Illinois Environmental Protection Agency

Bureau of Water, Permit Section

(IEPA)

1021 North Grand Avenue East, Post Office Box 19276, Springfield, Illinois 62794-9276, 217/782-3362

The IEPA has issued a Public Notice of a request for a Clean Water Act Section 401 water quality certification that would allow the issuance of a federal permit for the discharge of pollutants to waters of the State.

Public Notice Beginning Date:	**Public Notice Ending Date:**
Thursday, May 22, 2025	Wednesday, June 11, 2025

Agency Log No.: C-0214-24

Federal Permit Information: Federal permit/license no. LRC-2024-0299 is under the jurisdiction of Chicago District, Regulatory Branch U.S. Army Corps of Engineers

Name and Address of Discharger: ANR Pipeline Company (ANR), Melissa Dettling - 700 Louisiana St, Houston, TX 77002-2700

Discharge Location: In Section 22 of Township 45-North and Range 6-East of the East 3rd Principal Meridian in McHenry County. Additional project location information includes the following: Kendall, Kane, and McHenry Counties, Hartland, IL 60098

Name of Receiving Water: Unnamed tributaries of SE Branch of Kishwaukee River, Kishwaukee River, S. Branch Kishwaukee River-E, Little Rock Creek, Burlington Creek. Franklinville, Hampshire, Eakin, Welch, Harmony Creeks, and Eakin Creek West. Union Ditch 3 Virgil Ditch 1 and 2.

Project Name/Description: Heartland Project - proposed project includes the construction of approximately 70.4 miles of new loop pipeline at four distinct locations and the replacement and upsizing of approximately 1.5 miles of existing pipeline within Illinois and Wisconsin. The project also includes the construction of three new compressor stations, the modification of one existing compressor station, the construction of two new meter stations, the modification of three existing meter stations, and the construction or modification of associated appurtenant facilities

Construction Schedule: Immediate (Planned project duration is approximately 486 days)

The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice. Interested persons are invited to submit written comments on the project to the IEPA at the above address. Commenters must provide their name and address along with comments on the certification request. The IEPA Log number must appear on each comment page. Commenters may include a request for public hearing. Only hearing requests and comments that pertain to Clean Water Act Section 401 authority will be considered. This authority provides consideration of whether the permit or license would be consistent with Sections 301, 302, 303, 306, or 307 of the CWA, as well as "any other appropriate requirement of State [or tribal] law". Requests for additional comment period must provide a demonstration of need. The final day of comment acceptance will be on the Public Notice Ending date shown above, unless the IEPA grants an extended notice period. The attached Fact Sheet provides a detailed description of the project and the findings of the IEPA's antidegradation assessment.

If written comments or requests indicate a significant degree of public interest in the certification application, the IEPA may, at its discretion, hold a public hearing. Public notice will be given 30 days before any public hearing. If a Section 401 water quality certification is issued, response to relevant comments will be provided at the time of the certification. For further information, please see the contact information below.

Name: Oyetunde Tinuoye Email: Oyetunde.Tinuoye@illinois.gov Phone: 217/782-3362

Post Document. No. C-0214-24-05222025-PublicNoticeAndFactSheet.pdf

401 Water Quality Certification Fact Sheet for ANR Pipeline/Wisconsin Reliability Project

IEPA Log No. C-0214-24

Contact: Angie Sutton 217-782-9864

ANR Pipeline Company (ANR) ("Applicant") has applied for a 401 Water Quality Certification for impacts associated with installation of approximately 70.4 miles of new loop pipeline at four locations, replacing and upsizing approximately 1.5 miles of existing pipeline and the construction of various associated facilities. The overall project is located within both Illinois and Wisconsin and will involve the following work in Illinois:

- **Pipeline facilities**
  - Segment PL1 - Installation of approximately 49.4 miles of 36-inch diameter pipeline loop next to ANR's existing Line 301 in Kendall, Kane, and McHenry counties.
  - Segment PL2 - Installation of approximately 11.4 miles of 42-inch diameter pipeline loop next to ANR's existing Line 100 in Kendall County.
  - Associated, minor above-ground appurtenance facilities:
    - The installation of a new launcher/receiver (LR) at the existing Sandwich Compressor Station (CS), along Segment PL-1 near Milepost (MP) 0.0, to be called LR-PL1-1.
    - The installation of a new mainline valve (MLV at the existing valve setting along Segment PL-1 near MP 14.2 to be called MLV-PL1-1.
    - The installation of a new MLV including permanent access road at a greenfield site along PL1 near MP 22.4 to be called MLV-PL1-2.
    - The installation of a new MLV at the existing valve setting along PL-1 near MP 36.2 to be called MLV-PL1-3.
    - The installation of a new LR at the existing Woodstock CS, along Segment PL-1 near MP 49.1, to be called LR-PL1-1.
    - The installation of a new LR at a greenfield site including permanent access road, along Segment PL-2 near MP 0, to be called LR-PL2-1.
    - The installation of a new LR at a greenfield site including permanent access road, along Segment PL-2 near MP 11.4, to be called LR-PL2-2.
- **Above-ground facilities**
  - Compressor Station (CS) facilities
    - Construction of the new greenfield Laraway CS in Will County.
    - Construction of the new greenfield Westfield CS in Bureau County.
    - Modifications at the existing Sandwich CS in Kendall County.
  - Meter Station (MS) facilities
    - Construction of the new greenfield Laraway MS within the Laraway CS footprint in Will County.
    - Construction of the new greenfield Westfield MS within the Westfield CS footprint in Bureau County.

This project will result in primarily temporary impacts to wetlands which total 33.851 Acres (Ac). This project will permanently fill 0.005 Ac of PEM wetlands. Temporary stream impacts from Segment PL1 are expected in 2332 linear feet (LF), and impacts from Segment PL2 are expected in 391 LF.

Remaining wetland impacts are expected to be from construction matting, excavation, and the placement of gravel for temporary construction entrances which will be restored to pre-construction conditions following construction. ANR is proposing to provide compensatory wetland mitigation for the unavoidable, permanent wetland fill and shrub and forested wetland conversion impacts. Additionally, erosion/sediment control measures and best management practices (BMPs) will be utilized.

Information used in this review was obtained from the application documents dated June 20, 2024, July 17, 2024, November 2024, January 14, 2025, February 14, 2025, and March 7, 2025.

Identification and Characterization of the Affected Water Body.

Segment PL-1

The unnamed tributary to the East Branch South Branch Kishwaukee River (1-s004-b) has 0 cfs of flow during critical 7Q10 low-flow conditions. The unnamed tributary to the East Branch South Branch Kishwaukee River is classified as General Use Water. The unnamed tributary to the East Branch South Branch Kishwaukee River 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. The unnamed tributary to the East Branch South Branch Kishwaukee River, a tributary to waterbody segment IL_PQCL-01, is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This segment of the unnamed tributary to the East Branch South Branch Kishwaukee River is not subject to enhanced dissolved oxygen standards.

The unnamed tributary to the Kishwaukee River (1-s001-b) has 0 cfs of flow during critical 7Q10 low-flow conditions. The unnamed tributary to the Kishwaukee River is classified as General Use Water. The unnamed tributary to the Kishwaukee River 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. The unnamed tributary to the Kishwaukee River, a tributary to waterbody segment IL_PQ-13 is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This segment of the unnamed tributary to the Kishwaukee River is not subject to enhanced dissolved oxygen standards.

Franklinville Creek (1-s001-c) has 0 cfs of flow during critical 7Q10 low-flow conditions. Franklinville Creek is classified as General Use Water. Franklinville 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. Franklinville Creek, (no segment code), tributary to Waterbody Segment IL_PQ-13, is not listed on the 2024Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. Franklinville Creek is not subject to enhanced dissolved oxygen standards.

Hampshire Creek (1-s001-d) has 0 cfs of flow during critical 7Q10 low-flow conditions. Franklinville Creek is classified as General Use Water. Hampshire 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. Hampshire Creek, Waterbody Segment IL_PQFD-H-A1, is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as impaired. Aquatic life use is fully supported. Hampshire Creek is subject to enhanced dissolved oxygen standards.

Eakin Creek West (1-s001-k) has 0 cfs of flow during critical 7Q10 low-flow conditions. Eakin Creek West is classified as General Use Water. Eakin Creek West 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. Eakin Creek West, a tributary to Eakin Creek (IL_PQ-IC) is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This segment Eakin Creek West is not subject to enhanced dissolved oxygen standards.

The Kishwaukee River (1-s002-c) has 4.2 cfs of flow during critical 7Q10 low-flow conditions. The Kishwaukee River is classified as General Use Water. The Kishwaukee River 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*; however, it is given an integrity rating of “D” in that document. The Kishwaukee River, Waterbody Segment IL_PQ-13, is listed on the

2024 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for aquatic life use with potential causes given as loss of instream cover, nitrogen, and sedimentation/siltation, and fish consumption with potential causes given as mercury and polychlorinated biphenyls. Aesthetic quality use is fully supported. This segment of the Kishwaukee River is subject to enhanced dissolved oxygen standards downstream of the project site.

Union Ditch 3 (1-s004-c) has 0 cfs of flow during critical 7Q10 low-flow conditions. Union Ditch 3 is classified as General Use Water. Union Ditch 3 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. Union Ditch 3, tributary to the East Branch South Branch Kishwaukee River, (Waterbody Segment IL_PQCL-01), is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This segment of Union Ditch 3 is not subject to enhanced dissolved oxygen standards.

Welch Creek (1-s005-b and 1-s006-b) has 1.2 cfs and 1.0 cfs, respectively, of flow during critical 7Q10 low-flow conditions. Welch Creek is classified as General Use Water. Welch Creek 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*; it is also given an integrity rating of "B" in that document. Welch Creek, Waterbody Segment IL_DTCB, is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This segment of Welch Creek is subject to enhanced dissolved oxygen standards downstream of the project site.

The unnamed tributary of Little Rock Creek (1-s005-d) has 0 cfs of flow during critical 7Q10 low-flow conditions. The unnamed tributary of Little Rock Creek is classified as General Use Water. Just downstream of the project site, the unnamed tributary of Little Rock Creek 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 is given an integrity rating of "B" in that document. The unnamed tributary of Little Rock Creek, tributary to Waterbody Segment IL_DTCA-01, is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This segment of the unnamed tributary of Little Rock Creek is not subject to enhanced dissolved oxygen standards.

The unnamed tributary of the South Branch Kishwaukee River-East (1-s005-k) has 0 cfs of flow during critical 7Q10 low-flow conditions. The unnamed tributary of the South Branch Kishwaukee River-East is classified as General Use Water. The unnamed tributary of the South Branch Kishwaukee River-East 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. The unnamed tributary of the South Branch Kishwaukee River-East, tributary to Waterbody Segment IL_PQI-H-C5, is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This segment of the unnamed tributary of the South Branch Kishwaukee River-East is not subject to enhanced dissolved oxygen standards.

Virgil Ditch #1 and #2 (1-0013-d and 1-s006-k, respectively) have 0 cfs of flow during critical 7Q10 low-flow conditions. Virgil Ditch #1 and #2 are classified as General Use Water. Virgil Ditch #1 and #2 are 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. Virgil Ditch #1 and #2 (no segment codes), tributaries to the East Branch South Branch Kishwaukee River (tributaries to Waterbody Segment IL_PQCL), are not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as they have not been assessed. Virgil Ditch #1 and #2 are not subject to enhanced dissolved oxygen standards.

Harmony Creek (1-s012-d) has 0 cfs of flow during critical 7Q10 low-flow conditions. Harmony Creek is classified as General Use Water. Harmony 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. Harmony Creek (no segment code), tributary to Coon Creek (tributary to Waterbody Segment IL_PQF-07), is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. Harmony Creek is not subject to enhanced dissolved oxygen standards.

The South Branch Kishwaukee River-East (1-s014-d) has 3.2 cfs of flow during critical 7Q10 low-flow conditions. The South Branch Kishwaukee River-East is classified as General Use Water. The South Branch Kishwaukee River-East 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*; however, it is given an integrity rating of "C" in that document. The South Branch Kishwaukee River-East, Waterbody Segment IL_PQI-10, is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as impaired. Aesthetic quality and aquatic life uses are fully supported. This segment of the South Branch Kishwaukee River-East is subject to enhanced dissolved oxygen standards.

The unnamed tributary of Burlington Creek (1-s017-d)) has 0 cfs of flow during critical 7Q10 low-flow conditions. The unnamed tributary of Burlington Creek is classified as General Use Water. The unnamed tributary of Burlington 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. The unnamed tributary of Burlington Creek, tributary to Waterbody Segment IL_PQCF, is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This segment of the unnamed tributary of Burlington Creek is not subject to enhanced dissolved oxygen standards.

Impacted wetlands in project area are generalized by Cowardin Classification and outlined in the table below:

Wetland Type	Size in Project Area (Ac.)	Area Impacted (Ac.) *
PEM	83.91	30.763
PFO	5.48	0.761
PSS	5.71	0.693
Total	**95.10**	**32.217**

* For PEM wetlands, this includes all impacts in all portions of the work area. For PSS and PFO wetlands, this includes any areas outside of the trench construction area or proposed new easement area. These areas will be allowed to re-vegetation naturally to their pre-construction community type.

Note: PEM=palustrine emergent; PSS=palustrine scrub-shrub; PFO=palustrine forested

A wetland delineation was completed by Merjent in November 2024 for the 2186.3 Ac survey area. Based on the field survey and desktop resources review, it was determined that 98 wetlands totaling 98.47 Ac, 32 waterways and 4 open water areas exist within the survey area. Land use across the environmental survey corridor includes agricultural, fallow fields/meadows, residential, roads and rights-of-way, forested areas, and railroad rights-of-way. The agricultural fields had standing or recently harvested crops, and the vegetation is considered disturbed. Upland areas within the survey area are comprised of agricultural fields, residential lawns, roadside rights-of-way, fallow grassland, and forested areas. Between the rows of planted crops, species such as barnyard grass (*Echinochloa crus-galli*), chufa (*Cyperus esculentus*), and fall panic grass (*Panicum dichotomiflorum*) are sparse in the herbaceous stratum. Agricultural areas used for hay production are densely covered with white clover (*Trifolium repens*), red clover (*Trifolium pratense*), and tall false rye grass (*Schedonorus arundinaceus*). In the residential lawns and roadside rights-of-way, dominant vegetation consists of Kentucky bluegrass (*Poa pratensis*) and common dandelion (*Taraxacum officinale*) tall fescue *(Festuca arundinacea)*,

sowthistle (*Sonchus arvensis*), and smooth brome (*Bromus inermis*). Fallow grasslands consisting of Kentucky bluegrass occur throughout the survey area, and Native Conservation Reserve Program (CRP) plantings are found in conservation areas in McHenry County evenly distributed with native plants. Vegetation consists of showy goldenrod (*Solidago speciosa),* big bluestem (*Andropogon gerardii*), switchgrass (*Panicum virgatum*), and grey headed coneflower (*Ratibida pinata*). Forested areas are dominated by eastern cottonwood (*Populus deltoides*), black cherry (*Prunus serotina*), American basswood (*Tilia americana*), burr oak (*Quercus macrocarpa*), ash-leaf maple (*Acer negundo*), common buckthorn (*Rhamnus cathartica*), and honeysuckle (*Lonicera* spp.).

Of the 32 streams in the project site, 16 are expected to receive temporary impacts. Eleven of the impacted streams are perennial streams, while 5 are intermittent. Substrates are primarily silt, clay and mud, while the remaining are either sand, gravel or cobble. Depths vary, ranging from 0.5 feet to 5 feet. 7247 LF of streams in the survey area will be impacted as a result of construction of Segment PL-1. Additionally, 4 open water features lie within the survey area to which no impacts are expected.

Of the 98 wetlands within the survey area, temporary impacts are expected in 84. Impacts to the wetlands are listed in the table above. The impacted wetlands include 69 palustrine emergent (PEM), 9 palustrine shrub scrub (PSS) and 6 palustrine forested (PFO) wetlands**.** Dominant vegetation for the impacted wetlands is listed in Appendix G – Summary of Delineated Wetlands, and a Floristic Quality Assessment is included in Appendix I – Floristic Quality Assessment, both in the wetland delineation report.

Segment PL-2

The unnamed tributary of Hollenback Creek (2-s001-b) has 0 cfs of flow during critical 7Q10 low-flow conditions. The unnamed tributary of Hollenback Creek is classified as General Use Water. The unnamed tributary of Hollenback 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. The unnamed tributary of Hollenback Creek, tributary to Waterbody Segment IL_DTZG-01, is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This segment of the unnamed tributary of Hollenback Creek is not subject to enhanced dissolved oxygen standards.

The unnamed tributary of West Aux Sable Creek (2-s001-d and 2-s001-h) has 0 cfs of flow during critical 7Q10 low-flow conditions. The unnamed tributary of West Aux Sable Creek is classified as General Use Water. The unnamed tributary of West Aux Sable 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; however, it is given an integrity rating of "A" in that document. The unnamed tributary of West Aux Sable Creek, tributary to Waterbody Segment IL_DWE, is not listed on the 2024 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This segment of the unnamed tributary of West Aux Sable Creek is not subject to enhanced dissolved oxygen standards.

Impacted wetlands in project area are generalized by Cowardin Classification and outlined in the table below:

Wetland Type	Size in Project Area (Ac.)	Area Impacted (Ac.)
PEM	4.79	1.634

A wetland delineation was completed by Merjent in November 2024 for the 532.43 Ac survey area. Based on the field survey and desktop resources review, it was determined that 16 wetlands totaling 6.64 Ac, 8 waterways and 1 open water areas exist within the survey area. Land use across the environmental survey corridor includes agricultural, fallow fields/meadows, residential, roads and associated right-of-way (ROW), forested areas, and railroad ROW. The agricultural fields had standing or recently harvested crops, and the vegetation is considered disturbed. Upland areas within the survey area are comprised of agricultural fields, residential lawns, roadside rights-of-way, fallow grassland, and forested areas. Between the rows of planted crops, species such as barnyard grass, and yellow foxtail (*Setaria pumila*) are sparse in the herbaceous stratum. In the residential areas and road/railroad rights-of-way, dominant vegetation consists of Kentucky bluegrass, common dandelion, tall fescue, sowthistle, and smooth brome. Fallow grasslands consisting of Kentucky bluegrass occur in the eastern end of the survey corridor. Forested areas are dominated by black locust (*Robinia pseudoacacia*) and ash-leaf maple (*Acer negundo*)

Of the 8 streams in the project site, 3 are expected to receive temporary impacts. Two of the impacted streams are perennial streams, while one is intermittent. Substrates for two are a silt, clay and mud combination, while the remaining is either gravel. Depths vary, ranging from 0.5 feet to 5 feet. 391 LF of streams in the survey area will be impacted as a result of construction of Segment PL-2. Additionally, 1 open water feature lies within the survey area to which no impacts are expected.

Of the 16 wetlands within the survey area, temporary impacts are expected in 9. Impacts to the wetlands are listed in the table above. The impacted wetlands are all classified as palustrine emergent (PEM) wetlands. Dominant vegetation for the impacted wetlands is listed in Appendix G – Summary of Delineated Wetlands, and a Floristic Quality Assessment is included in Appendix H – Floristic Quality Assessment, both in the wetland delineation report.

Wetlands identified at the Laraway and Heartland Booster and Meter Stations were not proposed to receive any impacts as a result of the project.

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

The increase in suspended solids from proposed activities would be short-term and temporary. The

proposed measures to minimize the potential effect to the receiving waters include minimizing ground disturbing activities, staging materials away from wetlands and waterbodies, and implementing the FERC Plan and Procedures, and the environmental conditions of the FERC's Orders. Controls and best management practices (BMPs) will be inspected on a routine basis and maintained in working order.

Fill in the form of construction matting (30.736 Ac), excavation, and gravel placement are proposed as temporary impacts. Construction matting will provide solid work platforms while reducing the risk of soil compaction, rutting, and mixing of topsoil with subsoil. Excavation will occur in wetlands crossed via the open-cut trench method. This would involve temporary side-casting of excavated soil, which will be stored on construction matting as needed to prevent soil mixing. Placement of spoils is accounted for in the acreage of construction matting. Gravel placement will be utilized when temporary construction entrances are needed. These entrances will involve placing rock or stone on geotextile fabric within the road ROW. This will also minimize sediment tracking onto public roads. These impacts are short-term and will return to preconstruction conditions shortly after construction activities are completed.

Multiple shrub and forested type (woody) wetlands occur within the project area. These wetlands would be cleared as part of the project, resulting in temporary and permanent conversion to herbaceous type wetlands.

Wetland conversion has been classified into three categories, per their location within the CWA:

1. Temporary Function Loss - This type of clearing is located outside of the Construction ROW, associated with portions of the CWA needed only during construction. In these areas, only temporary easement will be obtained for use during construction. Stump grinding will not occur.

Following construction, these areas would be allowed to naturally regenerate woody vegetation, resulting in temporary conversion. The total amount of temporary function loss is 1.454 acres.

2. Mechanized Land Clearing - This type of clearing is located within a portion of the Construction ROW, within the 20-foot-wide trench excavation area, where stump grinding is required. Following construction, these areas would be kept in a permanent herbaceous state and woody vegetation will not be allowed to regenerate, resulting in permanent conversion. The total amount of mechanized land clearing is 0.473 acre.

3. Permanent Function Lost - This type of clearing is located in the remaining 30-foot-wide portion of the Construction ROW, outside of the 20-foot-wide trench excavation area, where ANR has or will have permanent easement. Stump grinding will not occur, however, following construction, these areas would be kept in a permanent herbaceous state and woody vegetation will not be allowed to regenerate, resulting in permanent conversion. Permanent wetland conversion for clearing in permanent easement within the CWA is anticipated to be a total of 0.870 acre.

Temporary fill will occur in 32.397 Ac of PEM wetlands, 0.693 Ac of PSS wetlands, and 0.761 Ac of PFO wetlands for a total of 33.851 Ac. Forested wetlands will receive 1.454 Ac of fill. Function loss is expected in 0.005 Ac of PEM wetlands, 0.512 Ac of PSS wetlands and 0.358 Ac of PFO wetlands. Forested wetlands will undergo 0.87 Ac of function loss. Mechanized land clearing will occur in 0.225 Ac of PSS wetland, and 0.248 Ac of PFO wetlands. Forested wetland areas will undergo 0.473 Ac of land clearing.

Fate and Effect of Parameters Proposed for Increased Loading.

The increase in suspended solids from the proposed project would be short-term and temporary. Measures to minimize the potential impacts to the receiving waters include minimizing ground disturbing activities, staging materials away from wetlands and waterbodies, and implementing the FERC Plan; FERC Procedures; the environmental conditions of the FERCs orders; the mitigation measures proposed by ANR (as approved and/or modified by the FERC Order); project environmental permits and approvals from federal, state, and local agencies; and, environmental requirements in landowner easement agreements. Controls and best management practices (BMPs) will be inspected on a routine basis and maintained in working order.

With the exception of the 0.005 Ac of permanent impacts, all wetland impacts from construction matting, excavation, and the placement of temporary gravel for temporary construction entrances will be temporary in nature and will be restored to pre-construction conditions following construction. The Wetland Restoration Plan and post construction monitoring plans are included in the application documents. Post-construction wetland and waterbody restoration will be monitored until pre-construction conditions are restored.

ANR is proposing to provide compensatory wetland mitigation for the unavoidable, permanent wetland fill and shrub and forested wetland conversion impacts. In addition to permanent wetland fill, clearing of woody vegetation is proposed in 2.8 acres of wetland within the project area. Approximately 1.454 Ac of temporary conversion will occur within temporary easement; these areas will not be maintained in an herbaceous state for the purpose of the project, and ANR will allow trees and shrubs to regenerate in these areas following completion of the project. Approximately 1.346 Ac of permanent conversion will occur within permanent easement; these areas will be maintained in a permanent herbaceous state following project completion.

Wetland Impact Type	Wetland Type	Impact Amount (Ac)	Mitigation Ratio	Mitigation Credit
Permanent fill	Herbaceous	0.005	1:1	0.005
Temporary Conversion	Non-HQAR Forested	0.852	1.5:1	1.278
	HQAR Forested	0.602	2:1	1.204
Permanent Conversion	Non-HQAR Forested, >50% Invasives	0.036	1.5:1	0.054
	Non-HQAR Forested, >50% Natives	0.903	2:1	1.806
	HQAR Forested	0.404	3:1	1.212
			Total	**5.559**

ANR proposes complete waterbody crossings using an open trench crossing method to construct the pipeline under the waterbodies, as well as trenchless methods at some locations. Temporary bridges will be required to cross waterbodies with construction equipment.

ANR proposes to cross waterbodies that have perceptible flow at the time of the crossing using a stream flow bypass system, which includes the dam-and-pump or dam-and-flume method. Excavation within wetland areas will be scheduled so that the trench is not excavated across the wetland until immediately prior to pipe removal and/or pipe-laying activities.

To minimize impacts during clearing activities, ANR will adhere to the Spill Prevention, Control, and Countermeasures (SPCC) and Horizontal Directional Drill (HDD) Contingency Plans. Erosion and soil compaction will be minimized by the use of construction mats. Sediment and erosion control measures and devices will be installed prior to ground disturbing activities and maintained until restoration is achieved. Trench dewatering discharge will be directed to stable, vegetated, upland areas and/or filtered through a filter bag or siltation barrier so that no sediment-laden waters enter wetlands.

Purpose and Social & Economic Benefits of the Proposed Activity.

The Project is designed to expand ANR's system to provide up to 473,000 dekatherms per day of incremental firm transportation capacity by November 1, 2027. The additional capacity will help support electric grid reliability and make it more resilient to disruptions, especially during extreme weather events. It will also ensure continued access to affordable energy and serve as partner for renewable power sources while coal-fired power generation is retired and local utilities transition to cleaner natural gas and renewable energy sources.

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

The applicant analyzed a no-action alternative, alternative energy sources, system alternatives, design alternatives, route alternatives, and alternatives to aboveground facility sites for this project.

No-Action Alternative Under the no-action alternative, ANR would not construct or modify its facilities. The impacts associated with the project would not occur, and the project purpose and need would not be met. This alternative would require consumers to seek other sources of energy, which could include natural gas from other providers or other types of energy, including coal or oil. These other projects would result in their own set of impacts that could be less than, equal to, or greater than those associated with the proposed project.

Alternative Energy Sources - Potential alternative energy sources to natural gas include traditional fuels, such as coal and oil, nuclear energy, and electricity (including electricity generated from oil, coal, and nuclear power) and renewable energy sources, such as wind, solar, hydroelectric, biomass, tidal, and wave energy. Alternative energy sources do not meet the project purpose of delivering an additional 473,000 Dth/d of natural gas to project shippers in the Upper

Midwest; therefore, deeming alternative energy sources not viable alternatives. Even if other energy sources could meet the project objectives, those other energy sources would require construction and operation of their own facilities, which would result in their own set of impacts that could be less than, equal to, or greater than those associated with the proposed project.

System Alternatives - System alternatives would make use of existing, modified, or proposed pipeline systems to meet the purpose and need of the project and involve the transportation of the equivalent amount of natural gas by modification or expansion of existing pipeline systems, or by new pipeline systems. Evaluation of system alternatives would determine whether the environmental impacts associated with project construction and operation could be avoided or reduced by using another pipeline system, while still meeting the project objectives. To be considered viable, the system alternative would need to result in materially less environmental impact than the proposed Project.

Design Alternatives - Design alternatives are alternatives on ANR's system that would substantively change the design of the proposed Project while still meeting the Project purpose and need. They are often identified early in project planning or raised later by stakeholders and agencies review of a project. Because design alternatives can sometimes be radical, they often need to be evaluated for technical practicality and economic feasibility. And, as with other types of alternatives, a design alternative needs to result in materially less environmental impact than the proposed Project. This analysis considers four design alternatives: 1) a greenfield pipeline in lieu of the proposed pipeline; 2) a pipeline-only alternative with no compression; 3) a compression-only alternative with no pipeline; and 4) hybrid or electric compressor units in lieu of natural gas-powered compressor units.

Greenfield Pipeline in Lieu of the Proposed Loop and Replacement Pipeline - ANR evaluated the possibility of a new greenfield mainline instead of looping or replacing its existing pipeline. A new greenfield mainline would involve at least 204 miles of new 24-inch-diameter pipeline, 223 miles of new 12-inch diameter pipeline, and 79 miles of new 10-inch diameter pipeline, as well as three new greenfield CS facilities totaling more than 18,700 horsepower on approximately 40-acre sites each in or near Will County, Illinois; Sheboygan County, Wisconsin; and Iron County, Michigan. A more direct, single greenfield pipeline is not possible because of the various delivery points in several markets. This alternative represents a significant increase in impacts as compared to the proposed project, requiring about 506 miles of pipeline and affecting more than 6,133 acres of land during construction and 3,066 acres during operation.2 This compares to the proposed Project with about 69 miles of pipeline affecting about 835 acres during construction and 418 acres during operation. The alternative is an increase in land impacts of more than 700 percent, which is indicative of substantially greater impacts on other resources as well. Based on this analysis, a greenfield pipeline plainly does not have an environmental advantage over the proposed project and is not a suitable alternative.

Pipeline-Only Alternative with No Compression - The possibility of installing additional loop pipeline in lieu of compression on its system was evaluated. Loop pipeline can sometimes be a viable alternative to compression, subject to existing system constraints and design parameters that include, among other things, the non-ratable nature of the services across ANR's market area, the incremental power loads associated with the project, and the existing contractual pressure obligations at the designated points of delivery. Based on hydraulic modeling, installing loop pipeline in lieu of compression would not be technically feasible. Additionally, a minimal compression alternative does not confer a material environmental advantage over the proposed project and is not a suitable alternative.

Compression-Only Alternative with No Pipeline - The possibility of additional compression in lieu of loop pipeline or pipe replacement was evaluated. Additional compression can sometimes be a viable alternative to additional piping, subject to existing system constraints and design parameters. Based on hydraulic analysis, ANR determined that there are no viable compression-only alternatives for Segments PL-1 or PL-2 because the current pipelines are not large enough to handle the incremental volumes with installation of midpoint

compression alone. On Segment PL-3, ANR determined that additional compression is not desirable compared to pipe replacement from an operating standpoint because replacing the existing pipe with larger-diameter, thicker-walled pipe will allow the entire system to operate at higher pressures and provide the system with additional operational flexibility. ANR also determined that there are no viable compression-only alternatives for Segment PL-4 due to the transient nature of demand from the lateral. The spacing between the nearest CSs was an important factor in determining viability to prevent fast transient events. Based on this analysis, a compression-only alternative is not feasible.

Hybrid or Electric Compressor Units in Lieu of Natural Gas-Powered Compressor Units - Hybrid compressor units have both an electric motor and a natural gas engine that can drive the compressors. If there is an existing power line with adequate power, hybrid/electric compression may be desirable. ANR has evaluated the power supply in the vicinity of its CSs and determined that adequate power is not available, thereby necessitating construction of new electric substations and transmission lines that would increase costs and impacts beyond those required for gas-powered compressors. The selection of gas-driven compression units minimized the risk of long-term outages associated with electric driven components. Natural gas fired compression was chosen based on unit reliability, ease of repair, replacement part availability, and the smaller environmental footprint associated with proposed gas turbine units. For the reasons stated above, ANR determined that hybrid or electric compressor units in lieu of natural gas-powered compressor units would not result in a material environmental advantage over the proposed project and is not a suitable alternative.

Route Alternatives - ANR identified and evaluated a variety of route alternatives to determine if they would be preferable to the project route. Considerations included installing new loop and replacement pipelines adjacent to and within about 50 feet of existing pipelines, including adjusting design criteria to account for foreign pipelines. ANR also adjusted design criteria to account for pipeline crossovers. Routes were planned and due to existing structures or other features, the default offsets were deemed undesirable. The reroutes that departed farther from the existing ANR and foreign pipelines were evaluated. Route alternatives were considered for 16 different mileposts (MP) lengths of Segment PL-1, and 4 different MP lengths of Segment PL-2. The comparisons were made assuming a 110-foot-wide construction workspace, except in uncultivated wetlands where a 75-foot-wide construction workspace is assumed. The proposed routes for the project were determined to have benefits over the alternatives based on avoidance of homes and structures, and least environmental impacts proposed.

Laraway CS and MS Alternative – ANR evaluated an alternative site for the Laraway CS and MS, which will be constructed at the same location. A primary consideration in siting the CS and MS was the ability to deliver gas to Northern Border Pipeline between ANR's existing Alliance Interconnect and Will County Interconnect so that the Project can utilize existing capacity on its system. The alternative site is about 0.25 mile west-northwest of the proposed site. It is also about 3.7 Ac larger than the proposed site and would impact forested wetland and open upland in addition to the agricultural land. The alternative site also does not abut an existing public road, whereas the proposed site abuts South Cherry Hill Road. Hence, the alternative site would require a 0.25-mile-long driveway extending to South Ridge Road to provide access to the site. Additionally, the alternative site has a residential noise sensitive area (NSA) within approximately 300 feet, whereas the proposed site has a residential NSA within approximately 0.25 mile. Based on this analysis, ANR determined that there is little substantive difference between the two sites and the alternative site does not provide a material environmental advantage over the proposed site.

Westfield CS and MS Alternative - ANR evaluated an alternative site for the Westfield CS and MS, which will be constructed at the same location. The primary consideration for siting this facility at the proposed location was to intersect with two existing ANR pipelines and an existing Northern Border pipeline, which avoids the need for interconnecting pipelines. The proposed site also directly borders a major public road and electric transmission line, which reduces the length of the facility's permanent access road and electric distribution line. The alternative site was located on agricultural land to avoid impacts on environmentally sensitive resources, such as wetlands, waterbodies,

forests, and residences. A comparison of the alternative site to the proposed site indicates that the alternative would have fewer environmental impacts; however, the new permanent easement for the proposed site would be 20.0 Ac and the remaining construction work area would be allowed to revert to its previous use. The alternative site would also require a longer access road that crosses a drainage swale, which may require installing a culvert. Based on this analysis, ANR determined that the proposed site provides a substantive advantage over the alternative site.

Pulaski CS Alternatives

ANR Alternatives - ANR evaluated two alternative sites for the Pulaski CS: one immediately adjacent to the western edge of the proposed site, and one approximately 1.1 miles south-southeast of the proposed site. A primary consideration in siting the Pulaski CS was to maintain an appropriate distance between it and the existing upstream and downstream CSs on the system to allow efficient gas flow. Friction causes decreased pressure over a distance, which can be boosted by installing a CS. If the CSs are too close together, blowdowns would be needed to release pressure, and if they are too far apart, larger compressor units would be required. In both cases, air and noise emissions will result. The proposed location is at the northernmost limit to meet the Project's transportation volume requirements. A comparison of the alternative sites to the proposed site indicates that the proposed site is about 6.4 Ac larger than Alternative Site 1 and about 14.4 acres larger than Alternative Site 2. All three sites are similar in that they all affect mainly agricultural land. The two alternative sites, however, are about 0.1 mile closer to its nearest NSA. The proposed site has an access road that affects 0.3 Ac of forested upland and crosses one ephemeral waterbody. Based on this analysis, ANR determined that there is little substantive difference between the two sites and the alternative site does not provide a material environmental advantage over the proposed site.

Landowner Alternatives - ANR evaluated an alternative site for the Pulaski CS provided in landowner comments that expressed concerns over health and safety, noise, air quality, cumulative impacts, and wildlife. After review, ANR found that the landowner-suggested alternative would be located too far north along its system to operate efficiently given the existing pipeline hydraulics.

Proposed Project (Preferred) – The proposed project will achieve the purpose and need of the project while avoiding and minimizing wetland impacts to the extent practicable. The proposed project will allow for ANR to replace and upgrade existing pipeline facilities with new, more efficient pipeline facilities, to provide continued safe and reliable natural gas transportation service to existing customers on its pipeline system.

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

USFWS IPaC website was used to identify several different federally endangered, proposed and candidate species potentially present within or in the vicinity of the project area. These included northern long-eared bats *(Myotis septentrionalis)*, Indiana bats *(Myotis sodalis)*, western regal fritillaries *(Argynnis idalia occidentalis)*, monarch butterflies *(Danaus plexippus)*, and rusty patched bumble bees *(Bombus affinis)*.

- Conservation recommendations were made for the three bat species and with implementation of those recommendations, it was determined that the project may affect but is not likely to adversely affect northern long-eared bats, will have no effect on Indiana bats or Indiana bat critical habitat, may affect, but is not likely to adversely affect tricolored bats.

- Potentially suitable habitat for the western regal fritillary may be present in the Project areas where native or restored prairie habitat exists. ANR will coordinate with the USFWS to determine if a field-based habitat assessment or presence/absence surveys would be prudent, with the understanding that the species is currently proposed for listing and therefore does not presently require an effects determination.

- Potentially suitable habitat for the monarch butterfly may be present in the Project areas. ANR will coordinate with the USFWS to determine if a field based habitat assessment or presence/absence surveys would be prudent, with the understanding that the species is currently proposed for listing and therefore does not presently require an effects determination. If this species becomes listed prior to construction, ANR will coordinate with USFWS to determine appropriate avoidance and minimization measures and to determine an appropriate effects determination.

- Based on USFWS guidance along with implementation of additional conservation measures, ANR believes the Project may affect, but is not likely to adversely affect the Rusty Patched Bumblebee.

An EcoCAT endangered species consultation was submitted on June 20, 2024 (Project #2413144) to the Illinois Department of Natural Resources for Segment PL-1. The Illinois Natural Heritage Database shows the following protected resources may be in the vicinity of the project location: Hemmer – Kloempken Wetland, HUM Railroad Prairie East, Maple Park Railroad Prairie, Milhurst Fen, and West Woodstock Prairie INAI Sites, Del Webb Sedge Meadow and Grove Nature Preserve, Milhurst Fen Nature Preserve, and Yonder Prairie Nature Preserve Illinois Nature Preserves Commission Lands, Blanding's Turtle (*Emydoidea blandingii*), Mottled Sculpin (*Cottus bairdii*), Northern Harrier (*Circus hudsonius*), River Redhorse (*Moxostoma carinatum*), Slender Bog Arrow Grass (*Triglochin palustris*), Spike (*Eurynia dilatata*), Swainson's Hawk (*Buteo swainsoni*), Tall Sunflower (*Helianthus giganteus*) and the Yellow-Headed Blackbird *(Xanthocephalus xanthocephalus)*. Recommendations to avoid adverse impacts and protect natural areas were made for the Hemmer – Kloempken Wetland INAI and HUM Railroad Prairie East, Blanding's Turtle, Mottled Sculpin and River Redhorse, Northern Harrier and Swainson's Hawk, Slender Bog Arrow Grass and Tall Sunflower, Spike, and Yellow-headed Blackbird. The Department determined that adverse impacts to Maple Park Railroad Prairie INAI, Milhurst Fen INAI, West Woodstock Prairie, Del Webb Sedge Meadow and Grove Nature Preserve, Milhurst Fen Nature Preserve, and Yonder Prairie Nature Preserve are unlikely.

An EcoCAT endangered species consultation was submitted on June 20, 2024 (Project #2413154) to the Illinois Department of Natural Resources for Segment PL-2. The Illinois Natural Heritage Database shows the following protected resources may be in the vicinity of the project location: Fox River, Milhurst Fen, and Silver Springs Railroad Prairie INAI Sites, Milhurst Fen Nature Preserve and Silver Springs Railroad Prairie Natural Heritage Landmark Nature Preserve Illinois Nature Preserves Commission Lands, Mottled Sculpin and River Redhorse. Recommendations to avoid adverse impacts and protect natural areas were made for the Mottled Sculpin and River Redhorse. The Department determined that adverse impacts to the Fox River INAI, Milhurst Fen INAI, Silver Springs Railroad Prairie INAI, Milhurst Fen Nature Preserve, and Silver Springs Railroad Natural Heritage Landmark are unlikely.

An EcoCAT endangered species consultation was submitted on June 20, 2024, (Project #2416974) to the Illinois Department of Natural Resources for the Laraway CS MS. The Illinois Natural Heritage Database contains no record of State-listed threatened or endangered species, Illinois Natural Area Inventory sites, dedicated Illinois Nature Preserves, or registered Land and Water Reserves in the vicinity of the project location.

An EcoCAT endangered species consultations were submitted on July 17, 2024 (Project #2500853) to the Illinois Department of Natural Resources for the Sandwich CS. The natural resource review provided by EcoCAT identified protected resources that may be in the vicinity of the proposed action. The Department has evaluated this information and concluded that adverse effects are unlikely. Therefore, consultation under 17 Ill. Adm. Code Part 1075 is terminated. However, the Department recommends the following conservation measures:

- Good housekeeping practices should be implemented and maintained during and after construction to prevent trash and other debris from inadvertently blowing or washing into nearby natural areas.
- Soil erosion and sediment control BMPs should be implemented and properly maintained. Wildlife-friendly plastic-free blanket should be used to prevent the entanglement of native wildlife.
- Any required night lighting should follow International Dark-Sky Association (IDA) guidance to minimize the effect of light pollution on wildlife.

The applicant should also be aware that any IDNR or INPC conservation land is likely to be managed with prescribed burns to the site boundary. The applicant should consider these potential management activities when siting this facility near conservation land.

An EcoCAT endangered species consultations were submitted on July 17, 2024 (Project #2500853) to the Illinois Department of Natural Resources for the Westfield CS MS. The natural resource review provided by EcoCAT identified protected resources that may be in the vicinity of the proposed action. The Department has evaluated this information and concluded that adverse effects are unlikely. Therefore, consultation under 17 Ill. Adm. Code Part 1075 is terminated.

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 this assessment was written. We tentatively find that the proposed activity would 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 would benefit the community by providing much-needed natural gas supply to meet the increasing market demand of residential, commercial, and industrial consumers, while increasing the reliability and efficiency of ANR's existing system. Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.