Fact Sheet for Antidegradation Assessment
Enbridge Energy, LLP – Unnamed Wetlands and Various Streams – Will and Cook Counties
IEPA Log # C-0143-14
COE # 2013-226
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Enbridge Energy, LLP ("Applicant") has applied for Section 401 water quality certification for temporary impacts of approximately 25.5 acres of jurisdictional wetlands, 1.98 acres of permanently converted wetlands, and 0.70 acres of temporary stream impacts within the designated project area. The proposed project will construct approximately 79.6 miles of a new crude oil, 36" diameter pipeline starting at Enbridge's Flanagan Terminal near Pontiac, Illinois and terminating at its Griffith Terminal near Griffith, Indiana. The new pipeline (Line 78) will parallel the existing Enbridge Line 62 from its origin in Flanagan through Livingston, Grundy, Kankakee, and Will Counties to approximately milepost (MP) 56.7, except for a few minor deviations to avoid residences or other buildings near the existing line. Line 78 will deviate away from the Line 62 at the listed mileposts in Will and Cook Counties, Illinois and Lake County, Indiana to avoid the following:

- MP 56.7 to 62.3 - the exclusion zone of the planned South Suburban Airport
- MP 62.5 to 63.9 – residential area
- MP 64.8 to 68.0 – residential areas and race tracks
- MP 68.4 to 79.8 –residential and commercial congested areas

The majority of the last segment from MP 68.4 will be placed within the ComEd Powerline and Norfolk Southern Railroad ROW. The following table (provided by Applicant) lists the township, range, and sections to be crossed in Will and Cook Counties in Illinois.

Table 1: Sections crossed in Will and Cook Counties, Illinois

County	Township/Range	Sections
Will	32N, 10E	24, 25, 26, 33, 34, 35
	33N, 11E	36
	33N, 12E	13, 14, 21, 22, 23, 28, 29, 31, 32
	33N, 13E	4, 5, 7, 8, 18
	34N, 13E	25, 26, 27, 33, 34
	34N, 14E	2, 11, 14, 15, 16, 20, 21, 29, 30
Cook	35N, 14E	23, 24, 25, 26, 35
	35N, 15E	20, 29, 30

The purpose of this project is to expand Enbridge's capacity to transport supplies of light and heavy crude oil, produced in the Williston Basin region in North Dakota and western Canada, to the greater Chicago area. Supplies have exceeded the capacity of Line 62 to supply crude oil to the Enbridge Griffith Terminals near Griffith, Indiana and the Enbridge Hartsdale Terminal near Schererville, Indiana where crude oil is stored for future transportation to regional refineries. This will allow the regional refineries more opportunities to process U.S. and western Canadian crude oil and reduce the reliance on supplies imported from outside of North America. No mitigation is scheduled for the temporarily impacted wetlands and streams. Approximately 1.98 PFO and PSS wetland acres will be permanently converted to PEM wetlands. The impacts to these wetlands will be mitigated with the purchase of 6.41 acres of wetland credit from the Sauk Mitigation Bank in Cook County.

Identification and Characterization of the Affected Water Body.

The Kankakee River (IL_F-04), a direct tributary to the Illinois River (IL_D-10), is a General Use Water with an estimated 470 cfs 7Q10 flow at this location. According to the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List, the Kankakee River has been assessed by Illinois EPA and is listed as fully supporting for Aquatic Life and Aesthetic Quality uses. Fish consumption use is listed as impaired and the causes for impairment are given as Mercury and Polychlorinated biphenyls. Primary Contact Recreational and Secondary Contact uses have not been assessed. The Kankakee River is listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* and it is given an integrity rating of "B" in that document. The Kankakee River is designated as an enhanced water pursuant to the dissolved oxygen water quality standard.

North Branch Rock Creek (IL_FF-01), a direct tributary to the Kankakee River (IL_F-04), is a General Use Water with an estimated zero cfs 7Q10 flow at this location. According to the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List, North Branch Rock Creek has been assessed by Illinois EPA and is listed as fully supporting for Aquatic Life and Aesthetic Quality uses. Fish Consumption, Primary Contact Recreational, and Secondary Contact uses have not been assessed. North Branch Rock Creek is not listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* nor is it given an integrity rating in that document. North Branch Rock Creek is not designated as an enhanced water pursuant to the dissolved oxygen water quality standard.

Black Walnut Creek (IL_FFBA), a direct tributary to South Branch Rock Creek (IL_FFB-01), is a General Use Water with an estimated zero cfs 7Q10 flow at this location. According to the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List, Black Walnut Creek has been assessed by Illinois EPA and is listed as fully supporting for Aesthetic Quality use. Aquatic Life use is listed as impaired and the causes for impairment are given as Alteration in stream-side or littoral vegetative covers, Changes in Stream Depth or Velocity Patterns, Other flow regime alterations (non-pollutants), Chlorine, and Phosphorus (Total). Fish Consumption, Primary Contact Recreational, and Secondary Contact uses have not been assessed. Black Walnut Creek is not listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System*; it is given an integrity rating of "C" in that document. Black Walnut Creek is not designated as an enhanced water pursuant to the dissolved oxygen water quality standard.

Terry Creek (IL_FD), a direct tributary to the Kankakee River (IL_F-04), is a General Use Water with an estimated zero cfs 7Q10 flow at this location. According to the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List, Terry Creek has not been assessed by Illinois EPA. Terry Creek is not listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* nor is it given an integrity rating in that document. Terry Creek is not designated as an enhanced water pursuant to the dissolved oxygen water quality standard.

The other unnamed tributaries listed in Table 2A (information supplied by Applicant; Table F-2) are General Use streams with zero cfs 7Q10 flow. The streams are not listed as biologically significant streams in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in*

a Biological Stream Rating System, nor have they been given an integrity rating in that document. The streams have not been assessed by the Agency and are not listed on the draft 2014 Illinois Integrated Water Quality Report and Section 303(d) List. The streams are not designated as enhanced waters pursuant to the dissolved oxygen water quality standard.

The unnamed tributaries listed in Table 2B (information supplied by Applicant; Table F-2) are likely to be a 7Q1.1 zero flow streams, according to the Illinois State Water Survey. In this region of Illinois, 7Q1.1 zero flow streams are streams with a watershed area of 1 square miles or less. These streams will exhibit no flow for at least a continuous seven day period nine out of ten years. Aquatic life communities in these headwater streams are tolerant of the effects of drying. Depending on the rainfall received before biological surveys, either a very limited aquatic life community, or no community at all would be found. Given this flow regime, no additional biological characterization is required.

Table 2A Streams Crossed or Affected watershed area greater than 1 square mile

MP	Identifier	Waterbody Name 1, 2	County	Flow	Crossing Length (ft) [4] / Width (ft) [5]	Crossing Method	Construction Impacts (ac)[6]	Drainage Area Upstream of Crossing(ac) [7]	Comments
39.43	s-36.5	UT Rayns Creek	Will	Intermittent	195/2	Open Cut	0.01	758.4	
72.98	S-CO-A109	UT Deer Creek	Cook	Perennial	67/15	HDD	0.02	930.3	Pipeline will be installed by HDD; stream is located in the construction ROW.
48.57	s-27.4	UT Rock Creek	Will	Perennial	132/8	Open Cut	0.02	941.7	
71.67	S-CO-A107	UT Deer Creek	Cook	Ephemeral	0/4	HDD	0.00	964.9	HDD - No impact; a new 10-foot wide permanent easement will be maintained after construction.
57.48	S-WI-A108	UT Rock Creek	Will	Perennial	111/4	Open Cut	0.01	1013.0	
61.97	S-WI-A109	Black Walnut Creek	Will	Perennial	95/20	Open Cut	0.04	1461.7	Construction ROW is reduced to 95 feet.
74.83	S-CO-A103a	UT North Creek	Cook	Perennial	115/20	HDD	0.05	3361.9	Pipeline will be installed by HDD; stream is located in the construction ROW.
35.52	s-40.3	Terry Creek	Will	Perennial	110/20	Open Cut	0.05	5346.3	
52.29	s-23.8	North Branch Rock Creek	Will	Perennial	0/20	HDD	0.00	9846.5	HDD - No impact; a new 50-foot wide permanent easement will be maintained after construction.
37.84	s-38.1	Kankakee River	Will	Perennial	0/750	HDD	0.00	32050.0	HDD - No impact; 10-foot wide easement will be located within existing Line 62 ROW.

1 Based on USGS topographic maps. "UT" is unnamed tributary.
2 Based on USGS topographic maps, historic aerial photography, and field evaluation.
3 Based on Illnois 2012 303(d) Waters Listing and Indiana 2010 303(d) Waters Listing.
4 Typical construction ROW width at open cut crossings is 110'; stream lengths greater than 110' are due to non-perpendicular crossings.
5 Crossing width is defined as the distance between the Ordinary High Water Marks.
6 Horizontal Direction Hill (HDD) crossing method will place pipeline under waterbody. Some stream sections may be located in HDD
7 Drainage basin calculations are approximate and are based on USGS topographic maps and use 12 HUC sub-wastershed boundaries to individual stream

Table 2B Streams Crossed or Affected watershed area 1 square mile or less

MP	Identifier	Waterbody Name 1, 2	County	Flow	Crossing Length (ft) [4] / Width (ft) [5]	Crossing Method	Construction Impacts (ac)[6]	Drainage Area Upstream of Crossing(ac) [7]	Comments
54.47	SP-WI-A102	Stormwater Pond	Will	Pond	0/0	n/a	0.00	0.0	Portion of pond would be located within the 110-foot wide permanent easement.
56.41	s-19.8	UT Black Walnut Creek	Will	Ephemeral	136/5	Open Cut	0.02	45.6	
74.80	S-CO-A103	UT North Creek	Cook	Perennial	960/20	n/a	0.44	67.5	Not crossed by alignment; stream is located in construction ROW.
66.51	S-WI-A101	UT Deer Lake	Will	Ephemeral	85/1	Open Cut	0.00	124.2	
66.52	S-WI-A101	UT Deer Lake	Will	Ephemeral	85/1	Open Cut	0.00	124.2	
68.51	s-10.0	UT Plum Creek	Will	Intermittent	28/4	Open Cut	0.00	149.3	
63.33	S-WI-A102	UT Plum Creek	Will	Perennial	86/3	Open Cut	0.01	167.9	
66.68	S-WI-A101	UT Deer Lake	Will	Ephemeral	113/1	Open Cut	0.00	283.7	
70.68	S-WI-A107	UT Deer Creek	Will	Ephemeral	80/5	Open Cut	0.01	315.9	
71.22	S-CO-A107	UT Deer Creek	Cook	Ephemeral	117/4	Open Cut	0.01	413.4	Stream is located in HDD workspace
71.46	S-CO-A107	UT Deer Creek	Cook	Ephemeral	0/4	HDD	0.00	487.7	HDD - No impact; a new 10-foot wide permanent easement will be maintained after construction.
71.52	S-CO-A107	UT Deer Creek	Cook	Ephemeral	0/4	HDD	0.00	528.3	HDD - No impact; a new 10-foot wide permanent easement will be maintained after construction.
71.67	S-CO-A107	UT Deer Creek	Cook	Ephemeral	0/4	HDD	0.00	570.3	HDD - No impact; a new 10-foot wide permanent easement will be maintained after construction.

1 Based on USGS topographic maps. "UT" is unnamed tributary.
2 Based on USGS topographic maps, historic aerial photography, and field evaluation.
3 Based on Illnois 2012 303(d) Waters Listing and Indiana 2010 303(d) Waters Listing.
4 Typical construction ROW width at open cut crossings is 110'; stream lengths greater than 110' are due to non-perpendicular crossings.
5 Crossing width is defined as the distance between the Ordinary High Water Marks.
6 Horizontal Direction Hill (HDD) crossing method will place pipeline under waterbody. Some stream sections may be located in HDD
7 Drainage basin calculations are approximate and are based on USGS topographic maps and use 12 HUC sub-wastershed boundaries to individual stream

Table 3: Wetlands Affected

MP	Wetland Identifier	County	PEM Farmed	Temporary Construction[1] PEM	PFO	PSS	Total	Permanent Conversion[1] PFO	PSS	Total
37.68	W-38.2[2]	Will	No	0.007			0.007			0.000
37.83	W-38.1[2]	Will	No	0.007			0.007			0.000
39.16	W-WI-A102	Will	Farmed	0.502			0.502			0.000
47.94	W-28.0	Will	No	0.018			0.018			0.000
48.31	W-WI-A129	Will	Farmed	0.193			0.193			0.000
51.85	W-24.3	Will	Farmed	0.072			0.072			0.000
52.14	W-WI-A127[2]	Will	Farmed	0.000			0.000			0.000
53.77	W-WI-A138	Will	Farmed	0.139			0.139			0.000
54.10	W-WI-A132	Will	Farmed	0.154			0.154			0.000
54.15	W-21-9	Will	Farmed	0.244			0.244			0.000
54.19	W-21.9	Will	No	0.037			0.037			0.000
54.43	W-WI-A131[2]	Will	No	0.029			0.029			0.000
54.48	W-WI-A137[2]	Will	No	0.540			0.054			0.000
56.36	W-19.68	Will	Farmed	0.048			0.048			0.000
56.40	W-19.66	Will	No			0.248	0.248		0.117	0.117
56.57	W-19.5	Will	No	0.025			0.025			0.000
56.69	W-WI-A139	Will	No	0.071			0.071			0.000
57.12	W-WI-A133	Will	No	0.332			0.332			0.000
58.17	W-WI-A140	Will	Partial	0.069			0.069			0.000
58.62	W-WI-A141	Will	No	0.052	0.142		0.194	0.081		0.081
59.98	W-WI-A112	Will	Farmed	0.129			0.129			0.000
63.30	W-WI-A104	Will	Partial	0.215	0.163		0.378	0.099		0.099
64.22	W-WI-A106	Will	Farmed	0.011			0.011			0.000
64.35	W-WI-A114	Will	Farmed	0.301			0.301			0.000
64.90	W-WI-A101	Will	No	0.170			0.170			0.000
65.27	W-WI-A142	Will	No	0.161			0.161			0.000
65.32	W-WI-A108	Will	No	0.065			0.065			0.000
65.38	W-WI-A107	Will	No	0.001	0.328		0.329	0.207		0.207
65.62	W-WI-A109	Will	Partial	0.073	0.251		0.324	0.187		0.187
66.50	W-WI-A110	Will	No		0.688		0.688	0.142		0.142
66.92	W-WI-A111	Will	No		0.929	0.204	1.133	0.593	0.018	0.611
67.39	W-WI-A113	Will	No	0.406			0.406			0.000
68.83	W-WI-A123	Will	Farmed	0.023			0.023			0.000
68.88	W-WI-A124	Will	Farmed	0.463			0.463			0.000
69.28	W-WI-A126	Will	Farmed	0.124			0.124			0.000
70.32	W-WI-A121	Will	No	0.212		0.963	1.175		0.135	0.135
70.58	W-WI-A120	Will	No	0.018			0.018			0.000
70.70	W-WI-A119	Will	No	0.157	0.116	0.344	0.617	0.016	0.051	0.067
70.87	W-CO-A110	Cook	No	0.178			0.178			0.000
71.12	W-CO-A111	Cook	No	0.550	1.386	0.082	2.018	0.233	0.109	0.342
72.97	W-CO-A112	Cook	No	0.047			0.047			0.000
72.97	W-CO-A112a	Cook	No	0.134			0.134			0.000
73.03	W-CO-A112b	Cook	No	0.012			0.012			0.000
73.05	W-CO-A112c	Cook	No	0.099			0.099			0.000
73.15	W-CO-A112e	Cook	No	5.559			5.559			0.000
73.22	W-CO-A112d	Cook	No	3.049			3.049			0.000
73.99	W-CO-A112f	Cook	No	0.124			0.124			0.000
74.34	W-CO-A103a	Cook	No	0.414			0.414			0.000
74.52	W-CO-A103	Cook	No			2.321	2.321			0.000
75.11	W-CO-A103c	Cook	No			0.748	0.748			0.000
75.11	W-CO-A103d	Cook	No	0.069			0.069			0.000
75.26	W-CO-A103e	Cook	No	0.111			0.111			0.000
75.38	W-CO-A103f	Cook	No			0.857	0.857			0.000
75.56	W-CO-A113	Cook	No	0.312			0.312			0.000
			Total	**15.743**	**4.003**	**5.767**	**25.513**	**1.558**	**0.43**	**1.988**

URS Corporation and TRC Environmental Corporation conducted wetland surveys along a 300 foot corridor of Line 62 and the proposed Line 78. A total of 64 wetlands were identified within the survey corridor, totaling approximately 103 acres. Most of the wetland communities evaluated were considered to be farmed poor quality emergent wetlands with FQIs less than 5. Table 3 (information supplied by Applicant; Table F-1) identifies 54 sites to be temporarily impacted by the construction of Line 78. Temporary impacts will affect 15.7 acres of PEM (emergent), 4 acres of PFO (forested), and 5.8 acres of PSS (Scrub-shrub) wetlands. The Applicant proposes mitigation for the conversion of 1.98 acres of PFO and PSS wetlands (1.55 and 0.43 acres, respectively) to PEM wetlands. Conversion of these wetlands is unavoidable and will be mitigated at a rate of 4.5:1 in the Mississippi River watershed and 3.0:1 in the Lake Michigan watershed (Table 4; information supplied by Applicant; Table 3-3). A total of 6.41 acres of wetland credit will be obtained from the Sauk Mitigation Bank in Cook County.

Table 4: Wetland Mitigation for Permanent Impacts

Watershed	Wetland Type	Acres Impacted	Proposed Ratio	Total Mitigation
Mississippi	PFO	0.18	4.5:1	0.81
River	PSS	0.117	4.5:1	0.527
Lake	PFO	1.378	3.0:1	4.134
Michigan	PSS	0.313	3.0:1	0.939
			Total	**6.41**

Identification of Proposed Pollutant Load Increases or Potential Impacts on Uses.

The pollutant load increases that would occur during this project include possible increases in suspended solids. The Applicant will follow its Environmental Protection Plan (EPP) to minimize the temporary impacts. Erosion control devices (ECD) will include sediment barriers (silt fence, straw bales, biologs, etc.) stormwater diversions, trench breakers, sand bags, or other appropriate materials. Erosion control blankets, mulch, and horizontal slope grading will be implemented on slopes greater than 5%. During final grading, slopes greater than 3% will be stabilized with permanent berms constructed of compacted earth. All disturbed areas will be seeded or sodded after construction activities in the area have concluded. No adverse effects are expected to the streams or wetlands due to the pollutant load increase.

Aquatic life uses in the portion of the streams that will be disturbed during construction may be negatively impacted, but in time, they will recover and support approximately the same community structure now found in the existing channel. The Open Cut crossing method will be utilized on most streams with a watershed area of less than 1.5 miles^2, with the exception of Terry Creek. The in-stream crossings will occur during low-flow conditions. Aquatic life communities in these streams are tolerant of the effects of drying; therefore impacts to aquatic communities should be negligible. While the drainage area upstream of the Terry Creek crossing is listed as ~8.5 miles^2 in the Applicant's Table F-2, according to the USGS Illinois Streamstats basin characteristics program that figure reflects the watershed area of the entire stream and not the watershed upstream of the proposed crossing, which

would be approximately 3.5 miles^2. The impacts to the aquatic communities in Terry Creek should also be negligible due to the smaller watershed area.

To further avoid impacts to larger streams, the Applicant will utilize Horizontal Directional Drilling (HDD). This method of installing the pipe underneath the stream involves:

- Small diameter pilot hole drilled along a prescribed profile
- Barrel reams to enlarge the pilot hole
- Drilling mud to remove cuttings and maintain the integrity of the hole
- Drilling rig used to pull the pipe section through the hole
- Welding of pipe to the adjoining sections of pipe on each side of the stream

Drilling mud will be stored away from the waterbody in a tank or earthen berm sediment control structure to prevent flow into the waterbody, wetland, or off of the approved workspace. Any excess drilling mud will be removed from the site to a licensed disposal facility.

Fate and Effect of Parameters Proposed for Increased Loading.

The increase in suspended solids will be local and temporary. The Applicant's EPP provides several measures that will be utilized to minimize any increase in these disturbances and prevent further impacts to the streams and the wetlands. A few of these measures include:

- Temporary and permanent erosion and sediment controls
- Soil compaction treatment
- Topsoil segregation
- Wet weather shutdown
- Rough and final grading
- Temporary and permanent revegetation

The Applicant will purchase 6.41 acres of wetland credit from the Sauk Mitigation Bank in Cook County, the result of 4.5:1 mitigation ratio in the Mississippi River watershed and 3.0:1 mitigation ratio in the Lake Michigan watershed (Table 4).

Purpose and Social & Economic Benefits of the Proposed Activity.

The proposed pipeline project will replace the Applicant's Line 62 pipeline. The existing pipeline has become unable to meet the transportation demand to supply crude oil to the Enbridge's Griffith Terminals and Hartsdale Terminal where crude oil is stored for future transportation to regional refineries. The Applicant has an extensive and expanding network of pipelines east of the proposed Line 78 which connect to refineries in the Midwest, Pennsylvania, and eastern Canada. According to the Applicant, energy demand in the U.S. is forecast to grow for decades due to population growth and expanding economic activities. Expansion of the pipeline will allow regional refineries more opportunities to process U.S. and western Canadian crude oil and reduce reliance on imported oil.

Assessments of Alternatives for Less Increase in Loading or Minimal Environmental Degradation.

The Applicant completed both system and route alternative analyses for the pipeline expansion project. System alternatives were reviewed to determine if modifications made to the existing Line 62 would meet market needs, provide future expandability, and be economically viable. It was determined that modification to the existing pipeline would be infeasible considering Line 62's hydraulics and design capacity had been previously optimized with the addition of pump stations over the last several years and is already expanded to its optimal average capacity. Modification would also require alternative methods of crude deliveries during construction which were not feasible.

Route alternative analyses were conducted using the following criteria to minimize land disturbance and achieve the project purpose:

- Co-location - Maximize use of existing Line 62 ROW
- Avoid residential, commercial, or other developed areas
- Minimize overall pipeline length, avoid or minimize the length of public land crossings
- Avoid disturbance to protected species habitat and significant cultural resource areas
- Minimize crossings of streams and jurisdictional wetlands and clearing of forested areas
- Avoid areas of known contamination, such as landfills, or known petroleum or chemical spill sites

All route alternatives place Line 78 along the Line 62 ROW from MP 0.16 in Livingston County to approximately MP 68.4, except for the exceptions listed earlier in this report. From MP 68.4, five route alternatives (Table 5) were analyzed to avoid residential and commercial areas extensively developed since Line 62 was installed.

Table 5: Route Alternatives for Line 78 from MP 68.4

Alternative	Routing	Reasons Eliminated
1	Does not use the ComEd powerline ROW; utilizes 4.9 miles of new ROW west of Calumet Highway to Norfolk Southern ROW	Residential and commercial congestion along several segments of route and does not utilize ComEd ROW
2	Route would follow the existing Line 62 and utilize the Norfolk Southern Railroad ROW to Griffith Terminal	Residential and commercial congestion exists along most of this alternative's projected path
3	Uses the existing Vector pipeline ROW, follows railroad ROW to rejoin Line 62 at Alexander/Lincolnwood Road, then follow Norfolk Southern Railroad ROW to Griffith Terminal	This route is additional 3 miles in length and does not avoid the residential and commercial development along Alexander/Lincolnwood Road
4	Uses the existing Vector pipeline ROW, continues further east to avoid Alexander/Lincolnwood Road, then follows Norfolk Southern Railroad ROW to Griffith Terminal	Avoids residential and commercial congestion but would require an additional 10.5 miles of pipeline, was rejected due to costs associated with the additional pipeline

Alternative	Routing	Reasons Preferred
Preferred	From MP 68.4 the preferred Route turns north and continues within the ComEd powerline ROW then on new ROW for approximately 1 mile to the Norfolk Southern Railroad ROW to the Griffith Terminal	Maximizes existing ROW by utilizing both ComEd Powerline ROW and Norfolk Southern Railroad ROW; limits additional environmental impacts and associated costs of additional pipeline miles

Conclusion:

The construction of the proposed project will follow conditions set forth by the Agency and USACE. The completion of the pipeline project is the most cost effective, viable means for replacing the existing Line 62 pipeline. The preferred routing of the pipeline maximizes the existing ROW of Line 62, along with the ComEd Powerline and Norfolk Southern Railroad ROWs. The Applicant has a comprehensive EPP that includes temporary and permanent erosion and sediment control plans, revegetation plans, and additional measures that will be implemented pre- and post-construction to reduce the pollution load. HDD will be utilized on larger streams to avoid impacts to aquatic communities and the majority of wetlands will maintain their pre-construction classification. The PFO and PSS wetland acres converted to PEM wetlands will be mitigated through wetland credit (6.41 acres) purchased from the Sauk Mitigation Bank in Cook County.

Summary Comments of the Illinois Department of Natural Resources, Regional Planning Commissions, Zoning Boards or Other Entities

An Eco-CAT endangered species consultation submitted on March 27, 2013 to the Illinois Department of Natural Resources resulted in the identification of threatened or endangered species residing in the area of the proposed pipeline. IDNR has evaluated the EcoCAT information and concluded that adverse effects to endangered species are unlikely and terminated consultation for IDNR Project #1407060 on December 24, 2013. The EcoCAT termination consultation letter was revised on April 30, 2014 to add Cook County (errantly omitted from the original termination letter).

Agency Conclusion.

This preliminary assessment was conducted pursuant to the Illinois Pollution Control Board regulation for Antidegradation found at 35 Ill. Adm. Code 302.105 (antidegradation standard) and was based on the information available to the Agency at the time the draft 401 Water Quality Certification was written. We tentatively find that the proposed activity will result in the attainment of water quality standards; that all technically and economically reasonable measures to avoid or minimize the extent of the proposed increase in pollutant loading have been incorporated into the proposed activity; and that this activity will benefit the Midwest and the country by provided additional crude oil to regional refineries and in turn, reducing the country's dependence on imported crude oil. Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.