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August 22, 2025

Mr. Kevin S. White, P.E.
Director
Regional Permit Coordination Office
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Re: Technical Deficiency Notification Responses
Water Obstruction & Encroachment Permit
DEP Application No. E3683225-006 | APS ID 1139499 | AUTH ID 1530838
Northeast Supply Enhancement Project - Quarryville Loop
Drumore, East Drumore, and Eden Townships, Lancaster County

Dear Mr. White:

Transcontinental Gas Pipe Line Company, LLC (Transco) is providing a response to the Technical Deficiency Notification received from the Pennsylvania Department of Environmental Protection (PADEP) dated July 31, 2025, for the Northeast Supply Enhancement Project Quarryville Loop (Project) located in Lancaster County, Pennsylvania.

Please find attached the itemized responses (Attachment 1) and the Road Crossing Permit (Attachment 2) as discussed during the pre-submittal meeting with PADEP on August 21, 2025.

The following documents have been revised per Technical Deficiency comments and uploaded to PADEP OnBase:

- Requirement E PNDI
- Requirement H Project Description and Aquatic Resource Impact Table (ARIT)
- Requirement I Color Photographs with Map

- Requirement K Erosion and Sediment Control Plan
- Enclosure A Wetland Delineation Report June 2025
- Environmental Assessment Form (EAF) Module S1 Project Summary
- EAF Module S2 Resource Identification and Characterization and Resumes
- EAF Module S3 Identification and Description of Potential Project Impacts
- EAF Module S4 Mitigation Plan
- Exhibit 12 Water Supply Wells
- Exhibit 22 Alternatives Analysis with Updated Table 3-2
- Exhibit 39 Cumulative Impact Discussion and Updated Table 1E-1
- Site Restoration Plan

Transco appreciates the Department's assistance and expeditious review of this application. Transco looks forward to promptly providing any further information, as requested by the Department, to help facilitate the review of the application.

If you require any additional information, please contact me at (281)-433-8046 or via email at <u>Joseph.Dean@williams.com</u>. Alternatively, you can contact Steven MacLeod, Project Manager at WSP at (716)-462-0845 or via email at <u>Steven.MacLeod@wsp.com</u>.

Sincerely,

Joseph Dean

Manager, Permitting

cc (via e-mail):

Tim Powell, Transco Stephen Kellogg, Transco Daniel Merz, Esq., Transco

Sara Mochrie, WSP

Steven MacLeod, WSP

Clara Trueblood, WSP



Transcontinental Gas Pipe Line Company, LLC

NORTHEAST SUPPLY ENHANCEMENT PROJECT

ATTACHMENT 1
TECHNICAL RESPONSE
PADEP CHAPTER 105/USACE SECTION 404 JOINT PERMIT APPLICATION

August 2025

Technical Deficiency Notification Responses Water Obstruction & Encroachment Permit DEP Application No. E3683225-006 | APS ID 1139499 | AUTH ID 1530838

Northeast Supply Enhancement Project - Quarryville Loop Drumore, East Drumore, and Eden Townships, Lancaster County

<u>Comment # 1.</u> The Impact Plans and Aquatic Resource Impact Table (ARIT) show an impact to stream WW31001; however, the Erosion and Sediment Control Plans do not include this stream crossing. Please revise accordingly. [25 Pa Code § 105.21(a)(1)]

Response: Stream WW31001 was depicted on the Erosion and Sediment Control Plan, however, the line was missing its corresponding label. The Plan sheet has been updated to clearly label this resource as well as its corresponding floodway.

<u>Comment #2</u>. The Project Description has an older version of the ARIT attached. Please ensure updated files are replaced in all locations throughout the application. [25 Pa Code § 105.21(a)(1)]

Response: The Project Description (Requirement H) includes the current ARIT dated August 21, 2025. The crossing window for Fishing Creek was updated as discussed during the pre-submittal meeting with PADEP on August 21, 2025. The ARIT includes the updated time-of-year-restriction (TOYR) from Pennsylvania Fish and Boat Commission of February 15-June 1.

<u>Comment #3.</u> The color photo with map in Requirement I does not appear to provide photos for all wetlands. Please provide documentation for all resources, including WB-T02-012. [25 Pa Code § 105.21(a)(1)]

Response: The color photo map in Requirement I has been updated to include all wetlands, including WB-T02-012. Requirement I includes photos and location of vernal pool WB-T02-012 on pages 20 and 21.

<u>Comment #4.</u> Please provide the purpose and need for the proposed 25-foot offset between pipeline centerlines in the Project Description. [25 Pa Code § 105.13(e)(1)(iii)]

Response: As described in Requirement H (Project Description Narrative), a majority of the Quarryville Loop will be co-located within the existing pipeline right-of-way (ROW). Transco proposes to widen the existing ROW to accommodate a 25-foot offset between pipeline centerlines. The 25-foot offset is required from the existing natural gas pipeline for safety considerations. The purpose and need of the offset is to prevent damage and allow access for maintenance of both pipelines. The setback distance during construction and operation of the pipelines protects public safety, preserves the integrity of the pipeline infrastructure, and facilitates safe operation and maintenance of the pipelines.

<u>Comment #5</u>. The application's Module S1B4-3.8. states, "Based on the results of those surveys and consultation, each agency has responded, indicating clearance of the Project relative to those T&E species within their purview." Final clearances have not been received. Please provide all final clearances from agencies including:

a. Final clearance from the US Fish and Wildlife Service and include correspondences. [25 Pa Code §§ 105.14(b) and 105.24]

b. Final clearance from the Pennsylvania Fish and Boat Commission and include correspondences. [25 Pa. Code §§105.14(b) and 105.24]

Response a: A consultation letter was submitted to USFWS on July 11, 2025. USACE provided confirmation via email on August 15, 2025 that the Corps completed Section 7 of ESA consultation with USFWS. The avoidance measures and recommendations described in the August 15, 2025 email will be included as special conditions of the Corps permit. Requirement E (PNDI) has been revised with updated USFWS consultation.

Response b: A copy of the correspondence from Transco to PFBC dated August 12, 2025 has been added to Requirement E.

<u>Comment #6.</u> The Pennsylvania Fish and Boat Commission has not yet provided comment on the Project; additional comments may be forthcoming. [25 Pa Code §§ 105.14(b) and 105.24]

Response: In a letter dated June 16, 2025, PFBC requested additional evaluations regarding potential habitat for the Broad-headed Skink (*Plestiodon laticeps*, Candidate). That letter specified that PFBC has approved Mr. Brandon Ruhe of Skelly and Loy, Inc and has "... permit[ted] him (Type 3 Scientific Collectors' Permit) to search for and collect Broadhead Skinks." Transco worked with Mr. Ruhe to complete a habitat assessment between July 28 - 30, 2025 to characterize and determine if potential habitat exists within the vicinity of the proposed project area, limited to areas proposed for impact between the Western Terminus to State Route 272. No potential habitat for the Broad-headed Skink was identified, as described in the habitat assessment report, which was submitted to PFBC on August 12, 2025. A copy of the correspondence from Transco to PFBC dated August 12, 2025 has been added to Requirement E.

<u>Comment #7.</u> Please provide documentation of coordination with Pennsylvania Game Commission regarding construction within Muddy Run State Game Lands (SGL #423). [25 Pa Code §§ 105.14(b)(5)]

Response: Muddy Run State Game Lands (SGL #423), which includes Muddy Run Recreation Area, is located at the western terminus of the Project area between MP 1681.00 and 1681.41. Approximately 17 acres of the construction right-of-way (ROW) occur within SGL #423. Impacts to the SGL #423 have been minimized by co-locating the pipeline along the existing mainline pipelines. The Quarryville loop crossing is depicted in Figure 8A-6, Sheet 1, of Appendix 8A, RR 8 (See Exhibit 20). Project impacts to the Muddy Run State Game Land are summarized in Section 8.5.1.2.1 and Table 8B-2 of Appendix 8A of RR 8 (See Exhibit 17).

Transco acquired necessary land rights from Exelon Generation Company, LLC (Exelon), the owner of the applicable properties at the Muddy Run location at the time of

the original project. Title research did not reveal any interest held by the Pennsylvania Game Commission (PGC). The proposed Quarryville Loop expansion project is located on property owned by Exelon Corp and managed/leased with PGC. Exelon advised that PGC operates the Muddy Run Trail in the project vicinity and recommended that Transco request consultation. Transco subsequently held discussions with representatives of the PGC on several occasions in 2018 and provided the PGC with copies of the project alignment sheets and the re-vegetation plan. On April 30, 2018, Transco discussed the proposed Quarryville Loop expansion project with Kevin Clouser of the PGC. On May 3, 2018, Transco provided soil erosion and sediment control drawings via email to Mr. Clouser. The PGC declined an invitation for an on-site meeting and Transco does not have records of any comments from the PGC relative to the plans. Transco's records indicate that the PGC asked that signs be placed at the entrance to the Muddy Run Trail that would notify users of the upcoming construction. Transco intends to provide a project status briefing in-person to the PGC on August 22, 2025.

<u>Comment #8.</u> Please provide a summary of current resumes for work completed in 2025 for Module S2A1, per the instructions of the EA (3150-PMBWEW0017). [25 Pa Code § 105.15(a)(1)]

Response: Requirement J Environmental Assessment Form Module S2 Resource ID and Characterization has been updated with resumes for biologists that completed stream and wetland delineations in 2025, including Avery Miller, Laura Jane Kemper, Samuel Hillman, and Charlotte Takacsy.

Comment #9. Table 3-2 Streams Assessed Using the Riverine Protocol states WW-T02-007 had an overall Condition index of 0.29; however, the RCI number provided on page 678 provides an index of 0.43. Moreover WW-T02-001 is shown to have a 0.81 in the table, but 0.73 in the Riverine Assessment Form on page 669 of the PDF. Likewise, wetland W-T06-004 on page 655 has an index of 0.74, but on Table 3-1 of page 1293 there is an index of 0.71, which is what the report from 2016 shows on page 1363 of exhibit 3. Please review and revise final resource tables for consistency with 2025 data. [25 Pa Code §§ 105.21(a)(1)]

Response: The identified resource tables were reviewed and updated to reflect the 2025 survey data. Waterbody WB-T17-001 and wetland W-T02-006 were removed from the tables, as both features are located outside the 2025 survey area and the project limit of disturbance (LOD). Stream WW31001 was added to the survey area based on the 2025 data and is now included in the updated table and data sheet incorporated into Appendix 6: PADEP Wetland and Riverine Condition Level 2 Rapid Assessment Protocol Forms of Enclosure A – Wetland Delineation Report.

The overall condition index values for the relevant features have been updated based on the 2025 survey data. WW-T02-007 now has an updated overall conditional index of 0.41, which is correctly reflected in resource Table 3-2 and its corresponding data sheet. WW-T02-001 has an overall condition index of 0.73, and Table 3-2 has been revised to reflect this value. Wetland W-T06-004 has an overall condition index of 0.74, and this value is now accurately presented in Table 3-1.

<u>Comment #10.</u> The Modules S3 B8 states Transco will be crossing a property enrolled in the Conservation Resource Enhancement Program (CREP). Please identify this area in the Restoration Plan Drawings. [25 Pa Code §§ 105.21(a)(1)]

Response: On August 13, 2025, Transco contacted the landowner who confirmed that the property referenced in Module S3 B8 is currently enrolled in the Conservation Resource Enhancement Program (CREP) through 2027. Transco has identified the location of the CREP reserve area in the Site Restoration Plans.

Comment #11. Exhibit and Enclosures 1, Exhibit 13 (page 202 of the PDF) has a redlined sixty-four non-public water supply wells within 150 ft and 7 water supplies within 10 feet of the workspace, while the Modules S1 B3-3.4. states, "Additionally, forty-eight private water supply wells and three private springs with potential to provide water supply or located within or less than 10 ft. from the project area." There may also be discrepancy on the distance of these wells from the pipeline, as in Module S3, the application states, "six private water supply wells and three private springs are located within or less than 10 feet from Project workspaces. [...] Prior to construction, Transco will seek landowner permission to test all wells within 150 feet of the construction footprint before and after construction." Please state how many wells are within 150 feet of the construction footprint and subject to water testing. Please ensure the enclosures and modules reflect consistent and up-to-date data on this matter throughout the application. [25 Pa. Code § 105.21(a)(1)]

Response: WSP reviewed well locations using the most recent available information from Pennsylvania Groundwater Information System (2025). Sixty-eight private water wells are located on properties within 150 ft of the construction footprint. Three non-public springs are located on properties within 150 ft of the construction footprint. Module S3 has been revised.

<u>Comment #12.</u> Please provide the Subfacility table(s) in the EA Module S3.C. [25 Pa Code § 105.21(a)(1)]

Response: The Subfacility table is provided in the revised EA Module S3.C Requirement H (Project Description).

Comment #13. Please clarify the proposed construction method for Crossing 11, which includes an unnamed tributary to Stewart Run (WW-T06-001) and wetland W-T06-003A-1. The ARIT states this crossing will be completed using a conventional bore and timber mats, while the Alternatives Analysis narrative and Table 3-1 and 3-2 within Exhibit 22 indicate open cut construction. These documents conflict. Please confirm the correct construction method and revise the application for consistency. If conventional bore is proposed, include a discussion of how bore pit depth concerns will be addressed. [25 Pa Code § 105.21(a)(1)]

Response: The ARIT is correct. Crossing 11 will be completed using a conventional bore and timber mats. The Alternatives Analysis and Table 3-1 and 3-2 within Exhibit 22 have been revised.

The bore pit depth is designed to bore under the Resource Crossing and Robert Fulton Highway to provide sufficient coverage required for the road crossing. A copy of the road crossing permit that depicts the plan and profile of the bore crossing is provided (Attachment 2).

The conventional bore was designed with the following considerations:

- There is no space to install the bore pit between the stream and the highway.
- There is an overhead power line west of the road that doesn't allow installation of the bore pit in that location.
- Boring both the stream and the highway in one bore provides the least amount of ground disturbance.
- The bore pit achieves the five-foot depth requirement by Penn DOT.
- Bore pits 20 ft and deeper will require an engineered excavation solution signed by a Professional Engineer mostly made up of reinforced trench box systems.

Bore pit dewatering activities will discharge into an upland location and will not impact the stream channel.

<u>Comment #14.</u> Photos of Stream WW-T02-008 indicate severe instability of the stream bed and banks. Please evaluate potential secondary impacts that may occur in this area and evaluate the potential need for additional water obstructions and encroachments. [25 Pa Code §§ 105.14(b)(12) & 105.14(b)(4)]

Response: Stream WW-T02-008 flows north to south through the right-of-way. Based on site photos and the stream mapping, the northern portion of the stream is narrower and more incised. Two channels converge from the north and create a single, wider channel. The channel widens and becomes less incised as it crosses the right-of-way and flows south.

The proposed stream crossing will include trenching across the stream to install the 42-inch pipe. Appropriate and required measures will be taken to ensure no excess sediment enters the stream or waterways.

Potential secondary impacts for the crossing of Stream WW-T02-008 may include reduced bank stabilization downstream and vegetative recovery. Upstream of the pipeline crossing location, the banks are non-vegetated due to scour, which causes undercutting of the banks. To prevent secondary impacts, the banks will be seeded with a stabilizing seed mix. Bank stabilization methods such as fiber cloth and straw mulching may be utilized to increase bank stabilization. Additional vegetative coverage via live willow stakes may provide enhanced natural stabilization. Willow species such as riverbank willow, silky willow, and pussy willow are recommended. These measures are noted in the Site Restoration Plan. Overall, secondary impacts to stream WW-T02-008 are not anticipated based on the construction and restoration plans.

<u>Comment #15.</u> Modules S3H references Exhibit 39 for data collected on past, present, and reasonably foreseeable future activities considered in the Cumulative impact discussion. The project data is from 2016 and contains discussion of an HDD. Please provide an updated version of Table IE-1 and discussion, tailored to the current project on past, present, and reasonably foreseeable future activities considered to fulfil Modules S3H. [25 Pa Code § 105.21(a)(1)]

Response: An updated version of Table 1E-1 has been provided in Exhibit 39. Previous references to the Quarryville Loop HDD in Module S3 Exhibit 39 have been marked in Red, Italics and strikethrough.

<u>Comment #16.</u> Modules S4 should include a discussion on avoiding and minimization of impacts, as indicated in EA instructions S4A (3150-PMBWEW0017). Please also discuss repair and rehabilitation efforts to PSS wetlands and forested riparian floodways in the temporary workspaces. Please also indicate acreage of forested riparian floodways both cleared and replanted. [25 Pa Code §§ 105.13(e)(1)(ix) & 105.21(a)(1)]

Response: Approximately 0.05 acres of forested riparian floodways exist within the Permanent Easement and 0.13 acres exist within the temporary workspace. A total of 0.18 acres of forested riparian floodways will be impacted. Riparian Buffer Impact Areas are shown on the Site Restoration Plan. Avoidance and minimization measures are summarized in Exhibit 22 Alternatives Analysis. Exhibit 22 discusses design alternatives in addition to the associated impact minimization of each proposed alternative.

Additional information pertaining to replanting of forested riparian floodways was added to Module S4, Section 1.0 - Temporary Forested Wetland Impacts. A list of Riparian Buffer Replanting Species List has also been added to this section of Module S4.

Comment #17. Exhibits & Enclosure 3, Exhibit 30 VI.D indicates that a 10' wide corridor will be maintained in an herbaceous state through wetlands. Please provide a table clearly indicating the acreage of permanent conversion of PFO and PSS wetlands and the acreage of temporary conversion of PFO and PSS wetlands. In addition, please provide documentation in Module S4 on how you intend to mitigate for these impacts and update the Restoration Plans accordingly. [25 Pa Code §105.13(e)(1)(ix) & 105.15(a)(1)]

Response: Mitigation in the form of tree plantings is proposed for PFO wetland impacts associated with wetland W-T02-001C-1 in Resource Crossing 4. A table of wetland conversion impacts associated with the 10-ft maintenance corridor has been added to the Module S4 Mitigation Plan. The 10-ft herbaceous corridor is also shown on the Site Restoration Plan.

Mitigation is not proposed for PSS wetland impacts due to the minimal amount of permanent conversion (0.001 acre). Wetland trees and shrubs are proposed to be cut above ground level, leaving existing root systems in place. Tree stumps and grading activities will be limited to directly over the trenchline. Stumps and root systems will not be removed from the rest of the construction right-of-way in wetlands.

PSS wetland W-T02-008B-1 from Resource Crossing 3 and PSS wetland W-T02-001B-1 from Resource Crossing 4 are not crossed by the 10-ft trench or 10-ft herbaceous corridor. Approximately 0.001 acres of PSS wetland W-T02-010B-1 from Resource Crossing 9 is within the 10-ft trench and 10-ft herbaceous corridor.

<u>Comment #18.</u> Plan sheets were provided for the PFO replanting and vernal pool restoration in Modules S4. Please include plan details provided in the EA Module S4 within the Restoration Plan set and assure both documents correspond. [25 Pa Code §105.13(e)(1)(ix)]

Response: Per Comment #20, reference to reseeding of the vernal pool with a native seed mix was removed to avoid potential adverse effects to the ecology of the vernal pool through introduction of species not native to the pool. The vernal pool will be allowed to revegetate naturally. Module S4 and the Site Restoration Plan have been revised.

<u>Comment #19.</u> Regarding the W—T02-001C-1 PFO Planting Plan, the delineation report indicates the presence of Quercus palustris (pin oak) and Acer negundo (boxelder). Consider prioritizing the planting of these species. Additionally, please evaluate whether planting larger trees browse pressure and aid in a more successful replanting effort. [25 Pa Code § 105.13(e)(1)(ix)]

Response: The text in the Monitoring Plan has been revised to reflect the suggestions: PFO portions of wetland W-T02-001C-1 that are located within the temporary workspace (0.04 acres) will be planted with trees (herein referred to as the replanting area). The replanting area will be planted at a density 435 stems per acre, which is equivalent to 18 trees, using a variety of trees from the list below. Sheet 1 of 2 – Crossing 4: W-T02-001C-1 Planting Plan outlines the location where the planting is to take place. The trees will be provided with shelters and support stakes. Fertilizer and rodenticide tablets may be used at each planting to help jump start growth and protect against predation from herbivores.

Transco evaluated whether planting larger trees minimize browse pressure and may aid in a more successful planting effort. To further mitigate browse pressure and improve survivability, trees with a minimum caliper size of 1 to 1.5 inches (8 - 12 foot tall) will be planted. This size range is selected based on industry standards and field experience indicating reduced susceptibility to herbivore damage and improved establishment success. At least three of the following species should be planted in the restoration area:

- Pin Oak (*Quercus palustris*)
- Swamp White Oak (*Quercus bicolor*)
- Boxelder (*Acer negundo*)
- Eastern Hemlock (*Tsuga canadensis*)
- Blackgum (*Nyssa sylvatica*)
- American Sycamore (*Platanus occidentalis*)

In accordance with the delineation report and site-specific ecological conditions, priority will be given to planting Pin Oak (*Quercus palustris*) and Boxelder (*Acer negundo*), as these species are naturally present in the area.

<u>Comment #20.</u> The Vernal Pool Restoration Plan within the Site Restoration Plan indicates the disturbed areas will be reseeded with wetland seed mix. In order to avoid potential adverse effects to the ecology of the vernal pool through the introduction of species not native to the vernal pool, consider removing this language and allow the vernal pool area to revegetate naturally. [25 Pa Code § 105.14(b)(4)]

Response:

The Site Restoration Plan has been updated. The note addressing vernal pool seeding with a wetland seed mix has been removed and the areas will be allowed to revegetate naturally.

Comment #21. The project does not provide a monitoring plan for impacted water resources. Please provide a monitoring plan including parameters for success and adaptive management procedures in the EA Module S4 and reference this plan within the Restoration Site Plans. Monitoring shall be submitted to the Department in the spring and fall for the first two (2) calendar years following construction and annually for three (3) years thereafter. [25 Pa Code §§ 105.13(e)(1)(ix) & 105.21(a)(1)]

Response: The Monitoring Plan for impacted water resources has been created and provided within the revised EA Module S4.

Comment #22. Exhibit 38 of Exhibits and Enclosures 3, Section 3.2 of Attachment 10 Noxious Weed and Invasive Plant Management Plan states, "Where noxious weed and invasive plant species populations in disturbed areas exceed the density of adjacent, undisturbed locations, Transco will consult with a state-certified applicator and applicable regulating agency to choose the most effective method of control (i.e., herbicide, mechanical, etc.)" and that "prevention methodology will be considered successful if the density and cover of noxious weed and invasive plant species does not exceed the density and cover of that on adjacent, undisturbed lands." Consider inserting this language in the Long Term Operation and Maintenance Schedule on the Restoration Plan and PCSM Plan and reference the plan within Modules S4 during site monitoring. [25 Pa Code § 105.21(b), 105.13(e)(1)(ix)]

Response: These statements were added to Module S4, Section 4.0 and were also incorporated as a note on the supporting Site Restoration Plan.

<u>Comment #23.</u> Please review the list of Table 1.2-1 Designated Noxious Weeds of the State of Pennsylvania and provide updated species to be aligned with current lists, if necessary. Please review and update Table 2.1-1 for the Quarryville Loop and address within Module S4. Additionally, the term Invasive Plant is ambiguous, consider correcting language. [25 Pa. Code § 105.21(b), 105.13(e)(1)(ix)]

Response: Table 1.2-1 has been updated to include currently listed species. Table 2.1-1 has been updated to include current classifications.

<u>Comment #24.</u> Please provide a copy of the Erosion and Sediment (E&S) Control Plans for the Joint Permit Application. [25 Pa Code § 105.21(a)(1)]

Response: A copy of the E&S Plan, addressing the comments received in the PADEP July 31, 2025 technical deficiency letter, has been provided with this submission.

<u>Comment #25.</u> It is difficult to distinguish 105 features in the E&S Plans. Please show floodways and differentiate wetland types on the E&S Plans. [25 Pa Code § 105.13(g)]

Response: The E&S Plan has been updated to better depict the 105 features. Noting that on the E&S Plan submitted to the PADEP Chapter 102 team on July 8, 2025, wetlands and streams had been revised from grayscale to color to aid in viewing. Floodways were present on the plan set but were depicted in grayscale and have now been updated to a color for easier identification.

<u>Comment #26.</u> Please display on the Erosion and Sediment Control Plans the locations of the proposed Wetland Equipment Crossing (WEC) and stream crossings. [25 Pa Code § 105.21(a)(1)]

Response: The E&S Plan has been updated to depict all locations of proposed wetland and stream equipment crossings.

<u>Comment #27.</u> Please provide the method for construction within wetlands on the Erosion and Sediment Control Plans. [25 Pa Code § 105.21(a)(1)]

Response: The E&S Plan has been updated to provide a call-out at all wetland locations identifying the proposed method of construction per the appropriate detail.

Comment #28. Timber mat bridges in wetlands should have geotextile underlayment. Please review details and revise accordingly. [25 Pa Code § 105.13(e)]

Response: The Wetland Equipment Crossing (WEC) detail has been revised to note the requirement of geotextile underlayment beneath the timber matting.

<u>Comment #29.</u> The Department does not recommend stockpiling soil or subsoil within wetlands. Evaluate the ability to stockpile soils outside wetland boundaries throughout project when possible. If this is not feasible, please place wetland soil on a timber matting with geotextile or composite matting. Please review construction details and revise accordingly. [25 Pa Code § 105.13(e)]

Response: Where soil stockpiling cannot occur outside the limits of wetlands, soil will be stockpiled on timber matting with geotextile underlayment and a note denoting this requirement has been added to the wetland construction details within the E&S Plan.

<u>Comment #30.</u> Please verify the Bridge Equipment Crossings details has the siderails wrapped with geotextile fabric, in addition to having the fabric under the bridge, to prevent sediment from falling into the stream. [25 Pa Code § 105.13(e)]

Response: The Bridge Equipment Detail has been updated to note that siderails must also be wrapped in geotextile fabric to further deter sediment falling into streams.

<u>Comment #31.</u> Please discuss the ability to use naturally decomposing fiber matting in lieu of bio-or photodegradable plastic mesh erosion control blankets near wetlands and watercourses. [25 Pa Code §§ 105.16(d) and 105.13(g)]

Response: Transco will utilize naturally decomposing fiber matting in lieu of plastic mesh erosion control blankets near wetlands and watercourses. This requirement has been updated in the E&S Plan to depict this ECB specification.

<u>Comment #32.</u> Please review the location of trench plugs at all resources. Trench plugs should be placed within 10 feet of the edge of wetlands (e.g. W-T-02-012A-1 only has trench plug) as stated in the Wetland Crossing Configuration. [25 Pa Code § 105.21(a)(1)]

Response: All trench plug locations have been reassessed and where lacking, the E&S Plan has been updated for their installation within 10 feet of either side of a wetland resource.

<u>Comment #33.</u> The Exhibit 17 within Exhibit and Enclosures 1 indicates measures proposed to protect public safety in public recreation areas. Please update the plan drawings to include these notifications in the sequence and locations in the plans. [25 Pa Code §§ 105.14(b)(5) & 105.21(a)(1)]

Response: The E&S Plan construction sequence has been updated to include this required notification and a call out has been added on the corresponding parcel(s).

<u>Comment #34.</u> The E&S Plan notes a Sequence of Construction for Stream Crossings. Please provide a Sequence of Construction for Wetland Crossings, referencing all pertinent information. [25 Pa Code §§ 105.13(e) & 105.14(b)(4)]

Response: A Sequence of Construction for Wetland Crossings has been added to the E&S Plan.

<u>Comment #35.</u> DEP suggests the addition of the following note, or similar, to all wetland construction procedure details: (1) The Environmental Inspector is required to be onsite for all crossings to determine if a fragipan or restrictive layer is present. (2) If a restrictive layer, including but not limited to clay or fragipans, is encountered during the trench excavation of

a wetland, a knowledgeable wetlands scientist on the Environmental Inspection Team shall oversee the use of "Triple lift trench line technique", backfilling of the trench, and installation of trench plugs, in order to maintain wetland hydrology. [25 Pa Code §§ 105.13(e) & 105.14(b)(4)]

Response: Based on the Web Soil Survey, site location, and wetland delineation data sheets, two soil types with a defined fragipan (restrictive layer) are identified within the Project Area. The Glenville silt loam (GdB) and Clarksburg silt loam (ClB) soil series exhibit shallow fragipan which can cause a perched water table in wetlands.

The depth to the fragipan in the Glenville Series is 15-30 inches. The Glenville Series is present in the Quarryville Loop portion of the Project and based on the S4 module, is present in wetlands W-T02-001, W-T02-005, W-T02-006, W-T02-010, W-T02-011, W-T06-001, W-T06-003 and W-T06-004. Trenching is proposed through wetlands W-T-02-001, W-T02-005, W-T02-010, W-T02-011, W-T06-001, W-T06-003 and W-T06-004.

The depth to the fragipan in the Clarksburg Series is 20-36 inches. The Clarksburg Series is present in the Compressor Station 200 (C200) portion of the Project and based on Wetland Delineation data sheets, is present in wetlands W32001A and W32003A. No impacts are proposed to these wetlands.

In wetlands where fragipan is present and trenching is proposed, care must be taken to prevent the mixing of fragipan, subsoil, and topsoil. A wetland scientist will be onsite to verify fragipan is present (or not present) in the wetlands and will identify the depth of fragipan. The "Triple Lift Trench Line Technique" is proposed where fragipan is identified in a wetland.

A knowledgeable wetlands scientist on the Environmental Impact Team shall oversee the use of the "Triple lift trench line technique" while trenching wetlands. The "Triple lift Trench line technique" refers to a common pipeline installation method of trenching where backfilling is done in three separate layers ("lifts") to ensure proper compaction and prevent mixing of soil layers. The technique involves excavating and stockpiling the topsoil, upper subsoil, and lower subsoil (fragipan) in segregated piles. After the pipe is installed, the trench is backfilled with the lower subsoil (fragipan) first, followed by the upper subsoil, and lastly the topsoil.

The E&S Plan has been updated to include a Triple Lift Trench Line Technique detail and this wetland construction method has been called out on the plans for wetlands W-T-02-001, W-T02-005, W-T02-010, W-T02-011, W-T06-001, W-T06-003 and W-T06-004 accordingly.

<u>Comment #36.</u> The Module S4 discusses use of "Triple lift trench line technique." The E&S Plan contains "dry, saturated, and flooded" wetland details. Please verify this technique is in the E&S plans or provide detail. [25 Pa Code § 105.21(a)(1)]

Response: The "Triple Lift Trench Line Technique" is proposed in wetlands with a perched water table or where fragipan is present. Trenching is proposed within seven (7) wetlands (identified below) with high potential for fragipan and/or a perched water table.

The E&S Plan has been updated to include a Triple Lift Trench Line Technique detail, and this wetland construction method has been called out on the plans for wetlands W-T-02-001, W-T02-005, W-T02-010, W-T02-011, W-T06-001, W-T06-003 and W-T06-004 accordingly.

<u>Comment #37.</u> The BMP manual suggests "Erosion control blankets should be used for all seeded areas within 50 feet of a surface water — 100 feet of a special protection water — regardless of slope." Please review the need for ECB around wetlands (e.g. W-T-02-012A-1 does not have ECB on one side). Please also review language of General Note 34, as it only states 50 feet for all surface water, and does not address special protection waters. [25 Pa Code § 105.13(g)]

Response: All ECB locations have been reassessed and confirmed they are 100 feet in width, as the entire Quarryville Loop is present within a high-quality watershed and therefore all streams are a special protection water. General Note 34 has been updated accordingly to refer to 100 feet.

<u>Comment #38.</u> Please provide a full and complete copy of all files for final file storage. [25 Pa code § 105.21(a)(1)]

Response: A full and complete copy of all files for final file storage will be provided upon receipt of the clearances from USFWS and PFBC.



Transcontinental Gas Pipe Line Company, LLC

NORTHEAST SUPPLY ENHANCEMENT PROJECT

ATTACHMENT 2
FULTON HIGHWAY DRAWINGS
PADEP CHAPTER 105/USACE SECTION 404 JOINT PERMIT APPLICATION

August 2025



