

Sabal Trail conducted field surveys on May 13, 2016 at new contractor yard CY2-6 in Terrell County, Georgia. Proposed contractor yard CY2-6 is currently an agricultural field. At the time of the field survey, wheat was being grown. Access to this yard would be from adjacent public roads.

Sabal Trail conducted field surveys on July 19, 2016 at new contractor yard CY2-7 in Stewart County, Georgia. Proposed contractor yard CY2-7 is a fallow field that appears to have been cleared in the recent past (1-2 years). Bare ground was observed in patches. Early successional species, including red maple (*Acer rubrum*), sweetgum (*Liquidambar styraciflua*), as well as dog fennel (*Eupatorium capillifolium*), were present. Surface soils included some sand but were mostly clay.

No waters of the United States (e.g., wetlands or waterbodies) were identified within the proposed contractor yards. The upland cut drainage (D1TRC600) along Country Farm Road NE will not be disturbed by the Project.

No habitats for species listed under the Endangered Species Act or cultural resources were identified within the proposed contractor yards or along TAR-GA-CO-007.

Sabal Trail requests confirmation from the USACE Savannah District that inclusion of contractor yards CY3-6 (and TAR-GA-CO-007), CY2-6, and CY2-7 does not require modification of the existing Section 404 Clean Water Act/Section 10 Rivers and Harbors Act USACE authorization for the Project.

Earthen Dam Workspaces

Sabal Trail has revised workspace for the Sabal Trail Project – Spread 2 at a dam located between two waterbodies at approximate mainline milepost 105.1. Figures showing the location of the modified workspaces are enclosed. This area was reviewed with Shannon Winsness of Georgia Environmental Protection Division (“EPD”) on February 4, 2016 and two waterbodies (WB2TRC331 and WB2TRC036) in this vicinity were determined to be State Waters and have an associated 25 foot stream buffer. The wretched vegetation line of each waterbody was set in the field during Mr. Winsness’ visit.

The workspace revisions are to accommodate the pipeline installation in this area using the horizontal directional drill (“HDD”) method in place of the previously proposed open cut method. The use of the HDD method will avoid direct surface impacts to the waterbodies and their stream buffers. One of the waterbodies (WB2TRC331) is proposed as the water source for the hydrostatic testing of the drill segment and to facilitate the HDD operations. The workspace into the stream buffer of WB2TRC331 is for placement of the hose into the pond but no clearing is proposed within the stream buffer. The permanent easement of the pipeline will pass over a portion of WB2TRC036 and its stream buffer, but no clearing is proposed within this area. Given that no clearing is proposed within the stream buffers of the waterbodies, Sabal Trail believes a stream buffer variance is not required. Sabal Trail modified the Project’s Notice of Intent to use the NPDES General Permits to Discharge Storm Water Associated with Construction Activity and the EPD concurred on August 17, 2016 that “the project revision will **not** require a buffer variance”.

The workspace revisions include 0.07 acre of new area to be added and 1.95 acres of previously identified workspace to be removed for a net change of -1.88 acres.

Waterbodies WB2TRC331 and WB2TRC036 were included on Table 2.3-3 (Waterbodies Crossed by the Sabal Trail Project) referenced in the August 12, 2016 Authorization. The original crossing method was listed as “N/A” or not applicable because the pipeline did not directly cross either pond. Although direct impacts to both systems will be avoided, a revised version of Table 2.3-3 is enclosed showing the crossing method for WB2TRC036 changed to “IV” representing an HDD crossing. The crossing method for WB2TRC331 remains unchanged; it will not be crossed by the pipeline.