

August 5, 2016

Ms. Annie Dziergowski  
Fish & Wildlife Biologist  
U.S. Fish and Wildlife Service  
7915 Baymeadows Way  
Suite 200  
Jacksonville, Florida 32256

Subject: Sabal Trail Project  
Sabal Trail Transmission, LLC  
**Earthen Dam Workspace Reconfiguration (Georgia)**  
**USFWS Clearance Request**

Dear Ms. Dziergowski:

Sabal Trail Transmission, LLC (“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. A field review was conducted in this vicinity on February 4, 2016 with the Georgia Department of Natural Resources (“GADNR”). Two waterbodies (WB2TRC331 and WB2TRC036) in this vicinity were determined to be State Waters and have an associated 25 foot (“ft”) stream buffer. The wretched vegetation line of each waterbody was set in the field during the GADNR visit to determine where the stream buffers should begin.

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 from GADNR is not required.

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. The overwhelming majority of the workspace revisions have already been reviewed by the USFWS. The 0.07 acre of new area to be added is near the junction of two access roads that were previously surveyed and reviewed by the USFWS. This area is devoid of most vegetation and consists primarily of bare ground.

The United States Fish and Wildlife Service (“USFWS”) Information for Planning and Conservation (“IPaC”) database was consulted to determine what potentially federally listed species could occur within the 0.07 acre area to be added. Sabal Trail also reviewed the Georgia Department of Natural Resources (“GADNR”) Quarter Quad Rare Elements for Richland, GA SW. Table 1 presents a summary of the IPaC and Quarter Quad Rare Elements results.