

Given that there are no direct impacts to either waterbody, Sabal Trail does not propose any compensatory mitigation (e.g., mitigation credits) for these modifications.

**At this time, Sabal Trail requests confirmation from the USACE Mobile District that incorporation of the Earthen Dam workspace reconfiguration does not require modification of the existing Section 404 Clean Water Act/Section 10 Rivers and Harbors Act USACE authorization for the Project.**

### S3TRC1000 Workspace Reconfiguration

During preconstruction civil surveys, Sabal Trail noticed that a perennial unnamed tributary of Hog Creek at approximate MP 205.6 near Plyme Rd in Colquitt County, Georgia was not showing in the Project's environmental geodatabase that was used to generate figures, tables, and calculations. Given that other environmental features in the area, wetland W7TRC005 and waterbody WB7TRC004, were shown in the geodatabase, it is believed this was either do to an operator data entry error or equipment malfunction. Sabal Trail scientist's revisited the area in July 2016 and picked up the top of bank of both sides of the stream and it was given the ID of S3TRC1000. The enclosed revised Table 2.3-3 includes information for the crossing of S3TRC1000 which is discussed further below.

Sabal Trail has modified the workspaces at the stream to meet the requirements of the Georgia Stream buffer exemption criteria. All modifications occur within the footprint of the area of disturbance that was previously proposed and approved by the USACE as part of the August 12, 2016 Authorization. A figure is enclosed showing the approved Issued for Construction ("IFC") workspaces and the current workspaces. Additional figures are also enclosed showing the current workspaces as they relate to S3TRC1000. The current workspaces reduce the overall area of disturbance by 0.26 acres. These revisions have been discussed with Mr. Winsness (Georgia EPD) and Sabal Trail received confirmation on August 24, 2016 that a stream buffer variance is not required.

Sabal Trail proposes to cross S3TRC1000 using the open cut method and in accordance with the Sabal Trail Erosion and Sediment Control Plan ("E&SCP") submitted with the application. The Sabal Trail E&SCP complies with the 2013 *FERC Wetland & Waterbody Construction and Mitigation Procedures*. The crossing of S3TRC1000 is classified as minor and as such all instream construction activities (including trenching, pipe installation, backfill, and restoration of the streambed contours) will be completed within 24 hours.

Similar to other minor waterbody crossings approved in the August 12, 2016 Authorization, compensatory mitigation (e.g., mitigation credits) is not proposed for temporary waterbody impacts associated with the crossing of S3TRC1000.

At this time, Sabal Trail requests the USACE modify the August 12, 2016 Authorization to include the crossing of S3TRC1000 as indicated in revised Table 2.3-3 Waterbodies Crossed by the Sabal Trail Project.

Please contact me at 770.270.1192 x 119 or [jlancaster@trcsolutions.com](mailto:jlancaster@trcsolutions.com) should you have any questions concerning this request.

Sincerely,



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