysis and discussion with</p>	<p>The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.</p>



	<p>specific details explaining why this overlap is present in some areas and not others, and why the proposed ROW cannot further overlap. [25 Pa. Code §§105.14(b)(7), 105.13(e)(1)(viii), 105.18a(a), 105.18a(b)]</p>	
BL 120.e	<p>It appears that primary impacts and secondary impacts from the Temporary ROW and ATWS's can be avoided by locating them outside the floodway of streams. Revise the application accordingly to avoid and minimize impacts, or provide a detailed analysis of alternative routes, designs and methods to avoid and minimize these impacts which documents and provides evidence that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7)]</p>	<p>The Project impact assessment document, located in Attachment 11, Enclosure E, Part 2, has been revised to discuss primary impacts in more detail and now includes a Secondary Impact Analysis for the entire project, adjacent areas thereto, and future impacts, including the use of temporary ROW and ATWS areas located in the floodway of streams. In addition, A stand-alone alternatives analysis document has been added to the application materials and is located in Attachment 11, Enclosure E, Part 3.</p>
BL 120.f	<p>It appears, but is not described in the application, that HDD was assumed by the applicant to be the crossing method presenting the least potential impact to water resources and aquatic species. Revise the alternatives analysis to provide justification for the selection of which water resource (streams and wetlands) crossings will be made by HDD. [25 Pa. Code §§105.14(b)(7), 105.18a(b)(3), 105.18a(a)(3), 105.13(e)(1)(viii)]</p>	<p>A stand-alone alternatives analysis document, which presents the justification for the selected wetland and stream crossings that will be made by HDD, has been added to the application materials and is located in Attachment 11, Enclosure E, Part 3. The alternatives analysis includes and incorporates relevant information by reference presented in a stand-alone trenchless feasibility assessment, which is located in Attachment 11, Enclosure E, Part 3, Appendix C.</p>
BL 120.g	<p>It appears that several waters of the Commonwealth could be crossed using trenchless installation methods. Provide a revised alternatives analysis that incorporates a discussion of alternative crossing techniques (conventional bore, HDD, micro-tunneling, etc.) addressing each resource crossing and explaining why trenchless installation</p>	<p>The Alternatives Analysis provided in Attachment 11, Enclosure E, Part 3 has been revised to include a discussion on the limitations of trenchless methods and presents an attached trenchless feasibility assessment.</p>

	methods are not appropriate. [25 Pa. Code §§105.14(b)(7), 105.18a(b)(3), 105.18a(a)(3), 105.13(e)(1)(viii)]	
BL 120.h	It appears impacts can be avoided for wetland L70 through routing the pipelines to the North or South. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetland L70 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.
BL 120.i	It appears impacts can be avoided for wetlands M57 and Q52 through routing the pipelines to the South through wetland M58. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetland M57 which documents that other routes and designs would not further avoid or minimize impacts. . [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.
BL 120.j	It appears impacts can be avoided for wetlands M56 and M55 and stream S-M77 through routing the pipelines to the North. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetlands M56 and M55 and stream S-M77 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.
BL 120.k	It appears impacts can be avoided for stream S-Q59 through routing the pipelines to the Northwest. Provide a detailed analysis of alternative routes,	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.

	designs and methods to avoid and minimize impacts to stream S-Q59 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7)]	
BL 120.l	It appears impacts can be avoided for wetland M50 through routing the pipelines to the North. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetland M50 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.
BL 120.m	It appears impacts can be avoided for wetlands M79 and M49 through routing the pipelines to the South or outside of the survey area to the South. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetlands M79 and M49 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]	Wetlands M49 and M79 are proposed to be crossed using HDD methods. Therefore, there will be no disturbance in these wetlands and impacts to the wetlands will be avoided. The wetland acreage impacts that are listed in the wetland impacts table (Attachment 11, Table 2), represents calculations of the pipe width multiplied by the length of the crossing under the wetland per DEP's guidance, and not actual disturbance.
BL 120.n	It appears impacts can be avoided for wetlands Q54 and Q56 through routing the pipelines to the North. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetlands Q54 and Q56 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.
BL 120.o	It appears impacts can be avoided for wetland BB56 through routing the pipelines to the North.	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.

	<p>Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetland BB56 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]</p>	
BL 120.p	<p>It appears impacts can be avoided for wetland BB52 through routing the pipelines to the North or South. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetland BB52 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]</p>	<p>The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.</p>
BL 120.q	<p>It appears impacts can be avoided for wetland Q58 through routing the pipelines to the East. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetland Q58 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]</p>	<p>The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.</p>
BL 120.r	<p>It appears impacts can be avoided for wetlands L43 and L42 through routing the pipelines' deviation and re-alignment with the 8-inch line further Northwest and/or Southeast. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetlands L43 and L42 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]</p>	<p>The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.</p>

BL 120.s	It appears impacts can be avoided for wetland L40 through routing the pipelines to the West. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to wetland L40 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.
BL 120.t	The Alternatives Analysis' discussion on alternatives to avoid and minimize impacts for wetlands M24 and M29 states that the existing pipeline alignment was not utilized because of an existing easement and that an alignment further South than proposed would increase undisturbed habitat. The analysis also states that shifting the pipelines North or South would cause more forest clearing; however, the proposed route will require clearing of forested lands. It appears that a slight alignment shift in the HDD entry/Exit location west of wetland M24 could further minimize impacts to wetlands. Revise the alternatives analysis to identify the location(s) of the easements in reference, include specific details and quantification provide a detailed analysis of alternative routes, designs and methods to avoid and, potential and avoided impacts minimize impacts to wetlands M24 and M29 and stream S-M38 which documents that other routes and designs would not further avoid or minimize impacts[25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]	Wetland M29 and waterbodies (stream) S-M38 are proposed to be crossed using HDD methods. Therefore, there will be no disturbance in this wetland and waterbody, and impacts to the wetland and waterbody will be avoided. The wetland and waterbody acreage impacts that are listed in the wetland and waterbody impacts table (Attachment 11, Tables 2 and 3), represents calculations of the pipe width multiplied by the length of the crossing under the wetland per DEP's guidance, and not actual disturbance.  Wetland M24 is addressed in the Alternatives Analysis in Attachment 11, Enclosure E, Part 3.

BL 120.u	It appears impacts can be avoided for stream S-M35 through routing the pipelines to the East and or South/East. Provide a detailed analysis of alternative routes, designs and methods to avoid and minimize impacts to stream S-M35 which documents that other routes and designs would not further avoid or minimize impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7)]	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.
BL 120.v	Revise the Alternatives Analysis' discussion of alternatives considered to avoid wetlands BB60 and Q57 to identify SPLP's Existing ROW, and identify the First Energy Easement Boundaries which is stated to be avoided. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.
BL 120.w	It appears relocating the pipelines north or south of wetland M24 may further avoid and minimize impacts. The analysis states that relocating the pipeline to the north or south would create additional disturbance to undisturbed habitat; however, it does not identify the area of undisturbed streams and wetlands proposed to be disturbed in the existing alignment or alternative alignments. Revise the Alternatives Analysis to discuss with specific details and provide documentation that alternative routes north or south would not result in avoiding or minimizing impacts. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]	The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.
BL 120.x	The Alternatives Analysis does not provide sufficient detail, documentation, or explanation to document that there is not practicable alternative to further avoid and minimize impacts wetlands	Wetlands BB125, L55, and L56, and waterbodies (streams) S-BB95, S-L76, S-L77, and S-BB92 are proposed to be crossed using HDD methods. Therefore, there will be no disturbance in these wetlands and

	<p>BB124, Q60, BB125, L56, L55, L54, L46, and L48 and streams S-BB96, S-L69, S-L75, S-L74, S-L76, S-BB95, S-L77, and S-BB92. The Alternatives Analysis states that the existing 8-inch line crosses this complex, however, this is not accurate as depicted on the plans. Provide a detailed analysis, discussion, and evidence that alternative routes through and around this area, minor deviations, and construction methods would not further avoid and minimize impacts. This should include but not be limited do alternate route alignments outside of the delineation area, the use of additional HDD and conventional bore crossings, minor route adjustments and include plans, impact amounts and other evidence to support the analysis. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]</p>	<p>waterbodies and impacts to the wetlands and waterbodies will be avoided. The wetland and waterbody acreage impacts that are listed in the wetland and waterbody impacts table (Attachment 11, Tables 2 and 3), represent calculations of the pipe width multiplied by the length of the crossing under the wetland/waterbody per DEP’s guidance, and not actual disturbance.</p> <p>No impacts are anticipated to Wetlands Q60 and L46.</p> <p>The remainder of the wetlands (BB124, L54, L48) and streams (S-BB96, S-L69, S-L74, and S-L75) are addressed in the Alternatives Analysis in Attachment 11, Enclosure E, Part 3.</p>
<p>BL 120.y</p>	<p>Revise the Alternatives Analysis to provide a detailed analysis, discussion, and evidence on alternative crossing methods, including HDD and conventional bore, for the crossing of stream S-L58 (Clover Creek HQ-CWF, Class A Wild Trout) and wetland L35 and M23. This discussion should include why a boring method for this crossing is no longer proposed from the original application submission. If this is practicable, revise the application accordingly include this cross construction method. [25 Pa. Code §§105.13(e)(1)(viii), 105.14(b)(7), 105.18a]</p>	<p>The Alternatives Analysis in Attachment 11, Enclosure E, Part 3 has been revised to address this comment.</p>
<p>BL 121</p>	<p>The following comments pertain to the plans provided to the townships in Blair County.</p>	<p>NA - Heading</p>

BL 121.a	The HDD lengths shown on Sheet 13 of Tab 7A are different than those shown on sheet 13 of 321 provided to Blair Township. Provide consistent and up-to-date plans to the Department and Blair Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi)]	All Plans, maps, and figures have been updated to contain consistent information. Blair Township was sent the revised information on November 3, 2016.
BL 121.b	The HDD lengths shown on Sheet 14 of Tab 7A are different than those shown on Sheet 14 of 321 provided to Blair Township. Provide consistent and up-to-date plans to the Department and Blair Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi)]	All Plans, maps, and figures have been updated to contain consistent information. Blair Township was sent the revised information on November 3, 2016.
BL 121.c	There is a temporary access road depicted on Sheet 14 of Tab 7A that is no shown on Sheet 14 of 321 provided to Blair Township. Provide consistent and up-to-date plans to the Department and Blair Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi)]	All Plans, maps, and figures have been updated to contain consistent information. Blair Township was sent the revised information on November 3, 2016.
BL 121.d	There are a proposed block valve and permanent access road depicted on Sheets 15 and 16 of 321 that are not shown on Sheet 15 or 16 of Tab 7A. Provide consistent and up-to-date plans to the Department and Blair Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi)]	All Plans, maps, and figures have been updated to contain consistent information. Blair Township was sent the revised information on November 3, 2016.
BL 121.e	There are temporary access roads depicted on Sheet 18 of Tab 7A that are not shown on Sheet 18 of 321 provided to Blair Township. Provide consistent and up-to-date plans to the Department and Blair Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi)]	All Plans, maps, and figures have been updated to contain consistent information. Blair Township was sent the revised information on November 3, 2016.



BL 121.f	The HDD lengths shown on Sheet 20 of Tab 7A are different than those shown on Sheet 20 of 321 provided to Blair Township. Provide consistent and up-to-date plans to the Department and Blair Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi)]	All Plans, maps, and figures have been updated to contain consistent information. Blair Township was sent the revised information on November 3, 2016.
BL 121.g	There is a temporary access road crossing Stream S-L80 and Wetland L59 on Sheet 21 of Tab 7A that is not identified on Sheets 20 or 21 of 321 provided to Blair Township. Provide consistent and up-to-date plans to the Department and Blair Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) § 105.13(e)(1)(i)(A)]	All Plans, maps, and figures have been updated to contain consistent information. Blair Township was sent the revised information on November 3, 2016.
BL 121.h	Sheet 26 of 321 provided to Frankstown Township depicts a proposed Block valve that is not shown on Sheet 27 of Tab 7A. And Sheet 27 of Tab 7A depicts a permanent access road that is not identified on Sheet 26 of 321. Provide consistent and up-to-date plans to the Department and Frankstown Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) & § 105.13(e)(1)(i)(C)]	All Plans, maps, and figures have been updated to contain consistent information. Frankstown Township was sent the revised information on November 3, 2016.
BL 121.i	The HDD location shown on Sheet 27 of 321 provided to Frankstown Township is outside of the proposed permanent right-of-way; however, the same HDD is shown within the proposed right-of-way on Sheet 28 of Tab 7A. Provide consistent and up-to-date plans to the Department and Frankstown Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi)]	All Plans, maps, and figures have been updated to contain consistent information. Frankstown Township was sent the revised information on November 3, 2016.

BL 121.j	The bore lengths under stream S-L75 of Sheets 29 and 30 of Tab 7A are different than those shown on Sheet 28 of 321 provided to Frankstown Township. Provide consistent and up-to-date plans to the Department and Frankstown Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi)]	All Plans, maps, and figures have been updated to contain consistent information. Frankstown Township was sent the revised information on November 3, 2016.
BL 121.k	The HDD shown on Sheet 28 of 321 provided to Frankstown Township is in a different location than those shown on Sheet 29 of Tab 7A. Furthermore, the overall lengths of the proposed pipe, as well as the displayed resource impacts are markedly different. Provide consistent and up-to-date plans to the Department and Frankstown Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) § 105.13(e)(1)(i)(A) and (C)]	All Plans, maps, and figures have been updated to contain consistent information. Frankstown Township was sent the revised information on November 3, 2016.
BL 121.l	There are sections of temporary right-of-way that are omitted on Sheet 30 of Tab 7A which are not on Sheet 29 of 321 provided to Frankstown Township. Provide consistent and up-to-date plans to the Department and Frankstown Township. [25 Pa. Code § 105.21(a)(1)]	All Plans, maps, and figures have been updated to contain consistent information. Frankstown Township was sent the revised information on November 3, 2016.
BL 121.m	The block valve setting on Sheet 32 and 33 of Tab 7A is considerably larger than the one shown on Sheets 31 and 32 of 321 provided to Frankstown Township. Provide consistent and up-to-date plans to the Department and Frankstown Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) § 105.13(e)(1)(i)(A) and (C)]	All Plans, maps, and figures have been updated to contain consistent information. Frankstown Township was sent the revised information on November 3, 2016.
BL 121.n	The HDD lengths on Sheets 33 and 34 of Tab 7A are different than those shown on Sheets 32 and 33 of 321 provided to Frankstown Township. Provide consistent and up-to-date plans to the Department	All Plans, maps, and figures have been updated to contain consistent information. Blair Township was sent the revised information on November 3, 2016.

	and Frankstown Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) § 105.13(e)(1)(i)(A)]	
BL 121.o	The bore lengths shown on Sheet 6 of Tab 7A are different than those shown on Sheet 6 of 321 provided to Juniata Township. Provide consistent and up-to-date plans to the Department and Juniata Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) § 105.13(e)(1)(i)(A)]	All Plans, maps, and figures have been updated to contain consistent information. Blair Township was sent the revised information on November 3, 2016.
BL 121.p	The HDD lengths on Sheets 10 and 11 of Tab 7A are different than those shown on Sheets 10 and 11 of 321 provided to Juniata Township. Provide consistent and up-to-date plans to the Department and Juniata Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) § 105.13(e)(1)(i)(A)]	All Plans, maps, and figures have been updated to contain consistent information. Juniata Township was sent the revised information on November 3, 2016.
BL 121.q	The temporary access road shown on Sheets 11 of Tab 7A and 11 of 321 provided to Juniata Township are in different locations. Provide consistent and up-to-date plans to the Department and Juniata Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) § 105.13(e)(1)(i)(A)]	All Plans, maps, and figures have been updated to contain consistent information. Juniata Township was sent the revised information on November 3, 2016.
BL 121.r	The HDD lengths on Sheet 41 of Tab 7A are different than those shown on Sheet 40 of 321 provided to Woodbury Township. Provide consistent and up-to-date plans to the Department and Woodbury Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) § 105.13(e)(1)(i)(A)]	All Plans, maps, and figures have been updated to contain consistent information. Woodbury Township was sent the revised information on November 3, 2016.
BL 121.s	There is a bore crossing depicted on Sheet 44 of Tab 7A that is not shown on Sheet 43 of 321 provided to Woodbury Township. Provide consistent and up-to-date plans to the Department	All Plans, maps, and figures have been updated to contain consistent information. Woodbury Township was sent the revised information on November 3, 2016.

	and Woodbury Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) § 105.13(e)(1)(i)(A)]	
BL 121.t	Sheet 47 of Tab 7A shows an open cut of Stream S-L58 and wetland M23 with an associated permanent right-of-way; however, Sheet 46 of 321 provided to Woodbury Township shows that these two resources are being bored. Provide consistent and up-to-date plans to the Department and Woodbury Township. [25 Pa. Code § 105.21(a)(1) § 105.13(e)(1)(v) and (vi) § 105.13(e)(1)(i)(A) and (C)]	All Plans, maps, and figures have been updated to contain consistent information. The appropriate parties have been updated. Woodbury Township was sent the revised information on November 3, 2016.
BL 122	Provide comment letters from Blair, Frankstown, Juniata, and Woodbury Townships.	SPLP sent updated plans to Blair, Frankstown, Juniata, and Woodbury Townships and requested comments on those plans. The letters sent to these four Townships as well as the comment letters sent by the Townships are provided in Attachment 14.
BL 123	The following items pertain to the provided stream data sheets and Table 3 of Section 11.	NA - Heading
BL 123.a	Information for Stream S-L94 could not be found in Table 3 of Section 11. Update the table to include the missing information. [25 Pa. Code §§105.13(e)(1)]	Stream S-L94 impacts were previously presented in the Cambria County application. However, those impacts are now presented in the Blair County application (Attachment 11, Enclosure D (county-specific Project impacts) and Attachment 11, Enclosure E, Part 2 (Project-wide impacts). The county boundary shapefile that comes with all ArcGIS licenses is different than the boundaries recognized by Pennsylvania. The county boundaries now represent the data available from the Pennsylvania Spatial Data Access (PASDA) website, and matches the county boundaries in the E&S plan, Chapter 102 application, and Aquatic Resource Reports.

BL 123.b	Provide justification for why Stream S-BB96 uses the average width of the stream. What is the width of the stream at the proposed crossing? [25 Pa. Code §§105.13(e)(1)(A)]	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 123.c	Information for Stream S-L66 could not be found in Table 3 of Section 11. Update the table to include the missing information. [25 Pa. Code §§105.13(e)(1)]	Stream S-L66 is not proposed to be impacted by the Project. The stream and its floodway are to the north of the Project, outside of the LOD. Table 3 summarized direct impacts to waters.
BL 123.d	The bank to bank width for Stream S-M31 on Table 3 of Tab 11 indicates 150 feet; however, the listed width does not correspond to any values presented on the Stream Data Sheet. Clarify this discrepancy. [25 Pa. Code §§105.21(a)(1), 105.13(e)(1)(A)]	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 123.e	The bank to bank width for Stream S-BB72 on Table 3 of Tab 11 indicates 2 feet; however, the listed width only corresponds to the water width on the Stream Data Sheet. Why is the water width used when other streams use the Bank Width value from Stream Data Sheet? Clarify this discrepancy. [25 Pa. Code §§105.21(a)(1), 105.13(e)(1)(A)]	The data provided on the stream data sheet is not always indicative of the bank width at the proposed centerline crossing of the stream. The water width of the stream on the data form is incidentally equal to the same as the bank width crossing at centerline.
BL 123.f	Provide justification for why Stream S-STV3 uses the average width of the stream. What is the width of the stream at the proposed crossing? [25 Pa. Code §§105.21(a)(1), 105.13(e)(1)(A)]	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 123.g	Provide justification for why Stream S-STV1 uses the average width of the stream. What is the width of the stream at the proposed crossing? [25 Pa. Code §§105.21(a)(1), 105.13(e)(1)(A)]	The widths reported on Table 3 are accurate bank widths at centerline. Widths provided in the Aquatic Resource reports were estimated. Table 3 now has a footnote to include this explanation.
BL 123.h	Stream S-L78 on Sheet 23 of Tab 7A has a floodway and a floodplain that are in different locations. Clarify this discrepancy. [25 Pa. Code §§105.21(a)(1)]	100-year floodplains delineated by FEMA do not necessarily encompass the stream channel. The delineated stream S-L78 stops between the LOD and the delineated limits of the stream, but FEMA has determined

		through their NFHL calculations that in the event of a 100-year flood event, the high water mark would extend south through the proposed pipeline ROW.
BL 123.i	Stream Data Sheets could not be located for Streams S-KP1, S-STV2, S-KP2, S-M65, S-M67, and S-L78. Provide any missing data sheets. [25 Pa. Code §§105.13(1)(i)(A)]	Data Sheets are provided within the supplemental wetland delineation information provided in Attachment 11, Enclosure A.
BL 124	If any changes to the proposed route occur, revise all parts, components of the application to reflect these changes. This includes provided copies of the submission to and clearance from the PHMC, USFWS, PFBC, DCNR, and PGC. [25 Pa Code §§105.13(e)(1), 105.21(a)(1)]	<p>The attached Application represents the proposed route, facilities and workspaces.</p> <p>SPLP previously submitted a final request for determination letter from USFWS, PFBC, DCNR and PGC where the Project was described consistent with the attached Application, the consultation history was summarized, and survey reports and mapping (including GIS files) were provided referencing the most current alignment. Clearances from all four agencies have been obtained and the conditions of those clearances outlined within the revised Project Description located in Attachment 9 and details provided in Attachment 6, Tab 6B.</p> <p>With respect to the PHMC, while DEP is required to consider potential impacts to historic resources under 25 Pa. Code Chapter 105 when DEP conducts reviews of a water obstruction, encroachment or dam permit application, none of the regulations or guidance referenced in DEP’s comment require SPLP to provide clearance or approval from the PHMC as part of a Chapter 102 or Chapter 105 permit application. Furthermore, as noted in a letter from Alexandra C. Chiaruttini, Esq., DEP’s Chief Counsel concerning the SPLP Pennsylvania Pipeline Project, “the [Pennsylvania] History Code does</p>

		<p>not authorize our agency or any Commonwealth agency to stop the processing of permits solely due to possible or actual presence of archaeological or historic resources, unless the agency's enabling legislation contains specific statutory authorization for such action. DEP does not have such authorization here." A copy of the February 1, 2016, letter from Ms. Chiaruttini is provided in Attachment 4. See also Pennsylvania History Code §508(a)(4). Accordingly, SPLP requests that DEP continue its review of SPLP's applications.</p> <p>SPLP will continue to work with the PHMC to ensure that impacts to cultural resources are avoided where possible. In addition, SPLP has included with its Chapter 102 application a Cultural Resources Unanticipated Discovery Plan to be implemented during construction that outlines the protocols SPLP will follow if SPLP unexpectedly encounters archaeological or historic resources, including notification to DEP and PHMC and cessation of earth disturbance.</p>
BL 125	Please respond to and address the comments from the Pennsylvania Fish and Boat Commission found on the attached sheet. Due to the number of crossings and time-of-year restrictions, the Department recommends identifying the time-of-year restrictions on the plans. [25 Pa. Code §§105.14(b)(4), 105.14(b)(6)]	To ensure contractor compliance, SPLP has developed a state-of-the-art web-based mapping applications that is required to be used by the contractor to determine all special environmental restrictions such as PNDI and trout stream restrictions. All of the restrictions and avoidance measures committed to and approved by PNDI agencies are included in the Project Description within a summary table and within the PNDI agency final determination letters and accepted Conservation Plans that are also part of the Project Description (See Attachment 9). In addition, SPLP will implement a comprehensive Environmental Training and Inspection program designed

		specifically to ensure contractors are appropriately notified and are adhering to such restrictions.
BL 126	Revise the fee calculation worksheet to reflect any alterations in the reported impacts. [25 Pa. Code §§105.13(c)(2)(iii)(A)]	The fee calculation worksheet has been updated to represent the current proposed location of the pipeline as well as the proposed impacts to aquatic resources through the construction and operation of the Project.



SPLP appreciates your timely review of the revision. Please contact Sandy Lare of Tetra Tech, Inc. with any questions at 716-849-9419, or email [sandy.lare@tetrattech.com](mailto:sandy.lare@tetrattech.com).

Sincerely,  
Tetra Tech, Inc.



Sandra J. Lare  
Environmental Planner/Permitting Specialist

Enclosures: Revised Chapter 105 Joint Permit Application

cc: Ann Roda, DEP Headquarters / Program Integration (letter only)  
Sachin Shankar, DEP Southeast Region (letter only)  
Dominic Rocco, DEP Southeast Region (letter only)  
Jared Pritts, U.S. Army Corps of Engineers, Pittsburgh District (letter only)  
Wade Chandler, U.S. Army Corps of Engineers, Baltimore District (letter only)  
Sam Reynolds, U.S. Army Corps of Engineers, Philly District (letter only)  
Monica Styles, Sunoco Logistics  
Matthew Gordon, Sunoco Logistics  
Christopher Embry, Sunoco Logistics  
Brad Schaeffer, Tetra Tech, Inc.