

**Illinois Department of Natural Resources** 

### telephone log



Date: 4/12/2017

Project / Admin. No.: E160438.00

Call From: Lori Ferry, Rick Hall, Jason Duffey (GAI)

Company: GAI Consultants

Phone No.:

Call To: Jenny Skufca

Company: Illinois Department of Natural Resources

Phone No.: 217-557-8243

Subject: Spire STL Pipeline Conservation Plan

cc:

#### **Summary of Discussion, Decisions, and Commitments:**

GAI requested the call as an informal discussion on avoidance, mitigation, and monitoring measures to include in the Conservation Plan ("Plan") for the northern long-eared bat and timber rattlesnake.

#### Timber rattlesnake

- The Illinois Endangered Species Protection Board ("ESPB") is reviewing the listing due to development on south-facing bluffs, and favors habitat restoration such as removal of shade vegetation.
- Spire proposes to create habitat, through the placement of excavated rock along the edges of the ROW
  or adjacent to edges. IDNR indicated that this would be considered, provided a monitoring component
  was included. IDNR approves of monitoring being conducted by colleges or universities.
- Spire would involve Principia in the mitigation and monitoring
- Principia population is the most studied in the state, so avoidance, mitigation, and monitoring should be
  effective and will be reviewed carefully prior to approval.

#### **Northern Long-eared Bat**

- Unless the species is determined to be prolific in the Project footprint, it is likely that the seasonal
  avoidance, as planned, will be sufficient to avoid take, and therefore, mitigation would not be required.
- It should not be necessary to track northern long-eared bats unless it is determined that they are prolific in an area, in which case they should be tracked sufficient to determine impacts.
- GAI provided an update on the permitting schedule including the potential need to clear trees after April
   1.

#### Indiana Bat

• If Indiana bats are determined to be present, they will need to be included in the Plan.

#### General

- GAI provided an update indicating that access to conduct surveys on Principia will likely be granted.
- IDNR indicated that their internal review of the "Ownership or Control" requirement of the ITA application process is ongoing and no updates were available.

10

#### Ali Trunzo

From: Lori Ferry

**Sent:** Thursday, April 06, 2017 4:18 PM

To: Ali Trunzo

**Subject:** FW: Spire HCP technical assistance call request

From: Jason Duffey

Sent: Thursday, April 06, 2017 3:09 PM

To: Jenny.Skufca@Illinois.gov

Cc: Lori Ferry < L. Ferry@gaiconsultants.com>; Adam Mann < A. Mann@gaiconsultants.com>

Subject: Spire HCP technical assistance call request

Hi Jenny,

I just left you a voice message requesting a brief call to discuss our development of a draft HCP for the Spire STL Pipeline project. As a follow up on previous discussions on the HCP, we would like to request guidance on developing mitigations and monitoring strategy for the timber rattlesnake and northern long-eared bat (if the latter is found to be present).

We are available at your earliest convenience, and currently have most afternoons available next week to schedule a call.

Thanks,

#### Jason A. Duffey

Senior Project Environmental Specialist

#### **GAI Consultants**

1830 Airport Exchange Blvd, Suite 220, Erlanger, KY 41018

T 859.647.6647 | D 859.692.4152 | M 937.554.8488 | gaiconsultants.com | f 🛩 🛗 in 🔊



March 28, 2017

Mr. Keith Shank Impact Assessment Section Manager Illinois Department of Natural Resources One Natural Resources Way Springfield, Illinois 62701

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois

Dear Mr. Shank:

In June 2016, Spire Pipeline LLC ("Spire") initiated consultation with your office regarding their intent to construct, own, and operate the proposed Spire STL Pipeline Project ("Project") which consisted of approximately 59 miles of new, greenfield, 24-inch-diameter steel pipeline (referred to as the "24-inch pipeline"), originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey counties in Illinois before crossing the Mississippi River and extending east into St. Charles County, Missouri, crossing the Missouri River and tying into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Line 880 consisted of approximately seven miles of existing 20-inch-diameter steel pipeline. As part of the proposed Project, Spire was planning on modifying Line 880 before placing it in to interstate service. The Project also included the construction of minor aboveground metering and regulating ("M&R") stations. On January 26, 2017, Spire filed an application with the Federal Energy Regulatory Commission ("FERC") for a Certificate of Public Convenience and Necessity for the Project (Docket No. CP17-40-000).

On March 15, 2017, Spire filed a "Preliminary Notification of Preferred Route Change" with FERC, indicating that Spire no longer plans to modify the existing Line 880 as part of the Project. Instead, Spire intends to construct a new, greenfield, 24-inch pipeline (referred to as the "North County Extension") which will extend the 24-inch pipeline portion of the Project to a proposed interconnect with Enable Mississippi River Transmission ("Enable MRT"). Spire plans to file an amended application with the FERC in April 2017. GAI Consultants, Inc. ("GAI"), on behalf of Spire, is submitting supplemental information to assist with your review of the Project as amended. An updated description of the proposed Project facilities and location map (Figure 1) are provided herein.

#### **Amended Project Description**

The amended Project as proposed will consist of approximately 65 miles of new, greenfield, 24-inch-diameter steel pipeline in two segments. The first segment (referred to as the "24-inch pipeline" portion of the Project) will originate at a new interconnect with the REX pipeline in Scott County, Illinois, and extend approximately 59 miles through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east through St. Charles County, Missouri. The 24-inch pipeline then crosses the Missouri River into St. Louis County, Missouri, and terminates at a new interconnect with LGC. The second segment of new greenfield pipeline, North County Extension, will consist of a 24-inch-diameter steel pipeline which will extend approximately six miles from the LGC interconnect through the northern portion of St. Louis County and terminate at a new interconnect

with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

The acquisition and modifications to LGC's existing Line 880 is no longer proposed as part of the Project.

Spire anticipates a typical 90-foot temporary construction right-of-way width, and a 50-foot permanent easement. The construction right-of-way is anticipated to be reduced to 75-feet at streams and wetlands. An additional 25 feet of temporary work space will be required through agricultural areas, and additional temporary work space will be required to facilitate construction in certain areas, such as crossings of roads, railroads, streams, and wetlands.

The updated Project schedule includes the following target dates:

- July 22, 2016 National Environmental Policy Act ("NEPA") process began (initiation of FERC Pre-Filing process);
- August 2016 through March 2017 (Anticipated) Biological and Cultural Resource Surveys;
- January 26, 2017 Application Filed with FERC;
- April 2017 (Anticipated) File Amended Application with FERC;
- September 2017 (Anticipated) Draft NEPA Document Published; and
- December 2017 (Anticipated) FERC Decision on Application.

Construction is anticipated to commence in January 2018.

#### Illinois

Approximately 45.7 miles of the 24-inch pipeline will be located in Illinois and traverse Scott, Greene, and Jersey Counties. One metering and regulating station is proposed in Scott County, Illinois, at the interconnection location with the REX pipeline.

The Project facilities are shown on the attached United States Geological Survey ("USGS") Topographic Map (Figure 1). In addition, Spire has proposed the use/development of new and/or existing access roads throughout the Project area. Temporary staging areas will also be utilized to accommodate equipment staging and stockpiling of materials along the proposed corridor during construction.

#### **Site Description**

#### Illinois

The Illinois portion of the Project is located in Scott, Greene, and Jersey Counties, Illinois, and is depicted on the attached portions of the Alsey (1983), Roodhouse West (1983), Carrolton (1985), Boyer Creek (1983), Otterville (1983), Elsah (1979), and Grafton (1995), Illinois, United States Geological Survey (USGS) 7.5-minute series topographic maps (Figure 1).

The pipeline is greenfield and crosses a primarily agricultural landscape with some areas of forest. The Project is located within the North Little Sandy Creek [USGS Hydrologic Unit Code (HUC) #071300110503], Little Sandy Creek (HUC #071300110504), Hurricane Creek (HUC #071300110806), Whitaker Creek-Apple Creek (HUC #071300110702), Coates Creek-Apple Creek (HUC #071300120602), Wines Branch-Lower Macoupin Creek (HUC #071300120602), Wines Branch-Lower Macoupin Creek (HUC #071300120502), Sandy Creek-Otter Creek (HUC #071300110901), Shilow Hollow-South Fork Otter Creek

(HUC #071300110902), Lower Piasa Creek (HUC #071100090204), and Marais Temps Clair-Mississippi River (HUC #071100090401) watersheds.

Spire is currently coordinating with your office regarding this Project. On behalf of Spire we would like to take this opportunity to invite the Illinois Department of Natural Resources to provide any additional comments regarding the Project as it will be amended. We appreciate your continued involvement and cooperation in the review of this important Project.

If you have any questions or would like additional information, please feel free to contact me at 630.605.5255, or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

**GAI** Consultants, Inc.

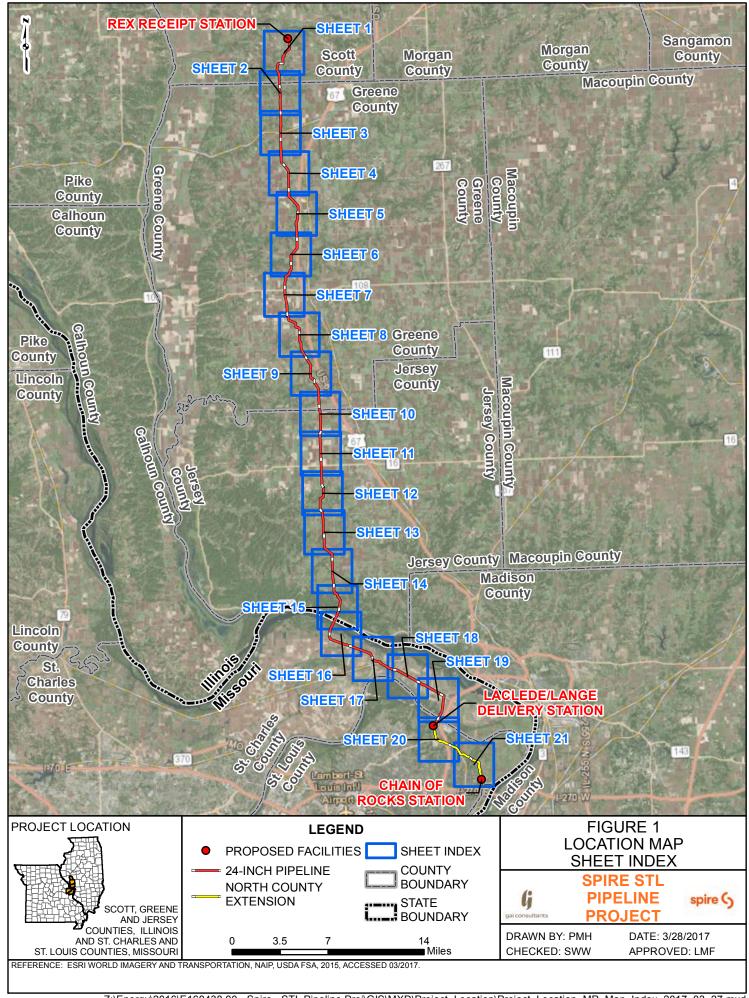
Lori M. Ferry

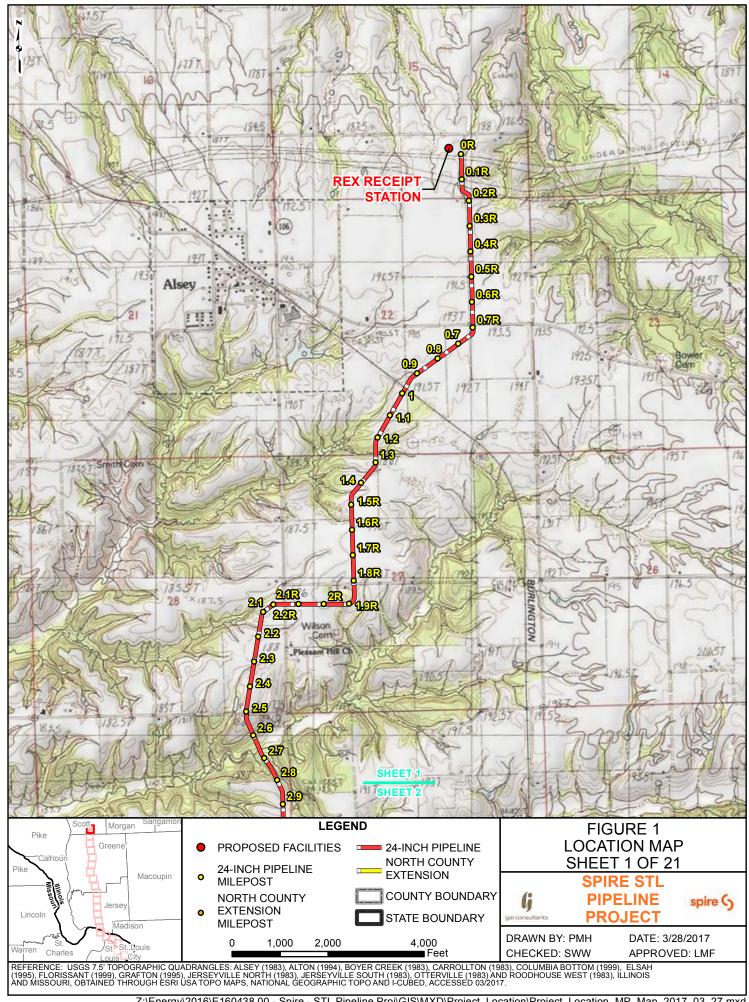
**Environmental Manager** 

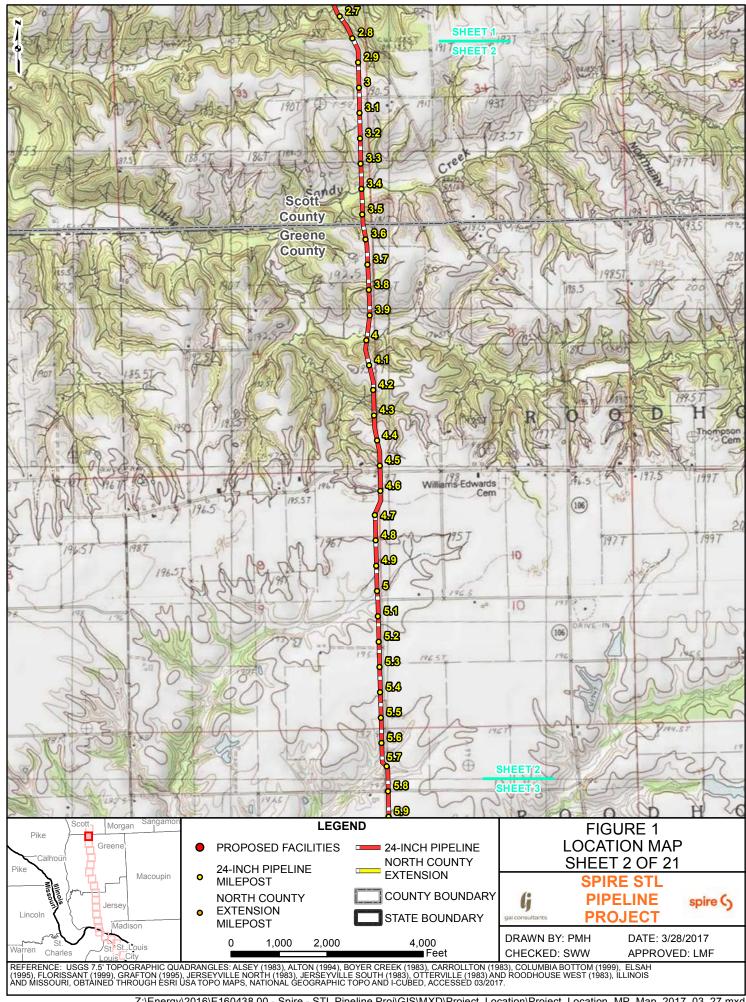
Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)

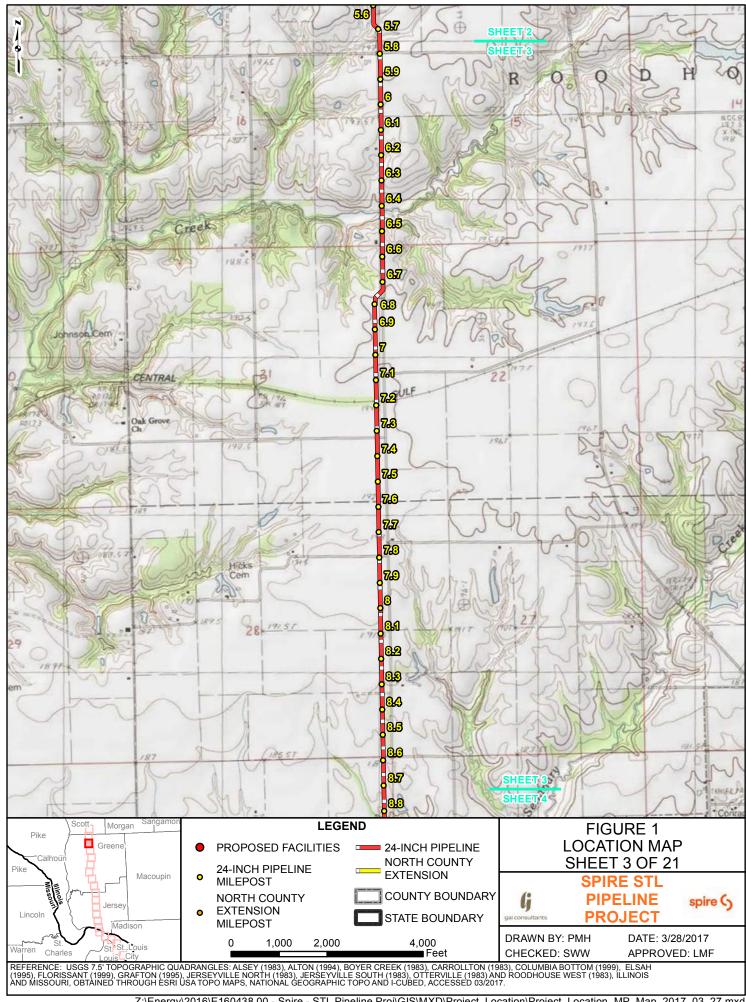
cc: Ms. Jenny Skufca, Illinois Department of Natural Resources

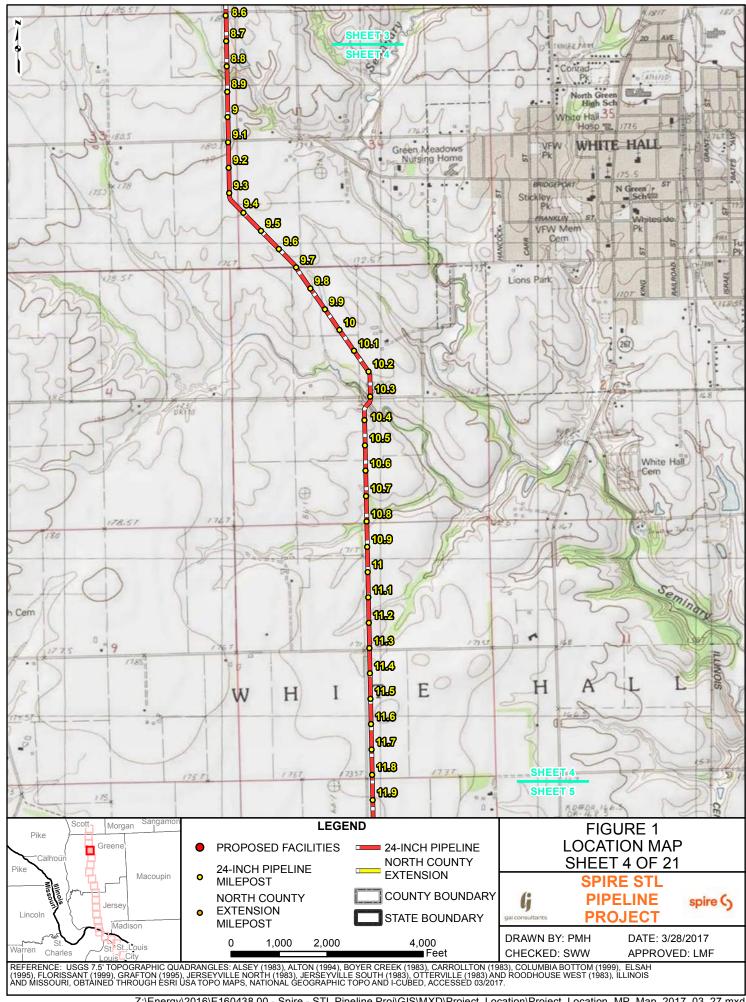
# ATTACHMENT USGS TOPOGRAPHIC MAP (FIGURE 1)

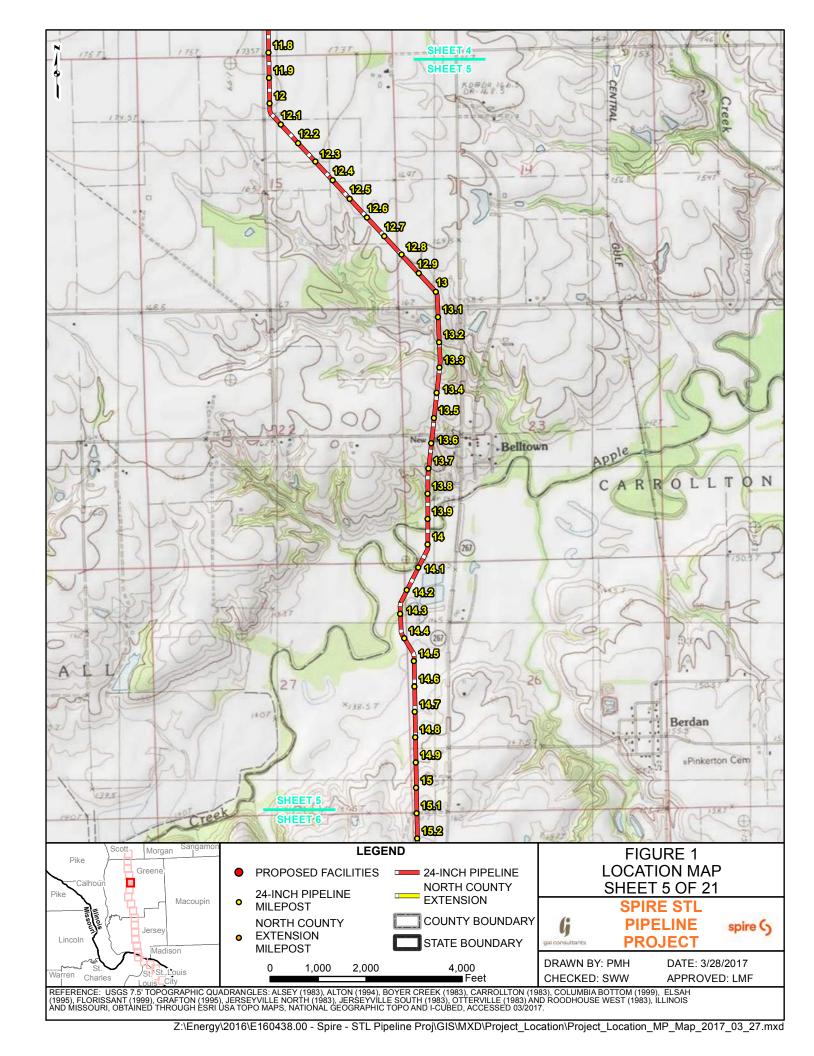


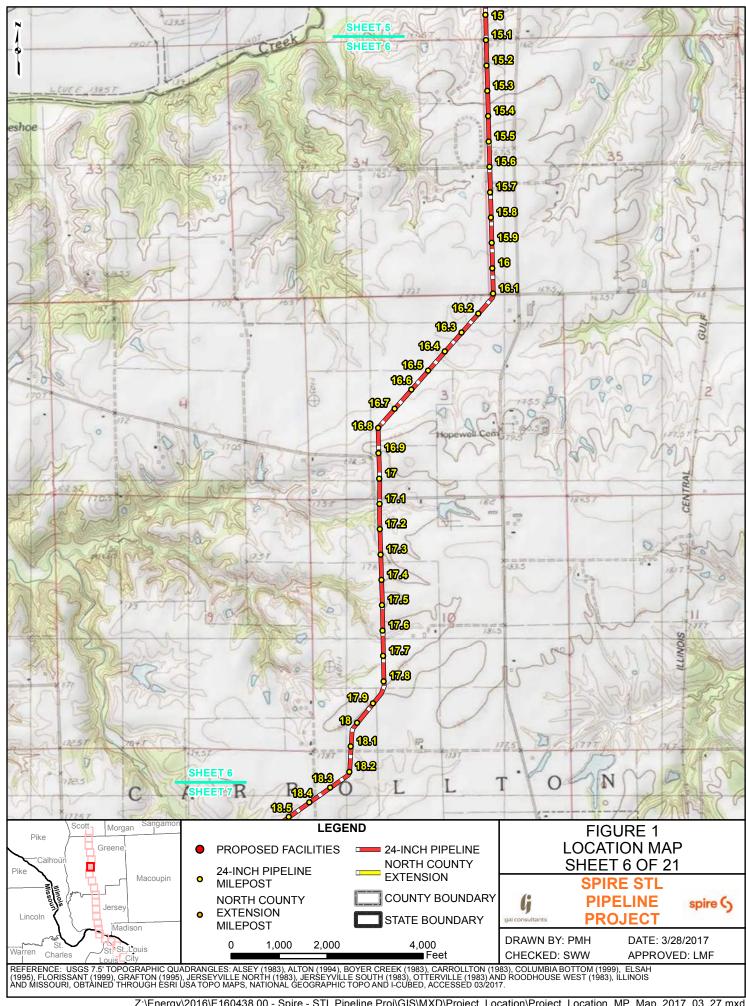


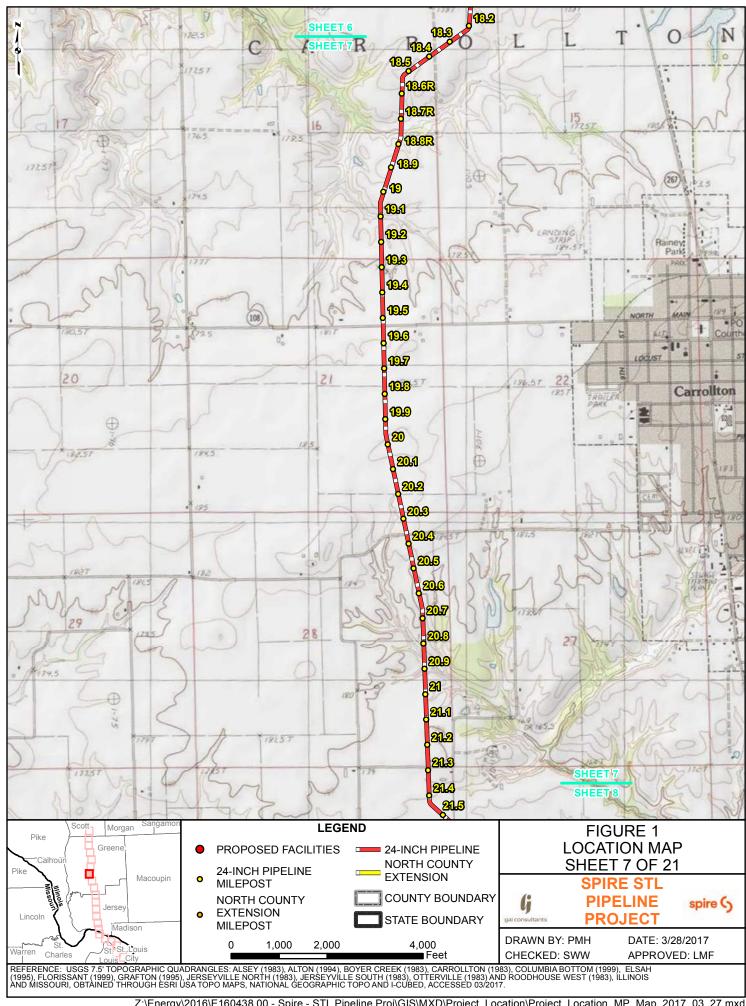


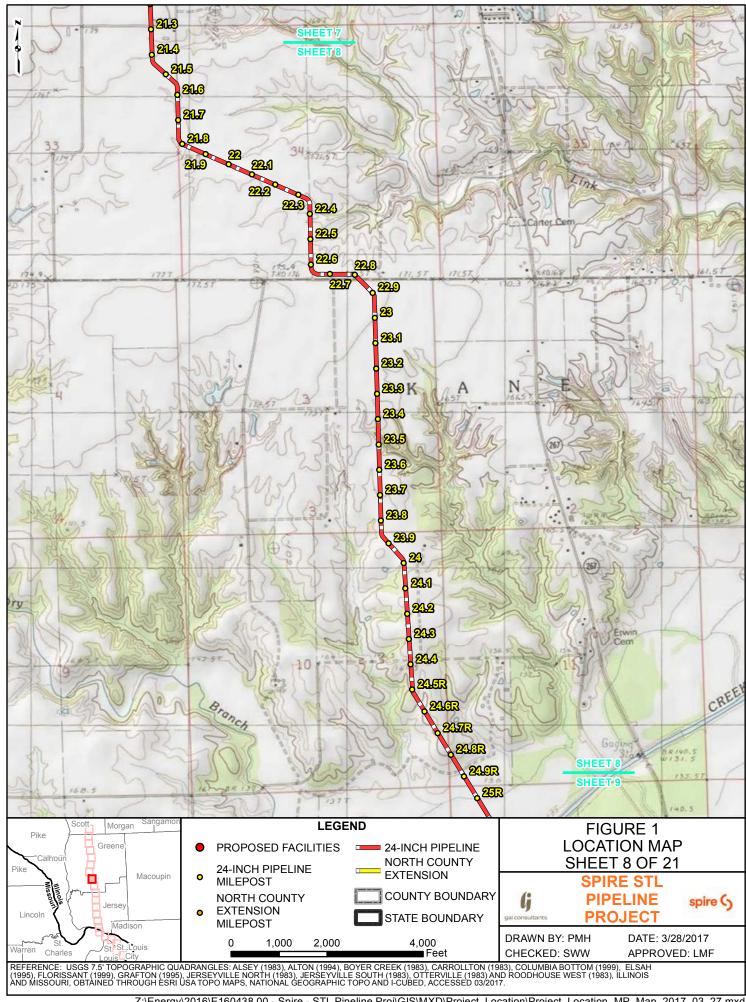


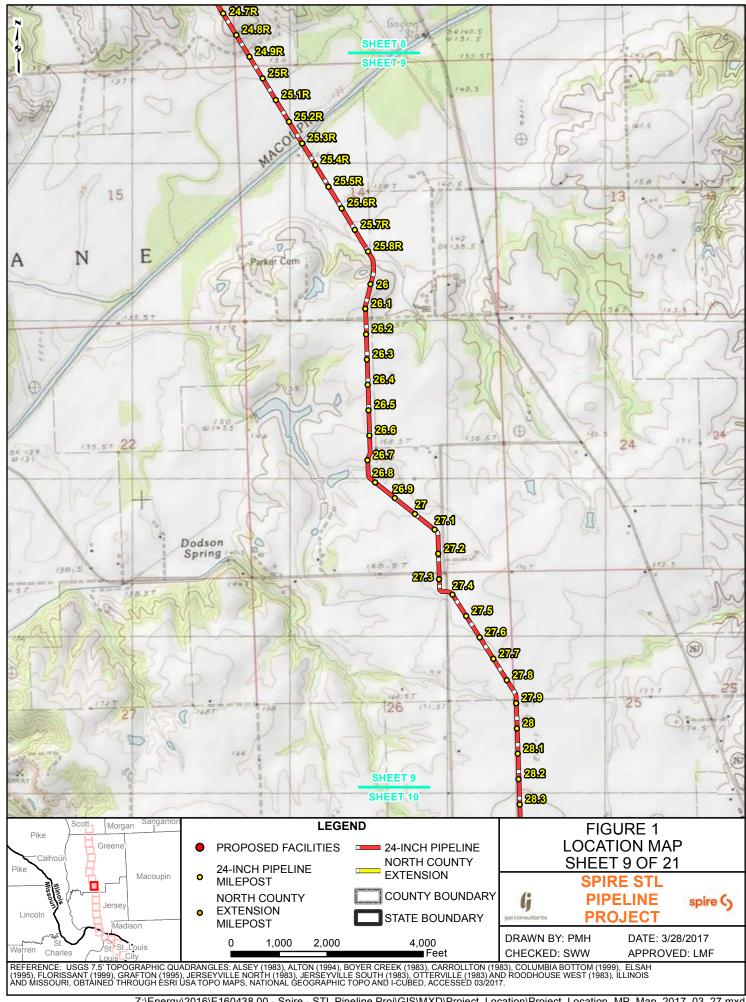


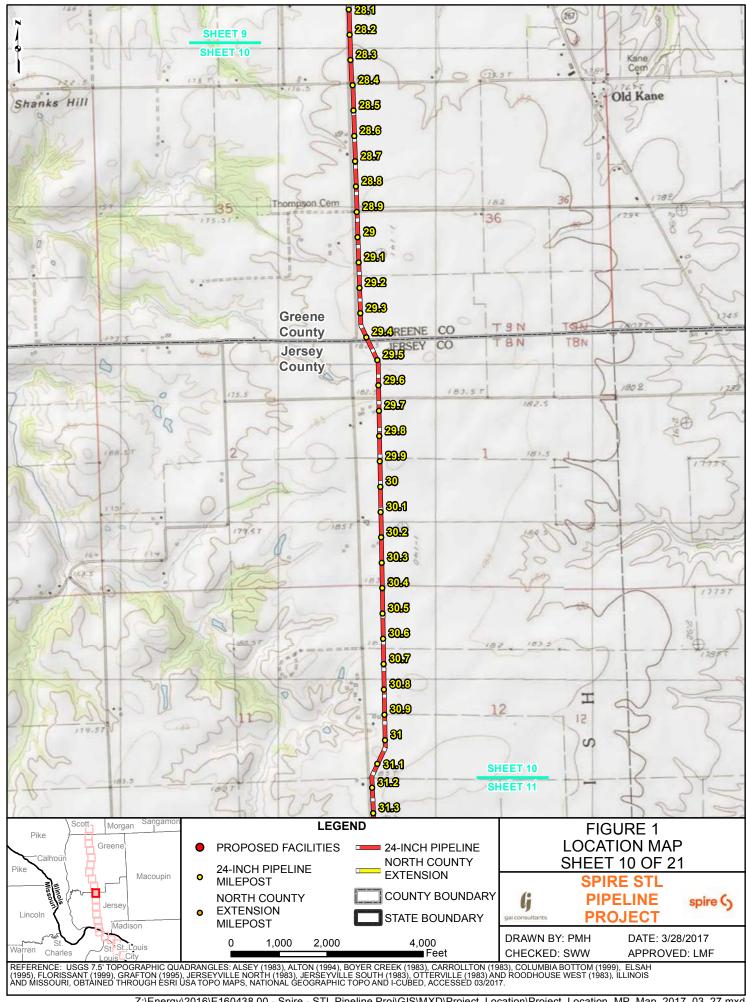


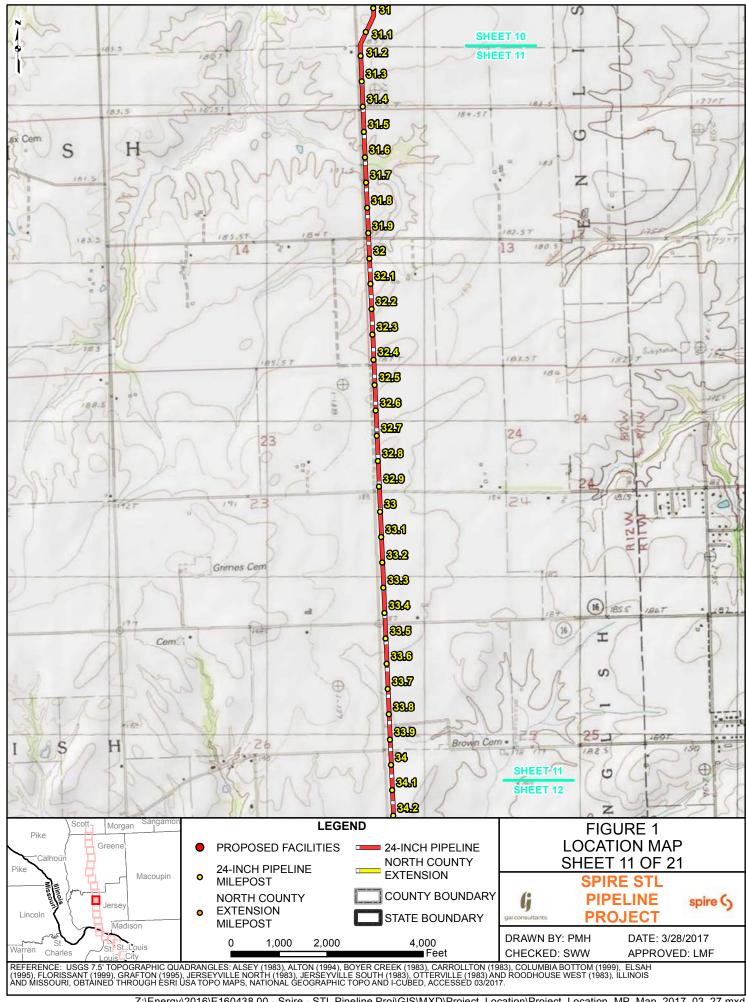


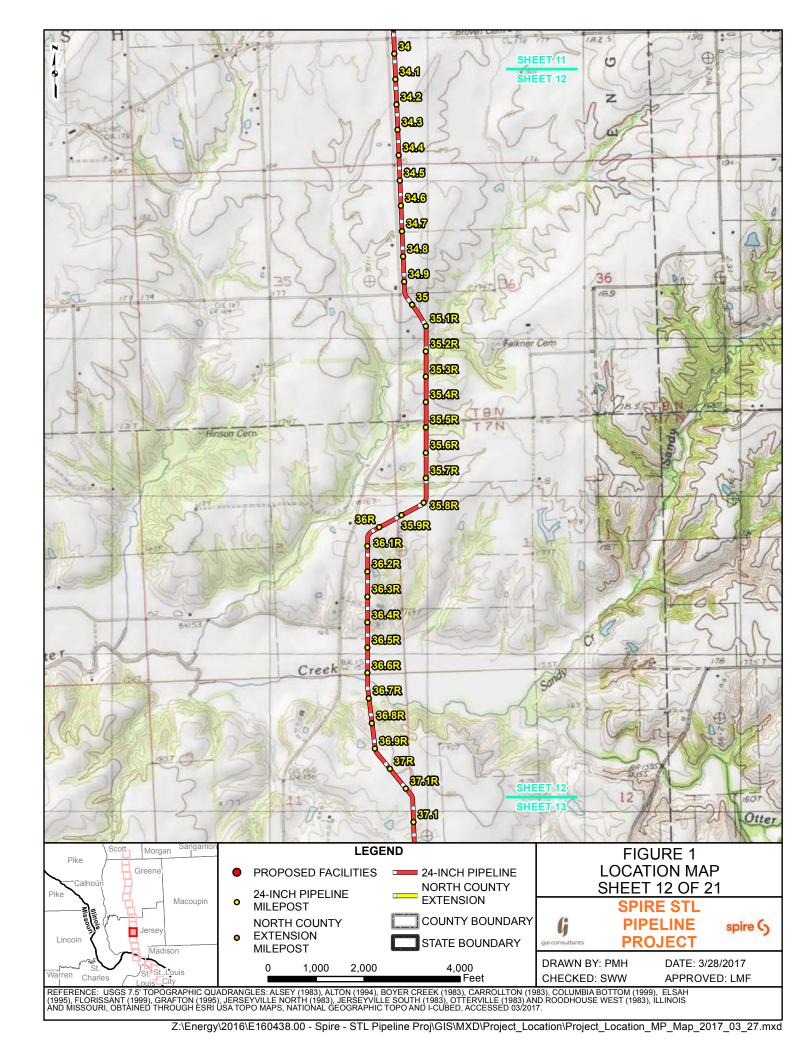


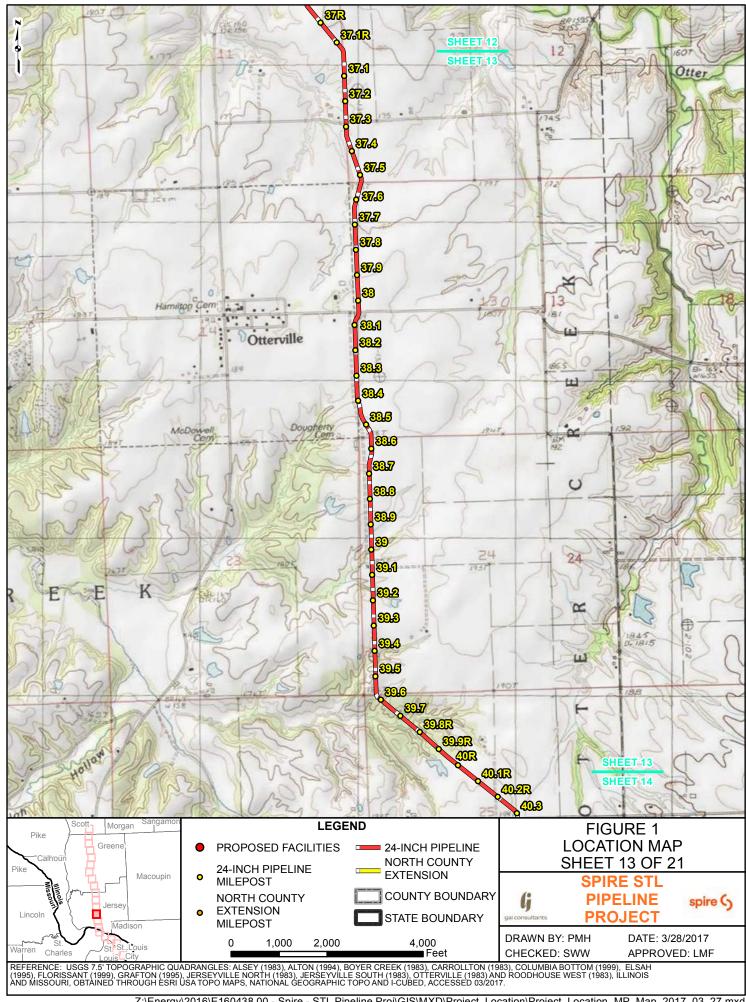


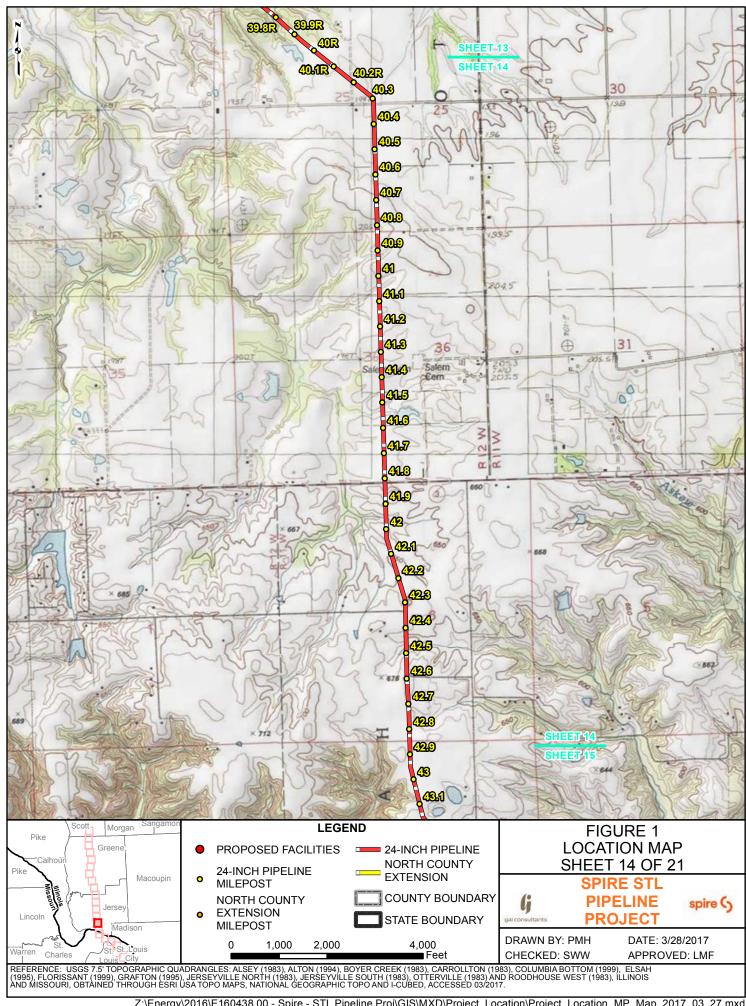


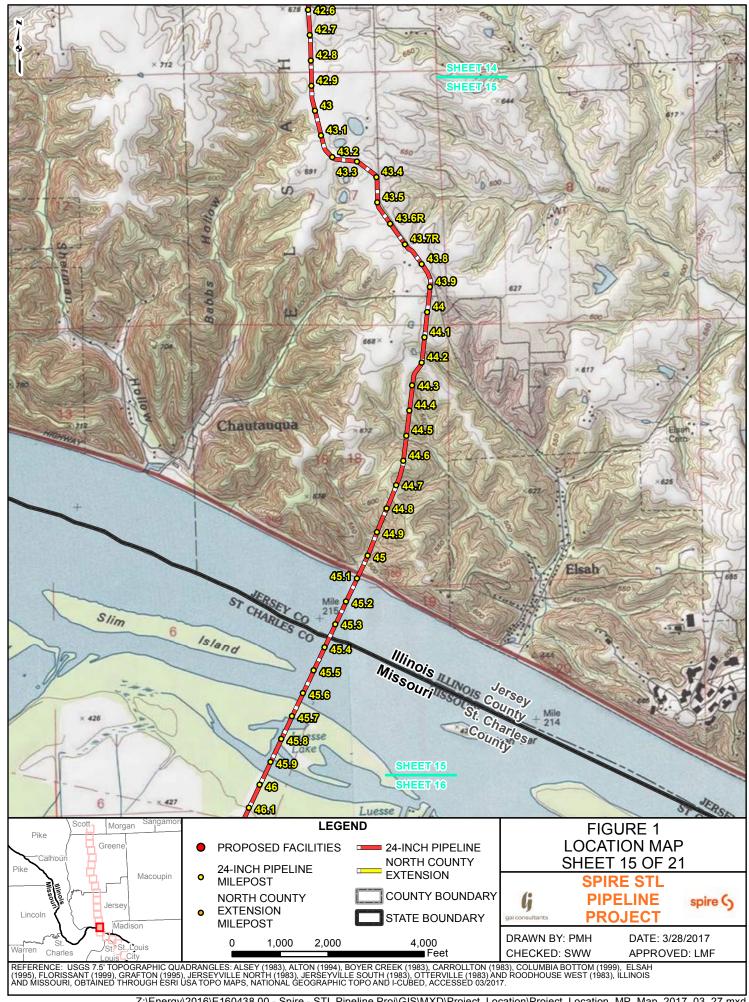


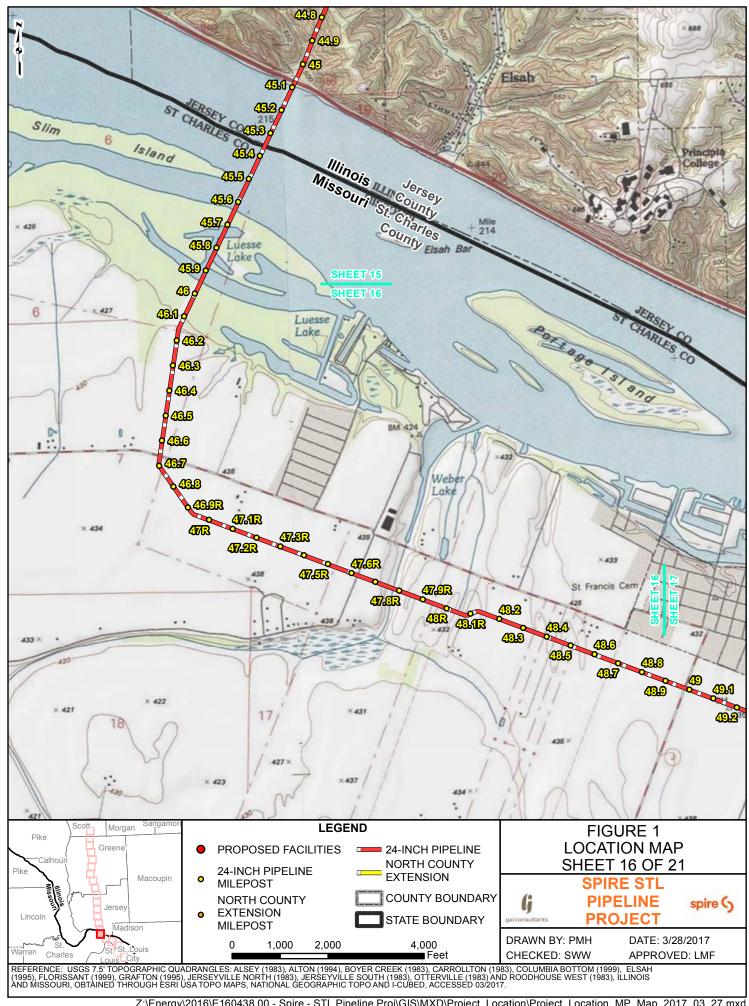


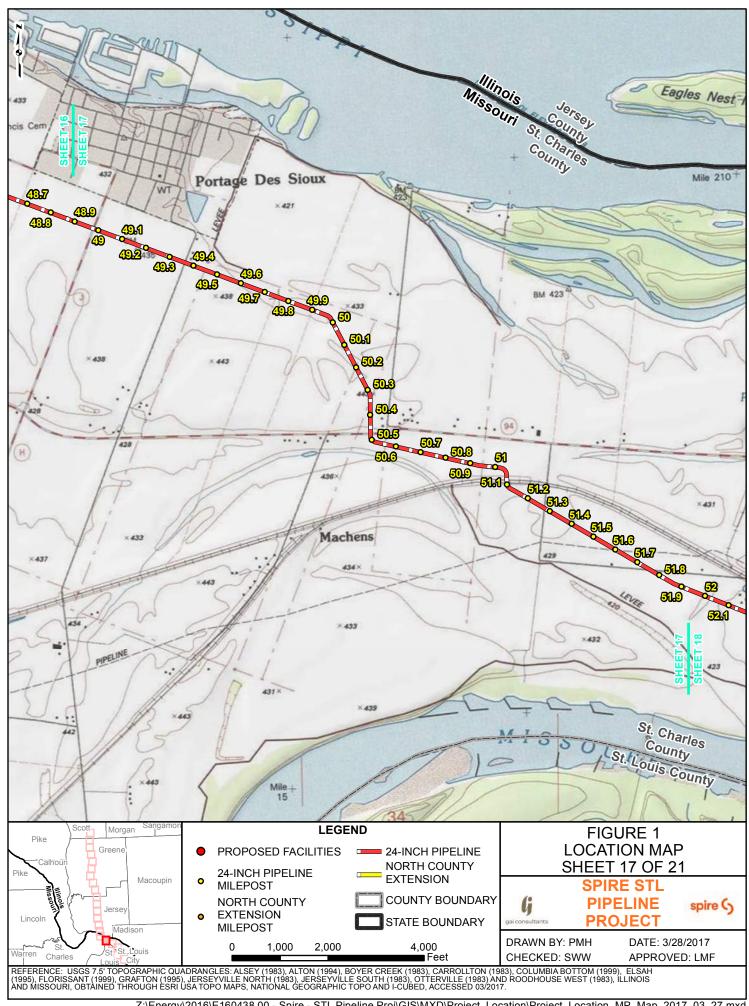


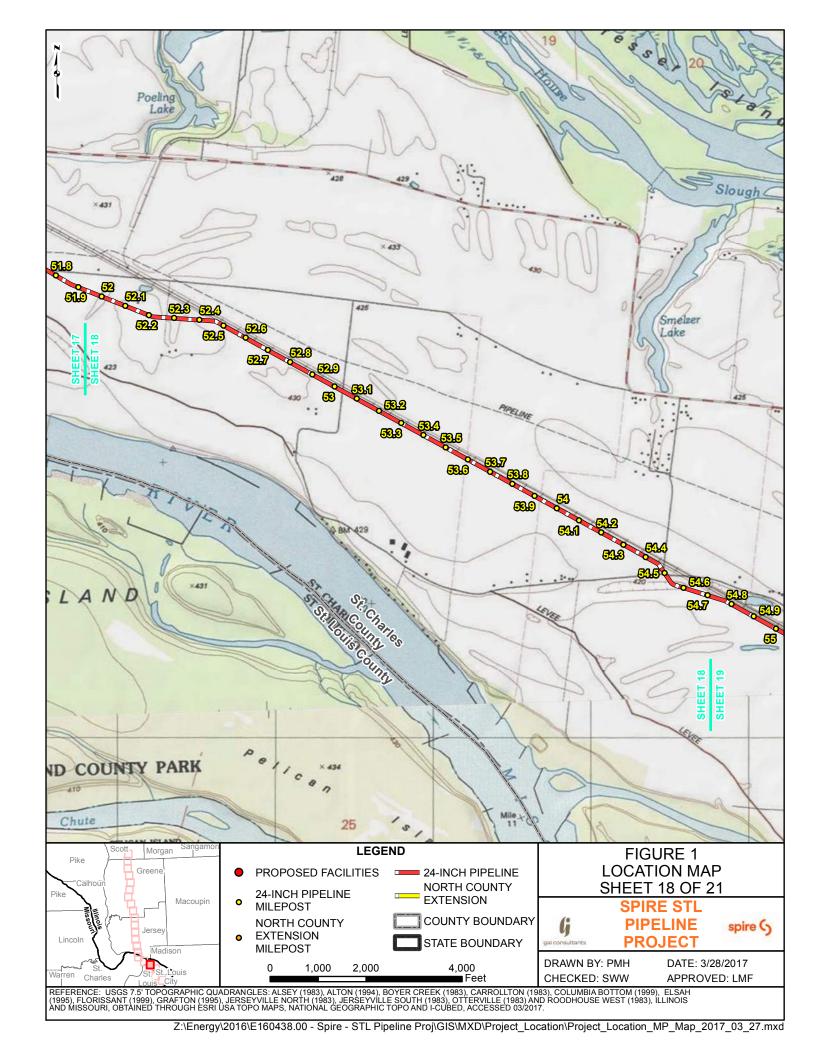


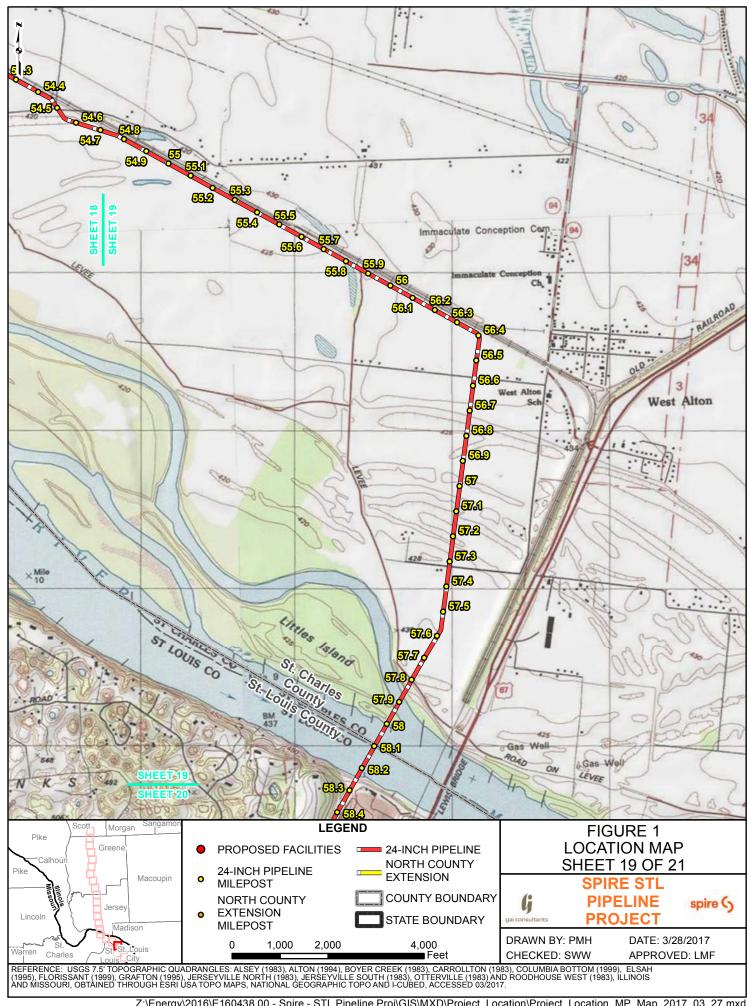


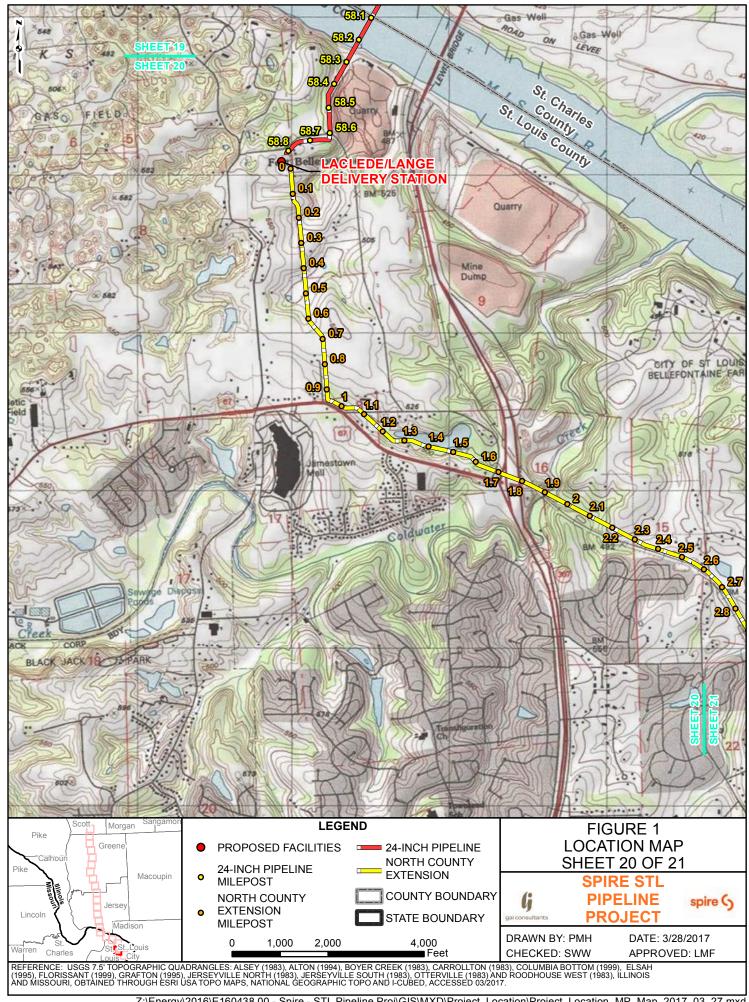


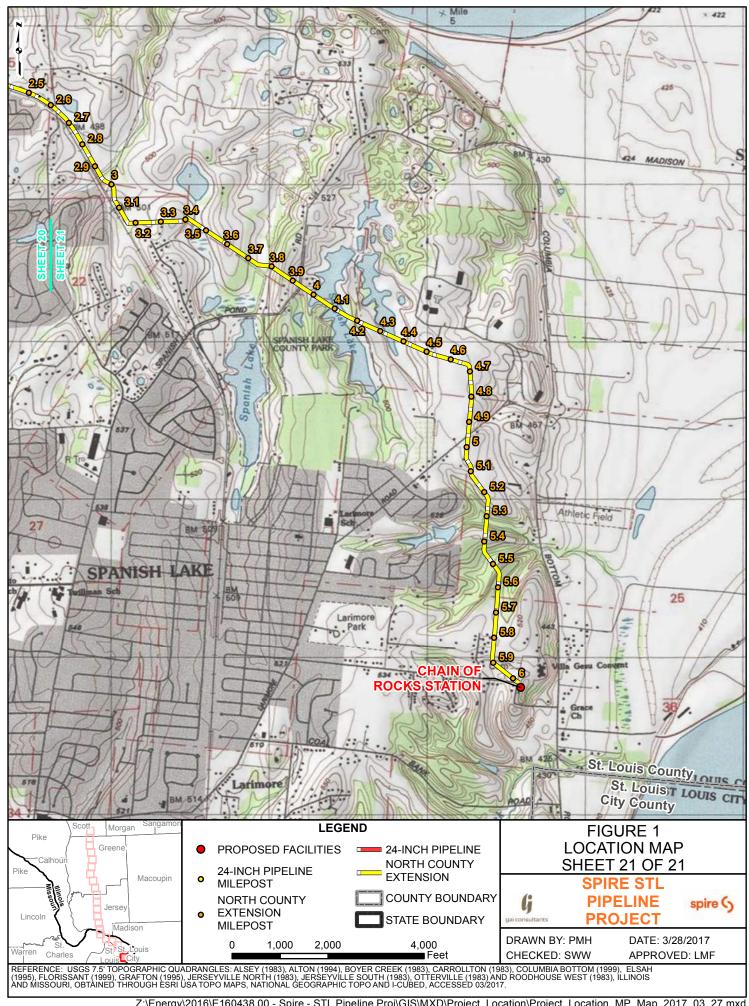














GAI Consultants, Inc.-Chicago Office 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532

March 28, 2017

Mr. Steve Altman P.E. Downstate Regulatory Program Illinois Department of Natural Resources One Natural Resources Way Springfield, IL 62702-1271

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

#### Dear Mr. Altman:

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interconnect through the northern portion of St. Louis County and terminate at a new interconnect with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

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Sincerely,

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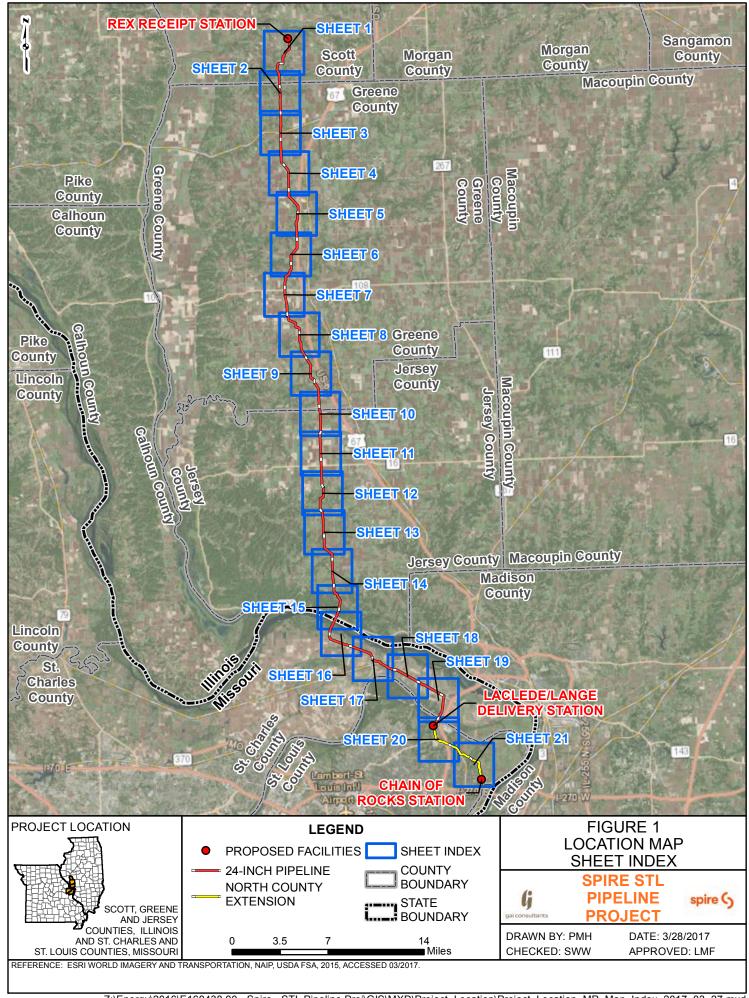
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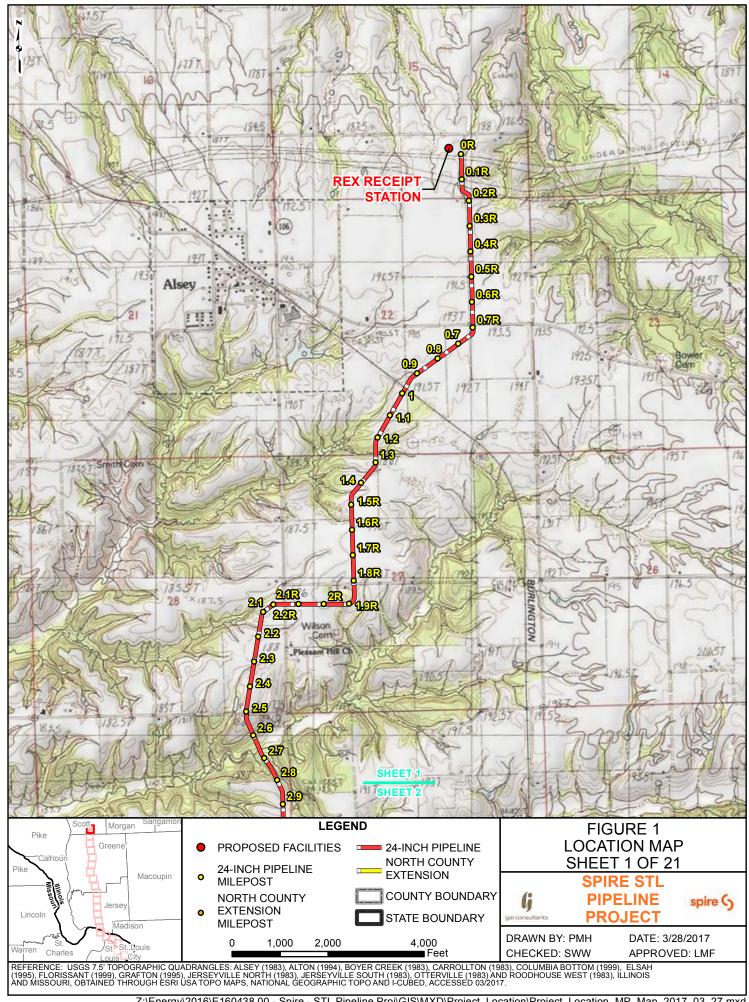
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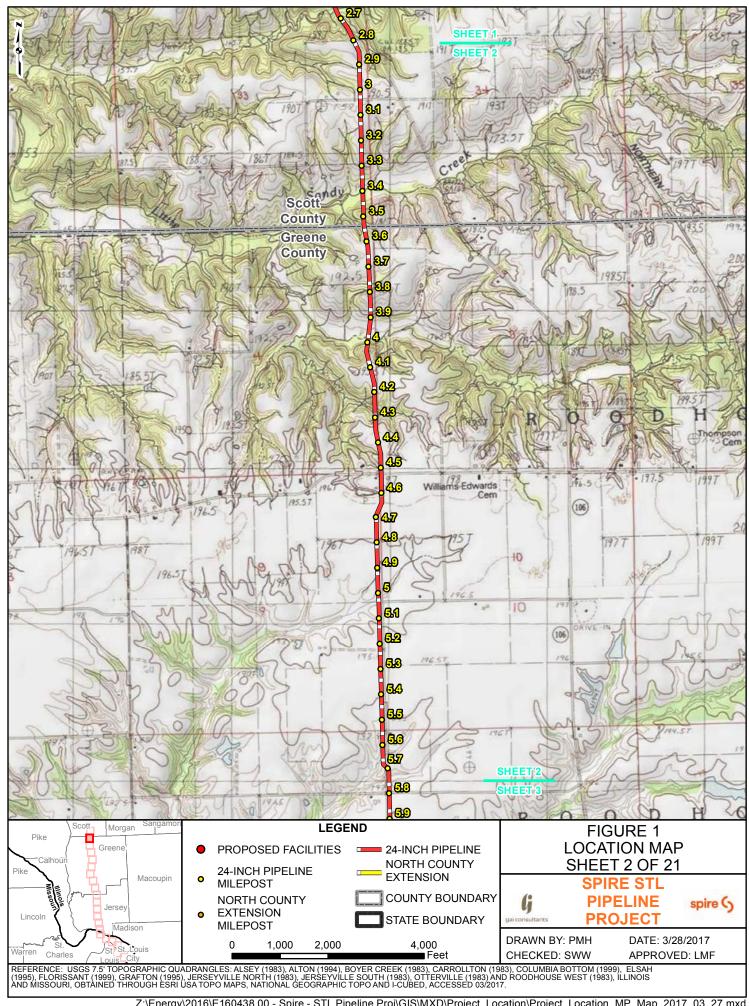
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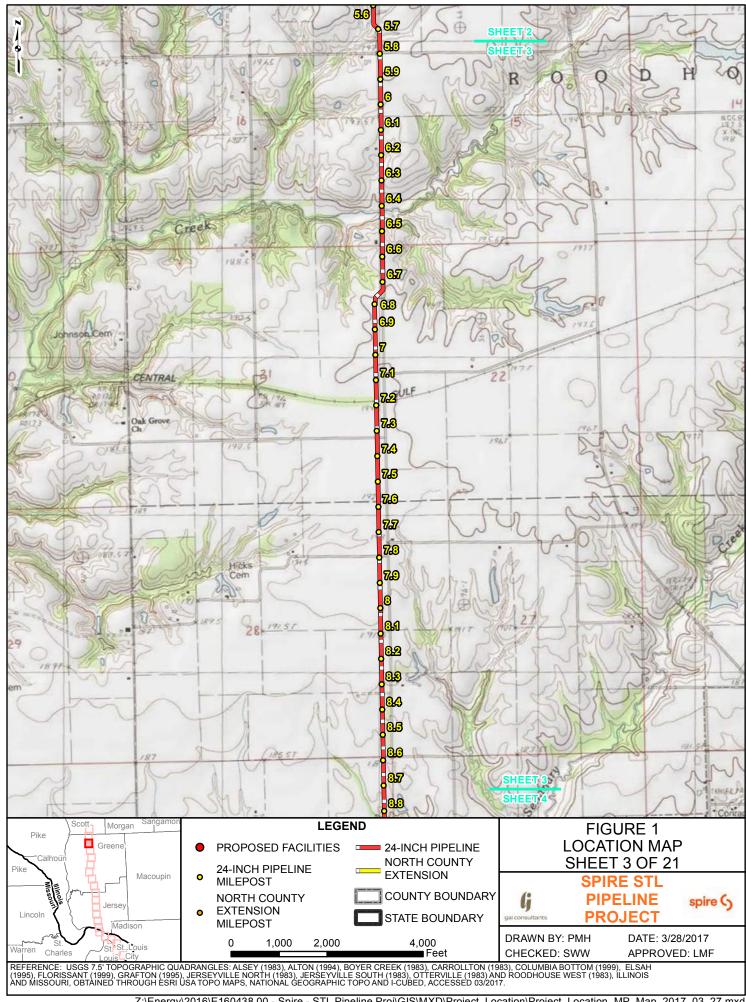
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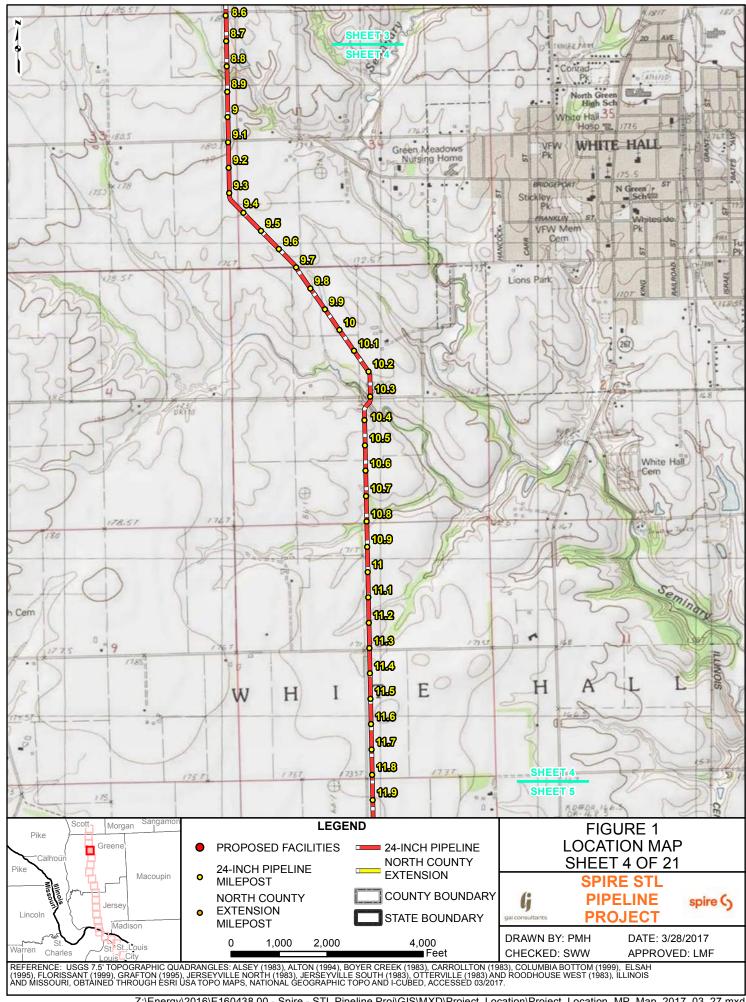
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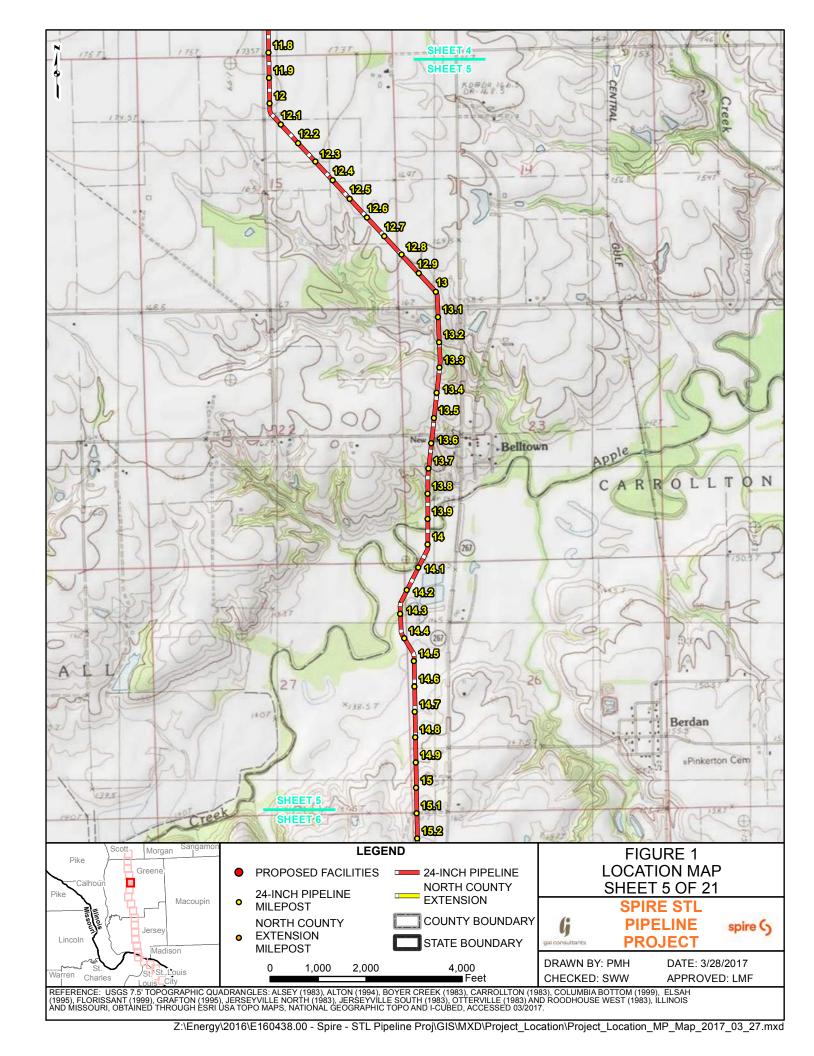


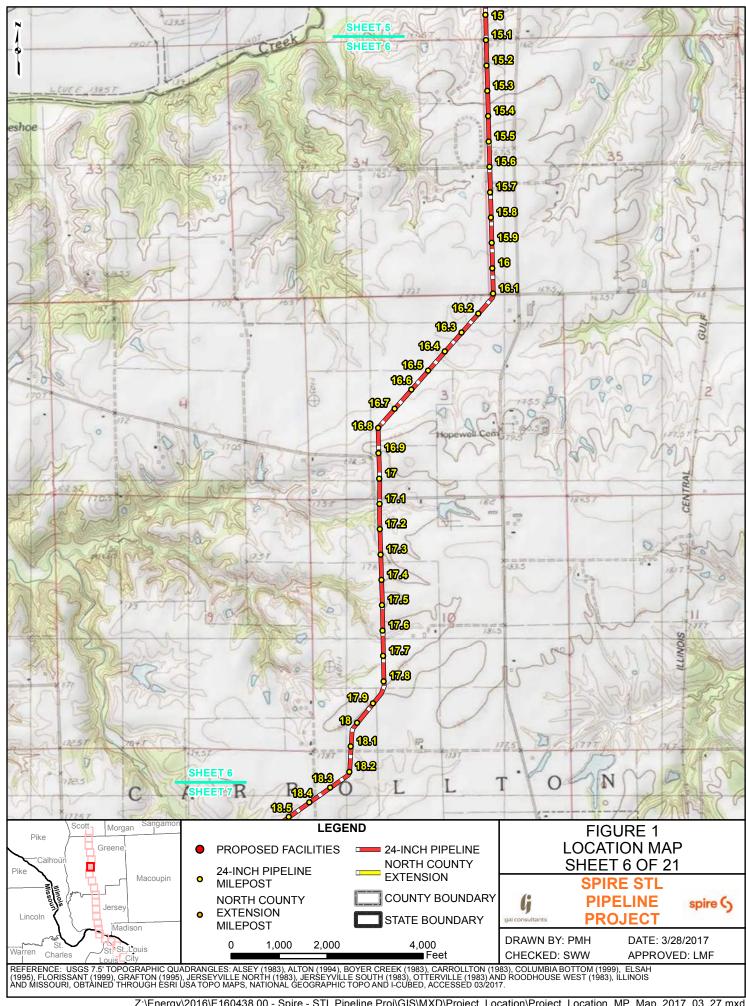


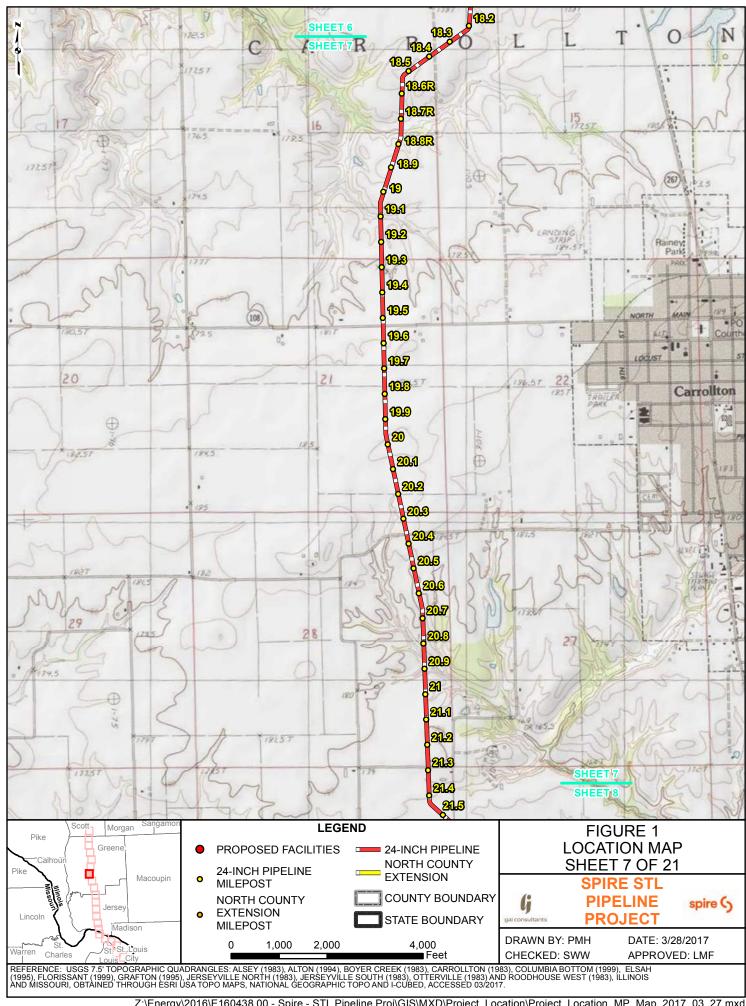


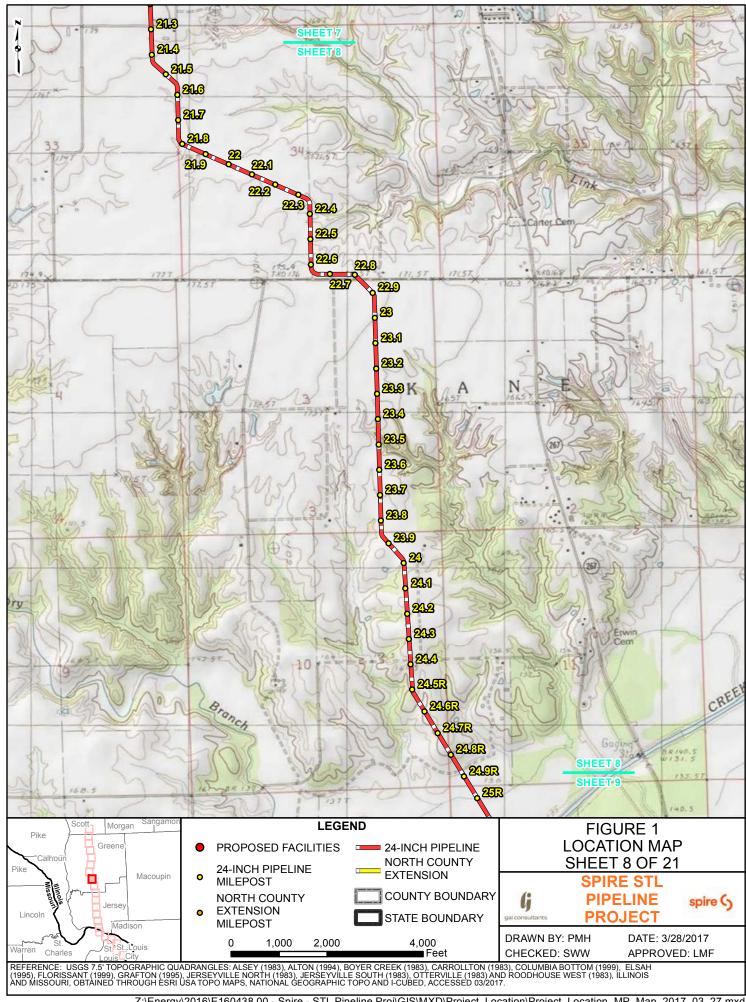


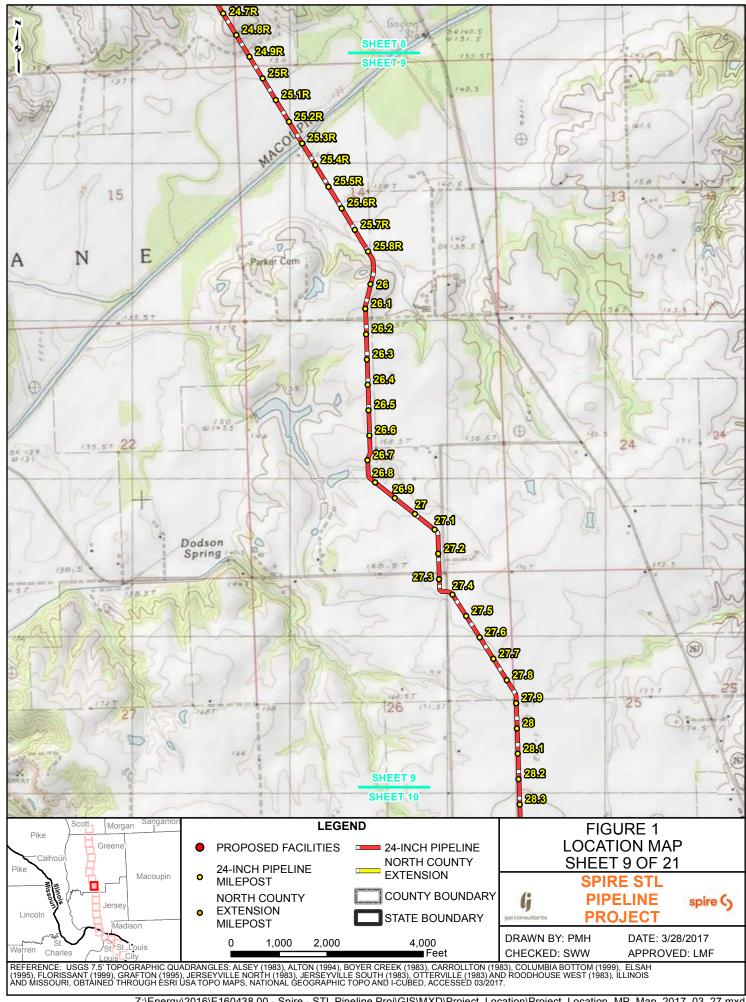


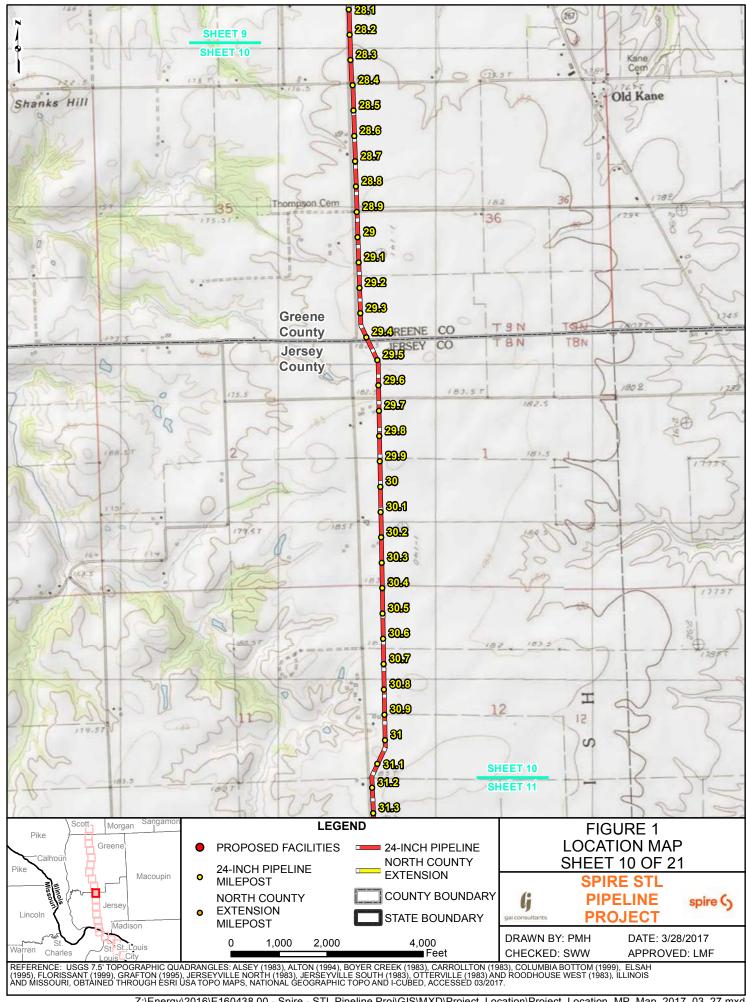


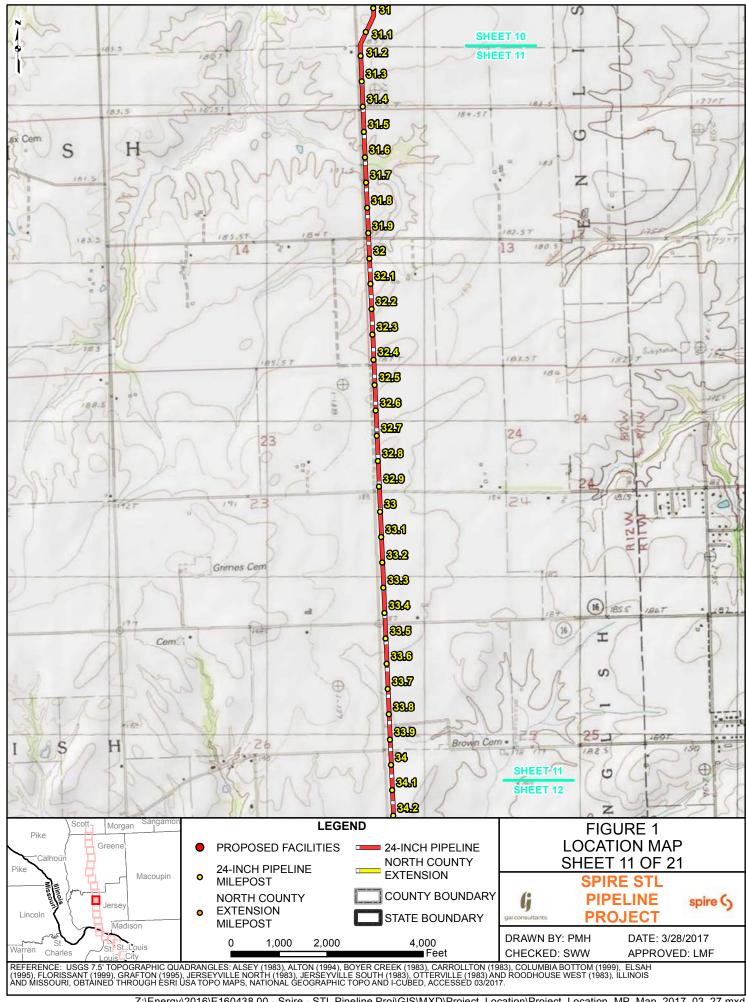


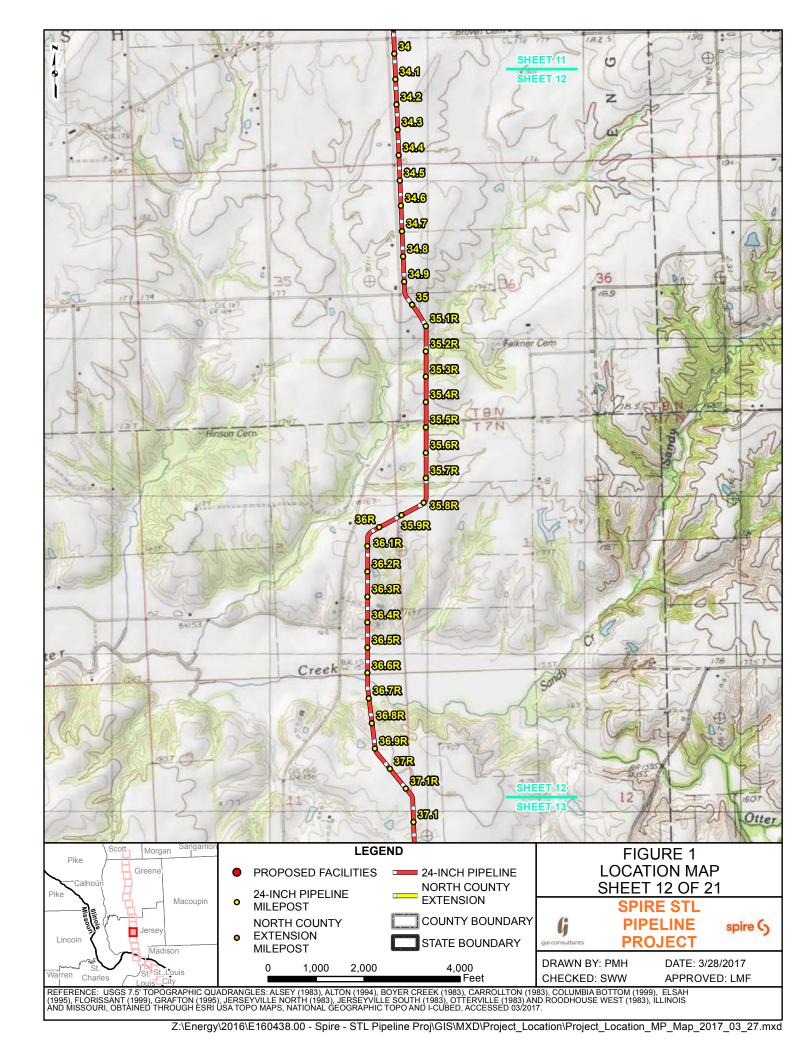


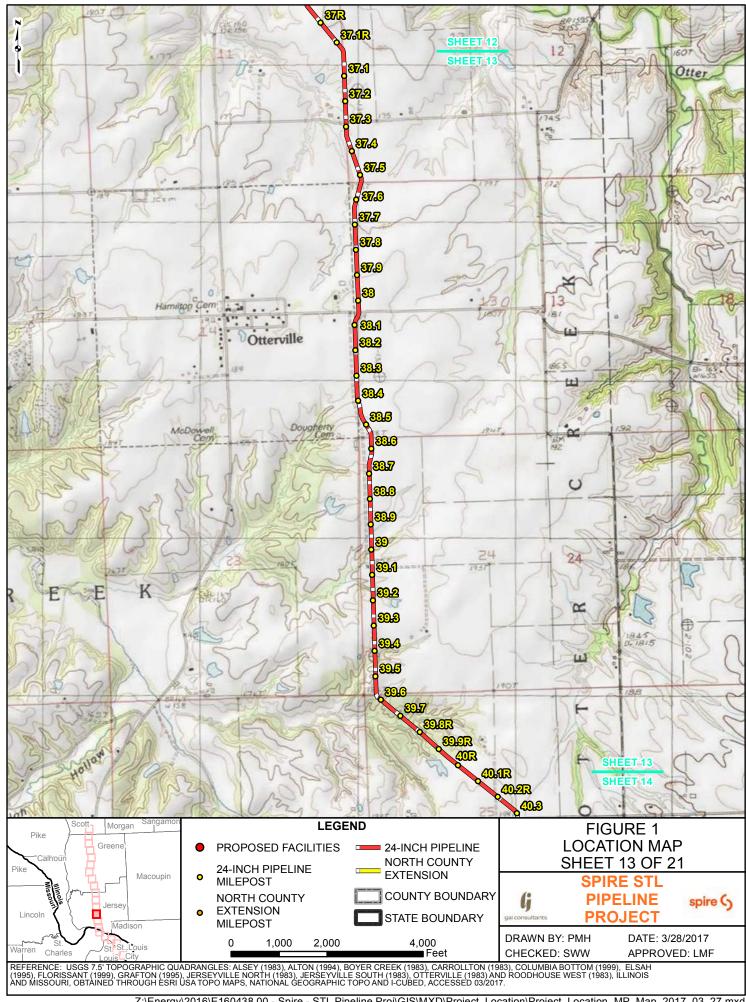


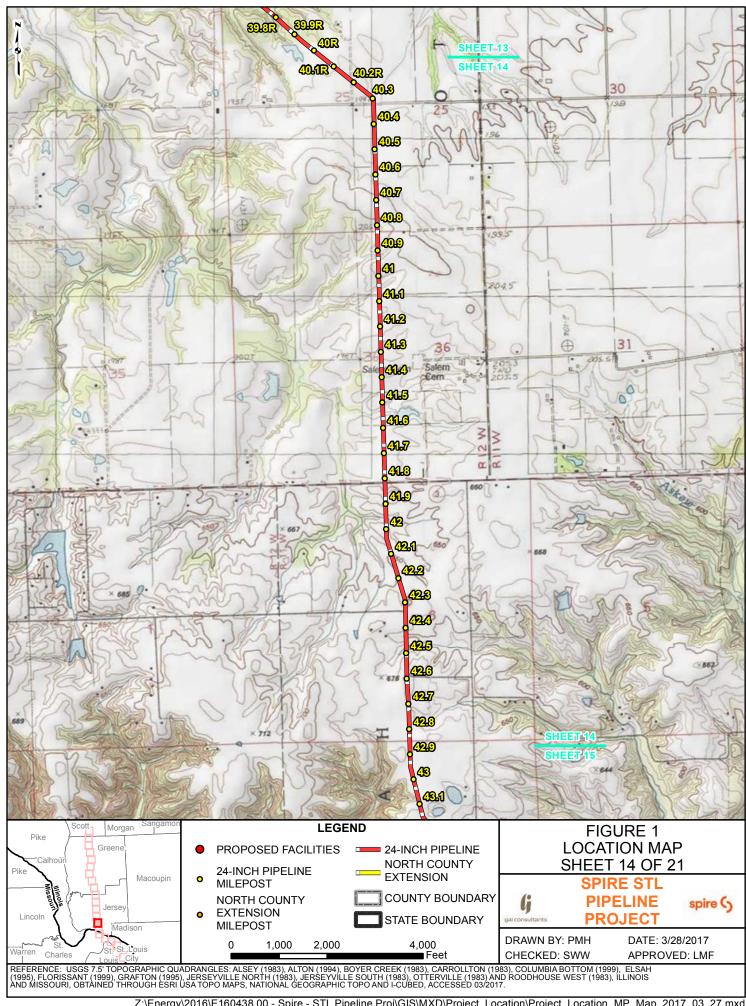


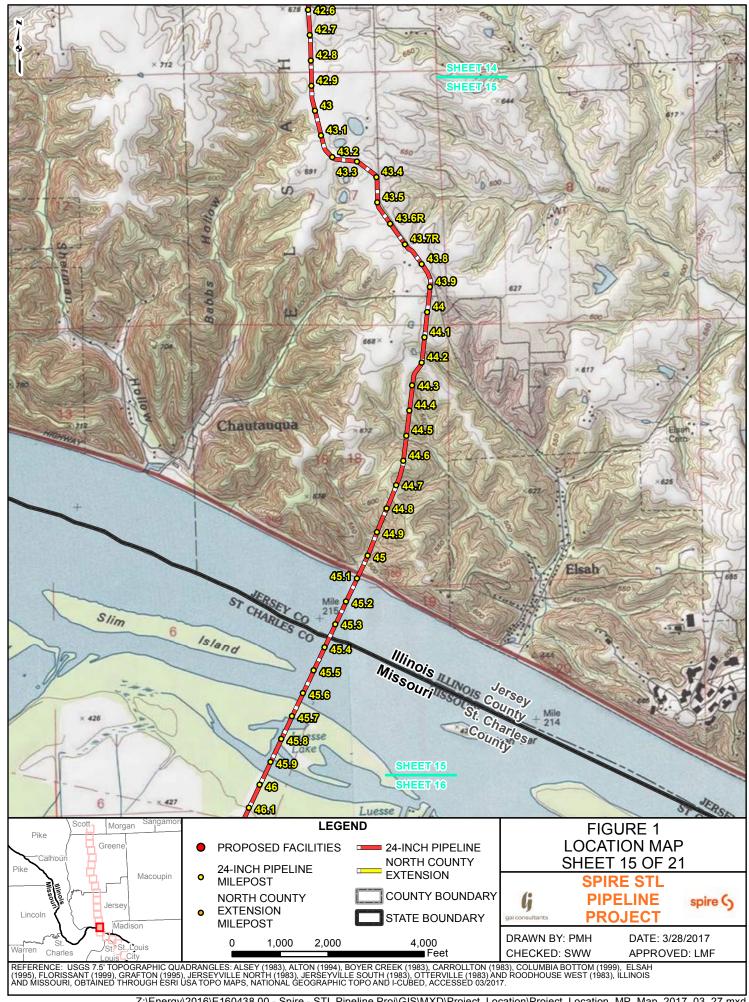


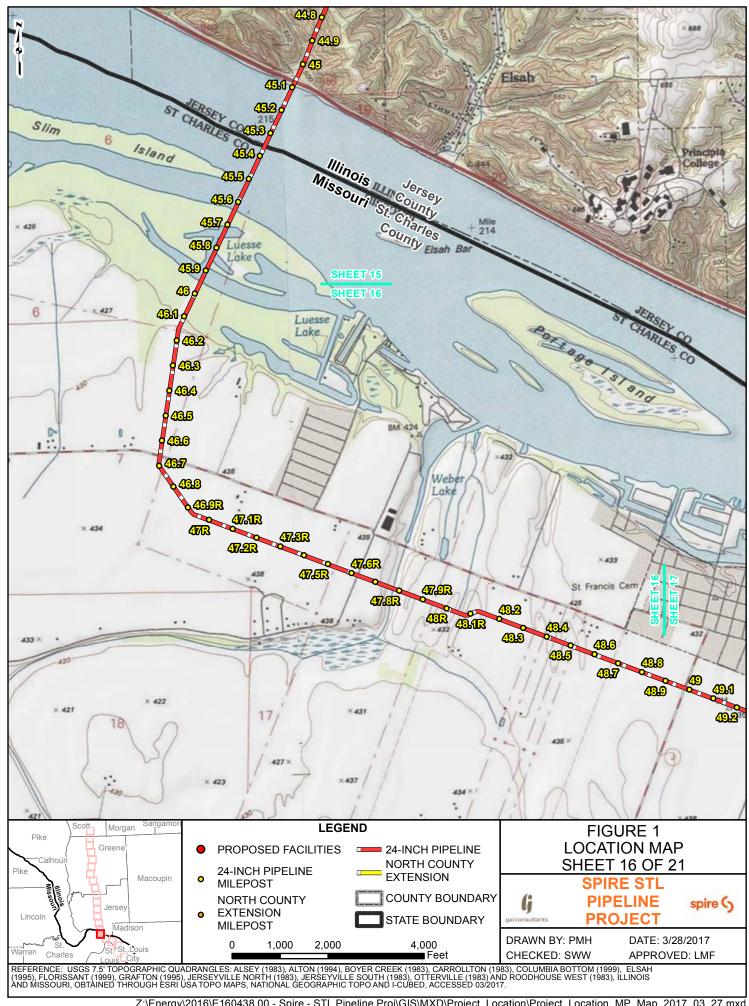


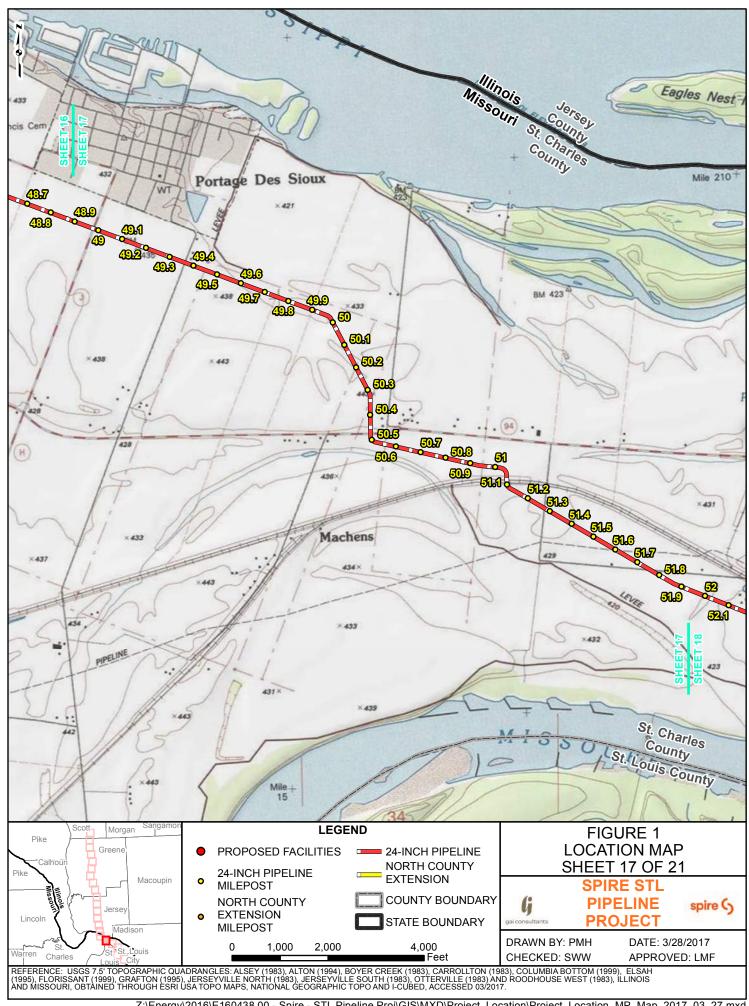


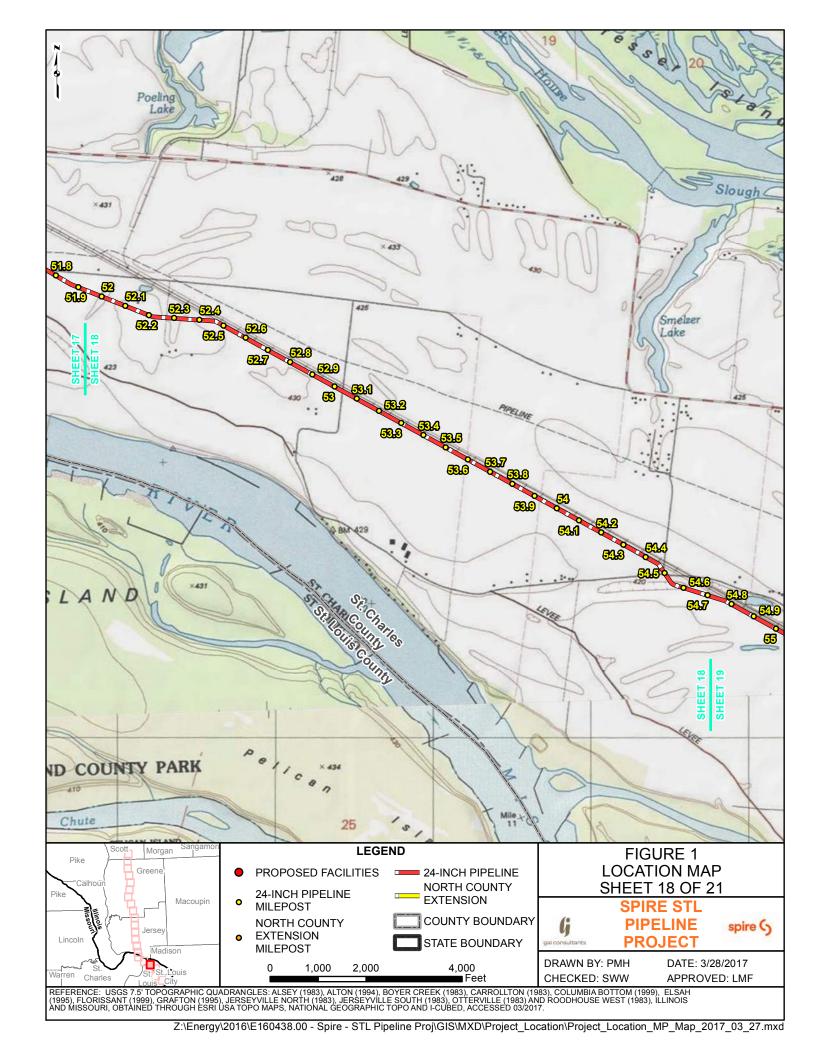


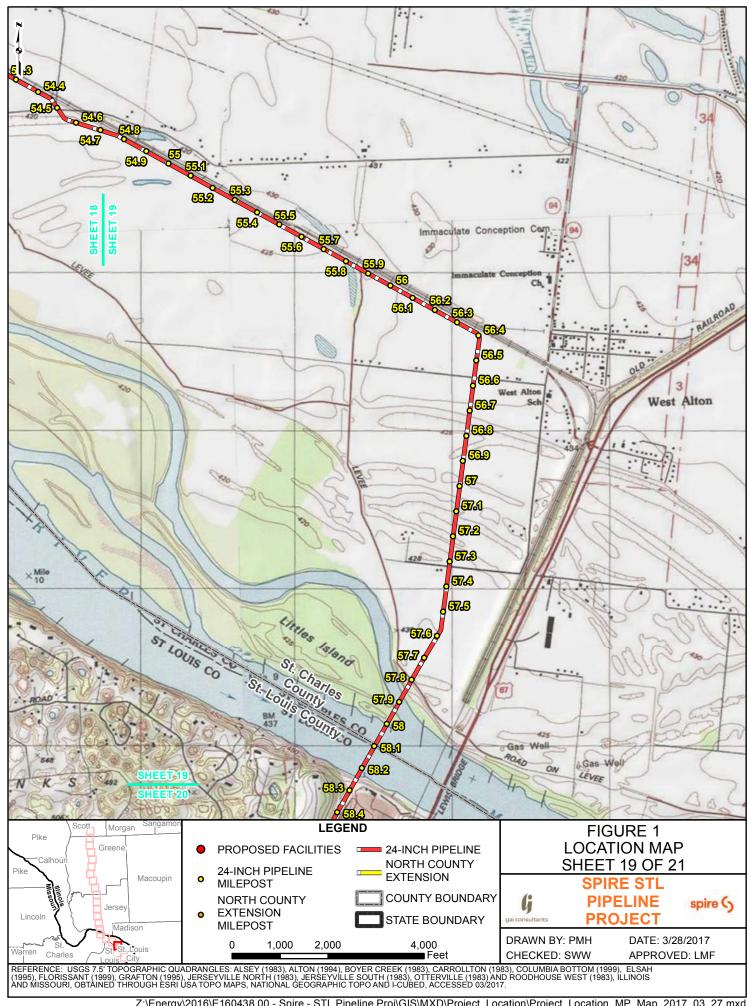


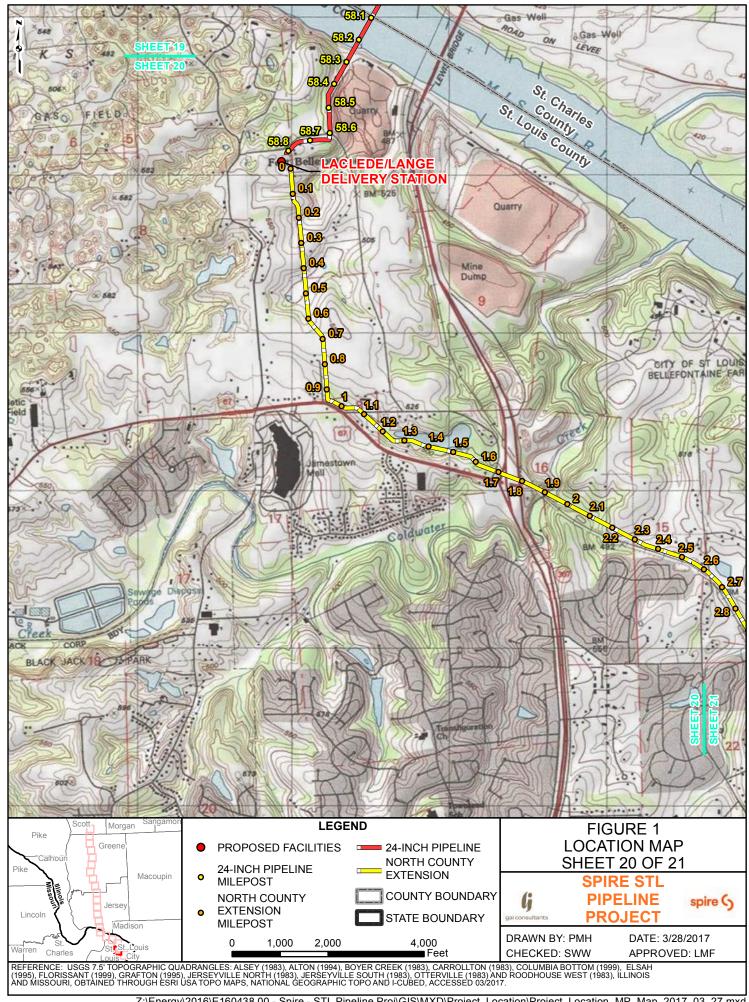


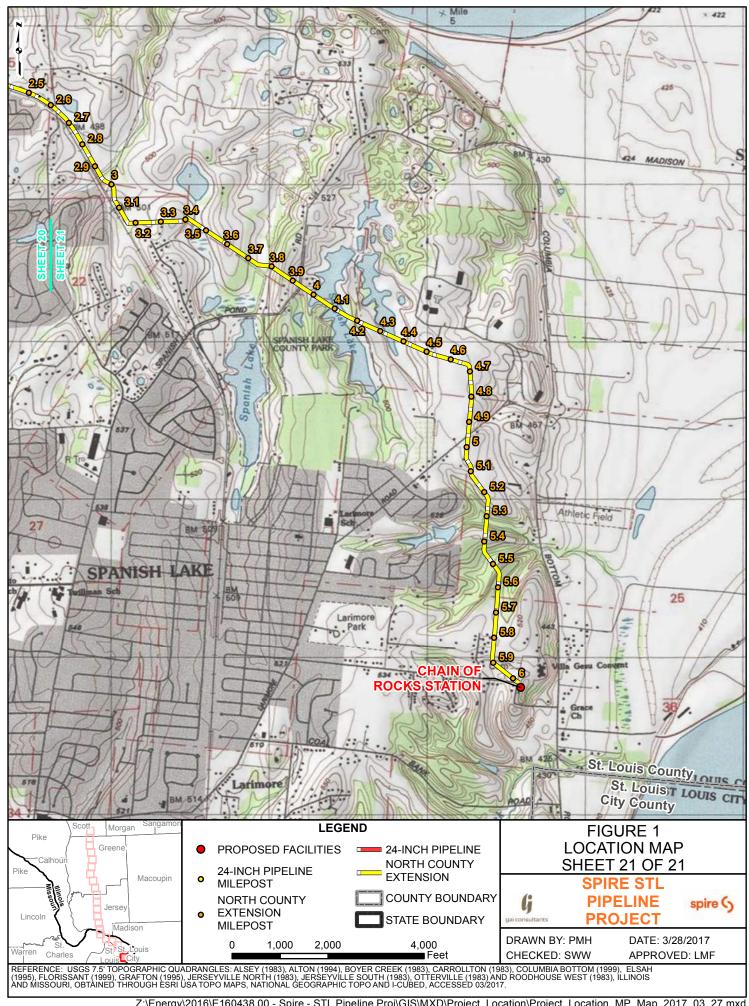












From: DNR.CREP <DNR.CREP@Illinois.gov>
Sent: Friday, March 24, 2017 10:23 AM

To: Ali Trunzo; DNR.CREP

Cc: Lori Ferry

Subject: RE: Spire STL Pipeline - CREP easements

#### Ali,

Thank you for your continued coordination with IDNR. We have reviewed your updated route and verified that the construction will not interfere with any land currently under a CREP easement.

All the best,

Robert Bedient
Administrative Assistant
Conservation Reserve Enhancement Program
Illinois Department of Natural Resources
1 Natural Resources Way
Springfield, IL 62702
(217) 557-6525



From: Ali Trunzo [mailto:A.Trunzo@gaiconsultants.com]

Sent: Thursday, March 23, 2017 4:08 PM

**To:** DNR.CREP **Cc:** Lori Ferry

**Subject:** [External] Spire STL Pipeline - CREP easements

Hello,

GAI, on behalf of Spire STL Pipeline LLC (Spire), previously coordinated with your office regarding CREP parcels that may be crossed by or in close proximity to the proposed Spire STL Pipeline Project, located in Scott, Greene and Jersey Counties, Illinois. There have been some minor route deviations proposed that are outside of the original 300-foot wide corridor that was reviewed.

Attached is a shapefile of a 300-foot wide review corridor of the proposed route (note that the construction right-of-way will typically be 90-feet wide, with 25-feet of additional temporary workspace in agricultural lands for topsoil segregation).

Our most recent coordination with your office is attached for your reference. Based on the map provided and the minor route changes proposed, we do not anticipate impacts to CREP lands. However, we would appreciate your review if new lands have been considered or approved within this corridor.

Thank you,		
Ali		

From: Ali Trunzo

**Sent:** Friday, March 24, 2017 8:19 AM

To: Ali Trunzo

**Subject:** FW: Spire STL Pipeline - CREP easements

Attachments: 12-6-16 CREP Email from R Bedient (PRIVILEGED).pdf; 300\_Ft\_Corridor\_in\_Illinois.prj; 300

Ft\_Corridor\_in\_Illinois.sbn; 300\_Ft\_Corridor\_in\_Illinois.sbx; 300\_Ft\_Corridor\_in\_Illinois.shp;

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\_Ft\_Corridor\_in\_Illinois.cpg; 300\_Ft\_Corridor\_in\_Illinois.dbf

From: Ali Trunzo

Sent: Thursday, March 23, 2017 5:08 PM

To: 'DNR.CREP@Illinois.gov' <DNR.CREP@Illinois.gov>

**Cc:** Lori Ferry <L.Ferry@gaiconsultants.com> **Subject:** Spire STL Pipeline - CREP easements

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Ali

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#### Alessandra M. Trunzo

Project Environmental Specialist

385 E. Waterfront Drive, Homestead, PA 15120-5005

Direct 412.399.5096 Office 412.476.2000 Email a.trunzo@gaiconsultants.com

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# Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271 www.dnr.illinois.gov

Bruce Rauner, Governor

Wayne A. Rosenthal, Director

March 17, 2017

SUBJECT:

Application for Permit No. S20170009

Pipeline Project

Mississippi River, Macoupin Creek, Apple Creek, Otter Creek

Scott County, Greene County, and Jersey County

Spire STL Pipeline LLC 700 Market Street St. Louis, Missouri 63101

#### Gentlemen:

Thank you for the recent submittal of your January 24, 2017 application (enclosed) for an Illinois Department of Natural Resources, Office of Water Resources (IDNR/OWR) permit to construct a pipeline in Scott County, Greene County, and Jersey County.

From our review of the submitted information, it was found that portions of the project are located within the floodplains of IDNR/OWR jurisdictional waterways. These jurisdictional waterways have drainage areas greater than one square mile in an urban area, or ten square miles in a rural area.

After and based on multiple correspondences with your agents, GAI Consultants, Inc., it appears the proposed project would be allowable under IDNR/OWR Statewide Permit Nos. 6, 8, and 13 (view at <a href="https://www.dnr.illinois.gov/WaterResources/Pages/PermitsStatewideRegionalGen">https://www.dnr.illinois.gov/WaterResources/Pages/PermitsStatewideRegionalGen</a>

<u>eral.aspx</u>). Please review these statewide permits to confirm whether your work will meet the terms and conditions of the permits. If any current aspects of the proposed project or changes are made to the proposed project related to IDNR/OWR's jurisdiction and do not meet the special conditions of the statewide permits, please inform us of the differences and we will continue with the formal permit process. If the proposed project meets the special conditions of the statewide permits, no further IDNR/OWR authorization is required.

This permit does not supersede any other federal, state or local authorizations that may be required for the project.

Spire STL Pipeline LLC March 17, 2017 Page 2

Please feel free to contact Jesse Tinch at 217/782-4545 if you have any questions or comments concerning this matter.

Sincerely,

Stephen C. Altman, P.E., CFM

Chief, Downstate Regulatory Programs Section

SCA:JST:cjp

Enclosure

cc:

GAI Consultants, Inc. (Lori Ferry)

GAI Consultants, Inc. (Todd Wheaton)

GAI Consultants, Inc. (Jayme Fuller)

Scott County Assessment Office (Lorrie Koch)

Greene County Supervisor of Assessments (Jill Waldheuser)

Jersey County Code Administrator (Cindy Cregmiles) IEPA, Div. of Water Pollution Control, Permit Section

USACE, St. Louis District (Regulatory Branch)

JOIN	IT APPLICATION		LLINOIS	
'. Application Number		FOR AGENCY USE  2. Date Received		
520170009		Janus	ury 30, 2017	
3. and 4. (SEE SPECIAL INSTRUCTIONS) NAME,				
3a. Applicant's Name  Company Name (if any): Spire STL Pipeline LLC  Address: 700 Market Street, St. Louis, MO 63101  Email Address: Castor.Armesto@spireenergy.com	3b. Co-Applicant/Prope (if needed or if different Company Name (if any Address Email Address	t from applicant)	4. Authorized Agent (an agent is not required)  Company Name (if any): GAI Consultants, Inc  Address: 1444 Farnsworth Ave, Suite 303  Aurora, IL, 60505  Email Address: L.Ferry@gaiconsultants.com	
Applicant's Phone Nos. w/area code Business: 314-342-3326 Residence: Cell: Fax:	Applicant's Phone Nos. Business: Residence: Cell: Fax:	w/area code	Agent's Phone Nos, w/area code Business: 331-301-2002 Residence: Cell: Fax:	
T d.X.		F AUTHORIZATION		
I hereby authorize, upon request, supplemental information in support of Applicant's Signature  5. ADJOINING PROPERTY OWNERS (Upstromann)  Name Mailing Ada a.  b.  c.  d.	of this permit application.  Semeral Course  eam and Downstream	w/	nt in the processing of this application and to furnish,	
6. PROJECT LOCATIONS Sort Crosses and Leave	0			
7. PROJECT LOCATION: Scott, Greene, and Jerse MO (Spanish Lake).  LATITUDE: 39.164251 (midpoint of Project)  LONGITUDE: -90.388330 (midpoint of Project)  STREET, ROAD, OR OTHER DESCRIPTIVE LOCANIA  IN OR X NEAR CITY OF TOWN (check a Municipality Name: Alsey, IL; White Hall, IL; O	ATION: L ppropriate box)	lorthing: 14236745.936 Easting: 2380429.384 EGAL QUARTE DESCRIPT	R SECTION TOWNSHIP NO. RANGE TERWAY RIVER MILE (If applicable)	
Otterville, IL; and Elsah, IL  COUNTY STATE  Scott, Greene, and Jersey (IL), St. Charles and St. Louis (MO)	ZIP CODE N/A	Mississippi Riv	ver and its Tributaries	
Revised 2011  Corps of Engineers IL Dept of Natural	ural Resources	☐ IL Environme	ntal Protection	

To: Spire STL Pipeline LLC

8. PROJECT DESCRIPTION (Include all features): The Spire STL Pipeline Project (Project) consists of the installation of approximately 59 miles of new 24-inch diameter steel natural gas transmission pipeline, upgrades along approximately 7.1 miles of existing 20-inch diameter pipeline known as Line 880, four mainline valve facilities, and four metering and regulation (M&R) facilities in Scott, Greene, and Jersey Counties, Illinois (IL), and St. Charles and St. Louis Counties, Missouri (MO). The proposed Project includes crossings along the Mississippi River, which is a Section 10 traditionally navigable water.
9. PURPOSE AND NEED OF PROJECT: The Project is designed to provide approximately 400,000 Dth/d of year-round transportation service from an interconnect with the Rockies Express Pipeline (REX) in Scott County, Illinois to markets in the St. Louis metropolitan area, eastern Missouri and southwestern Illinois. Its purpose is to provide additional firm interstate pipeline capacity and access to additional supply basins to serve homes and businesses in the St. Louis metropolitan area and surrounding counties. The Project will enhance reliability and supply security, and will reduce reliance upon older and less favorable natural gas pipelines and propane peak-shaving infrastructure.
COMPLETE THE FOLLOWING FOUR BLOCKS IF DREDGED AND/OR FILL MATERIAL IS TO BE DISCHARGED
10. REASON(S) FOR DISCHARGE: Temporary impacts to 60 streams and 32 wetlands will be necessary to construct the pipeline and access roads associated with the Project. Impacted streams and wetlands will be crossed using the open-cut method. A dam and flume method of dewatering is installed to create a dry work area, the trenches are dug, the pipeline is placed, and the trench is refilled and the work area reclaimed. Additionally, temporary crossings of 20 streams and 14 wetlands located within the Project workspace will also be necessary during construction of the Project. Other aquatic resources, including the Mississippi River, will be crossed using a Horizontal Directional Drill (HDD) method. This method involves boring a tunnel beneath the aquatic resources through which the pipeline will be pulled and installed. No physical impacts to the aquatic resources are anticipated to occur with this construction method.
11. TYPE(S) OF MATERIAL BEING DISCHARGED AND THE AMOUNT OF EACH TYPE IN CUBIC YARDS FOR WATERWAYS:
TYPE: See Section 3, Tables 1 and 2
AMOUNT IN CUBIC YARDS: See Section 3, Tables 1 and 2
12. SURFACE AREA IN ACRES OF WETLANDS OR OTHER WATERS FILLED (See Instructions) See Section 3, Tables 1 and 2
13. DESCRIPTION OF AVOIDANCE, MINIMIZATION AND COMPENSATION (See instructions) Avoiding stream and wetland impacts has been one of the driving factors in designing the proposed Project, and the currently proposed alignment represents an alternative that reduces stream and wetland impacts to the furthest extent practicable, while still meeting the purpose and need of the Project. Spire intends to utilize mitigation banking programs in IL should the District Engineer determine that compensatory mitigation is required for proposed impacts. Further avoidance and minimization includes the narrowing of the Limit of Disturbance (LOD) to a 75-foot width at all resource crossings.
14. Date activity is proposed to commence: January 2018  Date activity is expected to be completed: November 2018
15. Is any portion of the activity for which authorization is Sought now complete?  Month and Year the activity was Completed  NOTE: If answer is "YES" give reasons in the Project Description and Remarks section. Indicate the existing work on drawings.
16. List all approvals or certification and denials received from other Federal, interstate, state, or local agencies for structures, construction, discharges or other activities described in this application.
Issuing Agency Type of Approval Identification No. Date of Application Date of Approval Date of
See Section 3, Table 3
17. CONSENT TO ENTER PROPERTY LISTED IN PART 7 ABOVE IS HEREBY GRANTED. Yes No
18. APPLICATION VERIFICATION (SEE SPECIAL INSTRUCTIONS) Application is hereby made for the activities described herein. I certify that I am familiar with the information contained in the application, and that to the best of my knowledge and belief, such information is true, complete, and accurate. I further certify that I possess the authority to undertake the proposed activities.
Signature of Applicant or Authorized Agent County Date 24/3017
Signature of Applicant or Authorized Agent Date
Signature of Applicant or Authorized Agent Date
☐ Corps of Engineers ☐ IL Dept of Natural Resources ☐ IL Environmental Protection ☐ Applicant's Copy Revised 2011

From: Tinch, Jesse <Jesse.Tinch@illinois.gov>
Sent: Friday, March 17, 2017 12:51 PM

To: Todd Wheaton

Cc: Altman, Steve; Lori Ferry; Jayme Fuller; Ali Trunzo; Matt White

Subject: RE: Spire STL Pipeline Project - Statewide Permit 13

Todd,

Thank you for this information. A formal letter in which you are cc'd should be mailed out from our office in the next 1-2 business days.

Please let me know if you have any questions in the future.

Regards, Jesse

Jesse Tinch, EIT Permit Engineer IDNR, Office of Water Resources One Natural Resources Way Springfield, IL 62702-1271 Tel: 217/782-4545

Tel: 217/782-4545

<u>Jesse.Tinch@illinois.gov</u>

**From:** Todd Wheaton [mailto:T.Wheaton@gaiconsultants.com]

**Sent:** Friday, March 17, 2017 11:03 AM

To: Tinch, Jesse

**Cc:** Altman, Steve; Lori Ferry; Jayme Fuller; Ali Trunzo; Matt White **Subject:** [External] RE: Spire STL Pipeline Project - Statewide Permit 13

Hello Jesse,

We finally received some additional information from the project engineers regarding the gravel cover (Special condition 4) and temporary structures (Special Condition 5) that we discussed back in February.

Regarding Special Condition 4, the Placement of gravel will not exceed 6 inches in depth. In addition, any geotextile and gravel placed within a floodway will be removed within one construction season.

As it pertains to Special Condition 5, we have been informed that all flume crossings will be removed within 48-hours of installation. The environmental inspector and/or contractor on-site will monitor and document the flow conditions of the stream prior to installation. Additionally, weather conditions will be monitored to avoid installing the flume at times when significant precipitation is expected to occur. It is our belief that these steps will eliminate any concern of flooding or backup behind the structures, and are requesting your concurrence.

Please let us know if you have any follow up questions or need additional information and we will be happy to provide it.

Thanks, Todd

**Todd C. Wheaton** 

# telephone log



Date: 3/16/2017	
Project / Admin. No.: E160438.00	
Call From: Joe Wojnas	Matt White
Company: Mott MacDonald	GAI Consultants
Phone No.: (413)-535-0135	
Call To: Jesse Tinch	
Company: IDNR	
Phone No.: 217-782-4545	
Subject: Illinois Statewide Permits	
cc:	

# **Summary of Discussion, Decisions, and Commitments:**

Discussion to evaluate if the Project can meet the conditions of the Statewide Permits. The following items were discussed and Spire will evaluate if these can be met:

# Flume Crossing

- 1. The flume crossing will be removed within 48-hours of installation.
- 2. Weather conditions will be monitored and the flume will not be installed at times when a predicted significant precipitation event is to occur.
- 3. The Environmental Inspector and/or contractor will document the flow conditions of the stream prior to the installation of the flume.

#### **Gravel Use**

- 1. Gravel placed will not be greater than 6-inches.
- 2. Gravel placed within a floodway will be removed within one construction season. (I believe this only impacts two access roads. Lori K. just something to keep in mind because landowners sometimes request to have the gravel remain).

From: Lori Ferry

Sent: Wednesday, March 08, 2017 11:06 AM

To: Ali Trunzo

Subject: FW: Spire STL Pipeline Project: Flumed Crossings

**From:** Wojnas, Joseph E [mailto:Joseph.Wojnas@mottmac.com]

Sent: Tuesday, March 07, 2017 3:38 PM

To: Jesse.Tinch@illinois.gov

Cc: Todd Wheaton <T.Wheaton@gaiconsultants.com>; Lori Ferry <L.Ferry@gaiconsultants.com>; English, Russ A.

<Russ.English@spireenergy.com>

Subject: Spire STL Pipeline Project: Flumed Crossings

Jesse,

Colleagues from GAI provided me your contact information. The firm I work for, Mott MacDonald, is the lead design firm for the Spire STL Pipeline Project. We were wondering if you would be available for a call on either Thursday or Friday to talk through the approach we were thinking of proposing for temporary stream crossings? Thank you in advance for your help.

Joe

#### Joseph E. Wojnas, PE

Vice President / Principal Project Manager

T +1 (413) 535 0135 T +1 (413) 315 2152 C +1 (413) 519 1136 F +1 (413) 535 0136

joseph.wojnas@mottmac.com

Mott MacDonald

134 Capital Drive

MOTT Suite D

MACDONALD West Springfield, MA

01089

United States of

America

Website | Twitter | LinkedIn | Facebook | YouTube

From: Lori Ferry

**Sent:** Friday, March 03, 2017 4:14 PM

To: Ali Trunzo

Subject: FW: Spire STL Pipeline Project

From: Todd Wheaton

Sent: Friday, March 03, 2017 3:13 PM

To: Steve.altman@illinois.gov; Jesse.Tinch@illinois.gov

Cc: Lori Ferry < L. Ferry@gaiconsultants.com >; Jayme Fuller < J. Fuller@gaiconsultants.com >

Subject: Spire STL Pipeline Project

Good Afternoon Steve,

I wanted to reach out to you regarding a joint permit application we submitted to your office on January 27, 2017, for the Spire STL Pipeline Project. We have had some correspondence with Jesse Tinch regarding the applicability of statewide permits, and are still waiting for a response from the project engineers regarding a couple conditions of Statewide permit #13. I wanted to follow up to see If there was any additional information you may need to complete your review for the project? Please let us know if there is anything your office may require in additional to the joint permit application materials we provided to assist in your review.

Thanks, Todd

#### Todd C. Wheaton

Assistant Environmental Technical Leader

3720 Dressler Road NW, Canton, OH 44718 **T** 330.433.2680 **D** 234.203.0765 **M** 330.415.8364

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From: Matt White

Sent: Thursday, March 02, 2017 9:27 AM

To: Tinch, Jesse

Cc: Altman, Steve; Lori Ferry; Ali Trunzo

Subject: RE: Spire STL Pipeline Project - IDNR Statewide Permit No. 8

#### Thanks Jesse.

As for statewide permit no. 13 and your communication with Todd I believe we are still working on this item and I will relay this message to him. We will be in touch at some point.

# Thank you.

#### Matthew B. White, M.S.

**D** 317.436.4832 **M** 412.848.7283



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**From:** Tinch, Jesse [mailto:Jesse.Tinch@illinois.gov]

**Sent:** Wednesday, March 01, 2017 3:17 PM **To:** Matt White <m.white@gaiconsultants.com>

Cc: Altman, Steve <Steve.Altman@illinois.gov>; Lori Ferry <L.Ferry@gaiconsultants.com>; Ali Trunzo

<A.Trunzo@gaiconsultants.com>

Subject: RE: Spire STL Pipeline Project - IDNR Statewide Permit No. 8

Mr. White,

The Illinois Department of Natural Resources, Office of Water Resources (IDNR/OWR) concurs that you meet Special Condition No. 3 of IDNR/OWR Statewide Permit No. 8.

We are still awaiting a reply regarding the following, "If you agree to check the temporary work for its compliance to Statewide Permit No. 13 and inform us if the work does not comply, then please let me know and our office will be ready to send a formal determination letter regarding this project." This can be found within my email to Todd Wheaton dated February 9, 2017.

Thank you,

Jesse Tinch, EIT
Permit Engineer
IDNR, Office of Water Resources
One Natural Resources Way
Springfield, IL 62702-1271

Tel: 217/782-4545 Jesse.Tinch@illinois.gov

From: Matt White [mailto:m.white@gaiconsultants.com]

Sent: Wednesday, March 01, 2017 8:41 AM

# telephone log



Date: 3/1/2017
Project / Admin. No.: E160438.00
Call From: Lori Ferry, Doug Sipe
Company: GAI Consultants, MDM
Phone No.: 630-605-5255
Call To: Jenny Skufca, Brent Krebs
Company: Illinois Department of Natural Resources
Phone No.:
Subject: Incidental Take Authorization
cc:

Called IDNR to discuss the Incidental Take Process.

**Summary of Discussion, Decisions, and Commitments:** 

The purpose of the call was to follow up with the IDNR regarding the submittal of the Conservation Plan and subsequent Incidental Take Authorization (ITA) and the potential for the IDNR to issuance authorization of the without Spire potentially having an easement on certain properties under review as part of the ITA. IDNR indicated that they are more than willing to cooperate and want to be part of the process and not a hindrance. IDNR agreed that they could work through the process of incidental take (IT), but requested that they obtain legal opinion regarding whether they could issue a permit if Spire had not obtained an easement either through negotiations or eminent domain. The IDNR was open to potentially providing ITA and conditioning it based on Spire obtaining the necessary easements. This would also require legal opinion which the IDNR indicated they would follow up with Chris Young (IDNR) and get back with Spire.

Spire indicated that they are still attempting to work with the landowners where IT would be requested. However, it was likely that an easement would not be obtained prior to July 1 (the anticipated date of submittal of the Conservation Plan for Timber rattlesnake, northern long-eared bat and Indiana bat).

Additionally, Spire confirmed with IDNR that no additional timber rattlesnake surveys would be required regardless of whether Spire obtained permission to the necessary properties. The 2016 data supplied by the IDNR can be utilized to develop the Conservation Plan and has confirmed presence on the property.

From: Tinch, Jesse <Jesse.Tinch@illinois.gov>
Sent: Wednesday, March 01, 2017 3:17 PM

To: Matt White

Cc: Altman, Steve; Lori Ferry; Ali Trunzo

Subject: RE: Spire STL Pipeline Project - IDNR Statewide Permit No. 8

Categories: Spire - Filed

Mr. White,

The Illinois Department of Natural Resources, Office of Water Resources (IDNR/OWR) concurs that you meet Special Condition No. 3 of IDNR/OWR Statewide Permit No. 8.

We are still awaiting a reply regarding the following, "If you agree to check the temporary work for its compliance to Statewide Permit No. 13 and inform us if the work does not comply, then please let me know and our office will be ready to send a formal determination letter regarding this project." This can be found within my email to Todd Wheaton dated February 9, 2017.

Thank you,

Jesse Tinch, EIT Permit Engineer IDNR, Office of Water Resources One Natural Resources Way Springfield, IL 62702-1271

Tel: 217/782-4545 Jesse.Tinch@illinois.gov

**From:** Matt White [mailto:m.white@gaiconsultants.com]

Sent: Wednesday, March 01, 2017 8:41 AM

To: Tinch, Jesse

Cc: Altman, Steve; Lori Ferry; Ali Trunzo

Subject: [External] RE: Spire STL Pipeline Project - IDNR Statewide Permit No. 8

Jesse,

Per our discussion attached is a map identifying the location of proposed mainline valves and metering and regulating stations which have the ability to shut-off gas flow. Only those valves located in Illinois and just across the state line into Missouri are shown on the provided maps. The facilities located in Missouri would have the same capabilities as those located in Illinois. The statement below provides additional information on the design and capabilities of the mainline valves and metering and regulating stations.

As part of Spire's measures to protect the public, Spire will install sectionalizing block valves (i.e. mainline valves) along the proposed pipeline. The placement of each mainline valve is based on the USDOT Minimum Federal Safety Standards in 49 CFR §192 and are dependent on the type of Class location that the pipeline will be constructed in. Class locations are classifications based on population density in the vicinity of the pipeline which specify rigorous safety requirements for populated areas. Based on the location of the proposed pipeline, Spire has determined that two mainline valves will be installed on the 24-inch pipeline in Illinois and one in Missouri, approximately 15 miles apart (approximate MP 15.7 and MP 34.7 in Illinois and MP 46.2 in Missouri). Additional mainline valves will be installed along the Line 880 portion of the Project as well, which is located in Missouri. These mainline valves will have the capability to shutdown the flow of

From: Matt White

Sent: Wednesday, March 01, 2017 9:41 AM

To: Tinch, Jesse

Cc: Altman, Steve; Lori Ferry; Ali Trunzo

Subject: RE: Spire STL Pipeline Project - IDNR Statewide Permit No. 8

Attachments: Facilities Location Map 2017 02 28.pdf

Jesse,

Per our discussion attached is a map identifying the location of proposed mainline valves and metering and regulating stations which have the ability to shut-off gas flow. Only those valves located in Illinois and just across the state line into Missouri are shown on the provided maps. The facilities located in Missouri would have the same capabilities as those located in Illinois. The statement below provides additional information on the design and capabilities of the mainline valves and metering and regulating stations.

As part of Spire's measures to protect the public, Spire will install sectionalizing block valves (i.e. mainline valves) along the proposed pipeline. The placement of each mainline valve is based on the USDOT Minimum Federal Safety Standards in 49 CFR §192 and are dependent on the type of Class location that the pipeline will be constructed in. Class locations are classifications based on population density in the vicinity of the pipeline which specify rigorous safety requirements for populated areas. Based on the location of the proposed pipeline, Spire has determined that two mainline valves will be installed on the 24-inch pipeline in Illinois and one in Missouri, approximately 15 miles apart (approximate MP 15.7 and MP 34.7 in Illinois and MP 46.2 in Missouri). Additional mainline valves will be installed along the Line 880 portion of the Project as well, which is located in Missouri. These mainline valves will have the capability to shutdown the flow of gas in the pipeline remotely or manually. In addition, each proposed metering and regulating station which will be built (one station to be built in Illinois at MP 0.0, REX Receipt Station and three stations in Missouri), will also have the capability to shutdown or isolate portions of gas flow in the pipeline. Federal regulations do not require valves to be placed at waterbody crossings for natural gas pipelines.

Based on our discussion and the description above, it is our understanding that we meet Special Condition #3 of IDNR Statewide Permit No. 8.

If you concur please respond indicating such.

Thank you for your guidance.

Matthew B. White, M.S.

**D** 317.436.4832 **M** 412.848.7283



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From: Tinch, Jesse [mailto:Jesse.Tinch@illinois.gov]

**Sent:** Friday, February 17, 2017 12:33 PM

**To:** Matt White <m.white@gaiconsultants.com> **Cc:** Altman, Steve <Steve.Altman@illinois.gov>

Subject: RE: Spire STL Pipeline Project - IDNR Statewide Permit No. 8

Matt,

Based on our conversation with IEPA, natural gas would fall under the definition of water pollution.

Thank you for checking with us.

Jesse Tinch, EIT
Permit Engineer
IDNR, Office of Water Resources
One Natural Resources Way
Springfield, IL 62702-1271
Tel: 217/782-4545
Jesse.Tinch@illinois.gov

**From:** Matt White [mailto:m.white@gaiconsultants.com]

Sent: Tuesday, February 14, 2017 3:04 PM

To: Tinch, Jesse

Cc: Lori Ferry; Jayme Fuller; Altman, Steve; Matt White

Subject: [External] Spire STL Pipeline Project - IDNR Statewide Permit No. 8

Jesse,

In reviewing the special conditions of IDNR Statewide Permit No. 8 we wanted to obtain clarification on whether a pipeline carrying natural gas is applicable under Special Condition #3 of said permit.

Special Condition #3 – A utility crossing carrying material which may cause water pollution as defined by the Environmental Protection Act, 415ILCS 5 (1996 State Bar Edition), shall be provided with shut-off valves on each side of the body of water to be crossed.

We appreciate your continued guidance.

Thank you.

#### Matthew B. White, M.S.

Assistant Environmental Manager

6420 Castleway West Drive, Indianapolis, IN 46250 **T** 317.570.6800 **D** 317.436.4832 **M** 412.848.7283

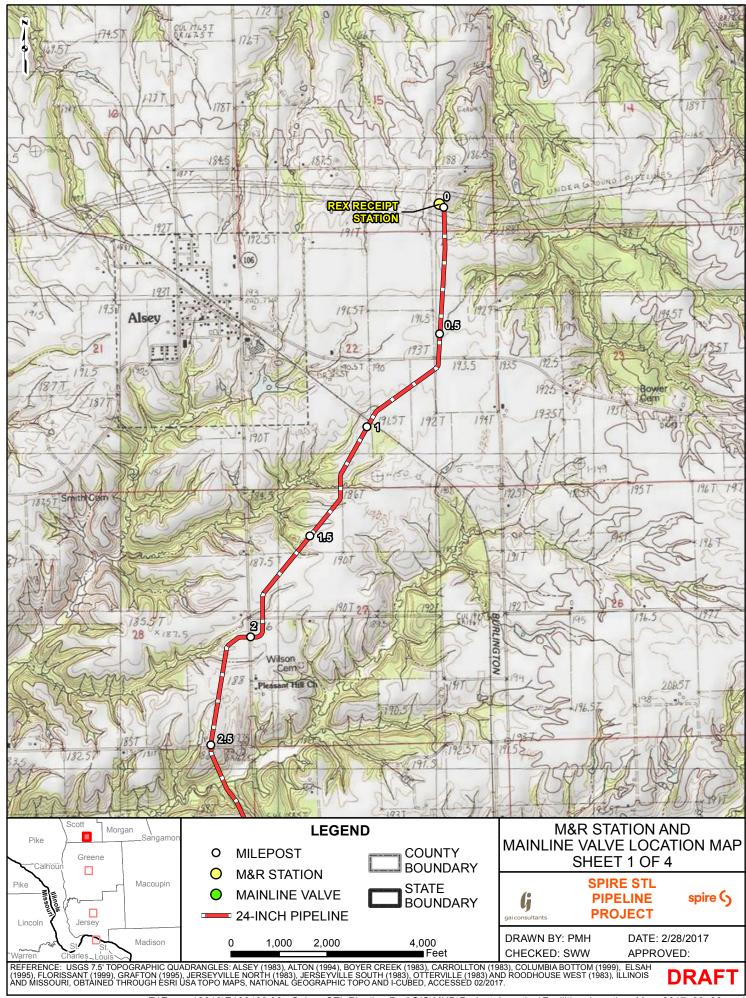
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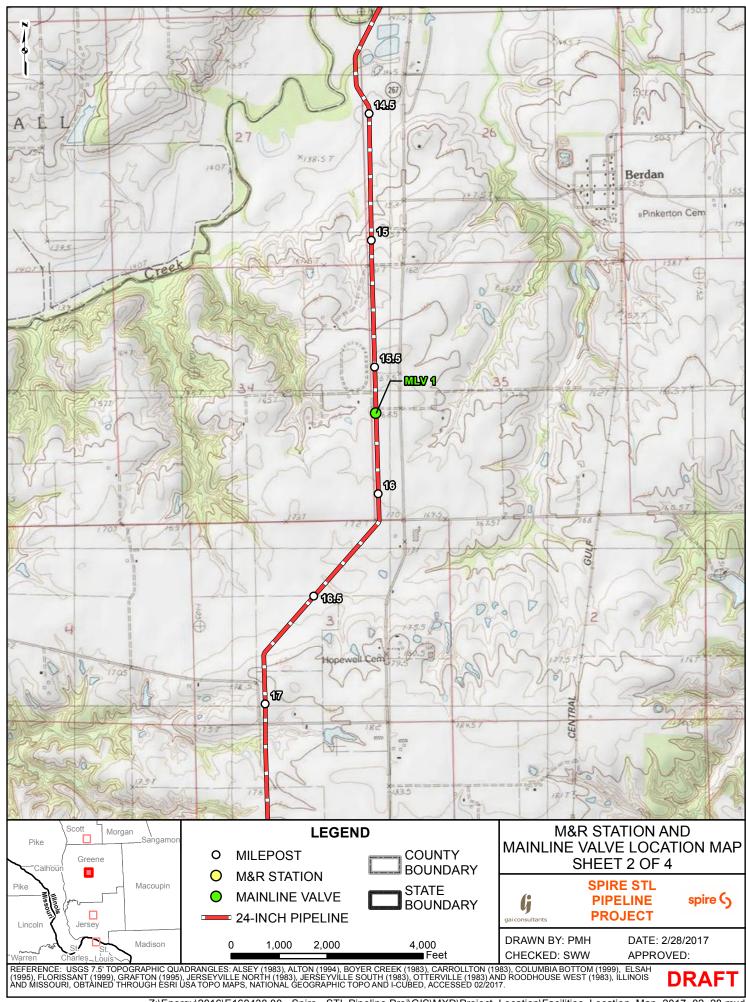


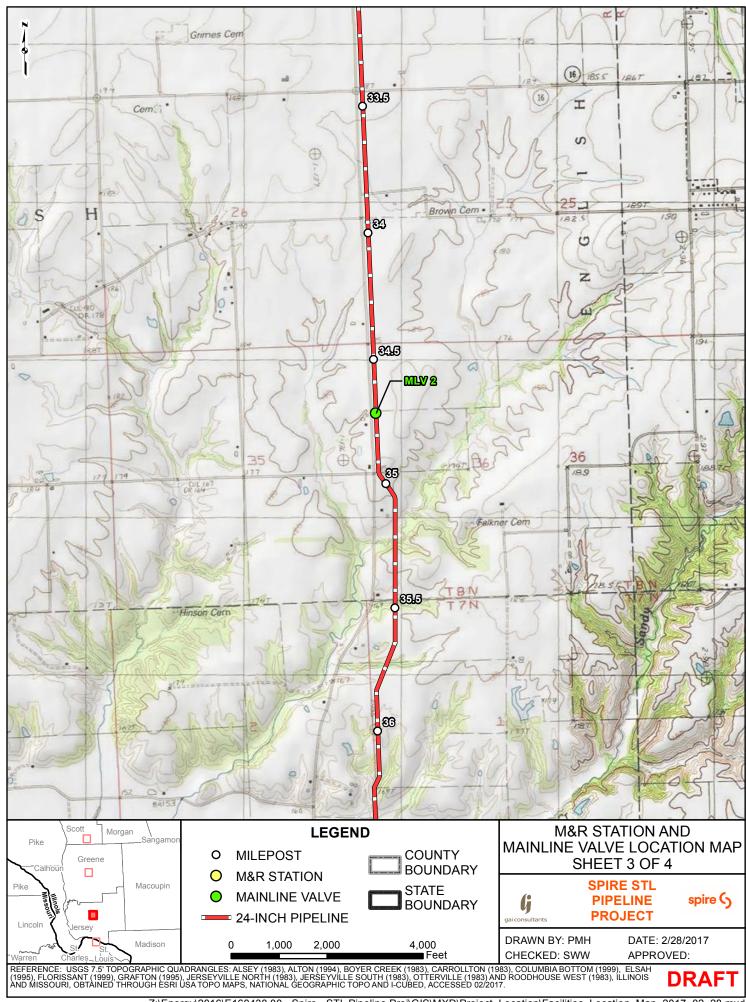
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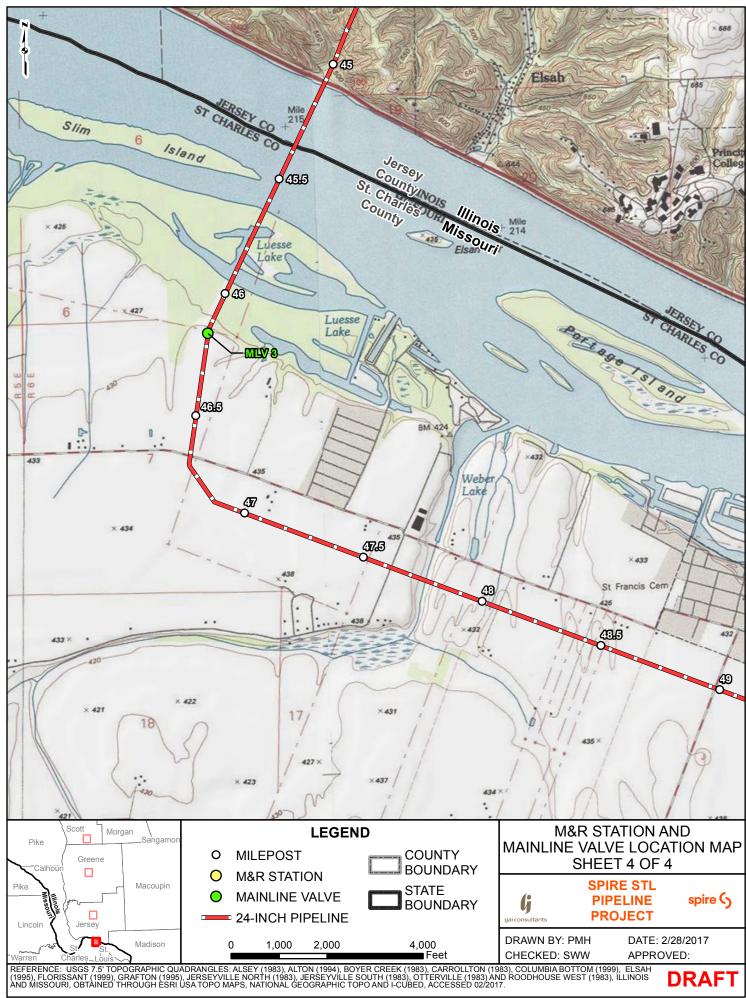
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## telephone log



Date: 2-21-2017

Project / Admin. No.: E160438.00

Call From: Matt White

Company: GAI Consultants

Phone No.: 317-436-4832

Call To: Jesse Tinch

Company: IDNR

Phone No.: 217-782-4545

Subject: Statewide permits and shutoff valves

cc:

## **Summary of Discussion, Decisions, and Commitments:**

Jesse indicated that their regulations do not specify a distance for where the valves need to be placed inrelation to the waterbody crossing. To that end I indicated to him that there are 3 aboveground facilities being proposed in IL and that those facilities likely have the capability of shutting-off the flow of gas. If we send IDNR a map of these facilities and they do have the capability of shutting off the gas and cover all the stream crossings in IL the Project should meet the permit conditions, but would need to send to IDNR for review and confirmation.

From: Matt White

**Sent:** Monday, February 20, 2017 10:10 AM

To: Ali Trunzo

Subject: FW: Spire STL Pipeline Project - IDNR Statewide Permit No. 8

#### Matthew B. White, M.S.

**D** 317.436.4832 **M** 412.848.7283



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From: Matt White

**Sent:** Monday, February 20, 2017 9:31 AM **To:** 'Tinch, Jesse' <Jesse.Tinch@illinois.gov> **Cc:** Altman, Steve <Steve.Altman@illinois.gov>

Subject: RE: Spire STL Pipeline Project - IDNR Statewide Permit No. 8

Jesse,

Thanks for the response. The proposed Project design does not incorporate shut-off valves on either side of waterbody crossings. To that end I assume we need to apply for an individual permit, or could we provide information regarding proposed shut-off valves and safety and handle this without the formal submission of a permit?

Thank you,

#### Matthew B. White, M.S.

**D** 317.436.4832 **M** 412.848.7283



### ENGINEERING, PLANNING, AND ENVIRONMENTAL CONSULTING SINCE 1958

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From: Tinch, Jesse [mailto:Jesse.Tinch@illinois.gov]

**Sent:** Friday, February 17, 2017 12:33 PM

**To:** Matt White <<u>m.white@gaiconsultants.com</u>> **Cc:** Altman, Steve <<u>Steve.Altman@illinois.gov</u>>

Subject: RE: Spire STL Pipeline Project - IDNR Statewide Permit No. 8

Matt,

Based on our conversation with IEPA, natural gas would fall under the definition of water pollution.

Thank you for checking with us.

Jesse Tinch, EIT

Permit Engineer IDNR, Office of Water Resources One Natural Resources Way Springfield, IL 62702-1271

Tel: 217/782-4545 Jesse.Tinch@illinois.gov

**From:** Matt White [mailto:m.white@gaiconsultants.com]

Sent: Tuesday, February 14, 2017 3:04 PM

To: Tinch, Jesse

Cc: Lori Ferry; Jayme Fuller; Altman, Steve; Matt White

Subject: [External] Spire STL Pipeline Project - IDNR Statewide Permit No. 8

Jesse,

In reviewing the special conditions of IDNR Statewide Permit No. 8 we wanted to obtain clarification on whether a pipeline carrying natural gas is applicable under Special Condition #3 of said permit.

Special Condition #3 – A utility crossing carrying material which may cause water pollution as defined by the Environmental Protection Act, 415ILCS 5 (1996 State Bar Edition), shall be provided with shut-off valves on each side of the body of water to be crossed.

We appreciate your continued guidance.

Thank you.

#### Matthew B. White, M.S.

Assistant Environmental Manager

6420 Castleway West Drive, Indianapolis, IN 46250 T 317.570.6800 D 317.436.4832 M 412.848.7283

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Subject: RE: Spire STL Pipeline Project

From: Todd Wheaton

Sent: Thursday, February 09, 2017 8:46 AM

To: Jesse.Tinch@illinois.gov

Cc: Ali Trunzo < A.Trunzo@gaiconsultants.com >; Jayme Fuller < J.Fuller@gaiconsultants.com >; Lori Ferry

<L.Ferry@gaiconsultants.com>

Subject: RE: Spire STL Pipeline Project

Good Morning Jesse,

I am reaching out to you in response to an information request for the Spire STL Pipeline Project we received last week. I've included your original request below for reference. Please let me know if you have any additional questions or need further clarification.

- Three aboveground facilities are located within the State of Illinois, none of which are located within a
  designated floodplain or floodway. Their locations are as follows: Rex Receipt Station (M&R Facility)
  39.566098, -90.415567 (1-mile south of North Little Sandy Creek Scott County); MLV 1 (Mainline Valve
  Facility) 39.352328, -90.413138 (1.3 –miles south of Apple Creek Greene County); MLV 2 (Mainline Valve
  Facility) 39.116647, -90.388953 (3.2–miles north of Otter Creek –Jersey County).
- 2. The project involves the following work within jurisdictional bodies of water (drainage area > 1 sq. mile in urban areas or drainage area > 10 sq. miles in rural areas):

Open Cut – Apple Creek SIL-TMA-033 Workspace – Apple Creek SIL-TMA-034 Open Cut – Macoupin Creek SIL-TMA-039 Temporary Access Road – Otter Creek NHD-784 Open Cut – Otter Creek SIL-CDK-022 Directional Boring – Mississippi River Workspace – Mississippi River

- 3.
- a) A minimum of 5 feet of cover below the stream bed will be maintained at all stream crossings.
- b) In regard to Statewide Permit #13, there are a couple questions we had regarding Special Conditions 4 and 5. The clarification would help in the determination of whether the condition would be met or if an additional permit would be necessary.
  - Special Condition 4 states: "This permit does not authorize the placement or construction of any solid embankment or wall such as a dam, roadway, levee, or dike across any channel or floodway". Two temporary access roads are located within a designated floodplain. A small segment of TAR-009 is located within the Apple Creek floodplain, and the entirety of TAR-015 is located within the Otter Creek floodplain. Both of these temporary access roads are existing dirt roads. However, to accommodate construction traffic, these temporary access roads may require an application of a geotextile fabric and gravel which would be removed in its entirety following construction. Since no embankment is proposed to be constructed for the temporary access road we feel that this condition would be satisfied. Could you please confirm?

Special Condition 5 states: "No temporary structure shall be placed within any river or stream channel until a registered professional engineer determines and documents that the temporary structure will meet the requirements of Special Condition 3 of this statewide permit. Such documentation shall include, at a minimum, confirmation that no buildings or structures will be impacted by the backwater induced by the temporary structure." Most of the proposed stream crossings associated with the Project will be a dam and flume crossing (typical attached). We would like to request clarification as to whether each of these temporary structures would require a separate plan to be submitted for each, or if this type of structure was authorized therefore satisfying Special Condition 5?

Thanks, Todd

#### **Todd C. Wheaton**

Assistant Environmental Technical Leader

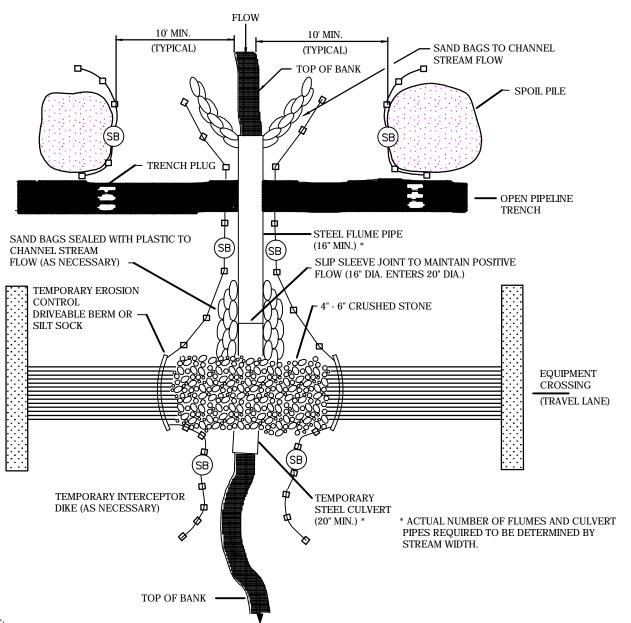
3720 Dressler Road NW, Canton, OH 44718 **T** 330.433.2680 **D** 234.203.0765 **M** 330.415.8364

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#### NOTES:

- 1. (SB) TEMPORARY SEDIMENT BARRIER OF SILT FENCE, SILT SOCK AND/OR STRAW BALES.
- 2. SAND BAGS MUST BE FILLED WITH CLEAN SAND.
- 3. THE ENDS OF THE FLUME AND CULVERT MUST EXTEND TO AN UNDISTURBED AREA.
- 4. FLUME PIPE(S) MAY BE REMOVED IF NO WATER IS FLOWING AT THE TIME(S) OF CONSTRUCTION ACTIVITIES FOR EXCAVATION OF CONTINUOUS TRENCH AND SUBSEQUENT INSTALLATION/ LOWERING IN OF NEW PIPELINE SECTION(S). IF THERE IS A SUBSTANTIAL AMOUNT OF WATER FLOWING AT THE TIME OF CONSTRUCTION, ALTERNATE METHODS MAY BE EMPLOYED TO ACHIEVE A DRY CROSSING.
- 5. FLUME PIPE(S) MUST BE REPLACED AT THE END OF EACH WORKING DAY UNTIL BACKFILLING AND RESTORATION ARE COMPLETE. STREAM BOTTOM AND BANKS WILL BE RESTORED IN ACCORDANCE WITH THE FERC PROCEDURES.
- 6. TRENCH PLUGS WILL BE CONSTRUCTED AT TIME OF PIPE INSTALLATION

						ENG. RECORD		DATE	TYPICAL FLUMED CROSSING
						DRAWN BY:	ММ	122016	
						DRAWING APPROVAL			FOR PROPOSED 24-INCH
						PROJECT APPROVAL			
						SURVEY DATE:			DIAMETER PIPELINE
						SCALE: N.T.S.			
NO	DATE	RY	DESCRIPTION	PROJ. ID	APPR	PROJECT ID:			No. TypicalFlumeCrossing
REVISIONS						FILE NAME:			No. 19pican fameorossing
				·				·	

From: Jayme Fuller

**Sent:** Monday, February 06, 2017 10:08 AM

To: Tinch, Jesse

Cc: Altman, Steve; Ali Trunzo; Lori Ferry Subject: RE: Spire STL Pipeline Project

Hi Jesse,

Thank you so much for responding in such a timely manner. We plan to get you answers to these questions no later than the end of this week.

Jayme L. Fuller, Environmental Manager

#### **GAI** Consultants, Inc.

Charleston Office I 300 Summers Street, Suite 1100, Charleston WV 25301

Indianapolis Office I 6420 Castleway West, Indianapolis, IN 46250

1-234-203-0763 | C 614.499.6258 | f 🛩 🛗 in 🔊

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From: Tinch, Jesse [mailto:Jesse.Tinch@illinois.gov]

Sent: Friday, February 03, 2017 3:14 PM

**To:** Jayme Fuller < J.Fuller@gaiconsultants.com> **Cc:** Altman, Steve < Steve.Altman@illinois.gov>

Subject: Spire STL Pipeline Project

Jayme Fuller,

After a cursory review of the Spire STL Pipeline Project, our office requests the following:

- The location of the metering and regulating facilities in Illinois as we discussed in the conference call. We will
  need additional plan and profile drawings if the facility is located within the floodway of an IDNR, Office of
  Water Resources jurisdictional waterway, or floodplain if the floodway is not delineated.
- 2. It appears the project involves the following work within jurisdictional bodies of water (drainage area > 1 sq. mile in urban areas or drainage area > 10 sq. miles in rural areas):

Open Cut – Apple Creek SIL-TMA-033 Workspace – Apple Creek SIL-TMA-034 Open Cut – Macoupin Creek SIL-TMA-039 Temporary Access Road – Otter Creek NHD-784 Open Cut – Otter Creek SIL-CDK-022 Directional Boring – Mississippi River Workspace – Mississippi River

a) Please confirm (a short email statement would be sufficient) that the pipeline crossings of the above waterways will provide at least 3 feet of cover below the stream bed.

b) Regarding the workspaces and temporary access roads, you will eventually be asked to review IDNR, Office of Water Resources' Statewide Permit No. 13 to determine whether they comply with its conditions. The Statewide Permit can be viewed at <a href="https://www.dnr.illinois.gov/WaterResources/Pages/PermitsStatewideRegionalGeneral.aspx">https://www.dnr.illinois.gov/WaterResources/Pages/PermitsStatewideRegionalGeneral.aspx</a>. If you chose to review this now, you can inform our office if any of the conditions cannot be met for the workspaces and the temporary access road.

Sincerely,

Jesse Tinch, EIT
Permit Engineer
IDNR, Office of Water Resources
One Natural Resources Way
Springfield, IL 62702-1271
Tel: 217/782-4545

Jesse.Tinch@illinois.gov

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## telephone log



Date: 2-1-17

Project / Admin. No.: E160438.00

Call From: Jenny Skufka

Company: Illinois Department of Natural Resources

Phone No.: 217-557-8243

Call To: Lori Ferry

Company: GAI Consultants

Phone No.: 630-605-5255

Subject: Spire STL Pipeline

cc:

## **Summary of Discussion, Decisions, and Commitments:**

Ms. Jenny Skufka called to discuss the status of consultation on the Spire STL Pipeline in response to my voicemail left on 1-30-2017. Ms. Skufka indicated that the information she sent over regarding incidental take not being authorized on areas protected by the Nature Preserves Commission did not apply to the Principia Hills Natural Inventory Site or Natural Heritage Landmark that the project is crossing. Those sites do not have the same level of protection as the nature preserves and the land and water resource sites.

Ms. Skufka also wanted to review the schedule for the delivery of the incidental take authorization. I informed her we anticipated submitting a draft to her in March 2017 to review and would submit a final conservation plan in July 2017 after mist net surveys had been completed. She thought that schedule would work, but could not commit to a review period. She also raised concerns around submitting an incidental take authorization on a property that would not have an acquired easement for the Project if that were to be the case by the time the ITA was submitted (anticipated July 2017). I informed Ms. Skufka that Spire is still continuing to work with the landowner in the area of question but that the project authorizations would need to be moved forward in order to meet the construction schedule. Additionally, the conservation plan is developed for the species regardless of how the easements on the properties are obtained. Ms. Skufka was concerned about opening a public comment period (as required) for the incidental take authorization when the landowner had not fully agreed to the Project. I questioned whether the Conservation Plan could be conditioned to indicate that the authorization is valid only if FERC approves and certificates the Project.

Ms. Skufka indicated she could help the team as they begin the development of the Conservation Plan.



January 27, 2017 Project E160438.00

Mr. Steve Altman Illinois Department of Natural Resources Office of Water Resources Downstate Regulatory Programs Section One Natural Resource Way Springfield, IL 62702

Nationwide Permit 12 Joint Permit Application Spire STL Pipeline LLC Spire STL Pipeline Project Scott, Greene, and Jersey Counties, Illinois

#### Mr. Altman:

On behalf of Spire STL Pipeline LLC ("Spire"), GAI Consultants, Inc. ("GAI") is submitting a Nationwide Permit 12 Joint Permit Notification for the Spire STL Pipeline Project ("Project"), located in Scott, Greene, and Jersey Counties, Illinois ("IL").

The proposed Spire STL Pipeline Project will consist of approximately 59 miles of new, greenfield, 24-inch diameter steel pipeline (referred to as the "24-inch pipeline" portion of the Project) originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east in St. Charles County, Missouri. The 24inch pipeline then crosses the Missouri River and ties into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). As part of the proposed Project and subject to LGC's receipt of approval from the Missouri Public Service Commission ("MPSC"), Spire is proposing to purchase Line 880 from LGC and modify the pipeline before placing it into interstate service. Line 880 consists of approximately seven miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the 24-inch pipeline part of the Project to the Enable Mississippi River Transmission, LLC ("Enable MRT") pipeline along the western bank of the Mississippi River in St. Louis County, Missouri at the terminus of the Project. The total length of the Project pipelines will be approximately 66 miles. The portion of the 24-inch diameter pipeline located within the State of Illinois is approximately 45 miles long. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project will also include the construction of three new metering and regulating ("M&R") station interconnects with REX in Illinois and LGC and Enable MRT in Missouri and the construction of a new facility at an existing LGC site along Line 880. This Project, as proposed, falls under the oversight of the Federal Energy Regulatory Comission ("FERC"). The FERC plan and procedures will be adhered to in respect to aquatic resource crossings and restoration, and have been included as Attachment D.

GAI, on behalf of Spire, is hereby submitting the Project's Nationwide Permit ("NWP") 12 Joint Permit Application. This package has been prepared based on the Project adhering to the general and regional conditions of a NWP-12 and Section 401 Water Quality Certification General and Specific Conditions within the State of Illinois. A full copy of this PCN, including resources specific to the State of Missouri, has been concurrently provided to the United States Army Corps of Engineers ("USACE").

United States Fish and Wildlife Service consultation was initiated on August 29, 2016 and a response was received on December 8, 2016. Correspondence with the Illinois Historic Preservation Agency ("IHPA") was initiated on August 29, 2016. A response from IHPA will be provided once received in the anticipation that this permit application's review can be initiated without those documents in hand. Since a portion of the Project is unavailable for cultural resources investigation access at this time, we are requesting authorization of Single and Complete Projects that receive this concurrence on a time-staggered basis. Agency correspondence is included as Attachment B in the attached Joint Permit Application.

### Nationwide Permit (NWP) 12 Joint Permit Application

Spire respectfully requests concurrence that the proposed Project can be authorized under Nationwide Permit 12. The construction of the Project has been designed to limit the amount of impacts to streams and wetlands within the Project area that are assumed to be jurisdictional waters of the United States to the greatest extent practicable.

Additionally, Spire is requesting a Section 10 letter of permission from the USACE for the crossings of the Mississippi and Missouri Rivers, which are both classified as Traditionally Navigable Waters ("TNW's"). In order to evaluate the feasibility, design, and constructability of the horizontal directional drill ("HDD") methods of pipeline installation under the Mississippi and Missouri Rivers, several geotechnical soil test borings were collected on land and along the river bottoms. The results of these test borings are outlined in the geotechnical report, included as Attachment C in the attached Joint Permit Application.

Temporary impacts to 60 streams and 32 wetlands will be necessary to construct the pipeline and access roads associated with the Project in the State of Illinois. Impacted streams and wetlands will be crossed using the dry-ditch open-cut method. A dam and flume method of dewatering is installed to create a dry work area, the trenches are dug, the pipeline is placed, and the trench is then refilled and the work area reclaimed. Additionally, temporary crossings of 20 streams and 14 wetlands located within the Project workspace will also be necessary during construction of the Project. Other aquatic resources, including the Mississippi River, will be crossed using the HDD method. This method involves boring a tunnel beneath the aquatic resources through which the pipeline will be pulled and installed. No physical impacts to the aquatic resources are anticipated to occur with this construction method. Detailed information regarding these impacts can be found in Tables 1 and 2 in the attached Joint Permit Application.

Avoiding stream and wetland impacts has been one of the driving factors in designing the proposed Project, and the currently proposed alignment represents an alternative that reduces stream and wetland impacts to the furthest extent practicable, while still meeting the purpose and need of the Project. Spire intends to utilize mitigation banking programs in IL should the District Engineer determine that compensatory mitigation is required for proposed impacts. Further avoidance and minimization includes the placement of timber mats for equipment crossings of streams and wetlands, and the Limit of Disturbance ("LOD") width will be narrowed to a 75-foot width at all resource crossings.

#### **Streams and Wetlands**

Fieldwork associated with stream and wetland investigations for the Project was conducted between September and November, 2016. The surveys identified streams and wetlands within a approximately 300-foot wide corridor centered on the proposed pipeline, and a 50-foot wide corridor surrounding the proposed access roads. Field investigations identified 73 wetlands, 158 waterbodies, and 6 ponds within the Project study area. These features are outlined in the Wetland Delineation and Stream Identification Report, included in the attached Joint Permit Application.

### Rare, Threatened, or Endangered Species

Spire initiated consultation regarding the Project with the USFWS in June 2016 and held a meeting with the USFWS Rock Island Field office in July 2016. Prior to the initiation of field surveys, Spire reviewed various sources of available data to determine federally-listed and state-listed or protected species that could potentially inhabit or traverse the Project areas. The USFWS IPaC system was utilized to identify the federally-listed species that could potentially inhabit or traverse the Project area in Scott, Greene, Jersey Counties, Illinois. Spire reviewed this list and the information contained within consultation from the USFWS to determine the species potentially affected from the construction of the Project.

In order to determine state-listed species which have the potential to occur with the Project areas, Spire initiated consultation with the IDNR in June 2016. Spire performed a 0.5-mile Project review search through the IDNR's EcoCAT. No Illinois state rare, threatened, or endangered species were present on the EcoCAT search receipt for Scott and Greene Counties. Since a large search buffer was surveyed in EcoCAT, multiple areas of concern are present on the search receipt that do not occur within the Project area. Spire is coordinating with the IDNR regarding results of the EcoCAT for Jersey County.

Agency permits and approvals associated with the project have been provided in Section 3, Table 3 of the attached Joint Permit Application.

Mr. Steve Altman Spire STL Pipeline Project January 2017

#### **Cultural Resources**

Background research was completed on the APE for the Project to gather information from previous cultural resource investigations and on known archaeological sites and historic architectural properties. Background research was acquired through an inventory search at the IHPA and MO SHPO offices. Additional online inventories were accessed by the use of the Inventory of Illinois Archaeological Sites Flex Archaeology Viewer, Illinois CRM Report Archive Database, and MO SHPO's Historic Districts and Sites viewer and Archaeology Viewer.

Eight previously identified archaeological sites extend into the defined APE. No historic or architectural resources are located within the Project's direct APE. Four of these archaeological resources are located in Greene and Scott Counties, Illinois, while the remaining four resources are within St. Charles and St. Louis Counties, Missouri. One of these archaeological sites has been recommended for Phase II archaeological testing, three have been previously determined as Not Eligible for listing in the NRHP, portions of one site were previously recommended not eligible, one site is recorded as being destroyed, and the remaining two sites have not been evaluated for NRHP eligibility. GAI conducted Phase I archaeological studies at each of these eight previously recorded site locations. Two small clusters of artifacts were identified along one site (GE00018). The remaining seven previously recorded sites were unidentified during Phase I survey.

Site GE00307 is situated on a terrace in a cultivated field. A portion of the site is crossed by a proposed access road for the current project. This site was identified in 1995 during a survey by the Center for American Archeology for a proposed four lane highway. The site is a small artifact scatter of lithic flakes and one prehistoric ceramic, dating the site from the Late Woodland. Site GE00307 was previously recommended for Phase II archaeological testing. However, since no artifacts were encountered during the current survey, no additional study is recommended.

Three previously recorded archaeological sites (GE00018, ST00499, and ST00500) in Illinois were determined to be Not Eligible for listing the NRHP. All but one of these resources (GE00018) were identified as a result of previous archaeological surveys. All three sites have an unknown prehistoric temporal affiliation.

Site SC1057 was identified in Missouri during a Phase I survey for the Keystone Pipeline Project in 2016. The portions of the site located within the study corridor of the Keystone Pipeline Project were determined to be Not Eligible for listing in the NRHP. This recorded site boundaries will be avoided by the Project construction right-of-way (ROW).

Site SC5 in Missouri is a Sioux Indian trail that is recorded as being destroyed. Systematic Phase I archaeological studies did not find evidence of an existing trail in the recorded location. This area is currently an active agricultural field.

The remaining two previously recorded archaeological sites (SL157 and SL158) are located in Missouri and remain unevaluated for NRHP eligibility.

Three historic districts are located within a 1-mile radius of the proposed Project. The Principia College Historic District is a National Historic Landmark and is situated approximately 0.8-mile from the APE. The Elsah Historic District is listed in the NRHP and is situated approximately 0.16-mile from the APE. The Chautauqua Historic District is also listed in the NRHP and located approximately 0.4-mile from the APE.

#### Closing

Spire and GAI thank you in advance for your review of this NWP-12 Joint Permit Application package. Please feel free to contact me at 614-499-6258, or at i.fuller@gaiconsultants.com if there are any questions or concerns.

Sincerely,

**GAI Consultants, Inc.** 

Jayme Fuller

**Environmental Manager** 

Attachments: Nationwide Permit 12 Joint Permit Application

## telephone log



Date: 1-20-17

Project / Admin. No.: E160438.00

Call From: Keith Shank

Company: Illinois Department of Natural Resources

Phone No.:

Call To: Lori Ferry

Company: GAI Consultants

Phone No.: 630-605-5255

Subject: Spire STL Pipeline

cc:

## **Summary of Discussion, Decisions, and Commitments:**

Mr. Shank called to discuss the status of consultation on the Spire STL Pipeline in response to my voicemail left on 1-18-2017.

Mr. Shank indicated that it was still the intent of the IDNR to submit a consultation letter on behalf of the Project but that the IDNR was behind, busy and short staffed and had not had time to submit a letter. I indicated that Mr. Pat Malone had informed Spire and FERC at an interagency meeting on 12-13-16 that IDNR was not going to submit a letter even though an EcoCat had been indicated in October 2016 and consultation had initiated in June 2016. Mr. Malone felt he had provided consultation information and was directed not to submit a formal letter on a federal project. Mr. Shank said he was going to submit a letter but it wasn't expected to be issued for another couple of weeks.

Mr. Shank asked about Spire's recent correspondence with USFWS. I informed him that on a conference call on 1-4-17 between Spire, USFWS and FERC; Spire approached the USFWS about their concerns with the tree clearing restrictions associated with federal (and state) listed bat species. Spire wanted to initiate incidental take with the USFWS to gain authorization to tree clear within the seasonal restriction assuming that federal permit authorizations may be delayed, and access on certain properties may not be obtained in time. Spire worked out a schedule with the USFWS to develop and submit a Draft Biological Assessment in March for the USFWS to review. In May 2017, Spire would conduct the requested mist net surveys and then provided a Final Biological Assessment to the USFWS in July 2017 should it be required (if Indiana bats are captured). USFWS will allow tree clearing for northern long-eared bats under the federal 4(d) rule. Spire understands that the IDNR does not recognize the 4(d) rule for northern long-eared bats, therefore, Spire wanted to discuss a similar

process for the development of a conservation plan and incidental take authorization with the IDNR (Jenny Skufka). Spire would also include timber rattlesnake in its Conservation Plan for the IDNR and Indiana bat (if capture during mist net surveys).

Spire is also in process of requesting approval from the USFWS for conducting mist net surveys off properties were survey access has not been obtained. These locations may also need to be vetted through the IDNR. Mr. Shank indicated that the IDNR typically likes mist net surveys to be conducted on the properties where the Project is located but would be open for reviewing what we can present. Mr. Shank indicated that other state listed species may be added to our consultations regardless of what EcoCat results showed. I informed Mr. Shank that we are fi ling our FERC application on January 25, 2017 and have included the state listed species from the EcoCat results we received (as applicable) and previous consultations with Mr. Malone. He thought that maybe Great Plains ratsnake might need to be added to our list as well as some bird species. I told him that we could further consult on these species once a consultation letter is received from their offices.

Mr. Shank indicated he would inform Ms. Jenny Skufka that we spoke and that her office can proceed with talking with us regarding incidental take authorizations.



Illinois Department of Agriculture

## telephone log



Date: 4-7-2017

Project / Admin. No.: E160438.00

Call From: Lori Ferry

Company: GAI Consultants

Phone No.: 630-605-5255

Call To: Terry Savko

Company: Illinois Department of Agriculture

Phone No.: 217-785-4458

Subject: Clarifications on the AIMA

cc:

## **Summary of Discussion, Decisions, and Commitments:**

Called Ms. Savko to clarify the wording in Section 19 of the executed Agricultural Impact Mitigation Agreement. Section 19 refers to weed control of the Project's aboveground facility sites which includes spraying pesticide/herbicide at facilities located adjacent to agricultural lands. The IDOA does not have a requirement for weed control on the pipeline right-of-way as long as it is done by Spire or worked out in an agreement with the landowners to do. Any spraying would need to be conducted by a licensed applicator in the state of Illinois.

From: Lori Ferry

**Sent:** Friday, April 07, 2017 10:36 AM

To: Ali Trunzo

Subject: FW: Spire STL Pipeline-AIMA

From: Savko, Terry [mailto:Terry.Savko@Illinois.gov]

Sent: Friday, April 07, 2017 9:18 AM

To: Lori Ferry <L.Ferry@gaiconsultants.com>

Subject: RE: Spire STL Pipeline-AIMA

Sorry, I was in a conference call earlier when you called.

This version looks fine.

## Terry Savko, IL Dept of Agriculture

Bureau of Land and Water Resources State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281 217.785.4458 terry.savko@illinois.gov

From: Lori Ferry [mailto:L.Ferry@gaiconsultants.com]

Sent: Thursday, April 06, 2017 2:26 PM
To: Savko, Terry < Terry.Savko@Illinois.gov > Subject: [External] Spire STL Pipeline-AIMA

Hi Terry

How does this one look for you?

Thanks again,

Lori

#### **Lori Ferry**

Environmental Manager-Energy Business Unit

#### **GAI Consultants**

Chicago Office | 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532

T 331.301.2002 M 630.605.5255 | gaiconsultants.com | f Liferry@gaiconsultants.com



transforming ideas into reality, since 1958

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From: Lori Ferry

Sent: Wednesday, April 05, 2017 8:16 PM

To: Ali Trunzo

Subject: FW: [External] Spire STL Pipeline-Updated AIMA

From: Savko, Terry [mailto:Terry.Savko@Illinois.gov]

**Sent:** Wednesday, April 05, 2017 4:57 PM **To:** Lori Ferry <L.Ferry@gaiconsultants.com>

Subject: RE: [External] Spire STL Pipeline-Updated AIMA

Thanks Lori.

I'm in the process of reading through the front page.

I will get back with you tomorrow.

## Terry Savko, IL Dept of Agriculture

Bureau of Land and Water Resources State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281 217.785.4458 terry.savko@illinois.gov

From: Lori Ferry [mailto:L.Ferry@gaiconsultants.com]

**Sent:** Wednesday, April 05, 2017 4:20 PM **To:** Savko, Terry < Terry.Savko@Illinois.gov>

Subject: [External] Spire STL Pipeline-Updated AIMA

#### Hi Terry

Per our discussion I have attached the following documents

- -Final AIMA with track changes indicating our new project description
- -Final AIMA with track changes accepted (please note this does push the text down and affects pages 1-4 of the document. Because of the page break into page 5 (Definitions), everything from page 5-16 should be the same.
- -Final PDF of the document with the first 4 pages replaced and signature pages included.

Please let me know if you are in agreement with these documents. I appreciate your understanding of this change.

Lori

## **Lori Ferry**

Environmental Manager-Energy Business Unit

## **GAI Consultants**

Chicago Office | 2300 Cabot Drive, Suite 365 Lisle, Illinois 60532

T 331.301.2002 M 630.605.5255 | gaiconsultants.com | 

M 630.605.5255 | gaiconsultants.com |



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March 28, 2017

Ms. Terry Savko Illinois Department of Agriculture - Bureau of Land and Water Resources P.O. Box 19281 State fairgrounds Springfield, IL 62794-9281

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

Dear Ms. Savko:

In June 2016, Spire Pipeline LLC ("Spire") initiated consultation with your office regarding their intent to construct, own, and operate the proposed Spire STL Pipeline Project ("Project") which consisted of approximately 59 miles of new, greenfield 24-inch-diameter steel pipeline (referred to as the "24-inch pipeline") originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey counties in Illinois before crossing the Mississippi River and extending east into St. Charles County, Missouri, crossing the Missouri River and tying into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Line 880 consisted of approximately seven miles of existing 20-inch-diameter steel pipeline. As part of the proposed Project, Spire was planning on modifying Line 880 before placing it in to interstate service. The Project also included the construction of minor aboveground metering and regulating ("M&R") stations. On January 26, 2017, Spire filed an application with the Federal Energy Regulatory Commission ("FERC") for a Certificate of Public Convenience and Necessity for the Project (Docket No. CP17-40-000).

On March 15, 2017, Spire filed a "Preliminary Notification of Preferred Route Change" with FERC, indicating that the Spire no longer plans to modify the existing Line 880 as part of the Project. Instead, Spire intends to construct a new, greenfield 24-inch pipeline (referred to as the "North County Extension") which will extend the 24-inch pipeline portion of the Project to a proposed interconnect with Enable Mississippi River Transmission ("Enable MRT"). Spire plans to file an amended application with FERC in April 2017. GAI Consultants, Inc. ("GAI"), on behalf of Spire, is submitting supplemental information to assist with your review of the Project as amended. An updated description of the proposed Project facilities and location map (Figure 1) are provided herein.

#### **Amended Project Description**

The amended Project as proposed will consist of approximately 65 miles of new, greenfield, 24-inch-diameter steel pipeline in two segments. The first segment (referred to as the "24-inch pipeline" portion of the Project) will originate at a new interconnect with the REX pipeline in Scott County, Illinois and extend approximately 59 miles through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east through St. Charles County, Missouri. The 24-inch pipeline then crosses the Missouri River into St. Louis County, Missouri, and terminates at a new interconnect with LGC. The second segment of new, greenfield pipeline, North County Extension, will consist of a 24-inch-diameter steel pipeline which will extend approximately six miles from the LGC

interconnect through the northern portion of St. Louis County and terminate at a new interconnect with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

The acquisition and modifications to LGC's existing Line 880 is no longer proposed as part of the Project.

Spire anticipates a typical 90-foot temporary construction right-of-way width, and a 50-foot permanent easement. The construction right-of-way is anticipated to be reduced to 75 feet at streams and wetlands. An additional 25 feet of temporary work space will be required through agricultural areas, and additional temporary work space will be required to facilitate construction in certain areas, such as crossings of roads, railroads, streams, and wetlands.

The updated Project schedule includes the following target dates:

- July 22, 2016 National Environmental Policy Act ("NEPA") process began (initiation of FERC Pre-filing process);
- August 2016 through March 2017 (Anticipated) Biological and Cultural Resource Surveys;
- January 26, 2017 Application Filed with FERC;
- April 2017 (Anticipated) File Amended Application with FERC;
- September 2017 (Anticipated) Draft NEPA Document Published; and
- December 2017 (Anticipated) FERC Decision on Application.

Construction is anticipated to commence in January 2018.

On behalf of Spire, we'd like to take this opportunity to invite the Illinois Department of Agriculture - Bureau of Land and Water Resources to provide comments regarding the Project as it will be amended. We appreciate your continued involvement and cooperation in the review of this important Project.

If you have any questions or would like additional information, please feel free to contact me at 630.605.5255 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

**GAI** Consultants, Inc.

youtherry

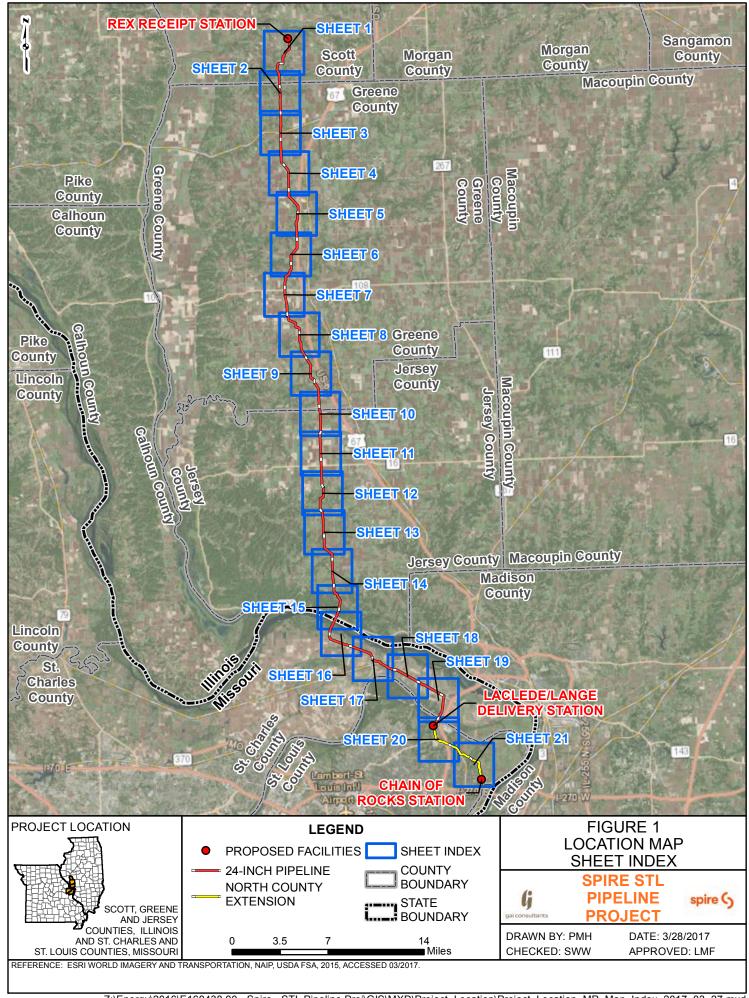
Lori M. Ferry

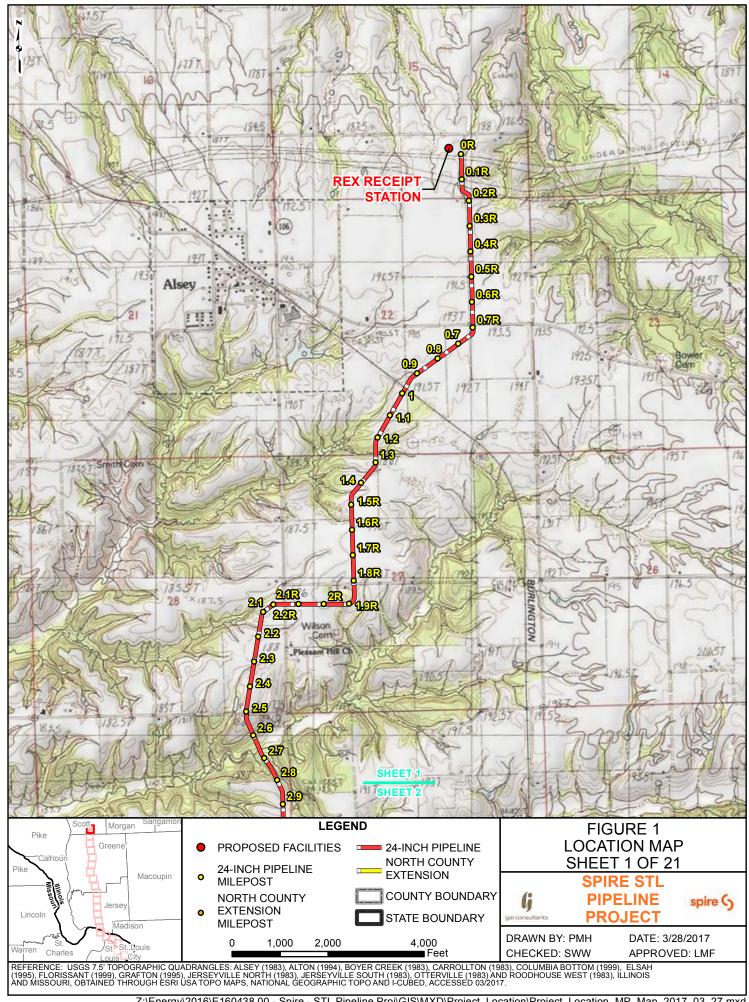
**Environmental Manager** 

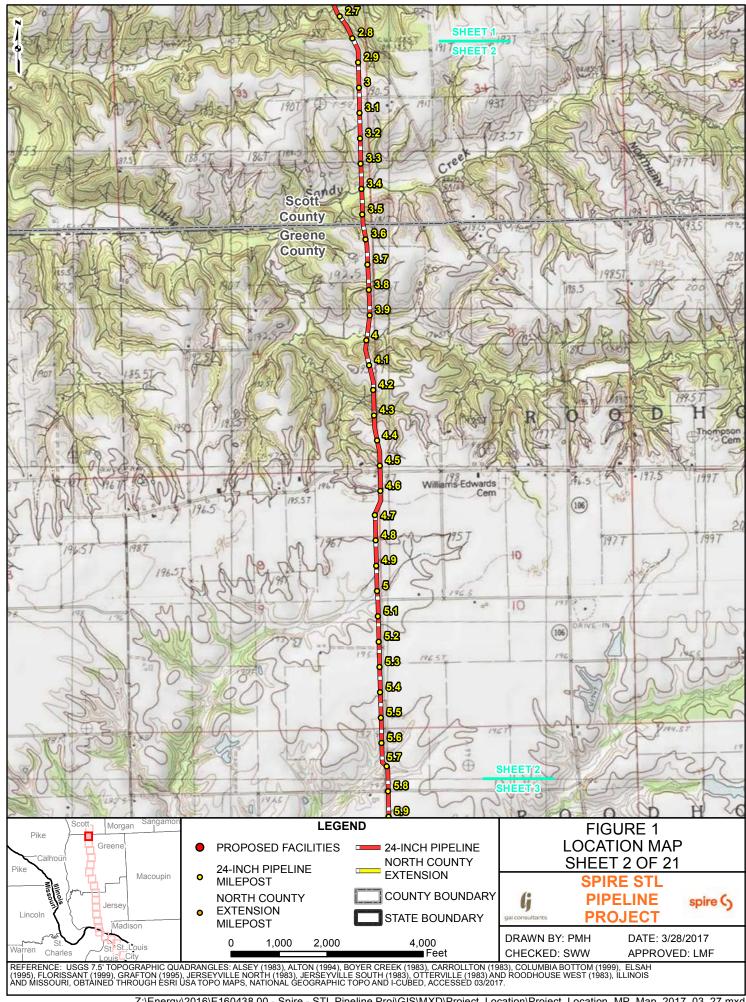
LMF/ka

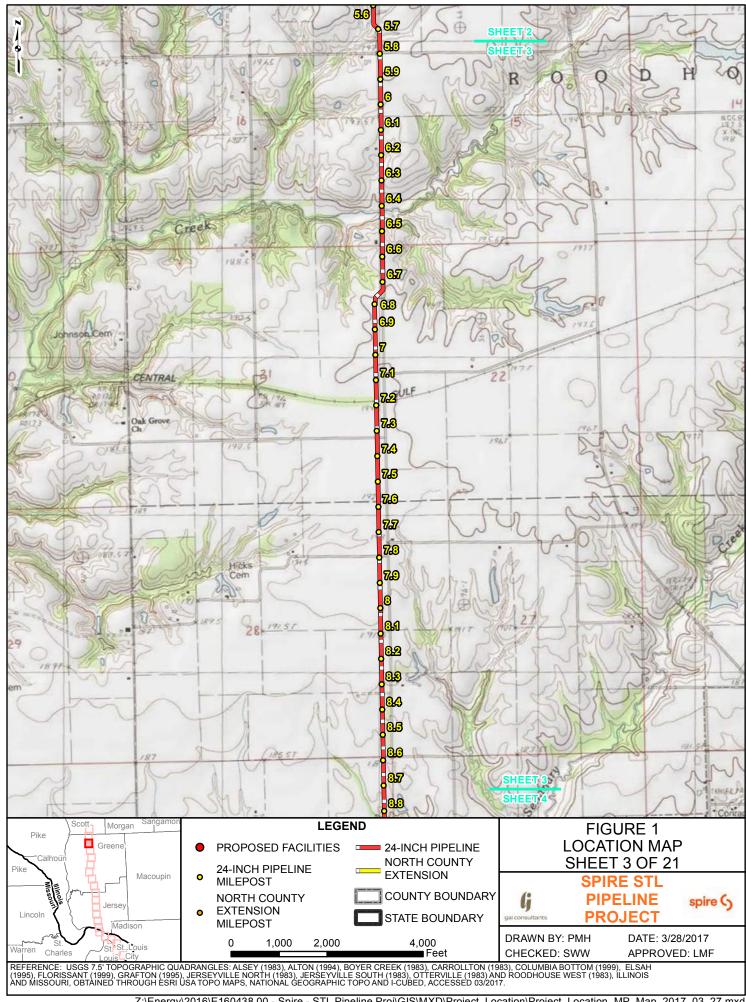
Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)

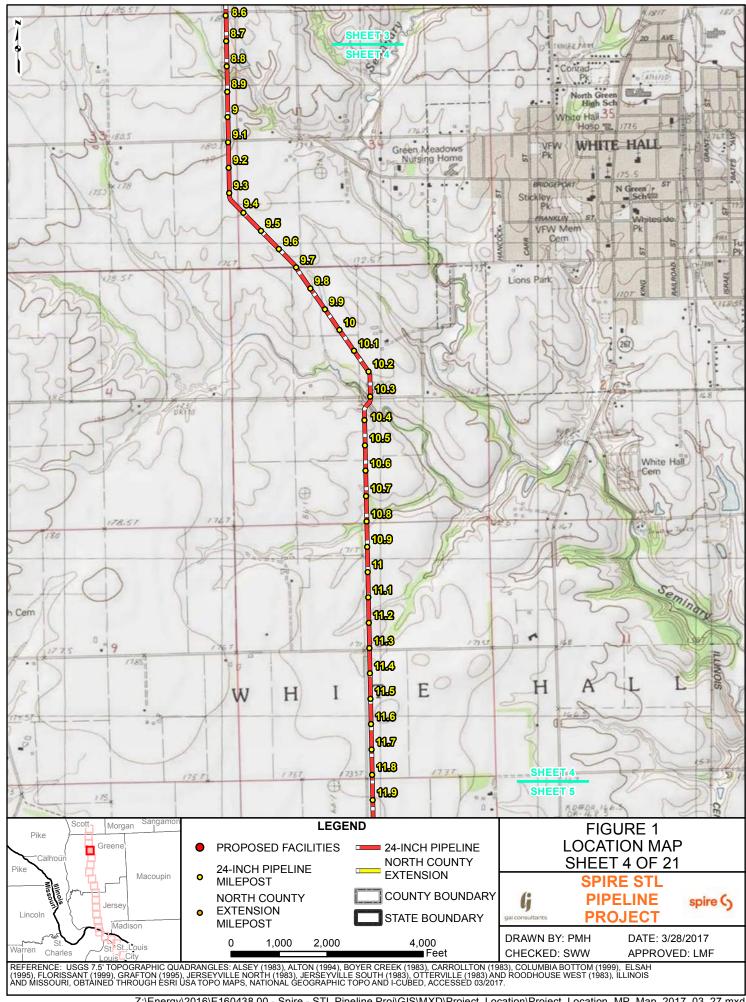
# ATTACHMENT USGS TOPOGRAPHIC MAP (FIGURE 1)

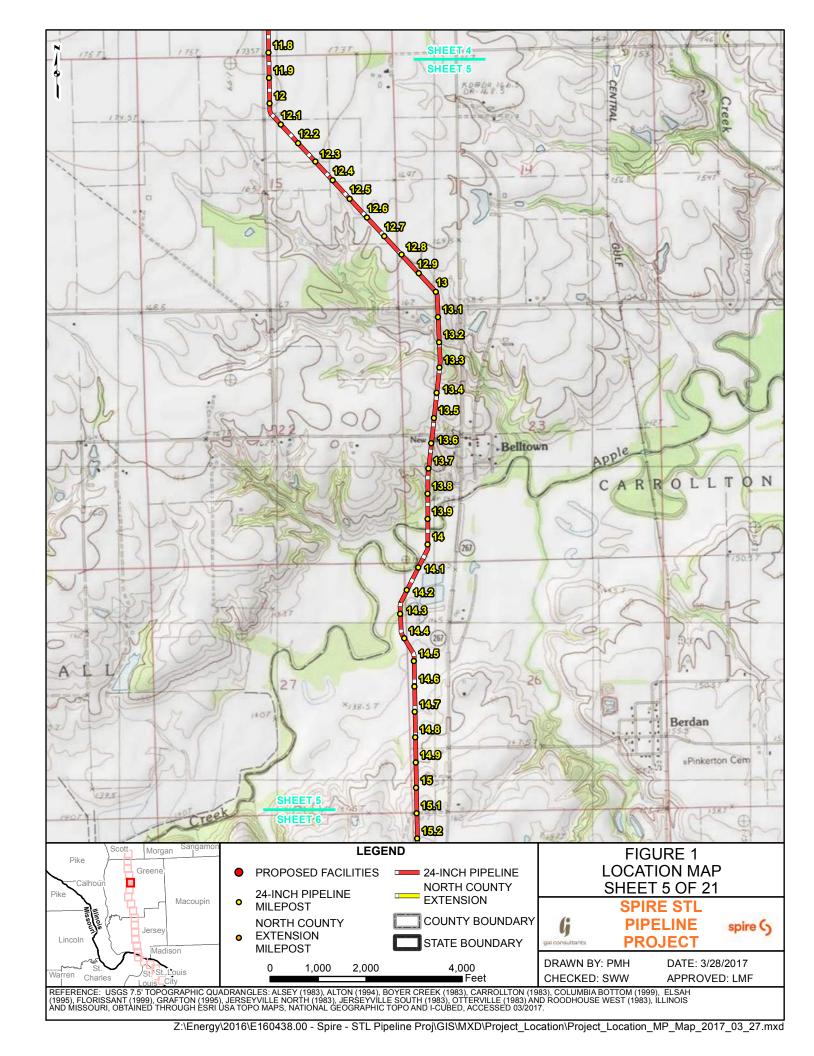


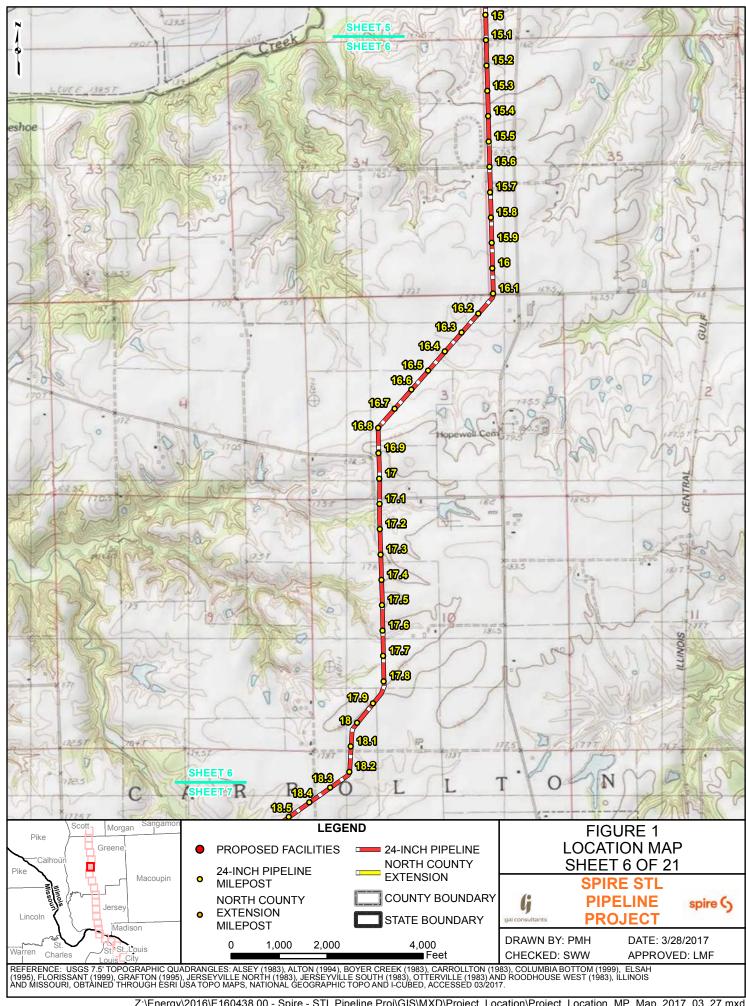


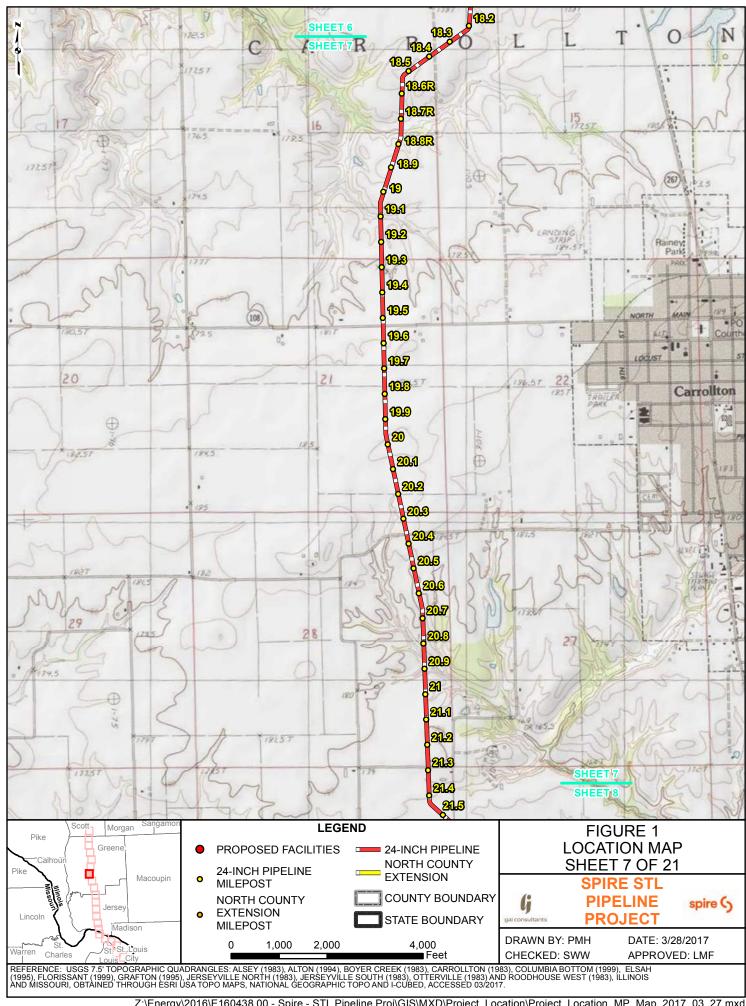


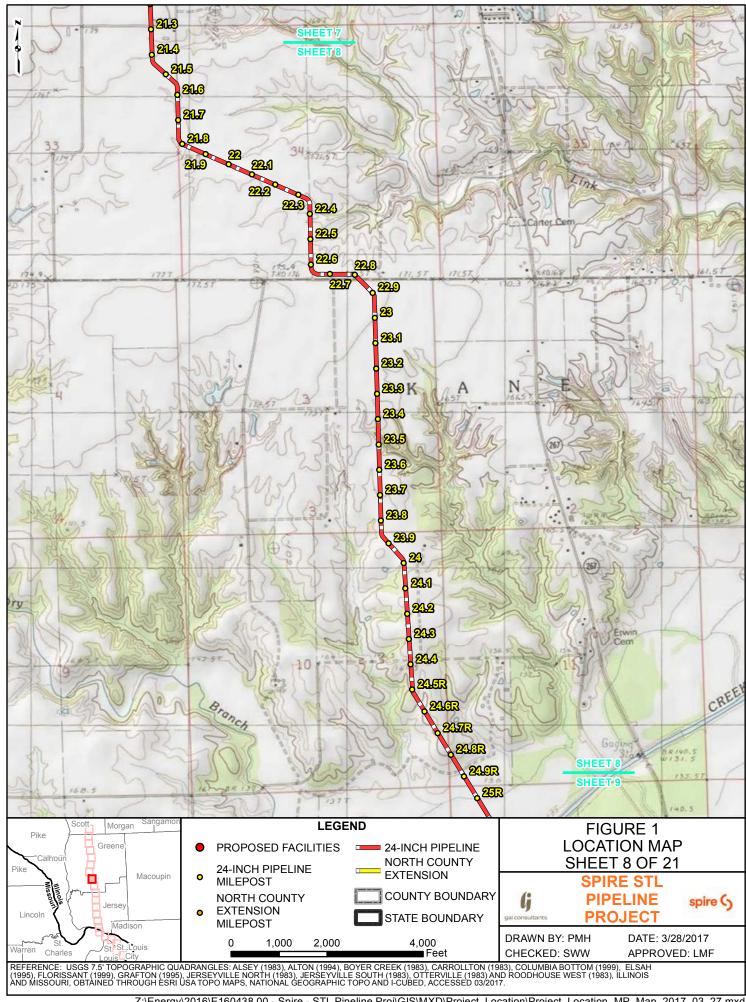


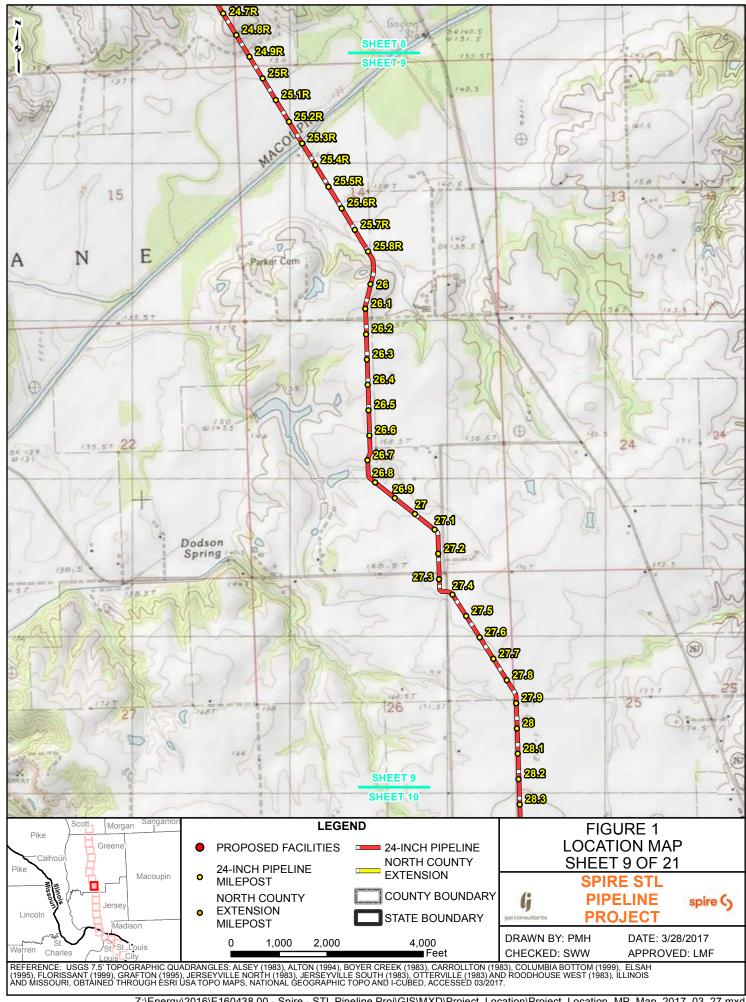


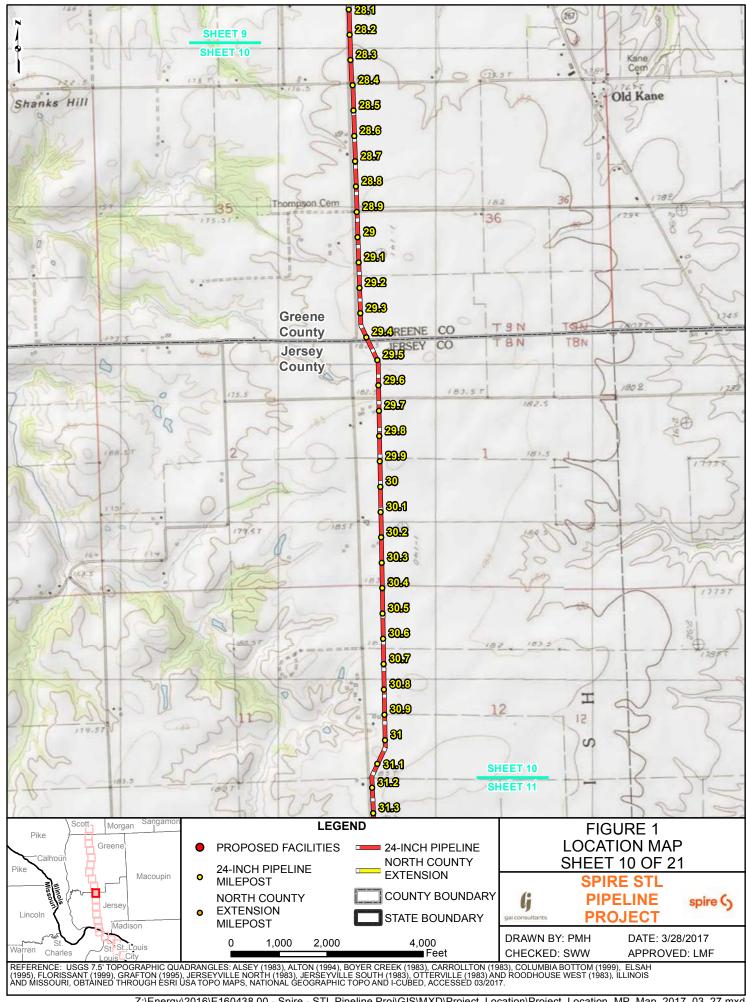


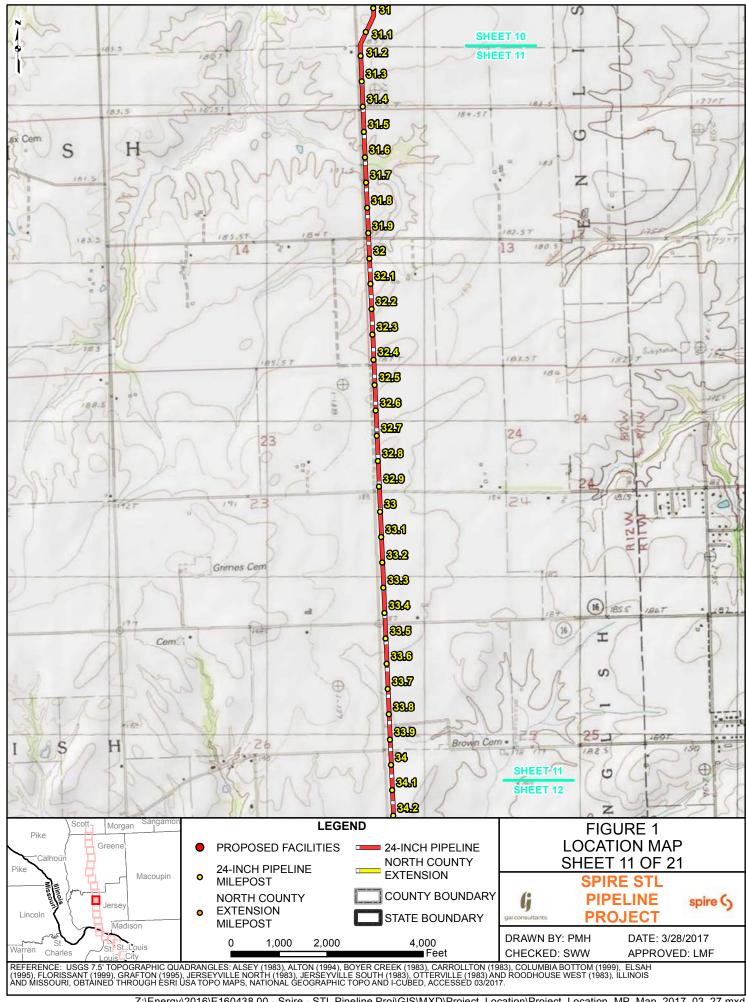


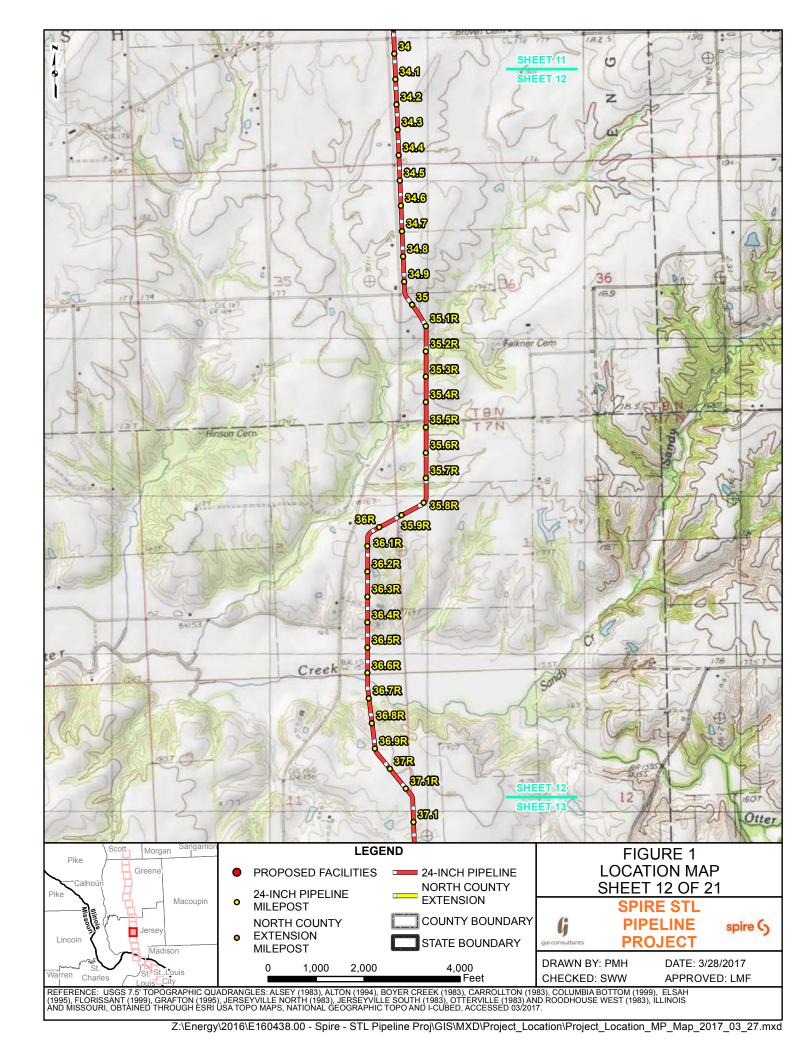


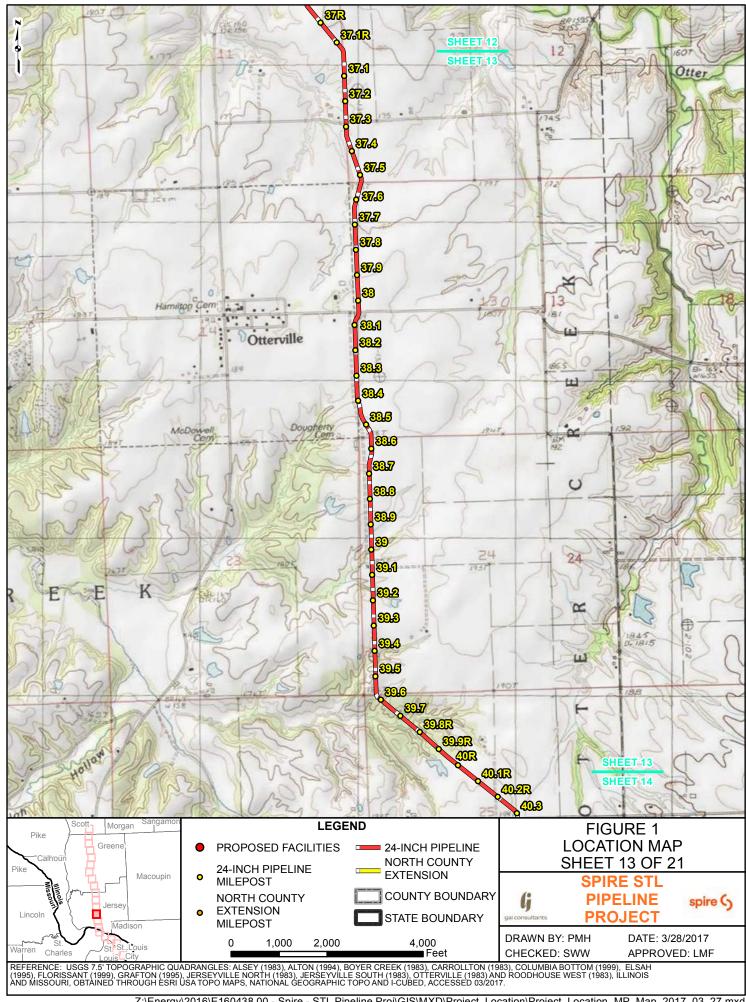


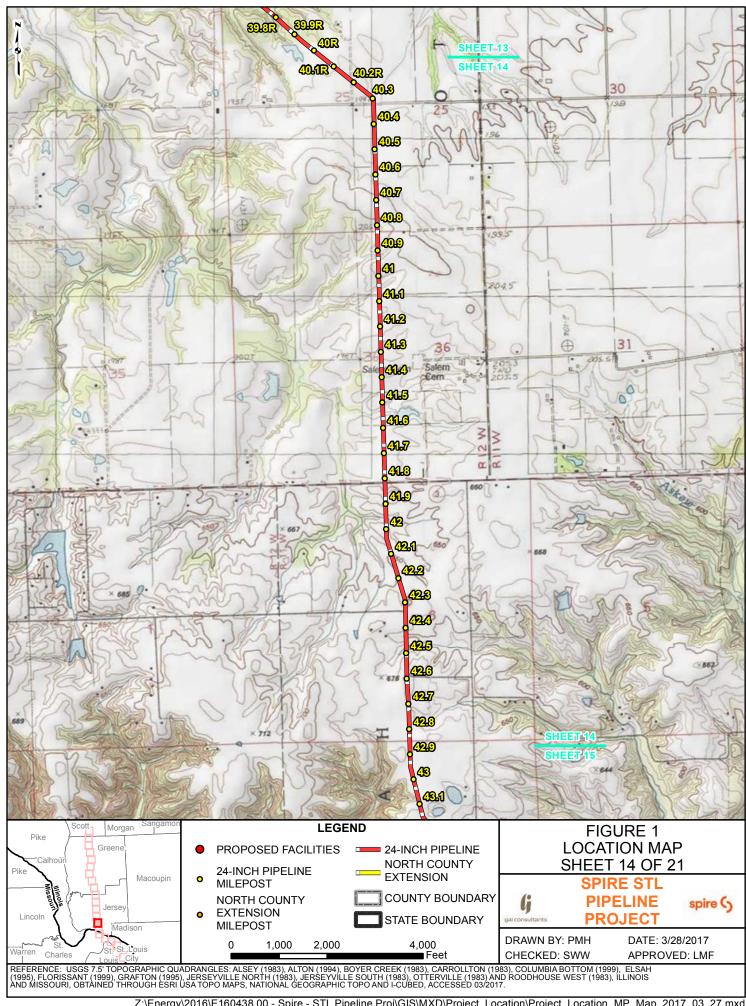


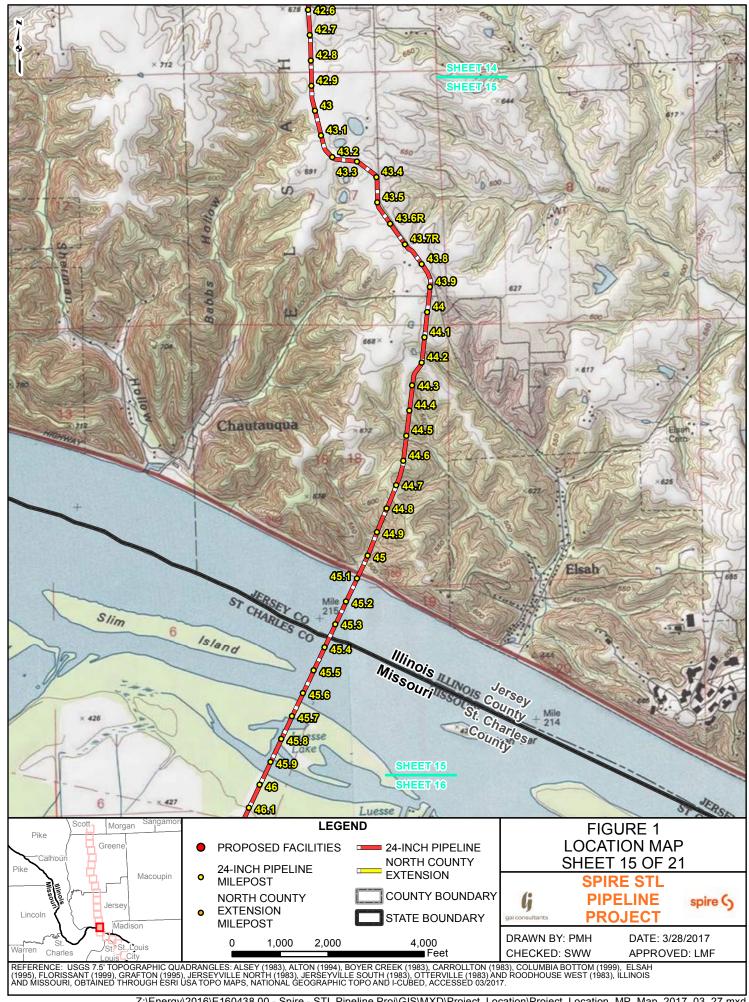


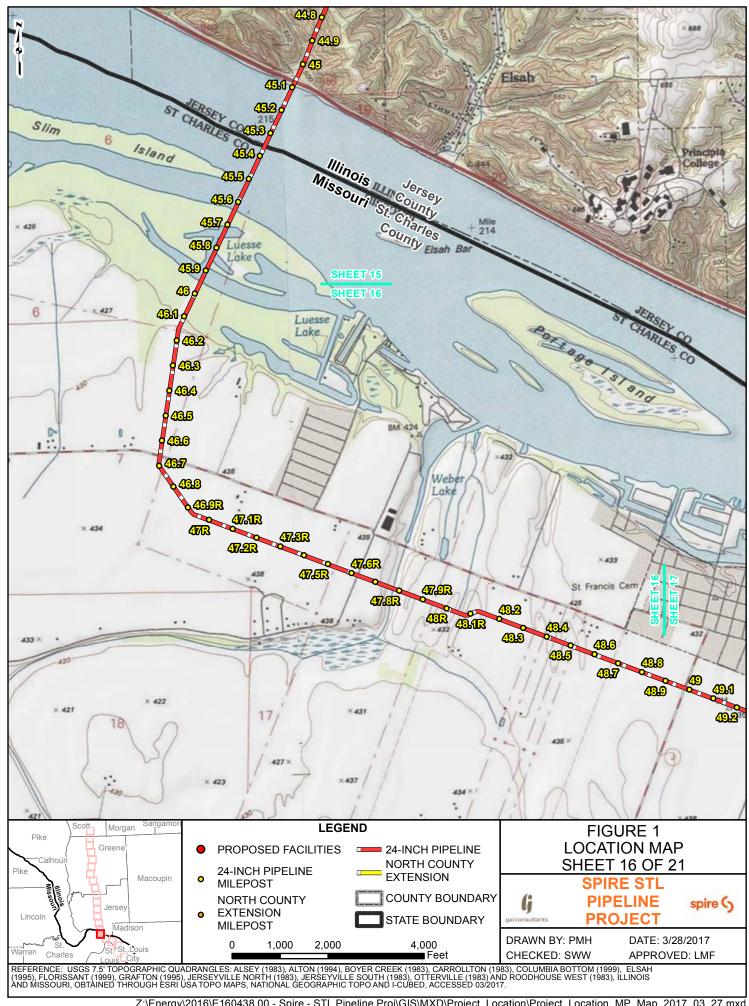


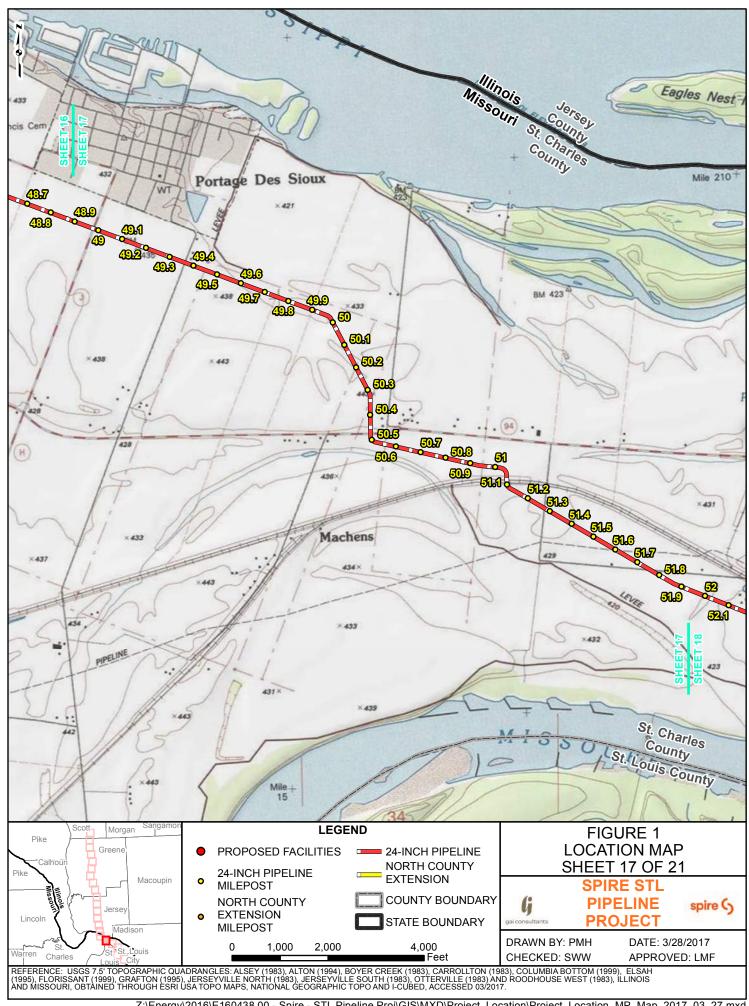


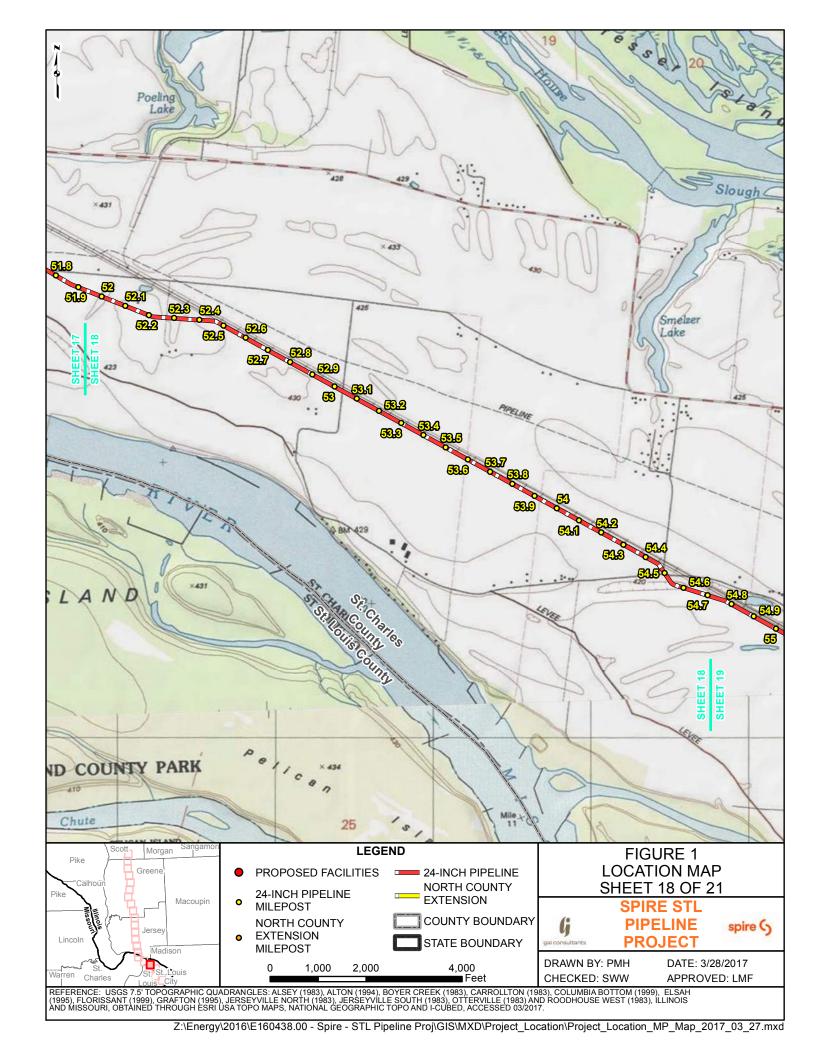


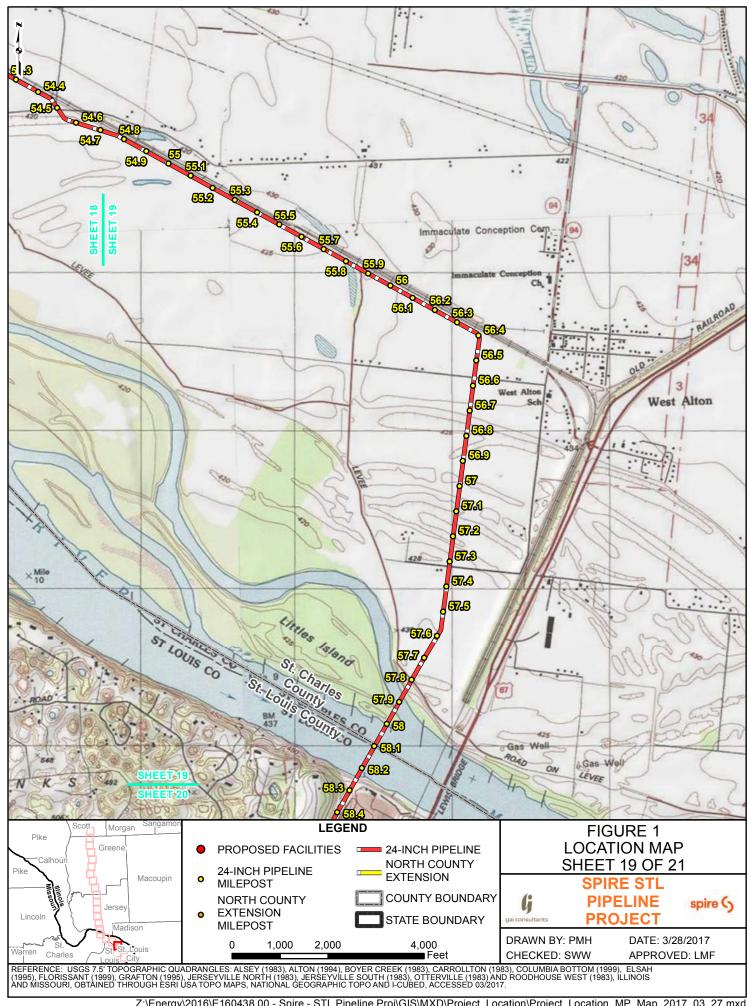


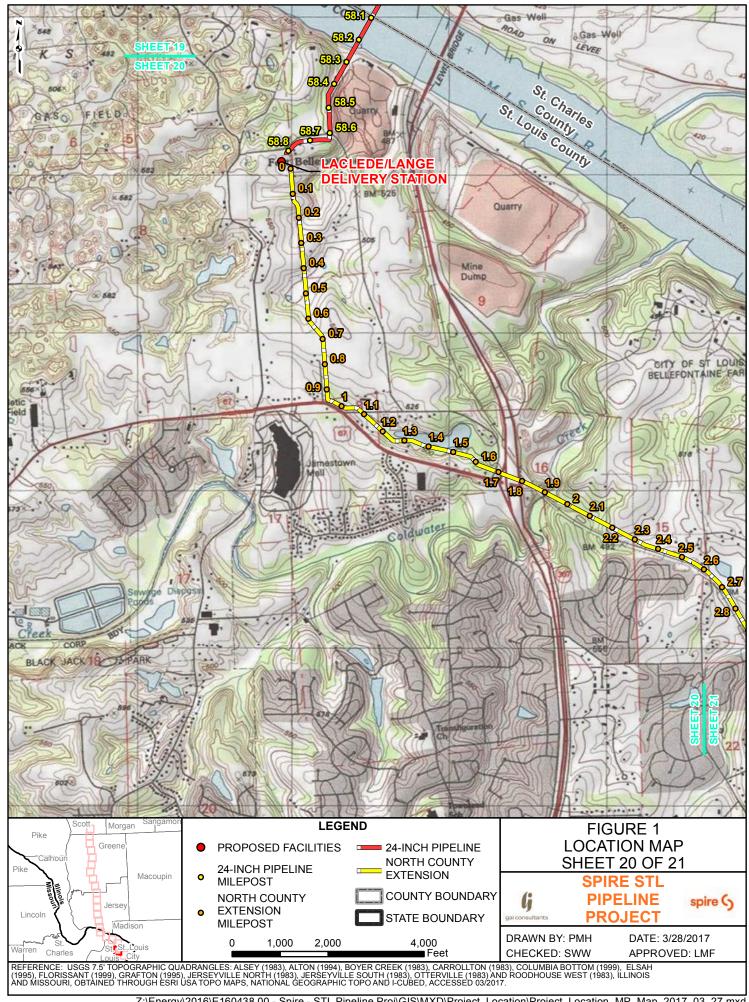


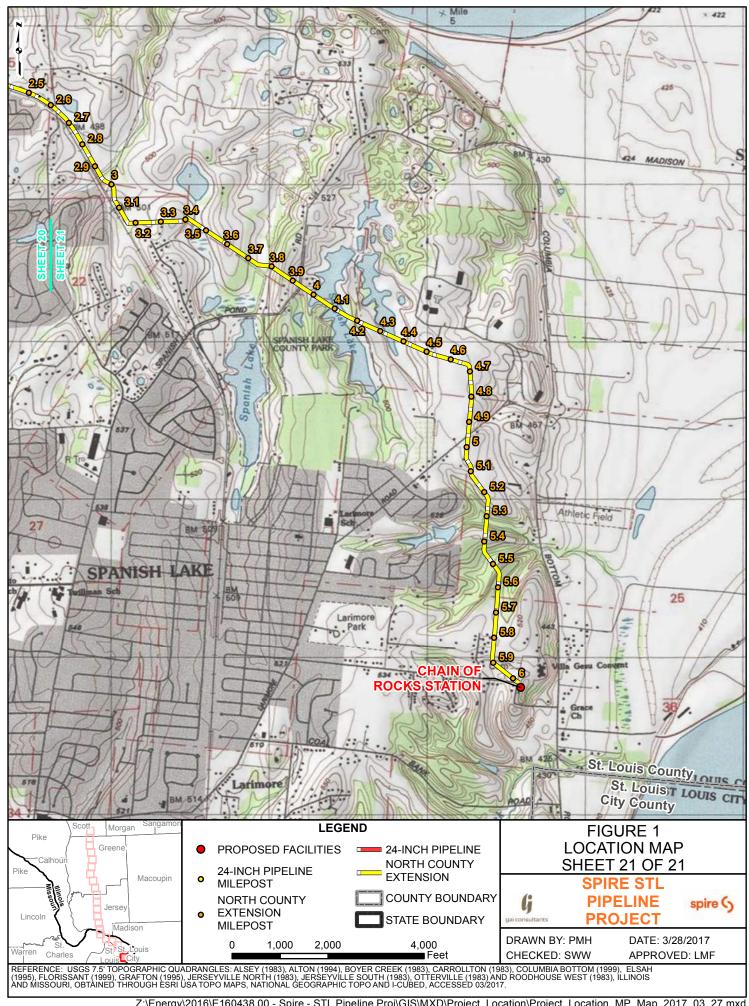












### Ali Trunzo

From: Lori Ferry

Sent: Wednesday, March 22, 2017 2:13 PM

To: Ali Trunzo

Subject: FW: Spire STL Pipeline AIMA

From: Lori Ferry

**Sent:** Tuesday, March 21, 2017 4:27 PM **To:** 'Savko, Terry' <Terry.Savko@Illinois.gov> **Cc:** Chard, Steve <Steve.Chard@Illinois.gov>

Subject: RE: Spire STL Pipeline AIMA

Thank you both!! The entire Spire team appreciates it!

Yes, please send us an invoice for the mailing and we can work on putting that through.

#### Lori

From: Savko, Terry [mailto:Terry.Savko@Illinois.gov]

**Sent:** Tuesday, March 21, 2017 1:31 PM **To:** Lori Ferry <L.Ferry@gaiconsultants.com> **Cc:** Chard, Steve <Steve.Chard@Illinois.gov>

Subject: Spire STL Pipeline AIMA

Good morning, Lori.

Attached is the scanned version of the Spire STL Pipeline AIMA. Copies have been made, landowner envelopes stuffed and delivered to the mailroom.

In addition, Spire's signed copy has been mailed in the stamped, labeled envelope you provided.

I will let you know what the total mailing cost is when it is relayed to me from the mail room.

Thank you again for your assistance in getting the AIMA written and executed.

### Terry Savko, IL Dept of Agriculture

Bureau of Land and Water Resources State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281

217.785.4458 terry.savko@illinois.gov

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### Ali Trunzo

From: Lori Ferry

**Sent:** Friday, March 17, 2017 12:51 PM

To: Ali Trunzo

Subject: FW: Spire STL-Check In

From: Savko, Terry [mailto:Terry.Savko@Illinois.gov]

**Sent:** Friday, March 17, 2017 11:19 AM **To:** Lori Ferry < L. Ferry@gaiconsultants.com>

Subject: RE: Spire STL-Check In

Hi Lori,

### And a Happy Wearing of the Green Day to you too!

Thanks for checking in. Yes, I received your labels and the envelopes are ready to go.

The document is in the General Counsel's Office.

More soon.

Terry

### Terry Savko, IL Dept of Agriculture

Bureau of Land and Water Resources State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281

217.785.4458 terry.savko@illinois.gov

From: Lori Ferry [mailto:L.Ferry@gaiconsultants.com]

Sent: Friday, March 17, 2017 10:36 AM

To: Savko, Terry < Terry.Savko@Illinois.gov>
Subject: [External] Spire STL-Check In

Hi Terry

Happy St. Patty's Day!

Just checking in to see that you received the mailing labels this week and if we had an executed agreement to send out.

Please let me know whenever you are able.

Happy Friday,

Lori

### **Lori Ferry**

Environmental Manager-Energy Business Unit

### **GAI Consultants**

I.ferry@gaiconsultants.com

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### Ali Trunzo

From: Lori Ferry

Sent: Wednesday, March 08, 2017 4:42 PM

To: Ali Trunzo

**Subject:** FW: [External] RE: Final version for Spire AIMA execution

From: Lori Ferry

**Sent:** Wednesday, March 08, 2017 3:41 PM **To:** 'Savko, Terry' < Terry. Savko@Illinois.gov>

Subject: RE: [External] RE: Final version for Spire AIMA execution

Thank you Terry! My address is below.

Can I go ahead and forward you the mailing labels as well? We are still anticipating to start acquisition in April so just want to make sure you have everything you need.

### Thank you!

Lori

### **Lori Ferry**

**Environmental Manager-Energy Business Unit** 

### **GAI Consultants**

Chicago Office | 1444 Farnsworth Avenue, Suite 303 Aurora, Illinois 60505

I.ferry@gaiconsultants.com

**From:** Savko, Terry [mailto:Terry.Savko@Illinois.gov]

**Sent:** Wednesday, March 08, 2017 3:34 PM **To:** Lori Ferry <L.Ferry@gaiconsultants.com>

Subject: RE: [External] RE: Final version for Spire AIMA execution

Your two signed copies have gone to the front office for execution.

Once they are returned to me, I will contact you. One executed document will be scanned and emailed to you prior to mailing the hard copy.

Do you want the signed copy mailed to you?

If so, I need a mailing address.

### Terry Savko, IL Dept of Agriculture

Bureau of Land and Water Resources

State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281

217.785.4458 terry.savko@illinois.gov

From: Lori Ferry [mailto:L.Ferry@gaiconsultants.com]

**Sent:** Tuesday, February 28, 2017 9:34 PM **To:** Savko, Terry < Terry.Savko@Illinois.gov>

Cc: Chard, Steve < Steve.Chard@Illinois.gov >; Ali Trunzo < A.Trunzo@gaiconsultants.com >

Subject: [External] RE: Final version for Spire AIMA execution

### Hi Terry

Thanks for this information. This is now in the hands of Spire legal for final review and signature. I will keep you posted as soon as I have notification that it was sent out.

### Thanks, Lori

From: Savko, Terry [mailto:Terry.Savko@Illinois.gov]

Sent: Thursday, February 23, 2017 4:43 PM
To: Lori Ferry < L.Ferry@gaiconsultants.com >
Cc: Chard, Steve < Steve.Chard@Illinois.gov >
Subject: Final version for Spire AIMA execution

Hi Lori,

I've gone through the tracked document and cleaned up the paragraphs, numberings and deletions to keep items together.

The final document now fits on 16 pages instead of 17 pages. Please review the changes. Questions or comments? Please call me.

As far as the Attachments go, we agree. You can send your documents with them or I can add them when I scan/email the signed version to you.

I will include them in your original AIMA that will go out in the next day's mail.

If the final version meets your approval, please print 2 copies and have Mr. Armesto sign. Then send them to me at the address listed below.

After we finish this step, we can discuss the mailing labels.

Terry

Terry Savko, IL Dept of Agriculture
Bureau of Land and Water Resources
State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281
217.785.4458 terry.savko@illinois.gov

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### Ali Trunzo

From: Savko, Terry <Terry.Savko@Illinois.gov>
Sent: Wednesday, March 01, 2017 10:05 AM

To: Lori Ferry

Cc: Chard, Steve; Ali Trunzo

Subject: RE: [External] RE: Final version for Spire AIMA execution

Thank you, Lori.

\_\_\_\_\_

### Terry Savko, IL Dept of Agriculture

Bureau of Land and Water Resources State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281

217.785.4458 terry.savko@illinois.gov

**From:** Lori Ferry [mailto:L.Ferry@gaiconsultants.com]

**Sent:** Tuesday, February 28, 2017 9:34 PM **To:** Savko, Terry <Terry.Savko@Illinois.gov>

Cc: Chard, Steve <Steve.Chard@Illinois.gov>; Ali Trunzo <A.Trunzo@gaiconsultants.com>

**Subject:** [External] RE: Final version for Spire AIMA execution

### Hi Terry

Thanks for this information. This is now in the hands of Spire legal for final review and signature. I will keep you posted as soon as I have notification that it was sent out.

### Thanks,

Lori

From: Savko, Terry [mailto:Terry.Savko@Illinois.gov]

Sent: Thursday, February 23, 2017 4:43 PM
To: Lori Ferry < L.Ferry@gaiconsultants.com >
Cc: Chard, Steve < Steve.Chard@Illinois.gov >
Subject: Final version for Spire AIMA execution

Hi Lori,

I've gone through the tracked document and cleaned up the paragraphs, numberings and deletions to keep items together.

The final document now fits on 16 pages instead of 17 pages. Please review the changes. Questions or comments? Please call me.

As far as the Attachments go, we agree. You can send your documents with them or I can add them when I scan/email the signed version to you.

I will include them in your original AIMA that will go out in the next day's mail.

If the final version meets your approval, please print 2 copies and have Mr. Armesto sign.

Then send them to me at the address listed below.

After we finish this step, we can discuss the mailing labels.

Terry

\_\_\_\_\_\_

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**Illinois Historic Preservation Agency** 



GAI Consultants, Inc.-Chicago Office 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532-4644

April 21, 2017

Ms. Rachel Leibowitz Division Manager and Deputy SHPO Illinois Historic Preservation Agency 1 Old State Capitol Plaza Springfield, Illinois 62701-1507

Re: Submittal of Technical Report - Addendum I
Phase I Archaeological Survey
IHPA Log #: 005080216
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois

Dear Ms. Leibowitz:

Spire STL Pipeline LLC ("Spire"), a wholly owned subsidiary of Spire Inc., is seeking authorization from the Federal Energy Regulatory Commission pursuant to Section 7(c) of the Natural Gas Act to construct and operate the proposed Spire STL Pipeline Project ("Project") located in Scott, Greene, and Jersey Counties, Illinois, and St. Charles and St. Louis Counties, Missouri. The total length of the Project pipelines will be approximately 65 miles, of which approximately 45.35 miles are in Illinois.

GAI Consultants, Inc. ("GAI") conducted a supplemental Phase I archaeological survey in February and March 2017 to survey alternative Project alignments to avoid impacts to archaeological sites Potentially Eligible for listing in the National Register of Historic Places ("NRHP"), and parcels where survey permission has been granted since the initial Phase I field session concluded in December 2016. The Area of Potential Effect ("APE") for the supplemental archaeological investigations was defined as the direct impact APE, or the area of ground disturbance anticipated for the construction activities. For the purposes of the supplemental archaeological survey, in order to accommodate Project design changes throughout the process, the APE within the Illinois portion of the Project consists of a 300-foot-wide study corridor centered on the proposed pipeline route, a 100-foot-wide study corridor for each access road, and the footprint of the workspace needed for a proposed contractor yard/staging area.

The total APE for the Illinois portion of the Project was 698.8 hectares (1,726.8 acres). Of this, 88.27 hectares (218.13 acres) was surveyed during the supplemental Phase I investigation in February and March 2017, 518.39 hectares (1,280.98 acres) was previously surveyed, and 92.16 hectares (227.73 acres) was not surveyed due to land access restrictions or avoidance via horizontal directional drilling.

During the supplemental Phase I survey in February and March 2017, 34 archaeological sites and six isolated finds were identified. Of these 34 sites, four were previously recorded: 11GE738, 11GE757, 11GE758, and 11JY665. All six isolated finds were newly identified. Two of the 34 sites are recommended Eligible for the NRHP: 11GE757 and 11GE758. Based on current Project design, both sites are located outside the construction right-of-way, and impacts to the sites will be avoided. Therefore, GAI recommends no further work at Sites 11GE757 and 11GE758. The remaining 32 sites and six isolated finds are recommended Not Eligible for NRHP listing, and no further work is recommended. Impacts to the 10 archaeological sites recommended Potentially Eligible for listing in the NRHP in the initial Phase I cultural resource report for the proposed Project are being avoided as a result of the supplemental Phase I survey, which include: 11ST613, 11GE789, 11GE773, 11GE757, 11GE758, 11JY700, 11JY698, 11JY699, 11JY661, and 11JY680.

The indirect impact APE is considered to be the area of potential visual impact on historic-period architectural resources within the line-of-sight (viewshed) of the construction workspace and/or right-of-way and related aboveground facilities. As the Project will be primarily subterranean, the impact to architectural and historical resources is expected to be minimal, primarily stemming from minor proposed aboveground pipeline facilities (i.e., meter stations, pig launchers/receivers, and valves). Based on a review of the supplemental APE within the Illinois portion of the proposed Project, all architectural/historical resources located in the supplemental APE were surveyed during GAI's prior historical resources reconnaissance survey and included in the initial Phase I cultural resource report (Scuoteguazza et al. 2017). If additional field surveys are conducted for architectural and historical resources, Spire will submit supplemental Phase I reports to the Illinois Historic Preservation Agency as required.

GAI, on behalf of Spire, is requesting your review and concurrence of the attached addendum technical report presenting the cultural resources results and recommendations for the Project.

We look forward to continuing to work with you on this Project. Please contact Mr. Eric Scuoteguazza at 412.399.5188 or e.scuoteguazza@gaiconsultants.com, if there are questions regarding this report.

Sincerely,

GAI Consultants, Inc.

Eric P. Scuoteguazza, M.A., M.B.A., RPA Senior Manager, Cultural Resources

Lori M. Ferry

**Environmental Project Manager** 

EPS:LMF/gmg

Attachments: Attachment 1 (Technical Report - Addendum Report, Phase I Archaeological Survey) and

Attachment 2 (Archaeological Survey Short Report)

Reference

Scuoteguazza, Eric P., Richard B. Duncan, Jonathan Glenn, Angela Hood, Meghan Mooney, Susan Pugh-Rose, Evelyn M. Tidlow, and Elizabeth Williams

2017 Technical Report, Phase I Archaeological Survey and Architectural and Historical Resources Reconnaissance Survey. GAI Consultants, Inc. Submitted to Spire STL Pipeline LLC. Copies available from the Illinois Historic Preservation Agency, Springfield, Illinois.





April 10, 2016

Ms. Rachel Leibowitz Division Manager and Deputy SHPO Illinois Historic Preservation Agency 1 Old State Capitol Plaza Springfield, Illinois 62701-1507

Re: Unanticipated Discoveries Plan for Cultural Resources
Spire STL Pipeline LLC
Spire STL Pipeline
Scott, Greene and Jersey Counties, Illinois

Dear Ms. Leibowitz:

Spire STL Pipeline LLC ("Spire") is in the planning stages of the Spire STL Pipeline ("Project"), located in Scott, Greene, and Jersey Counties in Illinois and in St. Charles and St. Louis Counties in Missouri. Spire retained GAI Consultants, Inc. to conduct required cultural resources studies. Construction and operation of the proposed Project will be regulated by the Federal Energy Regulatory Commission ("Commission") among other regulatory agencies.

On October 28, 2016, Spire had provided the Illinois Historic Preservation Agency with the Project's Unanticipated Discoveries Plan for Cultural Resources in Illinois. Spire has revised the Unanticipated Discoveries Plan for Cultural Resources in Missouri, based on the Commission's comments to the previous submission. I have enclosed a copy of that revised plan for your review and for your files.

Thank you for your consideration of this matter. If you have any questions regarding this submission, please feel free to contact me at 412.399.5188, or by e-mail at e.scuoteguazza@gaiconsultants.com.

Sincerely,

**GAI Consultants, Inc.** 

Eric Scuoteguazza

Senior Cultural Resources Manager

Attachment: Unanticipated Discoveries Plan for Cultural Resources in Illinois

April 10, 2017
Project E160438.00

### **ATTACHMENT:**

**UNANTICIPATED DISCOVERIES PLAN FOR CULTURAL RESOURCES IN ILLINOIS** 



### Spire STL Pipeline Project

Unanticipated Discoveries Plan for Cultural Resources in Illinois

FERC Docket No. CP17-40-000

January 2017

**Public** 



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### **Acronyms and Abbreviations**

FERC Federal Energy Regulatory Commission

IHPA Illinois Historic Preservation Agency

NHPA National Historic Preservation Association

NRHP National Register of Historic Places

Project Spire STL Pipeline Project

SHPO State Historic Preservation Office

Spire STL Pipeline LLC

UDP Unanticipated Discoveries Plan

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# Unanticipated Discoveries Plan for Cultural Resources in Illinois

This Unanticipated Discoveries Plan ("UDP") details the procedures that will be implemented by Spire STL Pipeline LLC ("Spire") and its contractors to handle the unanticipated discovery of cultural resources that may be encountered during construction of the proposed Spire STL Pipeline Project ("Project"). This plan was developed in accordance with 36CFR800.13 (Post-Review Discovery clause), as well as the following regulations:

- Illinois Historic Preservation Agency's ("IHPA") Guidelines for Archaeological Reconnaissance Survey/Reports (IHPA no date);
- Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420);
- Illinois Archaeological and Paleontological Resources Protection Act (20 ILCS 3435); and,
- Illinois Human Skeletal Remains Protection Act (20 ILCS 3440).

All construction work force members have the responsibility to monitor construction sites for potential archaeological remains throughout construction. Archaeological remains consist of man-made objects or features greater than 50 years of age. These remains include, but are not limited to, items such as artifacts (e.g., stone flakes, stone tools, ceramics, glass, architectural material), fire pits, building foundations, and human remains. If, during the course of construction, potential archaeological remains are identified, the Environmental or Chief Inspector will immediately halt work in the vicinity (minimum of 25 feet) of the potential find. The Environmental Inspector will notify the Spire Environmental Project Manager. Work in the immediate area of the discovery will not resume until treatment of the discovery has been completed.

The Spire Environmental Project Manager will notify the IHPA and the Federal Energy Regulatory Commission ("FERC"), and will hire a state-approved archaeological consultant who will evaluate the site and provide an immediate verbal recommendation to Spire, FERC, and the IHPA regarding the eligibility status of the site. Spire's Environmental Manager will continue to consult with the FERC and IHPA's office, as per the requirements of Section 106 of the National Historic Preservation Act of 1966 ("NHPA"). Communications, such as consultation, transmittals, and reports may be provided via e-mail, as appropriate and acceptable to each agency. Contact information for the various agencies is listed below:



### **Environmental Inspector**

To be determined

### **Chief Inspector**

To be determined

### **Spire Environmental Project Manager**

Russell English
Spire, Inc.
700 Market Street
St. Louis, Missouri 63101
314-956-5221
russell.english@SpireEnergy.com

### **Spire Project Manager**

Russell English
Spire, Inc.
700 Market Street
St. Louis, Missouri 63101
314-956-5221
russell.english@SpireEnergy.com

### **IHPA**

Rachel Leibowitz, Division Manager and Deputy State Historic Preservation Office ("SHPO") Illinois Historic Preservation Agency 1 Old State Capital Plaza Springfield, Illinois 62701-1507 217-785-5031 rachel.leibowitz@illinois.gov

#### **FERC**

Laurie Boros, Archaeologist Federal Energy Regulatory Commission 888 1<sup>st</sup> Street NE Room 1A Washington, D.C. 20426 202-502-8046 laurie.boros@ferc.gov

### **Greene County Coroner**

Dean Bishop P.O. Box 207, Greenfield, Illinois 62044 217-368-2202

### **Greene County Sheriff's Office**

403 7th Street Carrollton, Illinois 62016 217-942-6901

### **Jersey County Coroner**

Larry Alexander 108 North Liberty Jerseyville, Illinois 62052 618-498-2711

### Jersey County Sheriff's Office

114 North Washington Jerseyville, Illinois 62052 618-498-6881

### **Scott County Coroner**

David King, Jr. 35 East Market Street Winchester, Illinois 62094 217-742-3141

#### **Scott County Sheriff's Office**

35 East Market Street Winchester, Illinois 62094 217-742-5217

# spire 5

If the unanticipated discovery is determined to be ineligible for inclusion in the National Register of Historic Places ("NRHP"), Spire will proceed with construction following written concurrence from the IHPA and approval from FERC. If the site is determined to be potentially eligible for inclusion in the NRHP, additional work, such as a Determination of Eligibility or Data Recovery, will be performed as required/approved by the IHPA and FERC. Further construction work at the site will be suspended until all criteria of Section 106 of the NHPA and other related federal and state regulations have been successfully completed. Construction activities will be kept a minimum of 25 feet from the site (dependent on the site type, location, construction design, and agency consultation) and separated from the site by temporary fencing.

In the event that human remains are discovered during construction, the Environmental or Chief Inspector will immediately halt work and notify the Spire Environmental Project Manager, the county coroner's office, and the IHPA. If the county coroner is not available, the Environmental Inspector will contact the local law enforcement agency. The Environmental Inspector will ensure that human remains are protected from further damage, intrusion, or removal until proper examinations can be performed. Provision for security to protect suspected burials from vandalism will be taken, including monitoring of the area. Discovery of human remains should not be made public, including but not limited to, conversations with local residents, posting on social media, or communication with news outlets. Construction activities including vehicle traffic will be kept a minimum of 25 feet from the remains (dependent on the location, construction design, and agency consultation) and separated by temporary fencing. If remains are found not to be of recent origin, the Spire Environmental Project Manager will contact the IHPA and FERC to ensure that relevant laws are followed. As soon as a determination has been made that the human remains are Native American, Spire will contact appropriate tribal representatives for the region in which the remains were found. If the remains are not Native American and not associated with a crime scene, guidance in National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places (Potter and Boland 1992) will be taken into account. A reasonable attempt will be made to identify the next of kin. Spire's Environmental Manager will notify FERC of the situation and will continue to keep FERC informed as to the progress of further consultation. Spire will attempt to redesign the Project to avoid impact to the human remains. Only if avoidance is not possible will Spire proceed with removal of the human remains.

If the unanticipated discovery of human remains is determined by the IHPA and FERC to be ineligible for inclusion in the NRHP, Spire will proceed with coordinating the proper removal of the remains through cooperation from the local police, the medical examiner, the IHPA, and FERC. Only after the human remains have been properly removed from the site should construction of the pipeline facilities in the site area be resumed.

Under no circumstances should human remains be removed from the site without completing all permitting and coordination processes with the local police, the medical examiner, the IHPA, Native American representatives as appropriate, and FERC. Further work at the site will be suspended until all criteria of Section 106 of the NHPA and other related state and federal regulations have been successfully completed.

# spire 5

### 1.1 References

Potter E.W. and B.M. Boland. 1992. *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places*. U.S. Department of the Interior, National Park Service. Washington, D.C.

Illinois Historic Preservation Agency (IHPA). No Date. *Guidelines for Archaeological Reconnaissance Survey/Reports*. Illinois Historic Preservation Agency, Springfield. Accessed electronically, September 2016, https://www.illinois.gov/ihpa/Preserve/Pages/Archaeology.aspx.



GAI Consultants, Inc.-Chicago Office 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532

March 28, 2017

Ms. Heidi Brown-McCreery
Director of Illinois Historic Preservation Agency
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
Springfield, IL 62701-1507

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

Dear Ms. Brown-McCreery:

In June 2016, Spire Pipeline LLC ("Spire") initiated consultation with your office regarding their intent to construct, own, and operate the proposed Spire STL Pipeline Project ("Project") which consisted of approximately 59 miles of new, greenfield 24-inch-diameter steel pipeline (referred to as the "24-inch pipeline") originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey counties in Illinois before crossing the Mississippi River and extending east into St. Charles County, Missouri, crossing the Missouri River and tying into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Line 880 consisted of approximately seven miles of existing 20-inch-diameter steel pipeline. As part of the proposed Project, Spire was planning on modifying Line 880 before placing it in to interstate service. The Project also included the construction of minor aboveground metering and regulating ("M&R") stations. On January 26, 2017, Spire filed an application with the Federal Energy Regulatory Commission ("FERC") for a Certificate of Public Convenience and Necessity for the Project (Docket No. CP17-40-000).

On March 15, 2017, Spire filed a "Preliminary Notification of Preferred Route Change" with FERC, indicating that the Spire no longer plans to modify the existing Line 880 as part of the Project. Instead, Spire intends to construct a new, greenfield 24-inch pipeline (referred to as the "North County Extension") which will extend the 24-inch pipeline portion of the Project to a proposed interconnect with Enable Mississippi River Transmission ("Enable MRT"). Spire plans to file an amended application with FERC in April 2017. GAI Consultants, Inc. ("GAI"), on behalf of Spire, is submitting supplemental information to assist with your review of the Project as amended. An updated description of the proposed Project facilities and location map (Figure 1) are provided herein.

### **Amended Project Description**

The amended Project as proposed will consist of approximately 65 miles of new, greenfield, 24-inch-diameter steel pipeline in two segments. The first segment (referred to as the "24-inch pipeline" portion of the Project) will originate at a new interconnect with the REX pipeline in Scott County, Illinois and extend approximately 59 miles through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east through St. Charles County, Missouri. The 24-inch pipeline then crosses the Missouri River into St. Louis County, Missouri, and terminates at a new interconnect with LGC. The second segment of new, greenfield pipeline, North County Extension, will consist of a 24-inch-diameter steel pipeline which will extend approximately six miles from the LGC

interconnect through the northern portion of St. Louis County and terminate at a new interconnect with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

The acquisition and modifications to LGC's existing Line 880 is no longer proposed as part of the Project.

Spire anticipates a typical 90-foot temporary construction right-of-way width, and a 50-foot permanent easement. The construction right-of-way is anticipated to be reduced to 75 feet at streams and wetlands. An additional 25 feet of temporary work space will be required through agricultural areas, and additional temporary work space will be required to facilitate construction in certain areas, such as crossings of roads, railroads, streams, and wetlands.

The updated Project schedule includes the following target dates:

- July 22, 2016 National Environmental Policy Act ("NEPA") process began (initiation of FERC Pre-filing process);
- August 2016 through March 2017 (Anticipated) Biological and Cultural Resource Surveys;
- January 26, 2017 Application Filed with FERC;
- April 2017 (Anticipated) File Amended Application with FERC;
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Construction is anticipated to commence in January 2018.

On behalf of Spire, we'd like to take this opportunity to invite the Illinois Historic Preservation Agency to provide comments regarding the Project as it will be amended. We appreciate your continued involvement and cooperation in the review of this important Project.

If you have any questions or would like additional information, please feel free to contact me at 630.605.5255 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

for merry

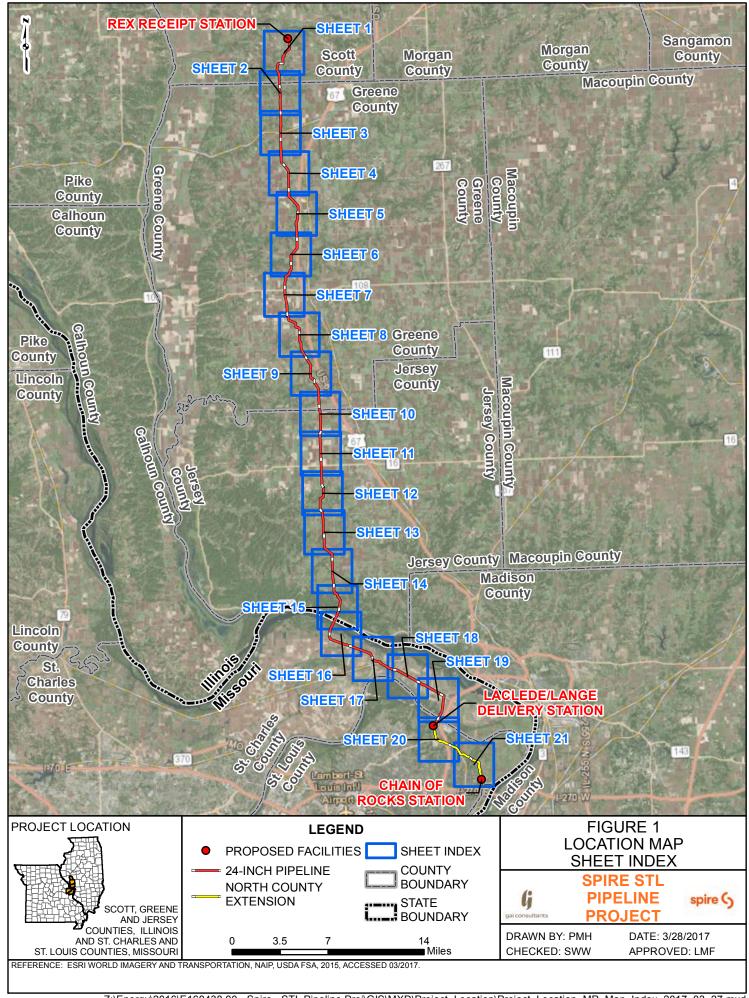
Lori M. Ferry

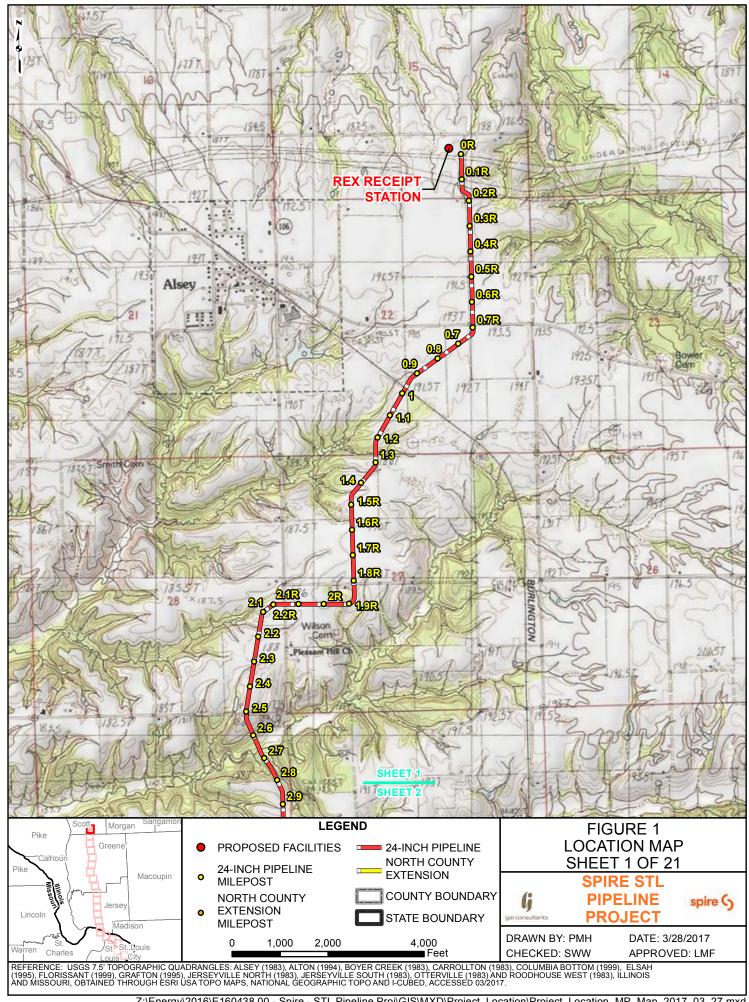
**Environmental Manager** 

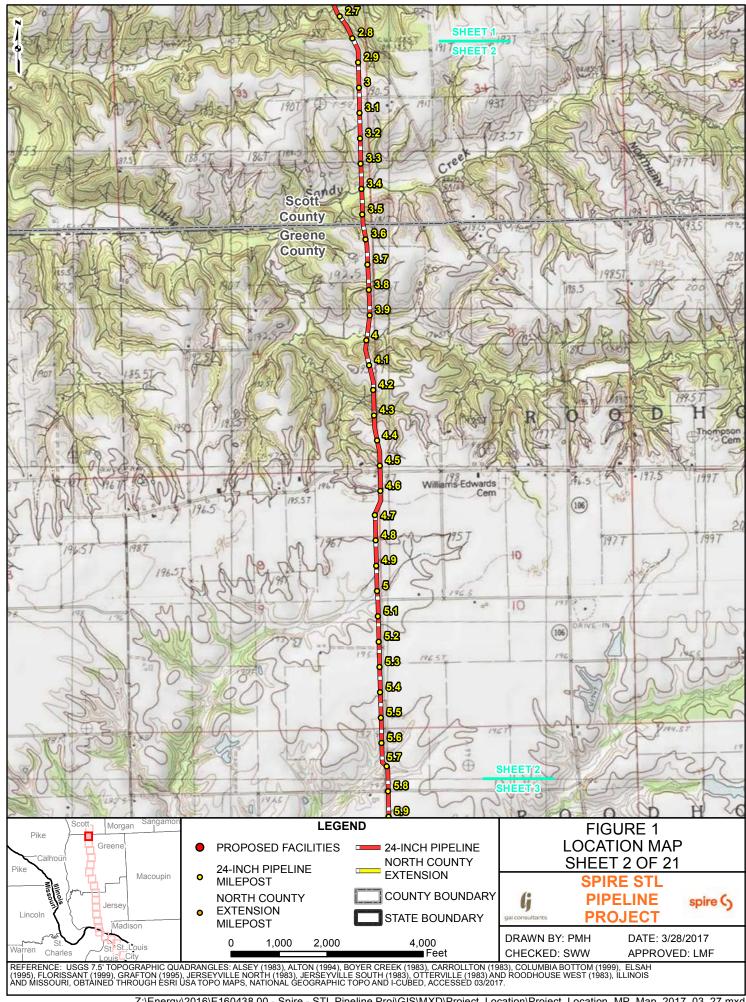
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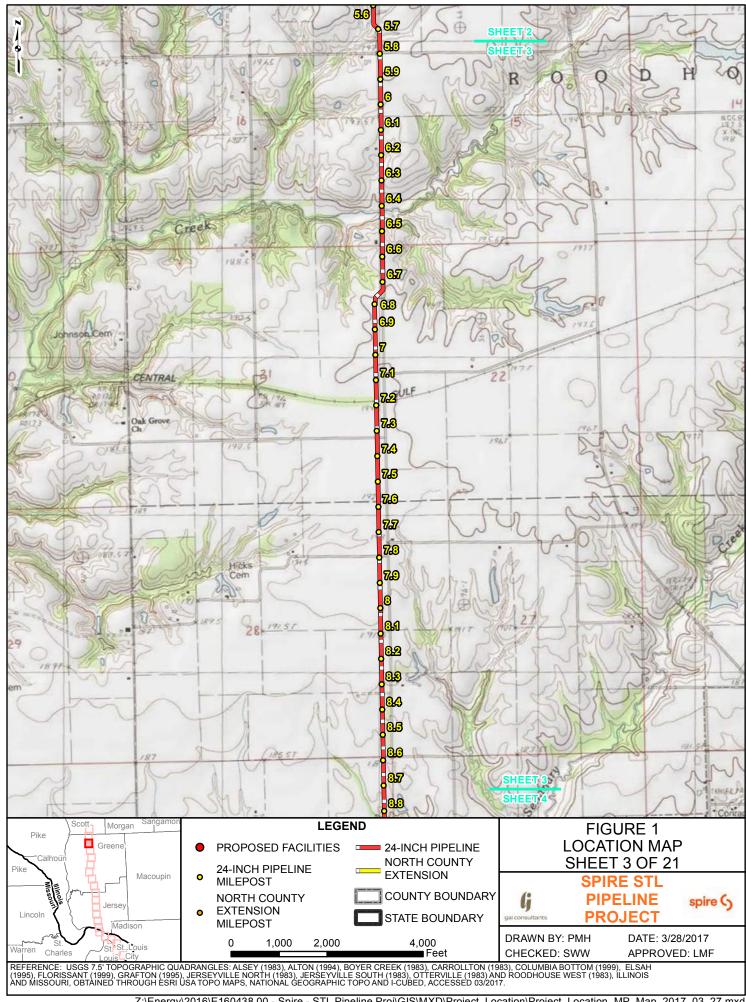
Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)

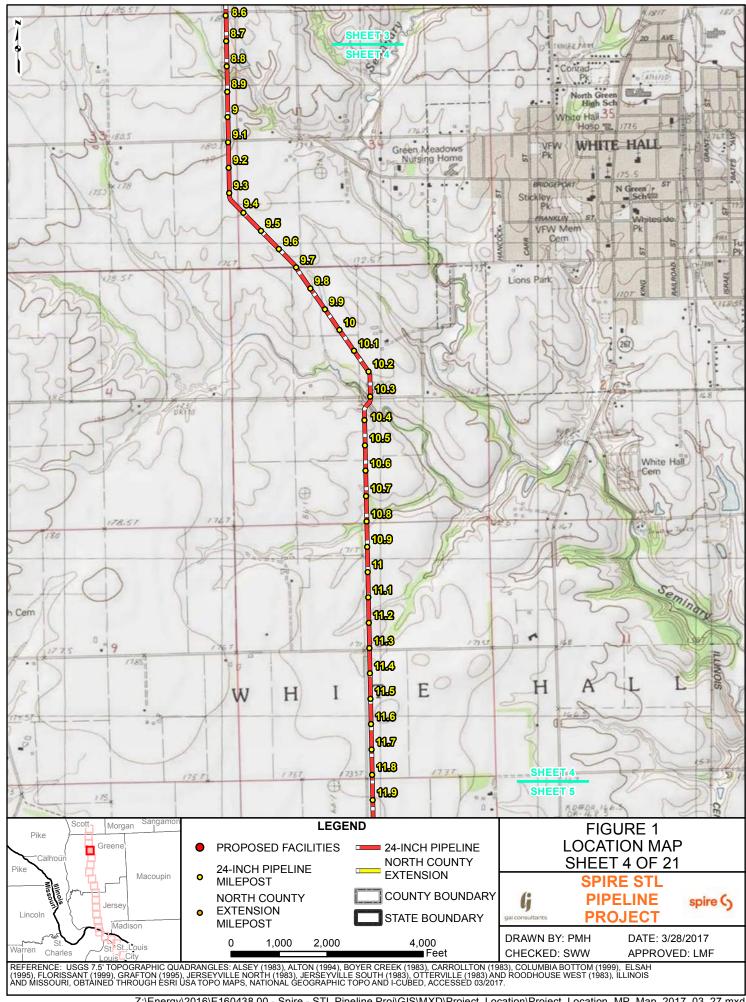
### ATTACHMENT USGS TOPOGRAPHIC MAP (FIGURE 1)

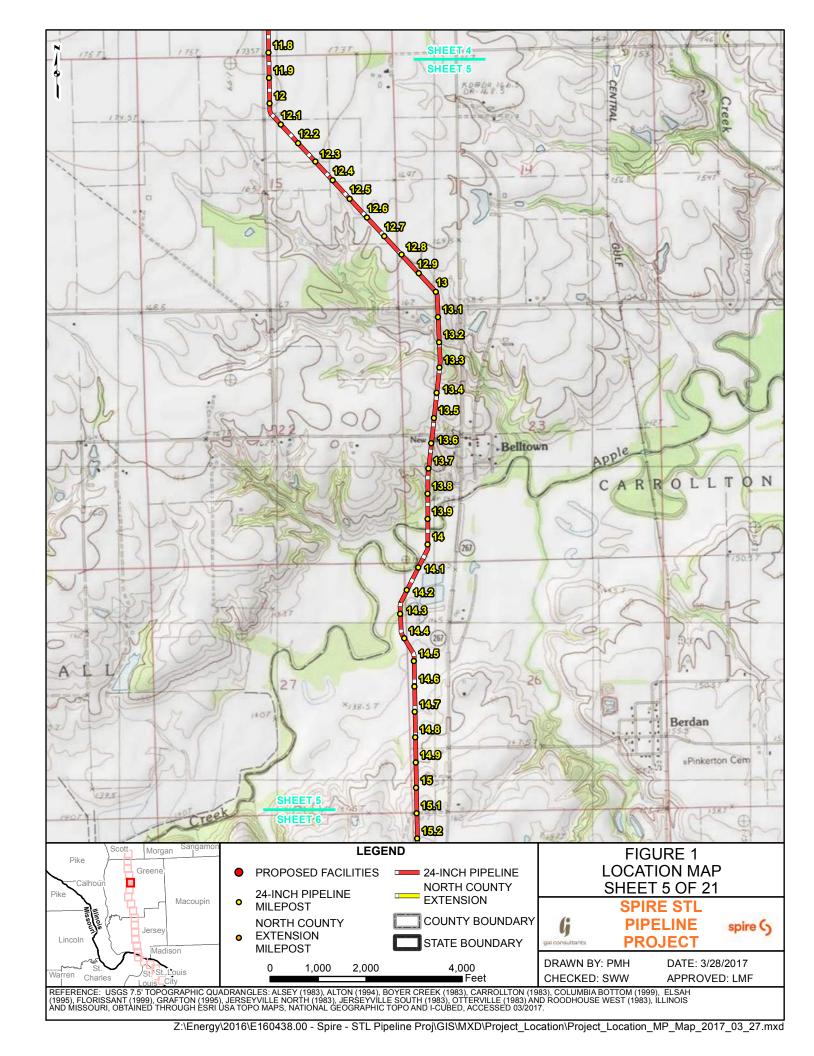


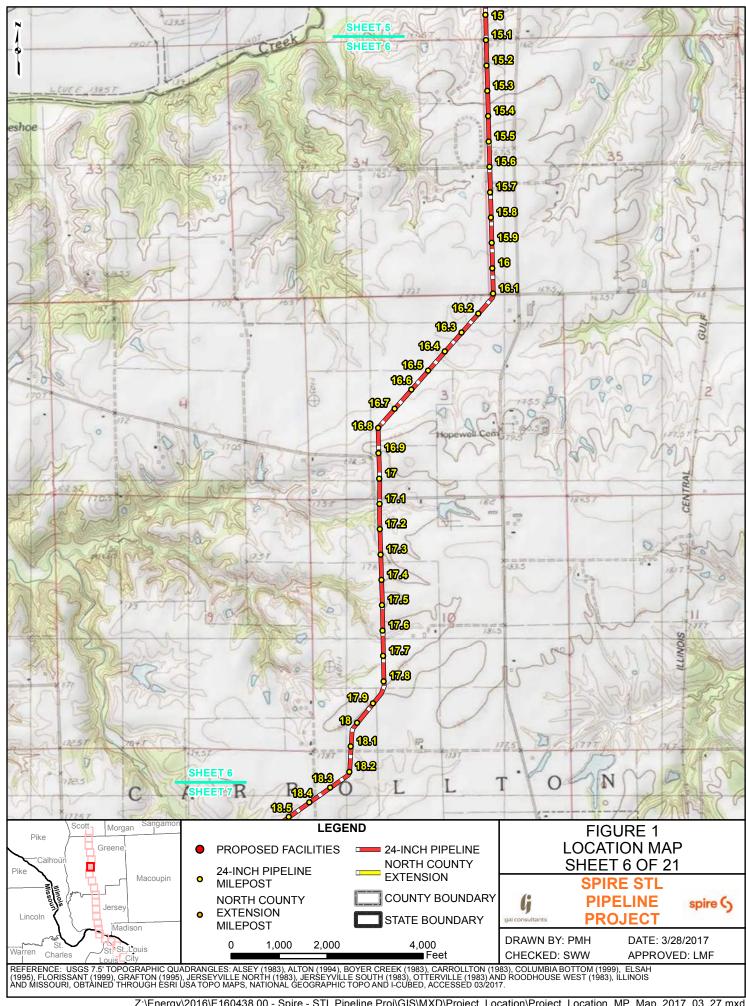


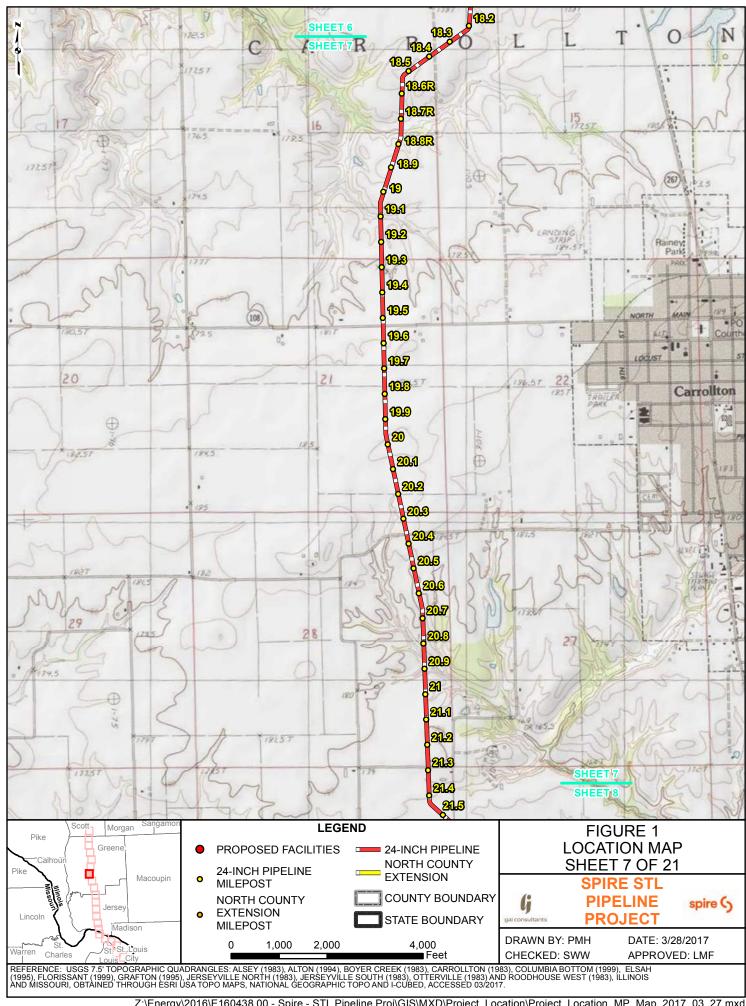


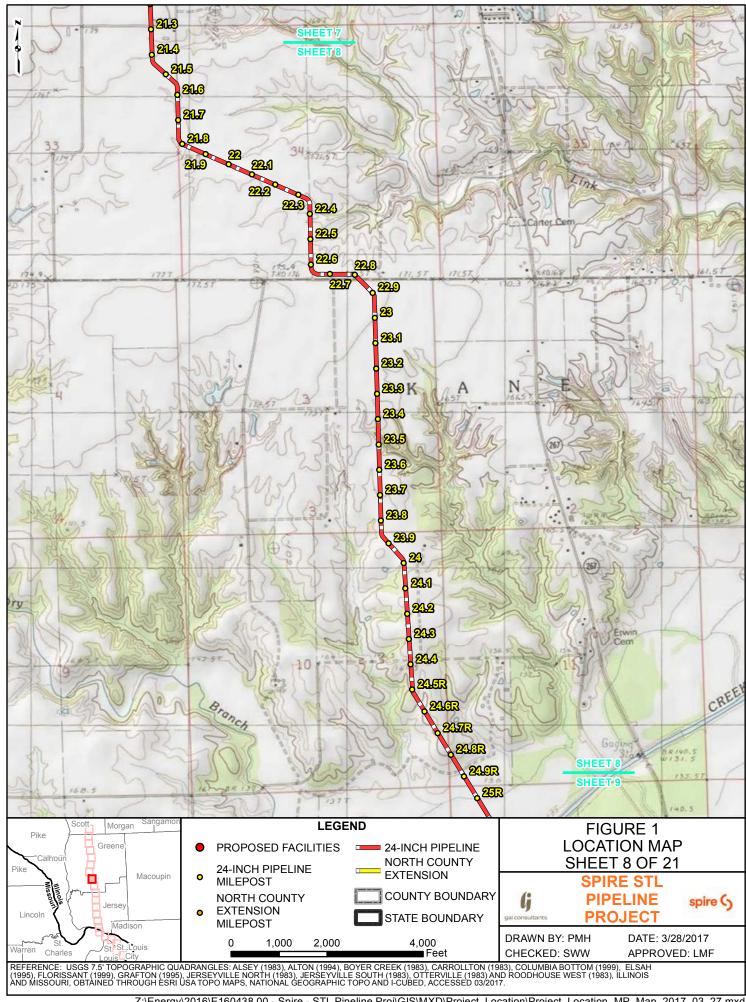


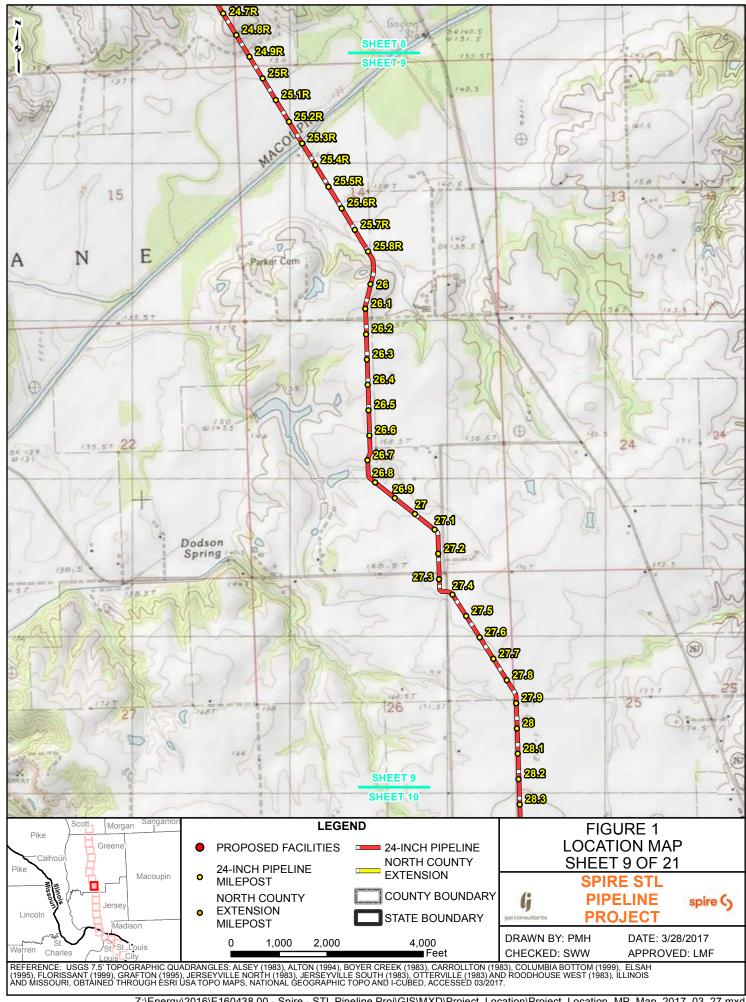


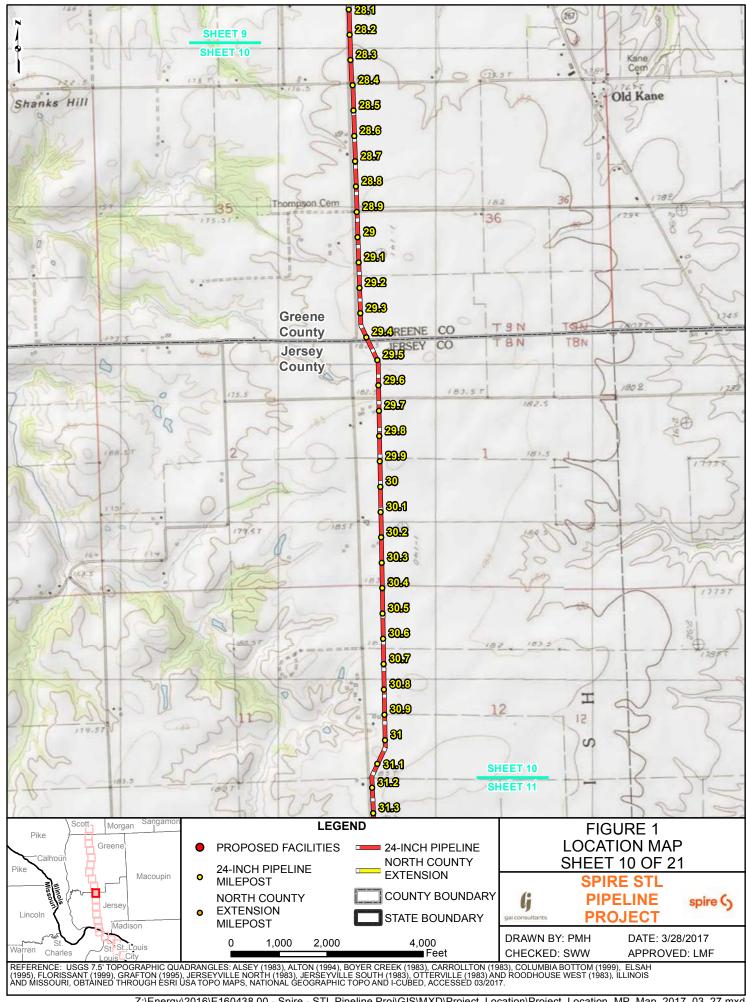


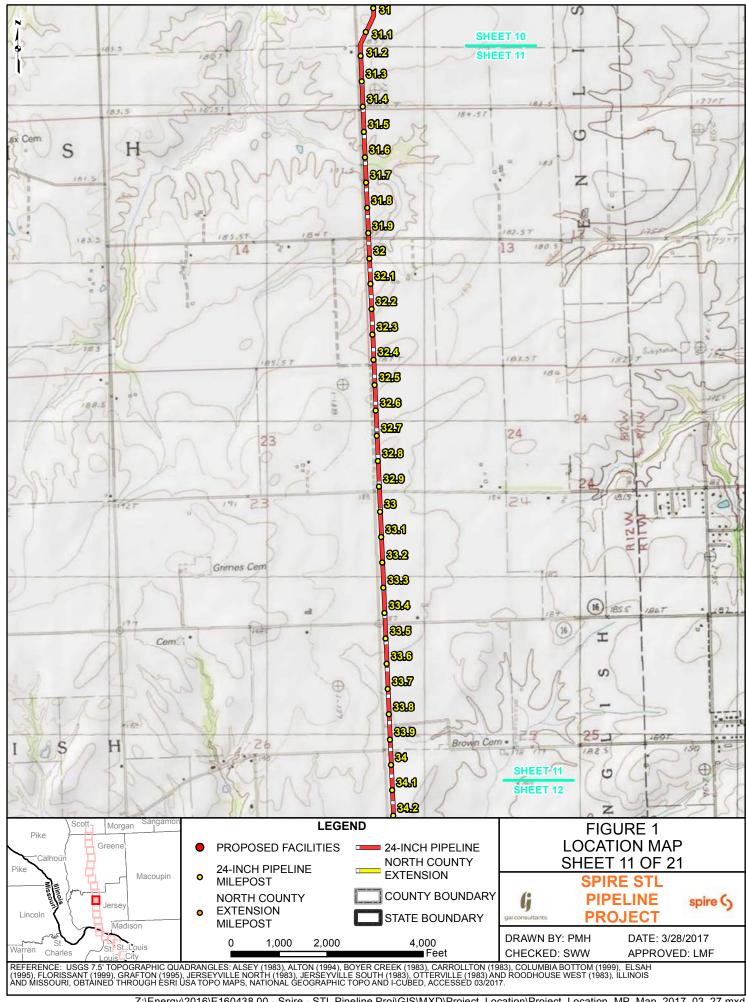


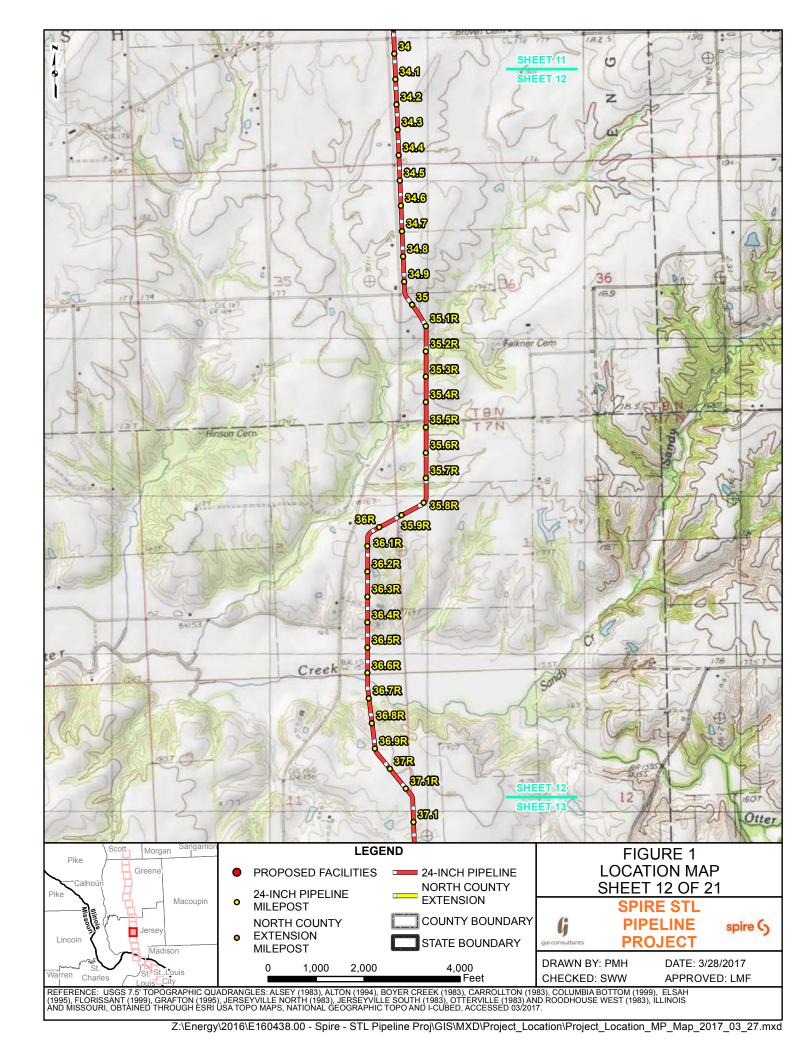


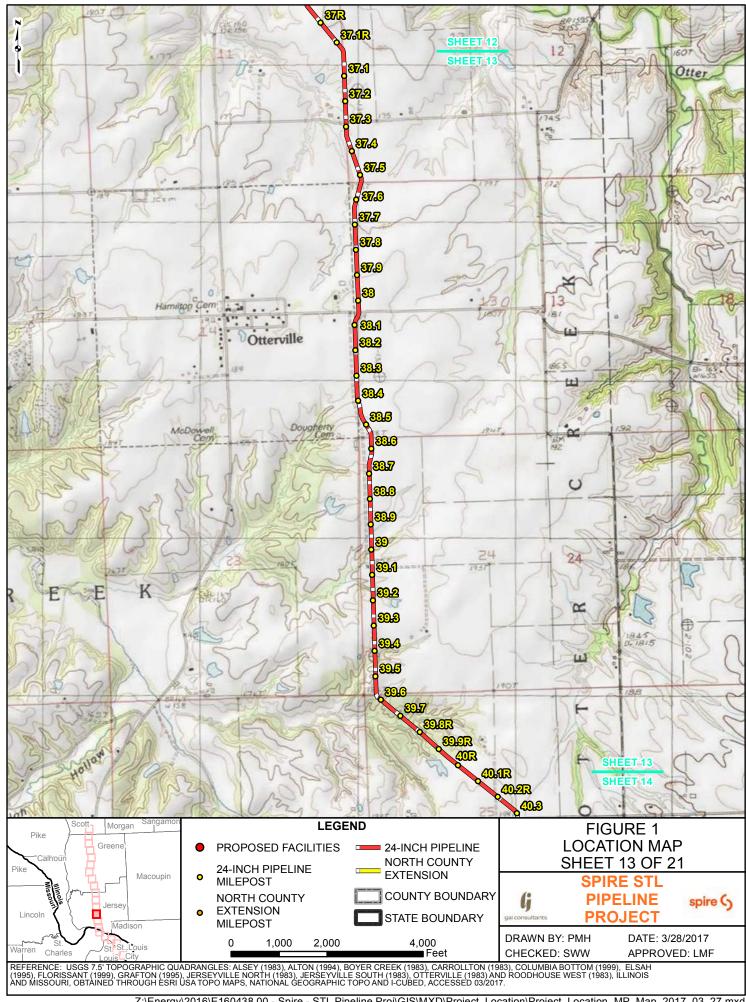


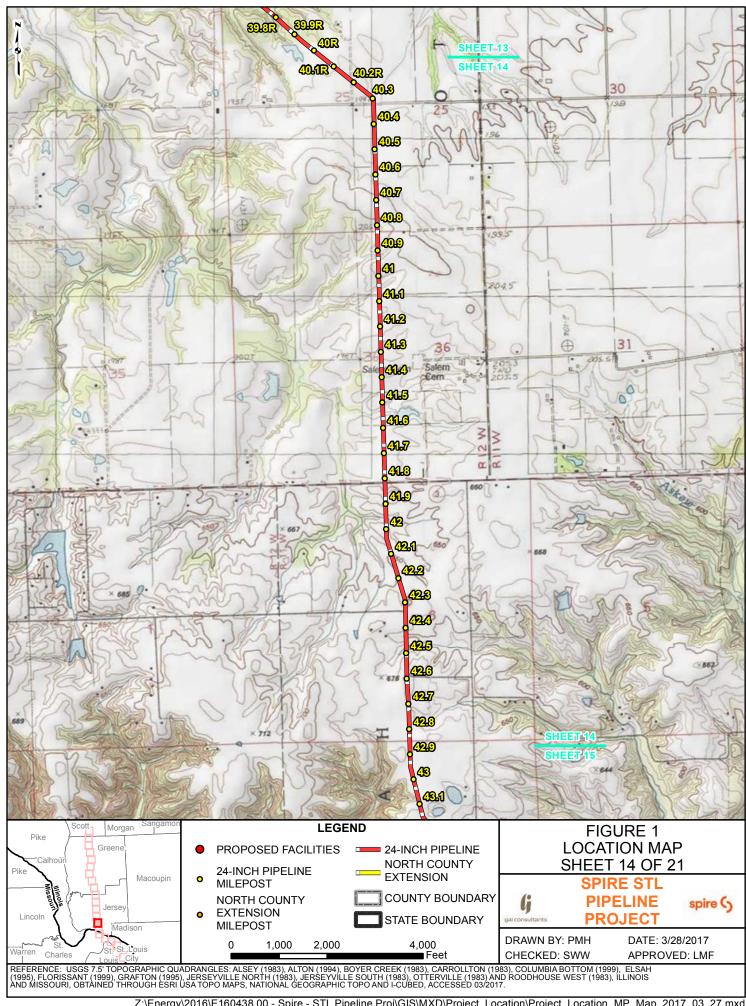


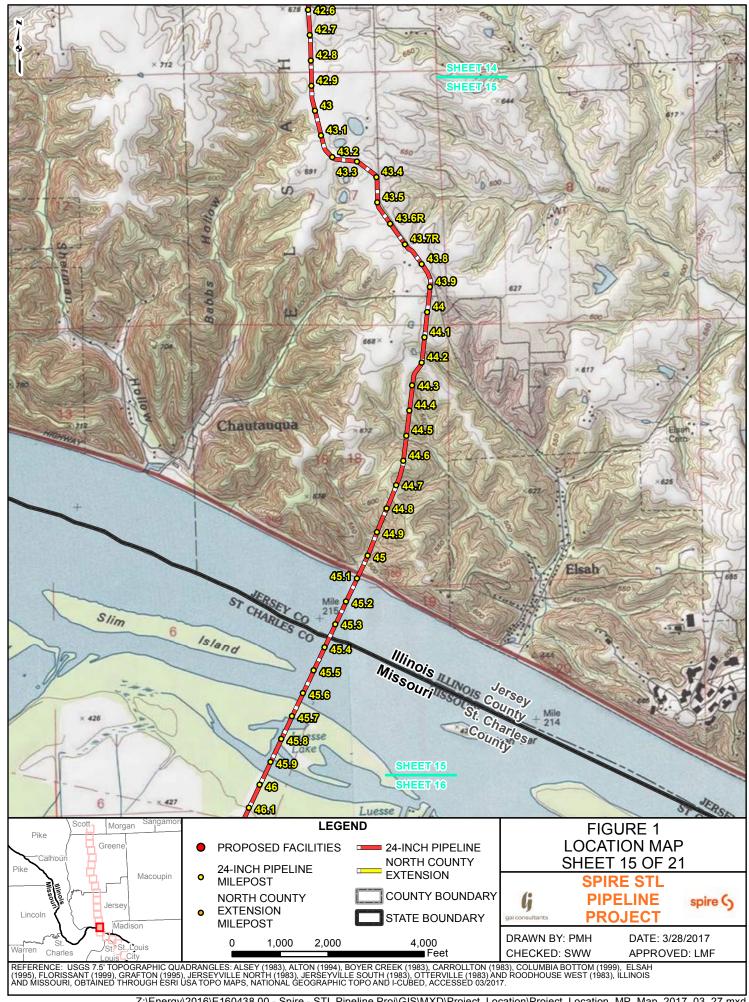


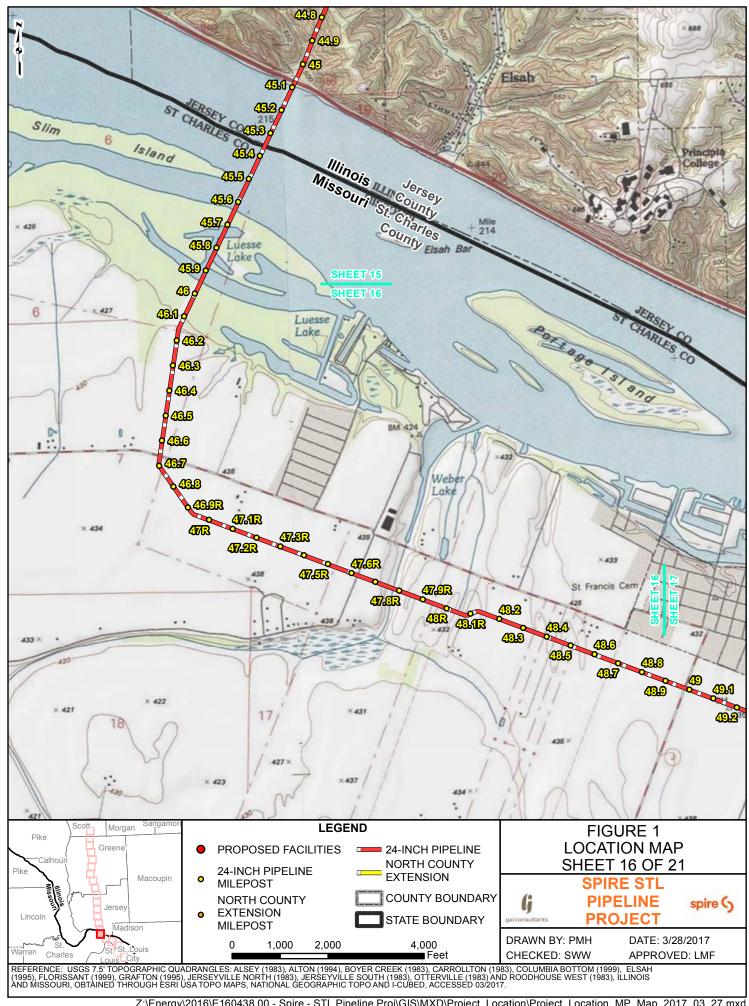


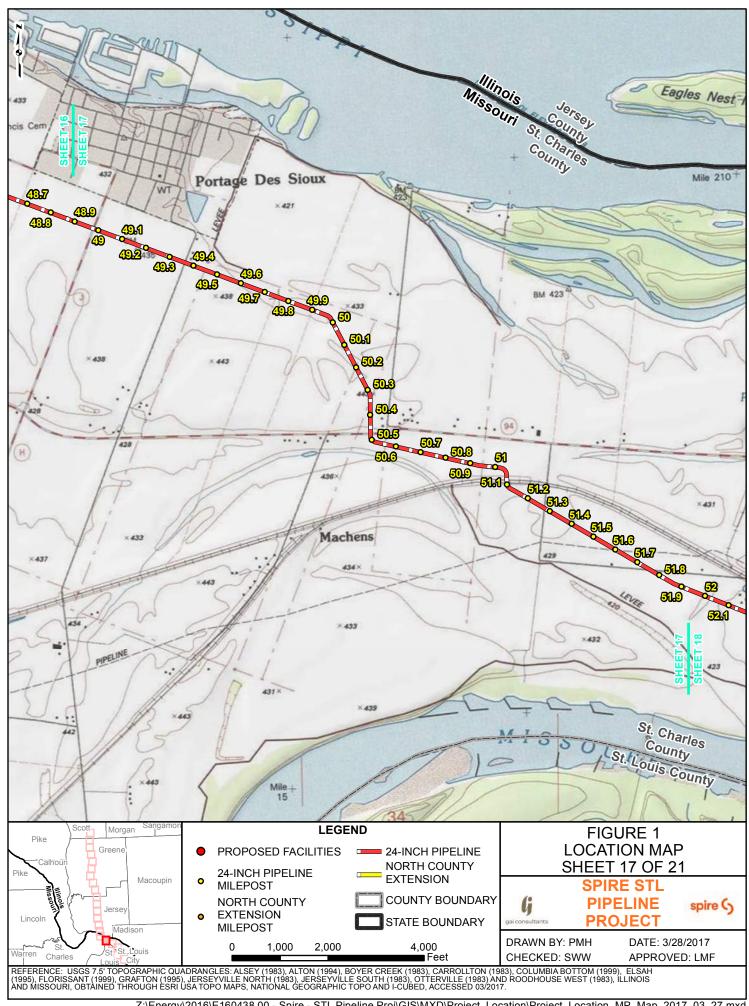


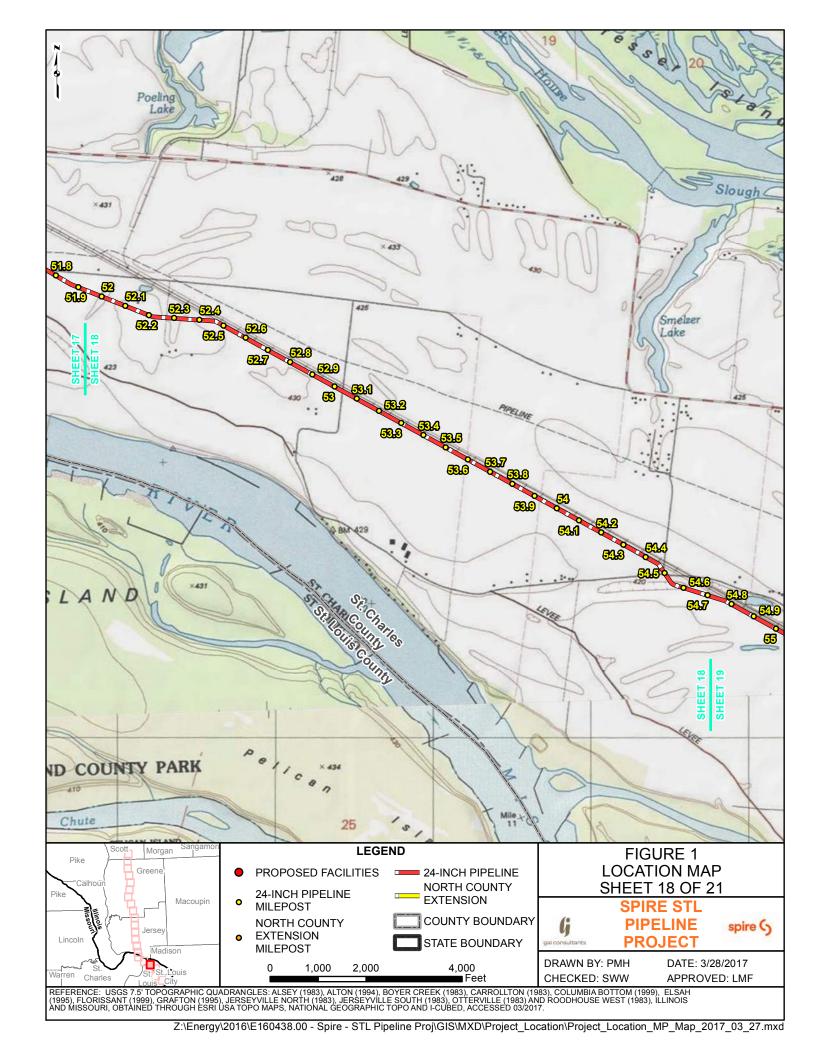


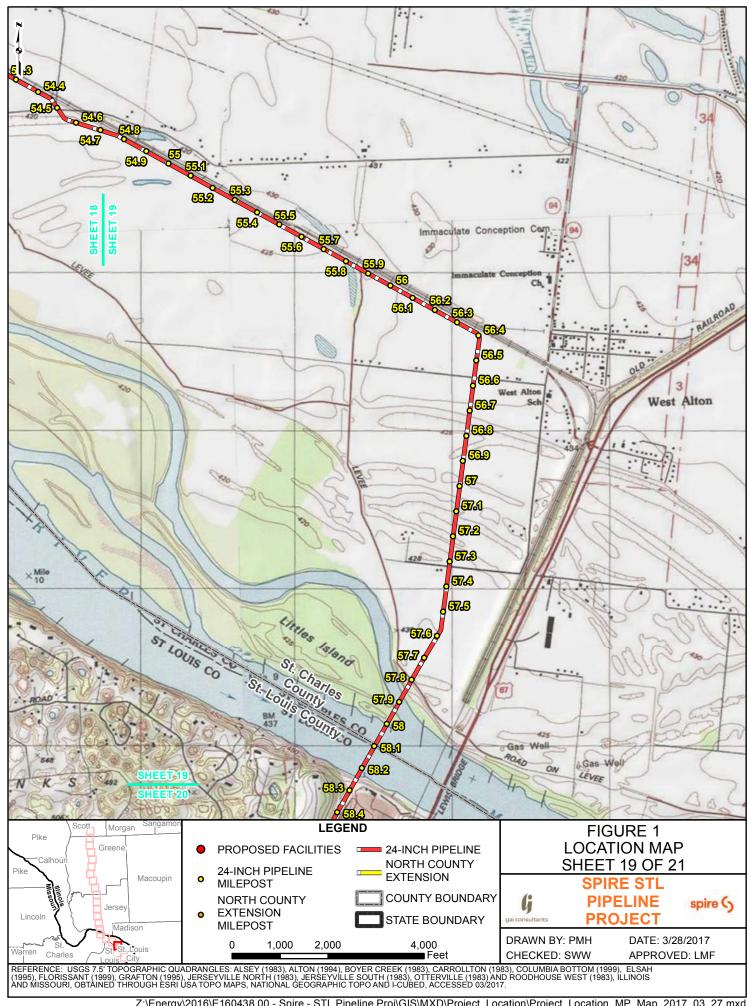


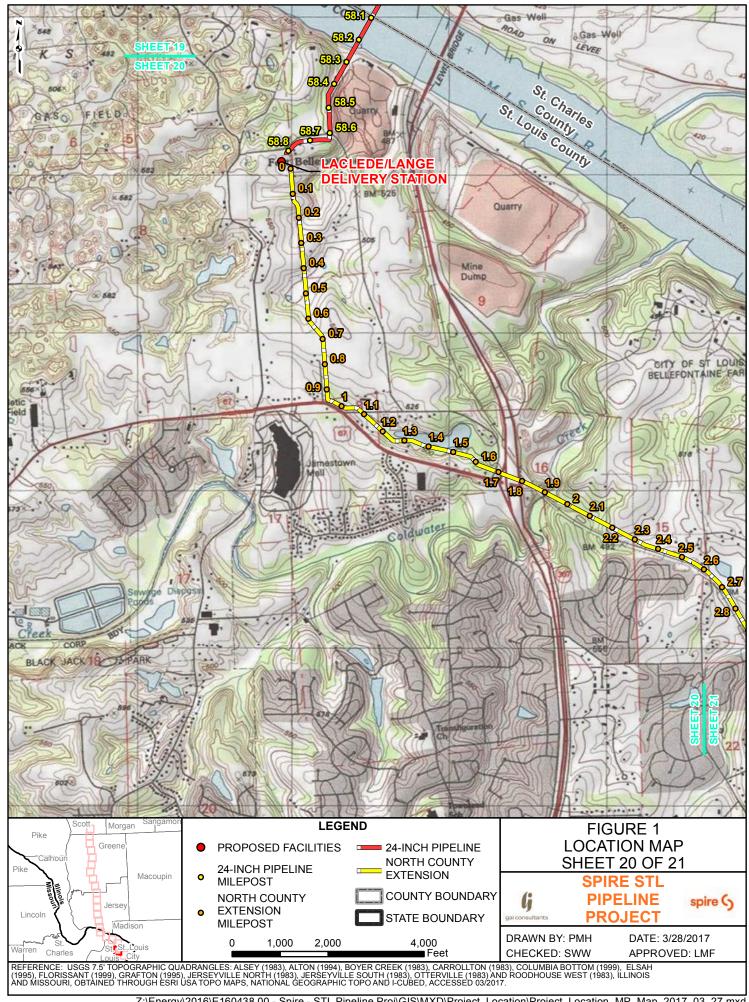


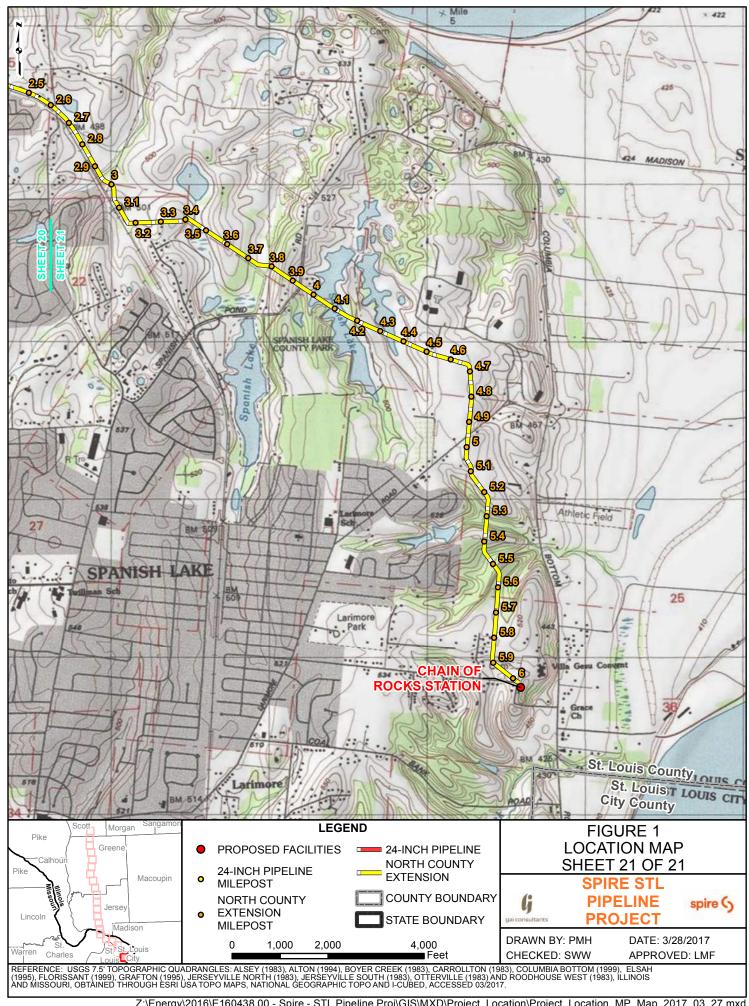














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March 28, 2017

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Sincerely,

GAI Consultants, Inc.

for merry

Lori M. Ferry

**Environmental Manager** 

LMF/ka

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GAI Consultants, Inc.-Chicago Office 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532

March 28, 2017

Mr. Joe Phillippe Illinois Historic Preservation Agency 1 Old State Capitol Plaza Springfield, IL 62701-1507

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Sincerely,

GAI Consultants, Inc.

pumperry

Lori M. Ferry

**Environmental Manager** 

LMF/ka

Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)

## GAI Consultants, Inc. Letter of Transmittal

Choose a building block.

TRANSMITTAL NO.	*	16
DATE:	2/10/2017	
PROJECT NO.	E160438.00.007	

**Illinois Historic Preservation Agency** 1 Old State Capitol Plaza Springfield, Illinois 62701

Attention: Ms. Tina Blankenship

PROJECT TITLE:

Spire STL Pipeline Project Spire STL Pipeline LLC Scott, Greene, and Jersey Counties, Illinois

SUBJECT:

Phase I Archaeological Survey Archaeological Survey Short Report (rev)

WE ARE SENDING YOU: Paper Documents & Electronic Files

VIA: FedEx Ground Delivery

PURPOSE: For Your Use

COMMENTS:

ATTACHMENTS:

Qty	Document No.	Rev	Document Date	Document Description/Title	Status*
2		1	1/7/2017	Archaeological Survey Short Report (rev) Hardcopies	
2		1 :	1/7/2017	Archaeological Survey Short Report (rev) DVDs	

<sup>\*</sup>Status Codes for Submittal Package Reviews: NE=No Exceptions; EN=Exceptions Noted; RR=Revise & Resubmit; RJ=Rejected

## DISTRIBUTION:

Name	Company	Transmittal (Y/N)	Attachments (Y/N)
			1
1	<u> </u>		

Sincerely

Eric P. Scuoteguazza, M.A., M.B.A., RPA Senior Manager, Cultural Resources

thank you, Tina. Man Know
Please let me Know
fling
you need anything
Welse.
Gric



**Illinois Environmental Protection Agency** 



GAI Consultants, Inc.-Chicago Office 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532

March 28, 2017

Mr. Dan Heacock
Facility Evaluation Manager
Illinois Environmental Protection Agency - Bureau of Water
1021 North Grand Avenue East
Springfield, IL 62794-9276

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

Dear Mr. Heacock:

In June 2016, Spire Pipeline LLC ("Spire") initiated consultation with your office regarding their intent to construct, own, and operate the proposed Spire STL Pipeline Project ("Project") which consisted of approximately 59 miles of new, greenfield 24-inch-diameter steel pipeline (referred to as the "24-inch pipeline") originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey counties in Illinois before crossing the Mississippi River and extending east into St. Charles County, Missouri, crossing the Missouri River and tying into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Line 880 consisted of approximately seven miles of existing 20-inch-diameter steel pipeline. As part of the proposed Project, Spire was planning on modifying Line 880 before placing it in to interstate service. The Project also included the construction of minor aboveground metering and regulating ("M&R") stations. On January 26, 2017, Spire filed an application with the Federal Energy Regulatory Commission ("FERC") for a Certificate of Public Convenience and Necessity for the Project (Docket No. CP17-40-000).

On March 15, 2017, Spire filed a "Preliminary Notification of Preferred Route Change" with FERC, indicating that the Spire no longer plans to modify the existing Line 880 as part of the Project. Instead, Spire intends to construct a new, greenfield 24-inch pipeline (referred to as the "North County Extension") which will extend the 24-inch pipeline portion of the Project to a proposed interconnect with Enable Mississippi River Transmission ("Enable MRT"). Spire plans to file an amended application with FERC in April 2017. GAI Consultants, Inc. ("GAI"), on behalf of Spire, is submitting supplemental information to assist with your review of the Project as amended. An updated description of the proposed Project facilities and location map (Figure 1) are provided herein.

## **Amended Project Description**

The amended Project as proposed will consist of approximately 65 miles of new, greenfield, 24-inch-diameter steel pipeline in two segments. The first segment (referred to as the "24-inch pipeline" portion of the Project) will originate at a new interconnect with the REX pipeline in Scott County, Illinois and extend approximately 59 miles through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east through St. Charles County, Missouri. The 24-inch pipeline then crosses the Missouri River into St. Louis County, Missouri, and terminates at a new interconnect with LGC. The second segment of new, greenfield pipeline, North County Extension, will consist of a 24-inch-diameter steel pipeline which will extend approximately six miles from the LGC

interconnect through the northern portion of St. Louis County and terminate at a new interconnect with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

The acquisition and modifications to LGC's existing Line 880 is no longer proposed as part of the Project.

Spire anticipates a typical 90-foot temporary construction right-of-way width, and a 50-foot permanent easement. The construction right-of-way is anticipated to be reduced to 75 feet at streams and wetlands. An additional 25 feet of temporary work space will be required through agricultural areas, and additional temporary work space will be required to facilitate construction in certain areas, such as crossings of roads, railroads, streams, and wetlands.

The updated Project schedule includes the following target dates:

- July 22, 2016 National Environmental Policy Act ("NEPA") process began (initiation of FERC Pre-filing process);
- August 2016 through March 2017 (Anticipated) Biological and Cultural Resource Surveys;
- January 26, 2017 Application Filed with FERC;
- April 2017 (Anticipated) File Amended Application with FERC;
- September 2017 (Anticipated) Draft NEPA Document Published; and
- December 2017 (Anticipated) FERC Decision on Application.

Construction is anticipated to commence in January 2018.

On behalf of Spire, we'd like to take this opportunity to invite the Illinois Environmental Protection Agency - Bureau of Water to provide comments regarding the Project as it will be amended. We appreciate your continued involvement and cooperation in the review of this important Project.

If you have any questions or would like additional information, please feel free to contact me at 630.605.5255 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

for merry

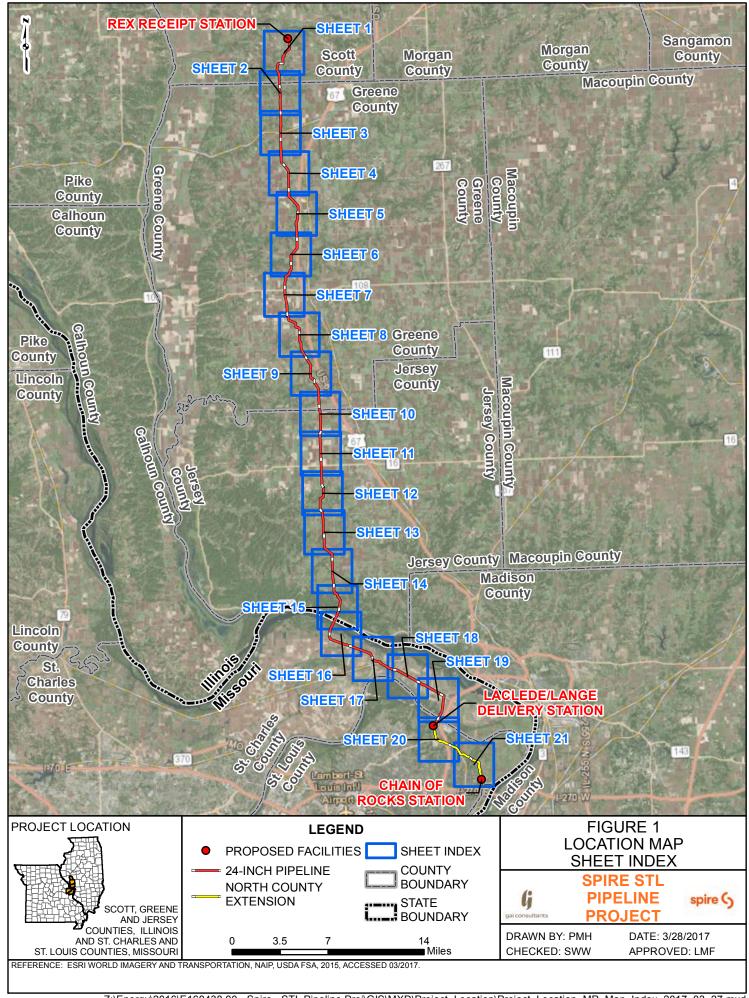
Lori M. Ferry

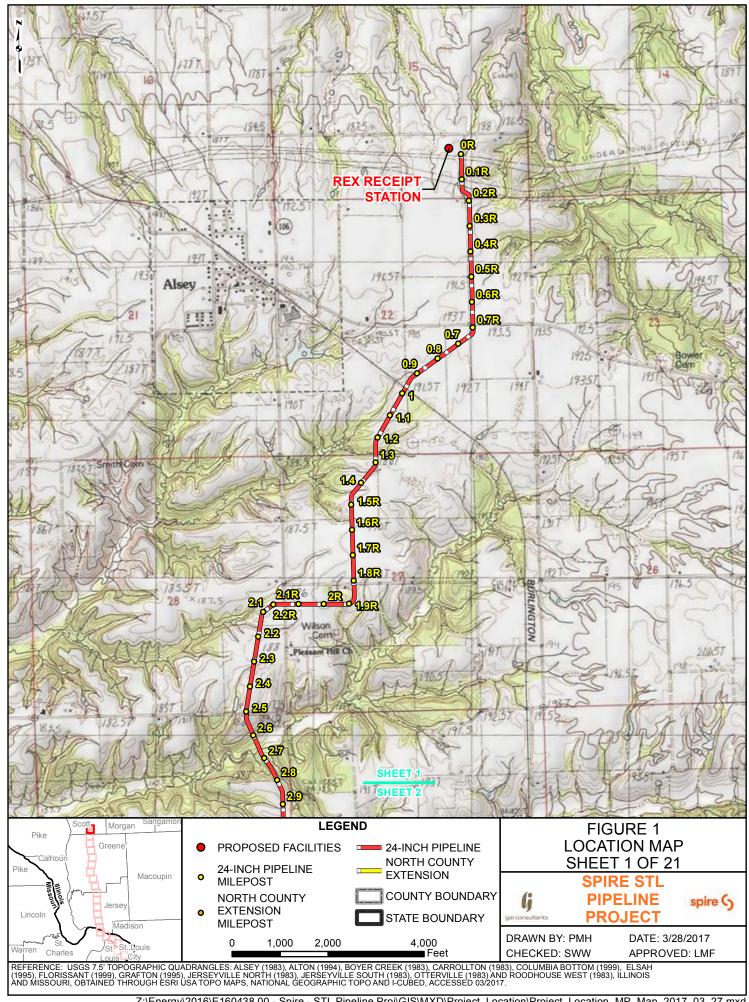
**Environmental Manager** 

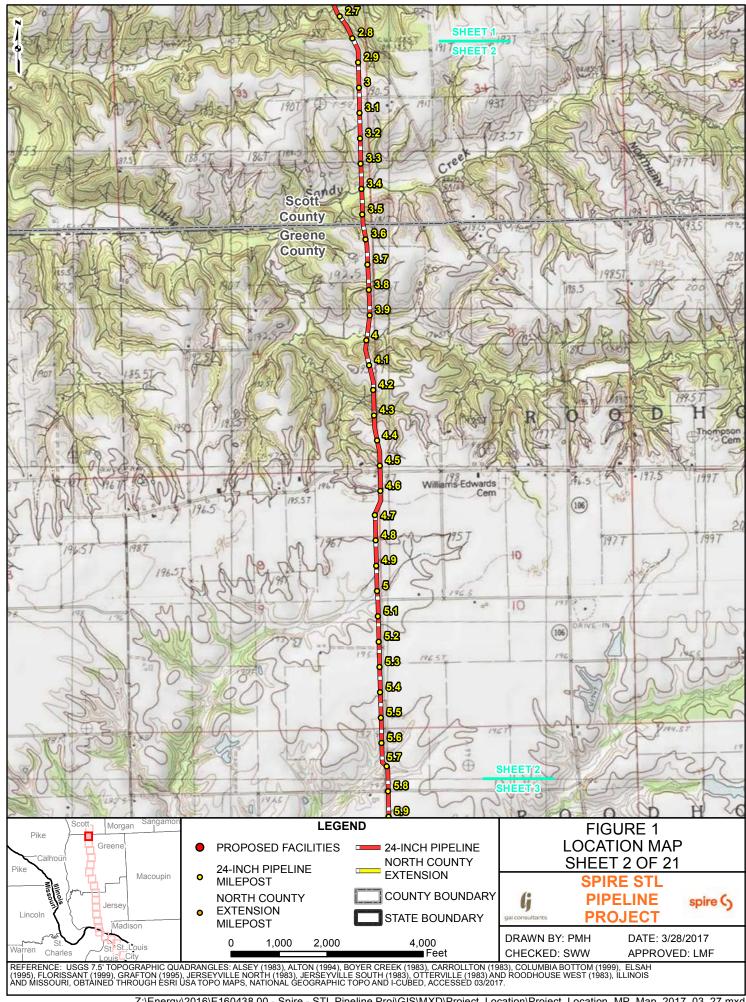
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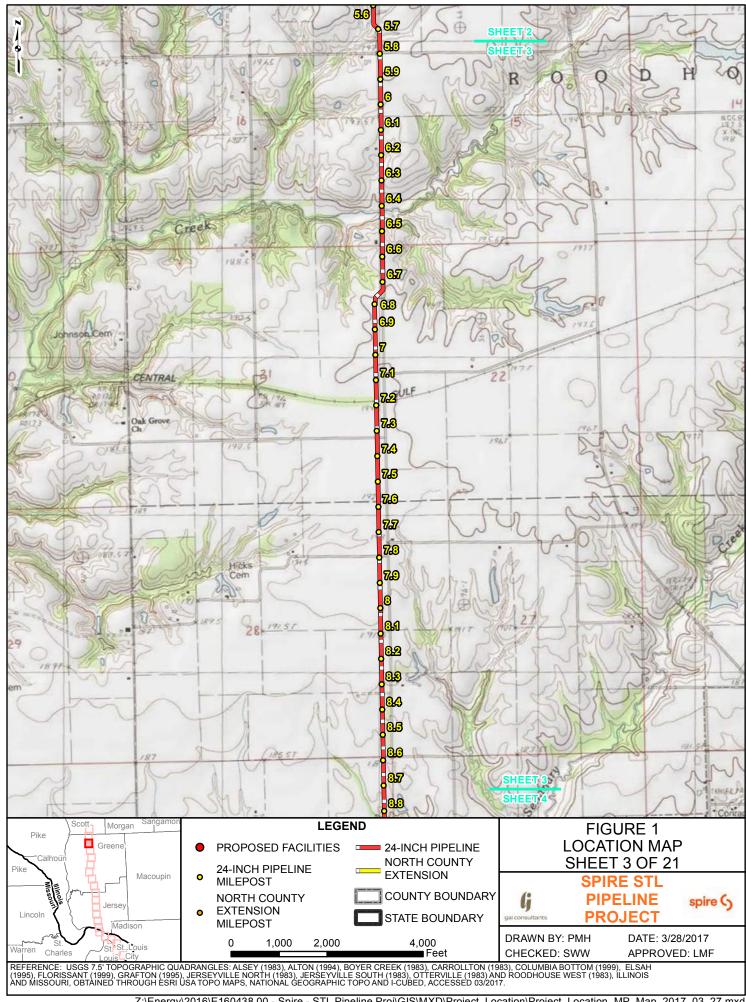
Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)

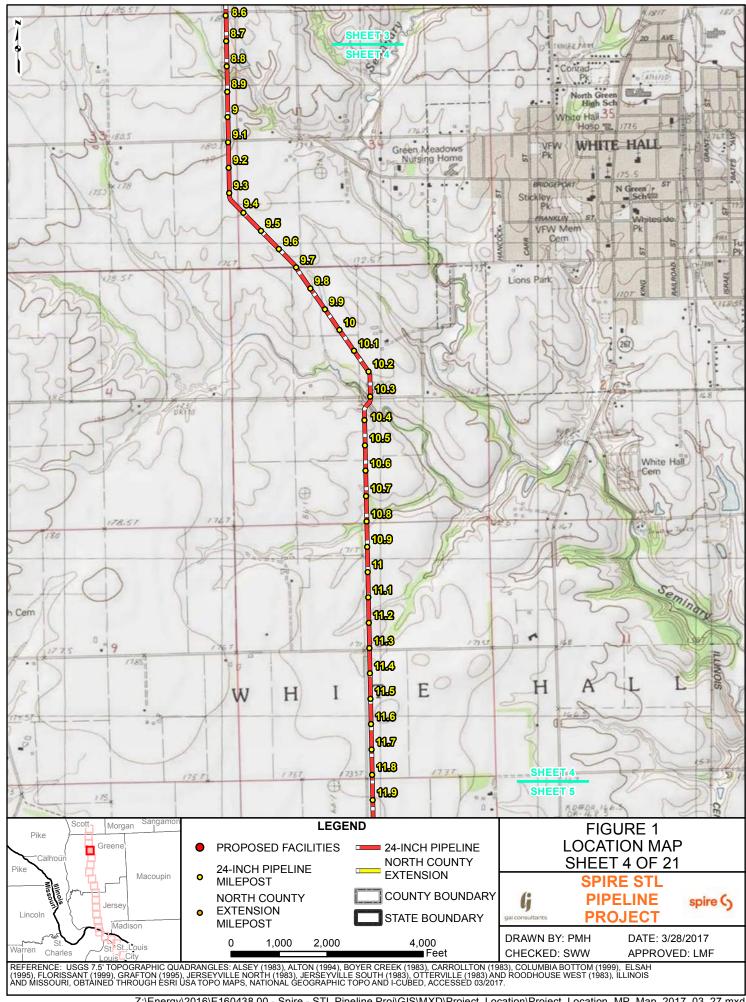
# ATTACHMENT USGS TOPOGRAPHIC MAP (FIGURE 1)

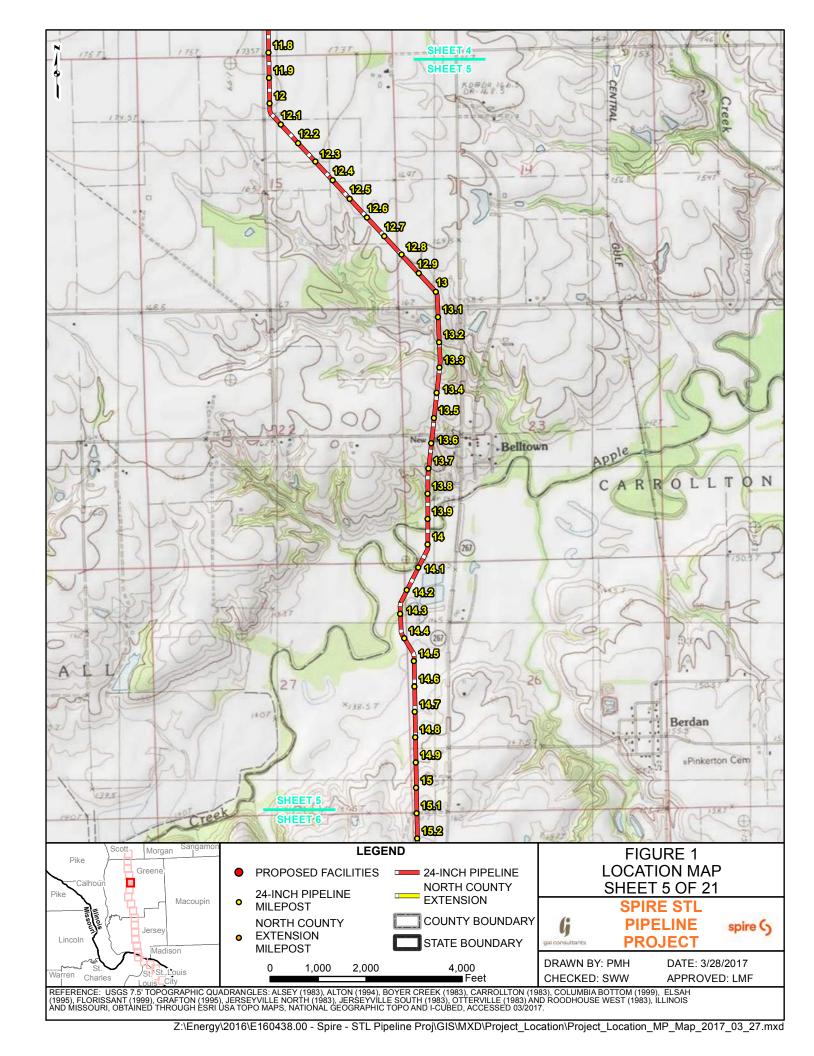


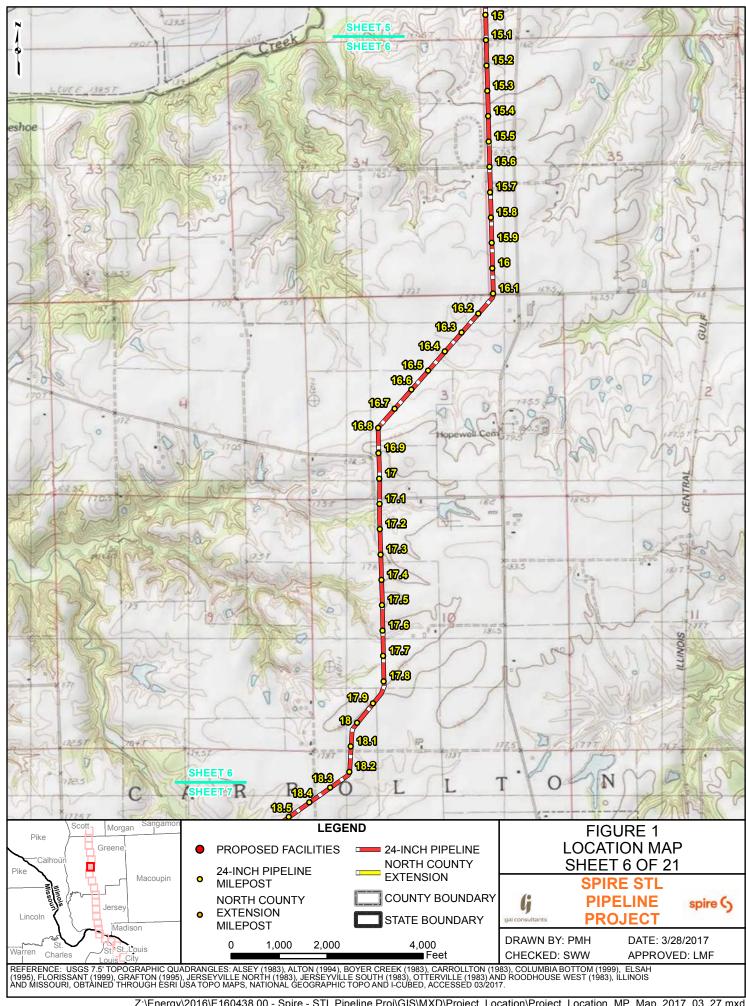


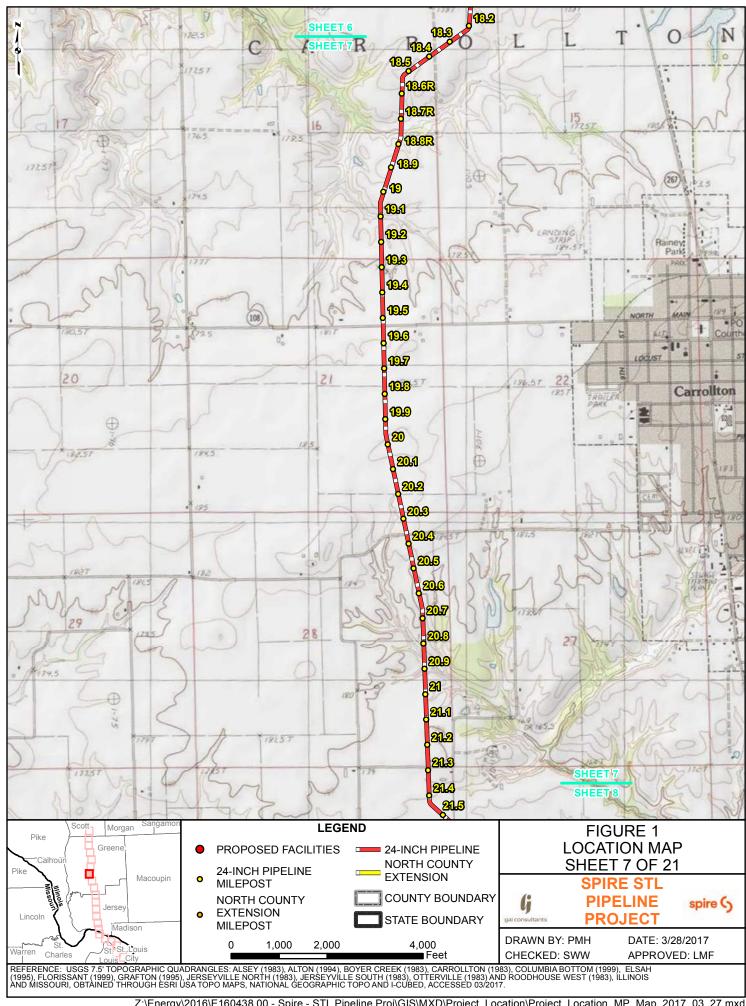


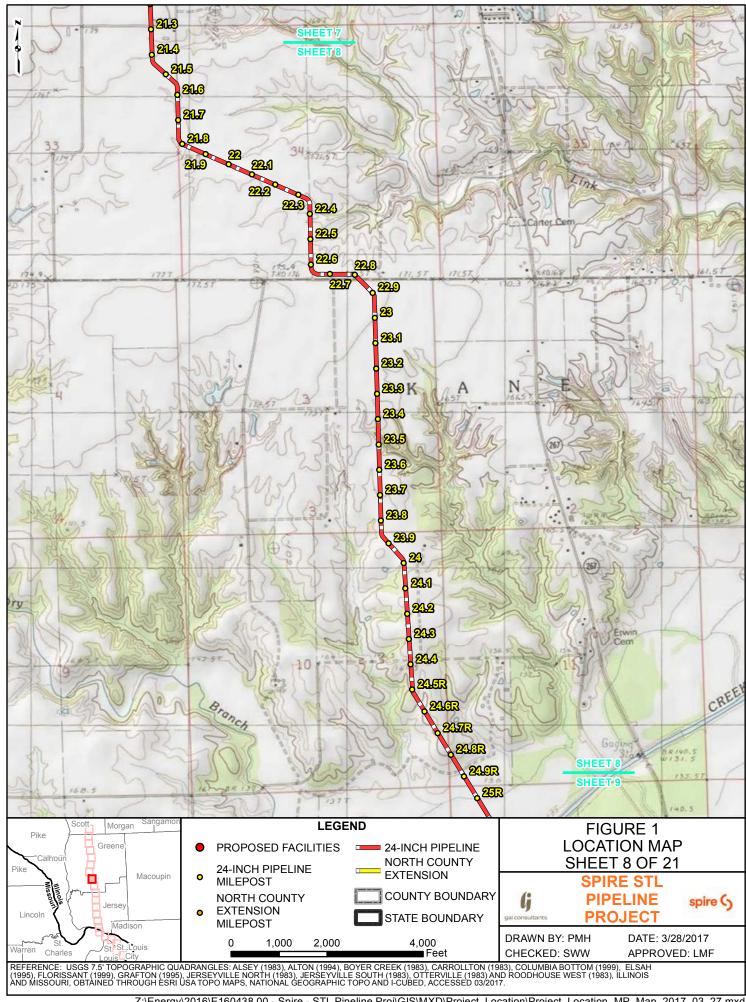


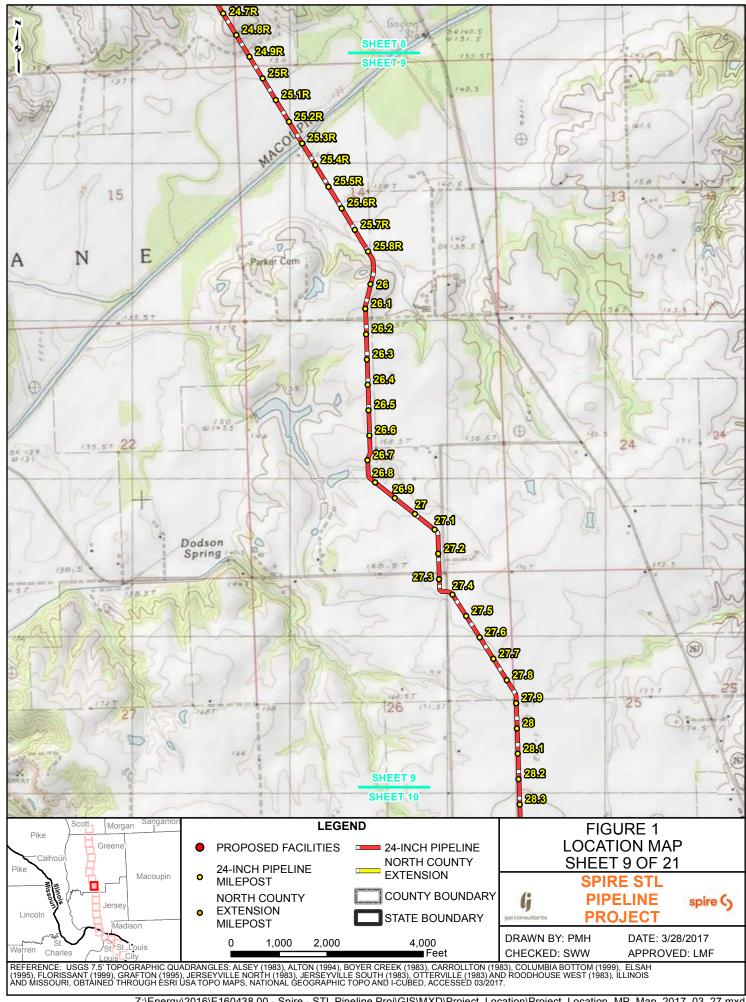


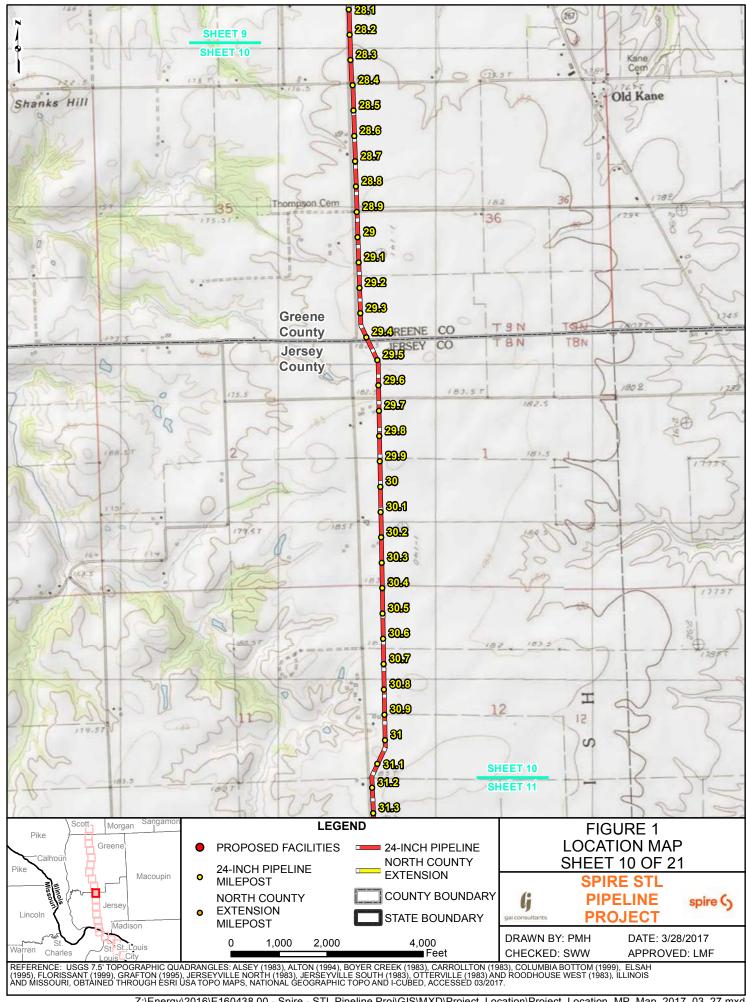


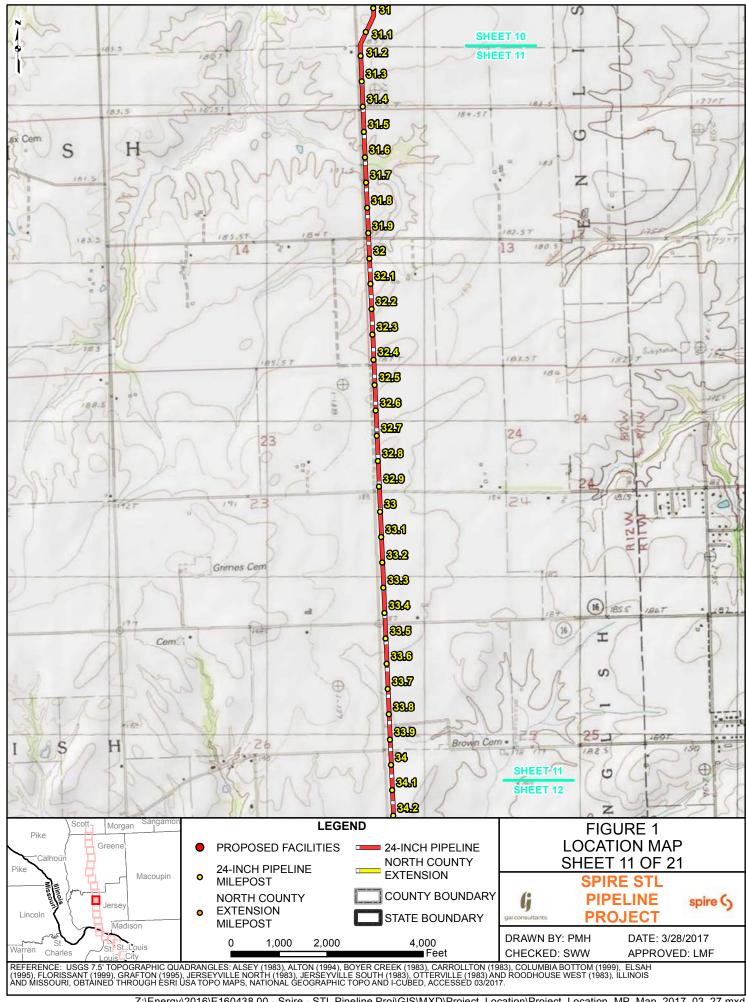


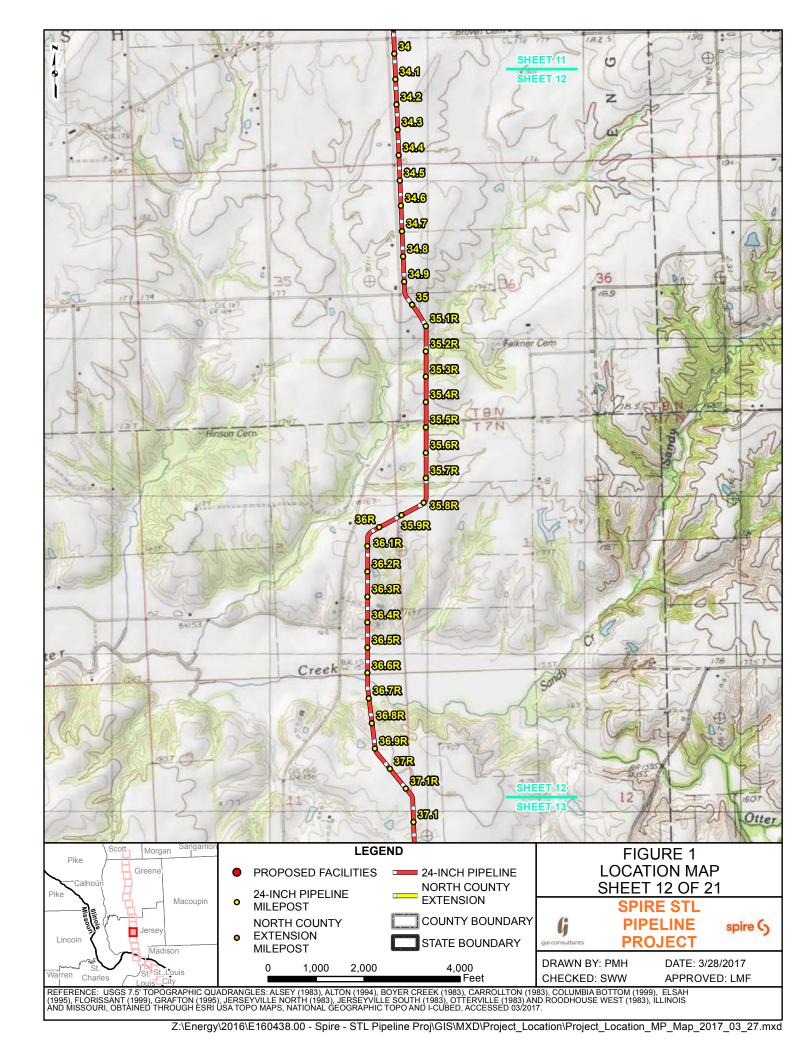


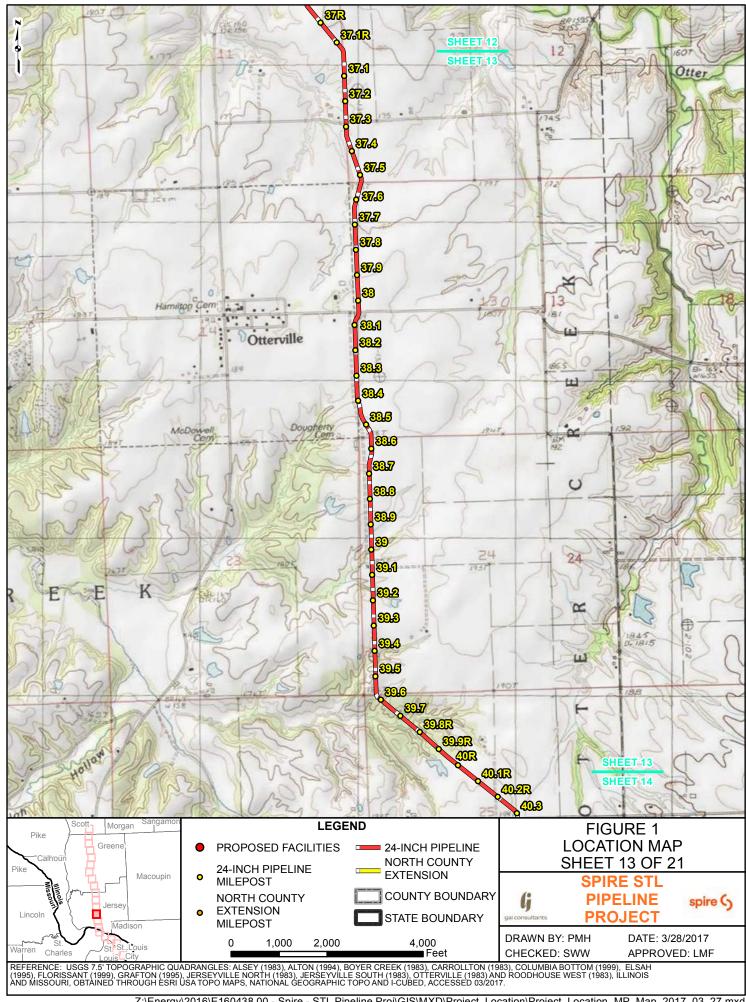


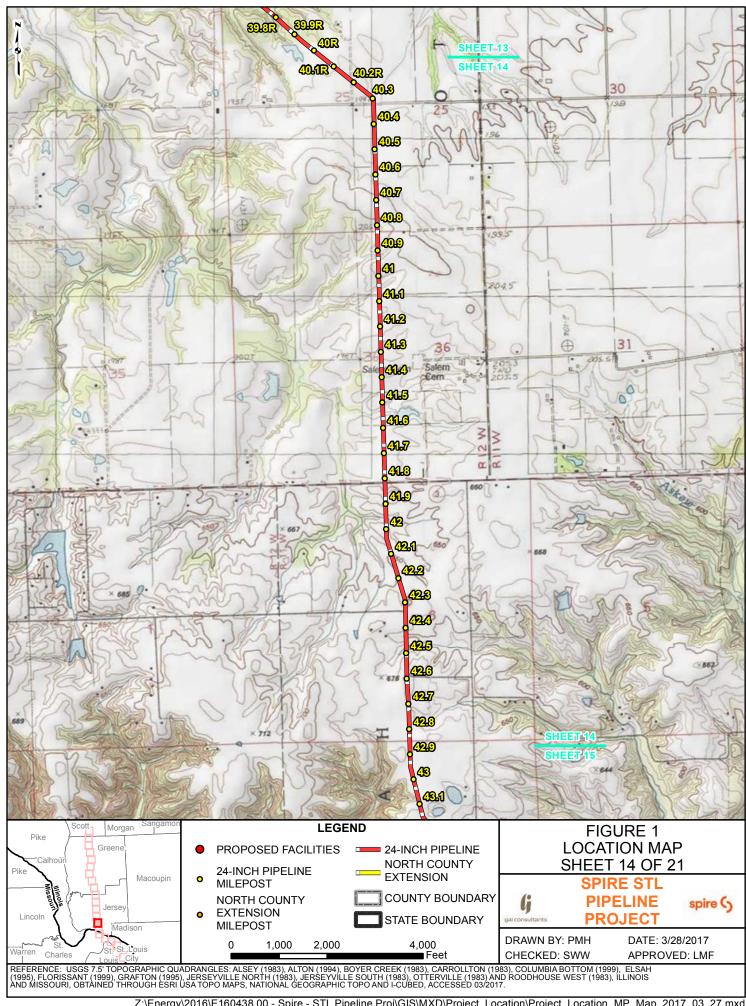


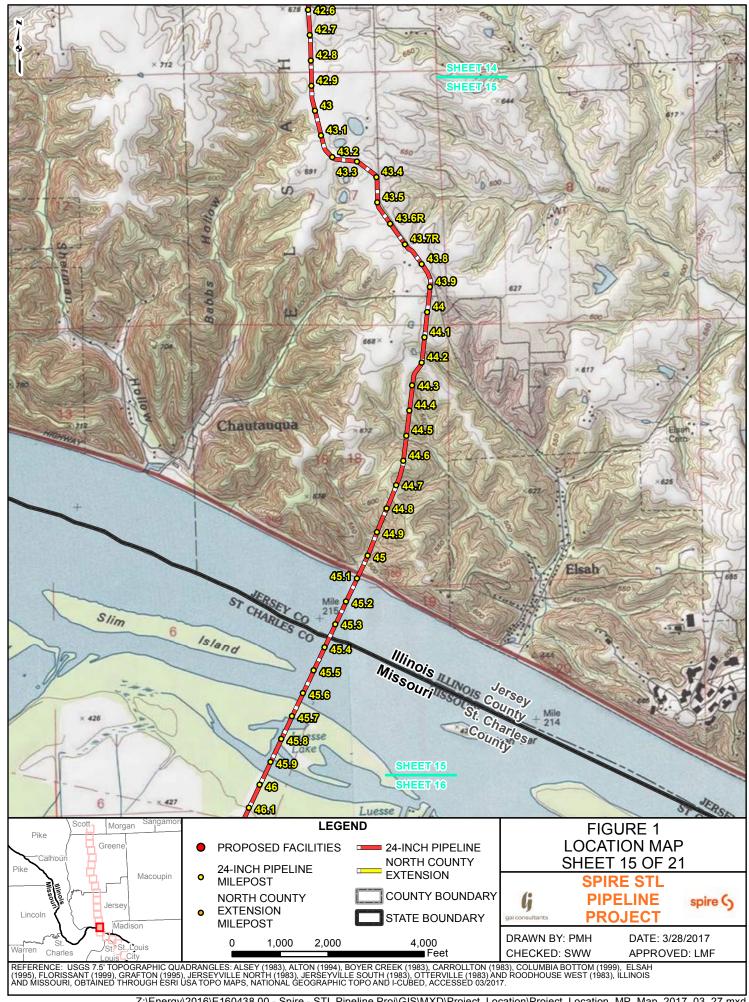


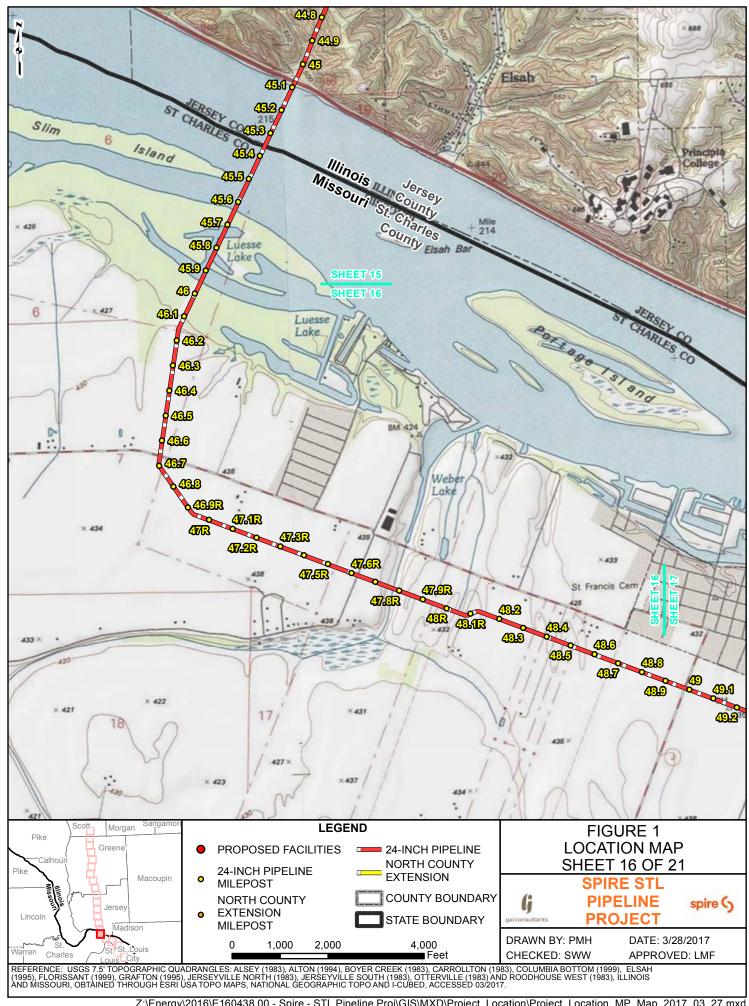


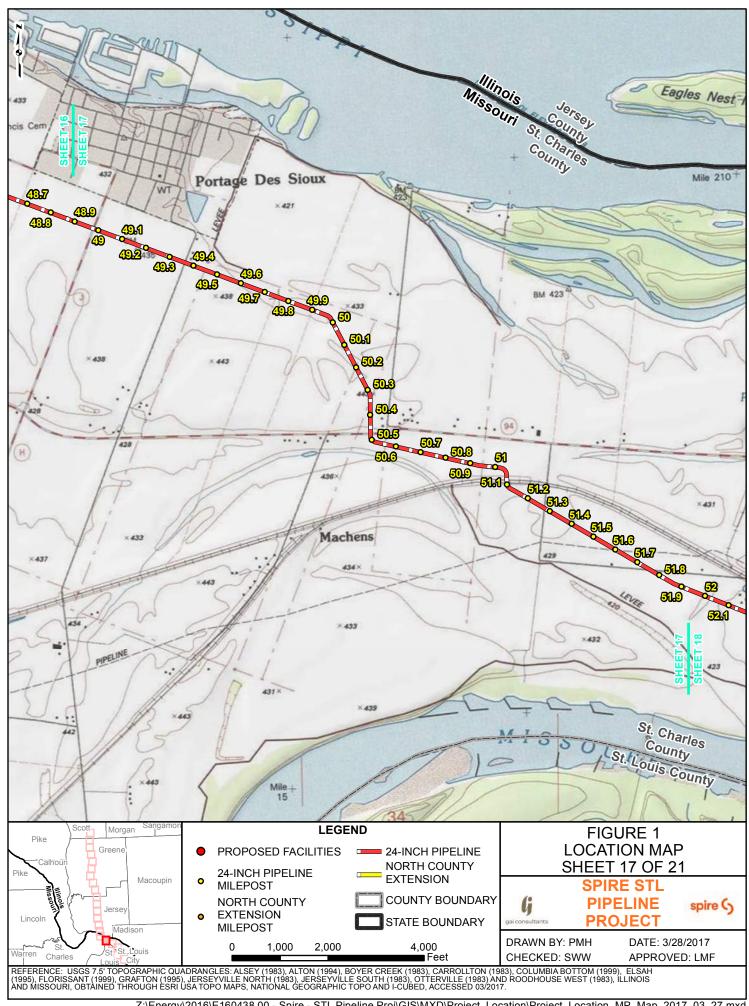


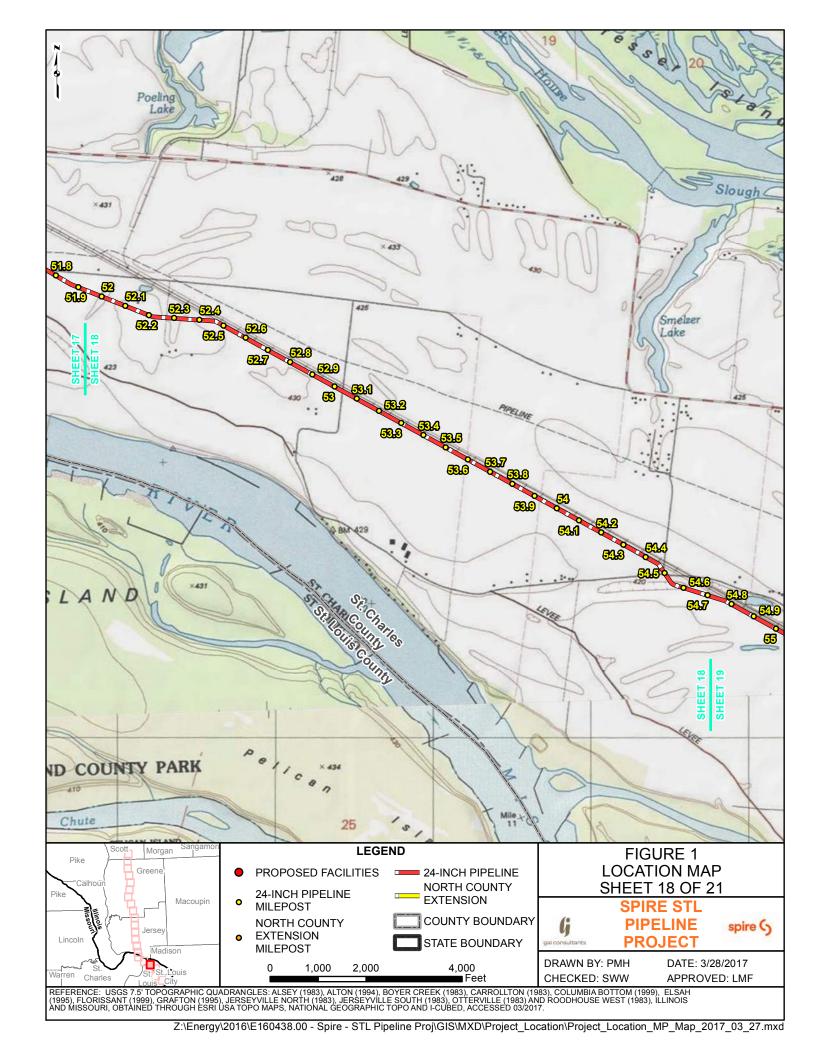


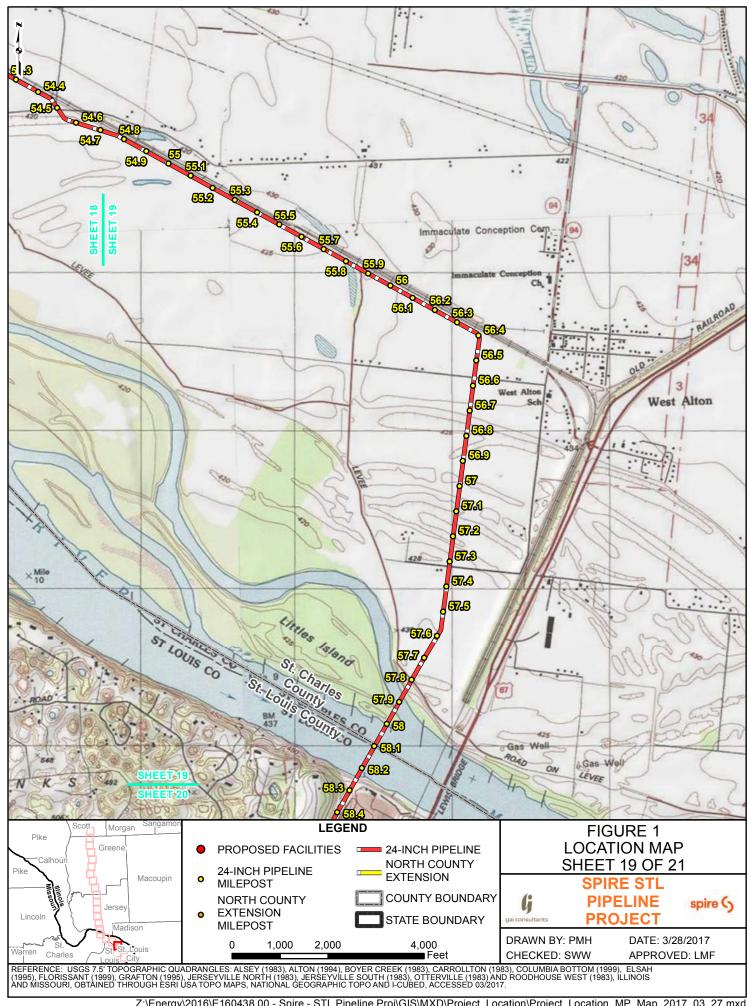


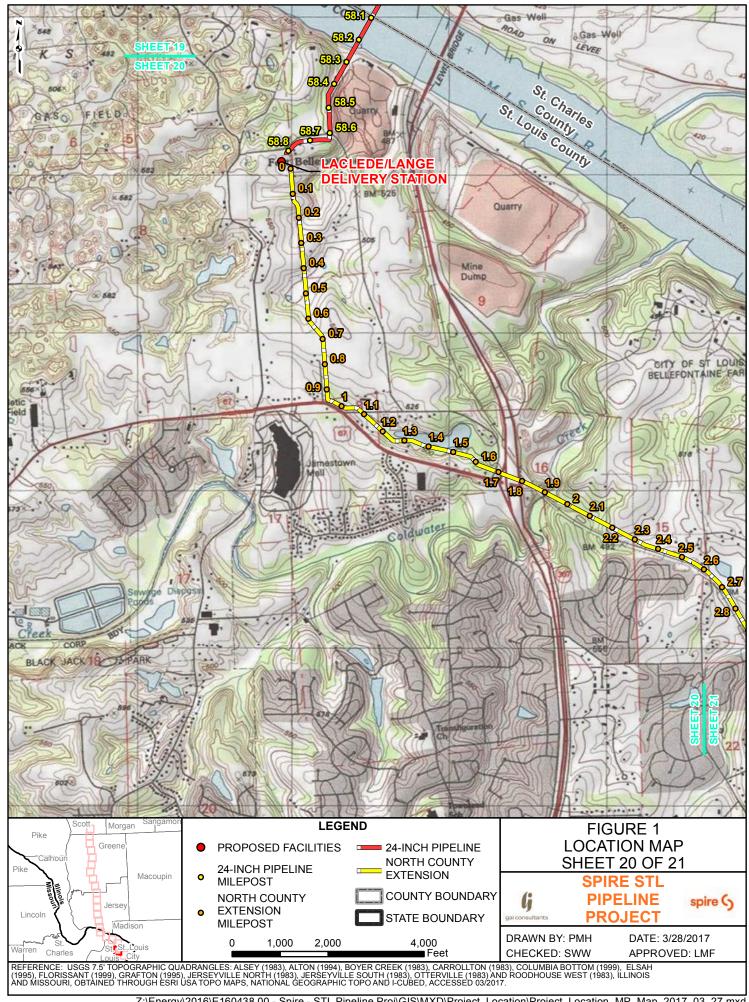


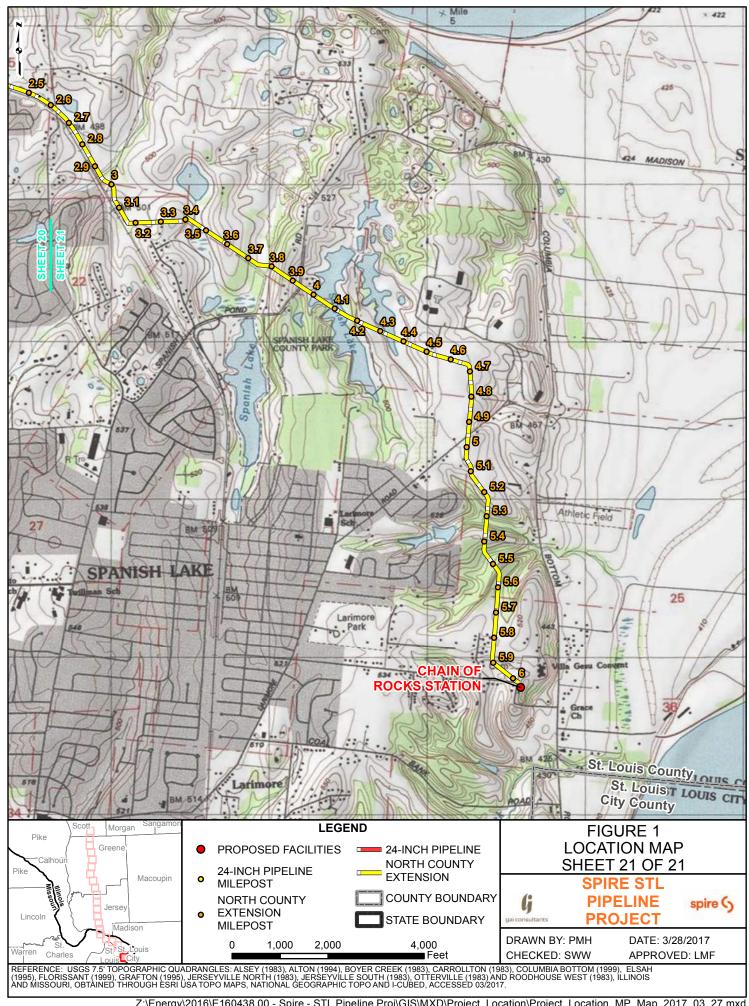














GAI Consultants, Inc.-Chicago Office 2300 Cabot Drive, Suite 395 Lisle, Illinois 60532

March 28, 2017

Mr. Darin LeCrone
Industrial Unit Manager
Illinois Environmental Protection Agency - Bureau of Water
1021 North Grand Avenue East
Springfield, IL 62794-9276

Re: Supplemental Information (Docket No. CP17-40)
Spire STL Pipeline LLC
Spire STL Pipeline Project
Scott, Greene, and Jersey Counties, Illinois
and St. Charles and St. Louis Counties, Missouri

Dear Mr. LeCrone:

In June 2016, Spire Pipeline LLC ("Spire") initiated consultation with your office regarding their intent to construct, own, and operate the proposed Spire STL Pipeline Project ("Project") which consisted of approximately 59 miles of new, greenfield 24-inch-diameter steel pipeline (referred to as the "24-inch pipeline") originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey counties in Illinois before crossing the Mississippi River and extending east into St. Charles County, Missouri, crossing the Missouri River and tying into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). Line 880 consisted of approximately seven miles of existing 20-inch-diameter steel pipeline. As part of the proposed Project, Spire was planning on modifying Line 880 before placing it in to interstate service. The Project also included the construction of minor aboveground metering and regulating ("M&R") stations. On January 26, 2017, Spire filed an application with the Federal Energy Regulatory Commission ("FERC") for a Certificate of Public Convenience and Necessity for the Project (Docket No. CP17-40-000).

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## **Amended Project Description**

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interconnect through the northern portion of St. Louis County and terminate at a new interconnect with Enable MRT and LGC. The total length of the Project pipeline will be approximately 65 miles. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) LGC in Missouri, and (3) Enable MRT and LGC in Missouri.

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On behalf of Spire, we'd like to take this opportunity to invite the Illinois Environmental Protection Agency - Bureau of Water to provide comments regarding the Project as it will be amended. We appreciate your continued involvement and cooperation in the review of this important Project.

If you have any questions or would like additional information, please feel free to contact me at 630.605.5255 or by e-mail at L.Ferry@gaiconsultants.com.

Sincerely,

GAI Consultants, Inc.

for merry

Lori M. Ferry

**Environmental Manager** 

LMF/ka

Attachment: United States Geological Survey (USGS) Topographic Map (Figure 1)

# Ali Trunzo

From: Lori Ferry

**Sent:** Friday, March 03, 2017 4:14 PM

To: Ali Trunzo

**Subject:** FW: Spire STL Pipeline Project

From: Todd Wheaton

Sent: Friday, March 03, 2017 3:13 PM

To: dan.heacock@illinois.gov

Cc: Lori Ferry < L. Ferry@gaiconsultants.com >; Jayme Fuller < J. Fuller@gaiconsultants.com >

Subject: Spire STL Pipeline Project

Good Afternoon Dan,

I wanted to follow up with you regarding a Joint Permit Application that was submitted to your office on January 27, 2017, for the Spire STL Pipeline Project. We wanted to ensure that you received the application, and to inquire as to whether a specific reviewer had been assigned to the project. Could you please let us know who will be handling our review, and if there is any additional information you may need?

Thanks, Todd

## Todd C. Wheaton

Assistant Environmental Technical Leader

3720 Dressler Road NW, Canton, OH 44718 **T** 330.433.2680 **D** 234.203.0765 **M** 330.415.8364

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GAI Consultants provides local expertise to worldwide clients in the energy, transportation, development, government, and industrial markets.

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January 27, 2017 Project E160438.00

Mr. Dan Heacock Illinois Environmental Protection Agency Bureau of Water Division of Water Pollution Control Permit Section #15 Facility Evaluation Unit 1021 North Grand Avenue East Post Office Box 19276 Springfield, IL 62794

Nationwide Permit 12 Joint Permit Application Spire STL Pipeline LLC Spire STL Pipeline Project Scott, Greene, and Jersey Counties, Illinois

Mr. Heacock:

On behalf of Spire STL Pipeline LLC ("Spire"), GAI Consultants, Inc. ("GAI") is submitting a Nationwide Permit 12 Joint Permit Notification for the Spire STL Pipeline Project ("Project"), located in Scott, Greene, and Jersey Counties, Illinois ("IL").

The proposed Spire STL Pipeline Project will consist of approximately 59 miles of new, greenfield, 24-inch diameter steel pipeline (referred to as the "24-inch pipeline" portion of the Project) originating at an interconnection with the Rockies Express Pipeline LLC ("REX") pipeline in Scott County, Illinois; extending down through Greene and Jersey Counties in Illinois before crossing the Mississippi River and extending east in St. Charles County, Missouri. The 24inch pipeline then crosses the Missouri River and ties into an existing pipeline in St. Louis County, Missouri that is currently owned and operated by Laclede Gas Company ("LGC") (referred to as "Line 880"). As part of the proposed Project and subject to LGC's receipt of approval from the Missouri Public Service Commission ("MPSC"), Spire is proposing to purchase Line 880 from LGC and modify the pipeline before placing it into interstate service. Line 880 consists of approximately seven miles of existing 20-inch diameter steel natural gas pipeline located in St. Louis County, Missouri that will connect the 24-inch pipeline part of the Project to the Enable Mississippi River Transmission, LLC ("Enable MRT") pipeline along the western bank of the Mississippi River in St. Louis County, Missouri at the terminus of the Project. The total length of the Project pipelines will be approximately 66 miles. The portion of the 24-inch diameter pipeline located within the State of Illinois is approximately 45 miles long. The overall design capacity of the Project pipeline is expected to be 400,000 dekatherms per day ("Dth/d"). No compression will be required. The Project will also include the construction of three new metering and regulating ("M&R") station interconnects with REX in Illinois and LGC and Enable MRT in Missouri and the construction of a new facility at an existing LGC site along Line 880. This Project, as proposed, falls under the oversight of the Federal Energy Regulatory Comission (FERC). The FERC plan and procedures will be adhered to in respect to aquatic resource crossings and restoration, and have been included as Attachment D.

GAI, on behalf of Spire, is hereby submitting the Project's Nationwide Permit ("NWP") 12 Joint Permit Application. This package has been prepared based on the Project adhering to the general and regional conditions of a NWP-12 and Section 401 Water Quality Certification General and Specific Conditions within the State of Illinois. A full copy of this PCN, including resources specific to the State of Missouri, has been concurrently provided to the United States Army Corps of Engineers ("USACE").

United States Fish and Wildlife Service consultation was initiated on August 29, 2016 and a response was received on December 8, 2016. Correspondence with the Illinois Historic Preservation Agency ("IHPA") was initiated on August 29, 2016. A response from IHPA will be provided once received in the anticipation that this permit application's review can be initiated without those documents in hand. Since a portion of the Project is unavailable for cultural resources investigation access at this time, we are requesting authorization of Single and Complete Projects that

receive this concurrence on a time-staggered basis. Agency correspondence is included as Attachment B in the attached Joint Permit Application.

## Nationwide Permit (NWP) 12 Joint Permit Application

Spire respectfully requests concurrence that the proposed Project can be authorized under Nationwide Permit 12. The construction of the Project has been designed to limit the amount of impacts to streams and wetlands within the Project area that are assumed to be jurisdictional waters of the United States to the greatest extent practicable.

Additionally, Spire is requesting a Section 10 letter of permission from the USACE for the crossings of the Mississippi and Missouri Rivers, which are both classified as Traditionally Navigable Waters ("TNW's"). In order to evaluate the feasibility, design, and constructability of the horizontal directional drill ("HDD") methods of pipeline installation under the Mississippi and Missouri Rivers, several geotechnical soil test borings were collected on land and along the river bottoms. The results of these test borings are outlined in the geotechnical report, included as Attachment C in the attached Joint Permit Application.

Temporary impacts to 60 streams and 32 wetlands will be necessary to construct the pipeline and access roads associated with the Project in the State of Illinois. Impacted streams and wetlands will be crossed using the dry-ditch open-cut method. A dam and flume method of dewatering is installed to create a dry work area, the trenches are dug, the pipeline is placed, and the trench is then refilled and the work area reclaimed. Additionally, temporary crossings of 20 streams and 14 wetlands located within the Project workspace will also be necessary during construction of the Project. Other aquatic resources, including the Mississippi River, will be crossed using the HDD method. This method involves boring a tunnel beneath the aquatic resources through which the pipeline will be pulled and installed. No physical impacts to the aquatic resources are anticipated to occur with this construction method. Detailed information regarding these impacts can be found in Tables 1 and 2 in the attached Joint Permit Application.

Avoiding stream and wetland impacts has been one of the driving factors in designing the proposed Project, and the currently proposed alignment represents an alternative that reduces stream and wetland impacts to the furthest extent practicable, while still meeting the purpose and need of the Project. Spire intends to utilize mitigation banking programs in IL should the District Engineer determine that compensatory mitigation is required for proposed impacts. Further avoidance and minimization includes the placement of timber mats for equipment crossings of streams and wetlands, and the Limit of Disturbance ("LOD") width will be narrowed to a 75-foot width at all resource crossings.

## **Streams and Wetlands**

Fieldwork associated with stream and wetland investigations for the Project was conducted between September and November, 2016. The surveys identified streams and wetlands within a approximately 300-foot wide corridor centered on the proposed pipeline, and a 50-foot wide corridor surrounding the proposed access roads. Field investigations identified 73 wetlands, 158 waterbodies, and 6 ponds within the Project study area. These features are outlined in the Wetland Delineation and Stream Identification Report, included in the attached Joint Permit Application.

## Rare, Threatened, or Endangered Species

Spire initiated consultation regarding the Project with the USFWS in June 2016 and held a meeting with the USFWS Rock Island Field office in July 2016. Prior to the initiation of field surveys, Spire reviewed various sources of available data to determine federally-listed and state-listed or protected species that could potentially inhabit or traverse the Project areas. The USFWS IPaC system was utilized to identify the federally-listed species that could potentially inhabit or traverse the Project area in Scott, Greene, Jersey Counties, Illinois. Spire reviewed this list and the information contained within consultation from the USFWS to determine the species potentially affected from the construction of the Project.

In order to determine state-listed species which have the potential to occur with the Project areas, Spire initiated consultation with the IDNR in June 2016. Spire performed a 0.5-mile Project review search through the IDNR's EcoCAT. No Illinois state rare, threatened, or endangered species were present on the EcoCAT search receipt for Scott and Greene Counties. Since a large search buffer was surveyed in EcoCAT, multiple areas of concern are present on the search receipt that do not occur within the Project area. Spire is coordinating with the IDNR regarding results of the EcoCAT for Jersey County.

Agency permits and approvals associated with the project have been provided in Section 3, Table 3 of the attached Joint Permit Application.

### **Cultural Resources**

Background research was completed on the APE for the Project to gather information from previous cultural resource investigations and on known archaeological sites and historic architectural properties. Background research was acquired through an inventory search at the IHPA and MO SHPO offices. Additional online inventories were accessed by the use of the Inventory of Illinois Archaeological Sites Flex Archaeology Viewer, Illinois CRM Report Archive Database, and MO SHPO's Historic Districts and Sites viewer and Archaeology Viewer.

Eight previously identified archaeological sites extend into the defined APE. No historic or architectural resources are located within the Project's direct APE. Four of these archaeological resources are located in Greene and Scott Counties, Illinois, while the remaining four resources are within St. Charles and St. Louis Counties, Missouri. One of these archaeological sites has been recommended for Phase II archaeological testing, three have been previously determined as Not Eligible for listing in the NRHP, portions of one site were previously recommended not eligible, one site is recorded as being destroyed, and the remaining two sites have not been evaluated for NRHP eligibility. GAI conducted Phase I archaeological studies at each of these eight previously recorded site locations. Two small clusters of artifacts were identified along one site (GE00018). The remaining seven previously recorded sites were unidentified during Phase I survey.

Site GE00307 is situated on a terrace in a cultivated field. A portion of the site is crossed by a proposed access road for the current project. This site was identified in 1995 during a survey by the Center for American Archeology for a proposed four lane highway. The site is a small artifact scatter of lithic flakes and one prehistoric ceramic, dating the site from the Late Woodland. Site GE00307 was previously recommended for Phase II archaeological testing. However, since no artifacts were encountered during the current survey, no additional study is recommended.

Three previously recorded archaeological sites (GE00018, ST00499, and ST00500) in Illinois were determined to be Not Eligible for listing the NRHP. All but one of these resources (GE00018) were identified as a result of previous archaeological surveys. All three sites have an unknown prehistoric temporal affiliation.

Site SC1057 was identified in Missouri during a Phase I survey for the Keystone Pipeline Project in 2016. The portions of the site located within the study corridor of the Keystone Pipeline Project were determined to be Not Eligible for listing in the NRHP. This recorded site boundaries will be avoided by the Project construction right-of-way (ROW).

Site SC5 in Missouri is a Sioux Indian trail that is recorded as being destroyed. Systematic Phase I archaeological studies did not find evidence of an existing trail in the recorded location. This area is currently an active agricultural field.

The remaining two previously recorded archaeological sites (SL157 and SL158) are located in Missouri and remain unevaluated for NRHP eligibility.

Three historic districts are located within a 1-mile radius of the proposed Project. The Principia College Historic District is a National Historic Landmark and is situated approximately 0.8-mile from the APE. The Elsah Historic District is listed in the NRHP and is situated approximately 0.16-mile from the APE. The Chautauqua Historic District is also listed in the NRHP and located approximately 0.4-mile from the APE.

#### Closing

Spire and GAI thank you in advance for your review of this NWP-12 Joint Permit Application package. Please feel free to contact me at 614-499-6258, or at j.fuller@gaiconsultants.com if there are any questions or concerns.

Sincerely,

**GAI Consultants, Inc.** 

Jayme Fuller Environmental Manager

Attachments: Nationwide Permit 12 Joint Permit Application