

MILLENNIUM PIPELINE COMPANY, L.P.

Data Request No. 1

In a March 28, 2001 letter, the Villages of Briarcliff Manor, Croton-on-Hudson and Ossining, New York and the Town of Ossining, New York suggested a modification to the ConEd Offset/State Route 100 Alternative as identified in the Millennium Pipeline Project Supplemental Draft Environmental Impact Statement (SDEIS). This alternative (the ConEd Offset/Taconic Alternative) would begin at milepost (MP) 391.2 on the 9/9A Proposal. Near MP 399.0A (a milepost with an "A" is on the original route) in the Millwood area, it would follow the Taconic State Parkway rather than State Route 100 to a point where the Consolidated Edison of New York (ConEd) electric powerline and Taconic State Parkway rights-of-way converge in southern Briarcliff Manor near MP 403 on the 9/9A Proposal just north of State Route 117.

During the April 9, 2001 comment meeting, the Public Service Commission of New York (PSCNY) stated that it recommends an offset route that would place the pipeline farther from the transmission towers than discussed in the SDEIS. The PSCNY would prefer a 100-foot offset from the nearest conductor rather than from the tower center line. The PSCNY also recommends using the Taconic State Parkway rather than State Route 100.

Please provide the following information for this route alternative:

- a. 7.5-minute U.S. Geological Survey topographic map(s) and aerial photo(s) showing a feasible route along this alternative;
- b. alignment sheets showing the location of the pipeline and the boundaries of the permanent and construction right-of-way in relation to the Taconic State Parkway and ConEd rights-of-way and to the electric transmission towers and conductors;
- c. identification by milepost of all locations where a 100-foot offset measured from the nearest conductor on the transmission towers may not be feasible, explain why (e.g., a structure would be in the construction work space), and indicate how the pipeline could be routed to avoid the problem;
- d. identification of all landowners abutting both sides of the Taconic State Parkway and the ConEd right-of-way that would be along the ConEd Offset/Taconic Alternative;

- e. cross section diagrams showing the highway and ConEd electric rights-of-way and the pipeline construction and permanent rights-of-way;
- f. a discussion of how the North County Trail, which lies between the Taconic State Parkway and State Route 100, could be used for this alternative;
- g. a discussion of how pipeline construction would affect residences, the Todd School, and the Briarcliff High School near the Pleasantville Road exit of the Taconic State Parkway;
- h. a discussion of the feasibility of using the rocsaw trencher to open a trench for the pipeline along the route alternative;
- i. the locations by milepost where topographic conditions would be too steep for use of the rocsaw trencher;
- j. the locations by milepost where blasting would be required for construction;
- k. a discussion of the impact on groundwater resources, including the location by milepost and identification of all primary and sole source aquifers that would be crossed and the locations by milepost of public and private water wells within 150 feet of the construction right-of-way;
- l. documentation of consultation with the New York State Department of Transportation (NYSDOT) concerning the development of this alternative and about the feasibility of installing the pipeline within the Taconic State Parkway right-of-way;
- m. the location by milepost of tree clearing along the Taconic State Park Parkway;
- n. the location by milepost where the construction right-of-way cannot be confined to the "clear zone" (the area between the curb and the tree line) along the Taconic State Parkway;
- o. a plan for restoration of the Taconic State Parkway developed in consultation with the NYSDOT;
- p. documentation of consultation with the State Historic Preservation Officer regarding the effect of this alternative on the Taconic State Parkway, the need for cultural resource surveys along the affected portion of the Taconic State Parkway, and the need for additional cultural resources surveys along the ConEd portion of this alternative; and
- q. an environmental, engineering, and economic analysis comparing the following factors of the ConEd Offset/State Route 100 and ConEd Offset/Taconic Alternatives between approximate mileposts (MP)399.OA on the ConEd/Offset State Route 100 Alternative and MP 403.0 on the 9/9A Proposal:
 - 1. the length of pipeline (miles);
 - 2. the acreage of both the permanent and construction rights-of-way;
 - 3. the size and location by milepost of any non-typical work areas required;
 - 4. the number and location by milepost of residences and businesses within 50 feet of the edge of the construction right-of-way
 - 5. the number and location by milepost of businesses that would have limited access during construction, if any;
 - 6. the number of wells within 150 {feet} of the construction right-of-way;
 - 7. the location by milepost of public land crossed;

8. the number and location by milepost of waterbodies and wetlands crossed, and the length of each crossing;
9. the acres of wetland affected (temporary and permanent);
10. the acres of open land affected (temporary and permanent);
11. the acres of commercial/industrial land affected (temporary and permanent);
12. the acres of forest cleared (temporary and permanent); and
13. the amount and location by milepost of screening trees or vegetation cleared near residences.

Millennium may supplement its response with other information that may be relevant to the analysis of the alternative and/or suggested modifications to the route that would result in fewer environmental impacts.

Response:

- a. 7.5-minute U.S. Geological Survey topographic maps and aerial photos (alignment sheets) showing the ConEd Offset/Taconic Alternative are attached to this Data Response. Aerial photos were filed with the Commission on April 23, 2001.
- b. The attached alignment sheets show the location of the pipeline and the boundaries of the permanent and construction ROW in relation to the Taconic State Parkway and ConEd ROW and to the electric transmission towers and conductors.
- c. There are only 2 locations where a 100-foot offset from the nearest conductor is not possible. In both cases, a 100-foot offset could not be maintained due to the proximity of residences. Millennium has routed the pipeline 15 feet closer to the nearest conductor in both instances in order to have a minimum 30-foot separation between the pipeline and the residences. These 2 locations are shown on the attached alignment sheets at MPs 0.9 and 3.1.
- d. The requested landowner information was filed with the Commission on April 20, 2001, and is also attached (this information has been reorganized to be used as an appendix to the alignment sheet map set).
- e. Cross section diagrams showing the highway and ConEd electric ROW and the pipeline construction and permanent ROW are attached.
- f. The North County Trail (Trail) lies between the Taconic State Parkway and NY Route 100 from approximately MP 8.5 to MP 9.5. As with the ConEd Offset/State Route 100 Alternative, Millennium has determined that the Trail is the preferable location for the pipeline in this area and has reflected this routing on the attached alignment sheets.

Further south, the Trail diverges from both highways. Although ample space exists in this area to construct the pipeline along this section of the Trail, several problems exist that make this option less desirable than the identified route, which follows the Taconic State Parkway. First, the Trail passes through a forested area, necessitating more tree clearing for the Trail route than the highway route. Second, the Trail passes through New York State Department of Environmental Conservation (NYSDEC) regulated wetland O-14 in the vicinity of Chappaqua Road. Third, the Pocantico River lies immediately adjacent to the east side of the Trail for a considerable distance in this same area. Finally, in this area, a portion of this section of the Trail has been constructed over a sewer line ROW and is thus already occupied by another utility line. Use of this portion of the Trail as the route for the pipeline would necessitate offsetting from the sewer line, which would require impacts to the environmental features identified above. Based on all of these facts, this portion of the Trail is a less desirable route for the Millennium Project.

- g. A field view of the proposed ConEd Offset/Taconic Alternative indicates that 7 residences will be within 50 feet of the construction work area along this alternative. All of these residences are located along the ConEd Offset portion of the route. Table DR1.1 indicates the location of these residences. Table DR1.2 includes proximity data for additional residences in the general vicinity of the route.

Virtually all of the residences adjacent to the ConEd Offset portion of the route lie within extensively forested lots. Thus, the primary impact for these residences will be the removal of these trees, many of which are mature. Screening tree removal is discussed further in part q.13 of this Data Response.

The Todd School is located adjacent to the Taconic State Parkway at approximately MP 10.7. The school is situated on a bluff on the west side of the highway. The horizontal separation between the pipeline centerline and the nearest building on school property will be approximately 150 feet. The horizontal separation between the pipeline and the nearest school property boundary will be approximately 75 feet. Construction will not affect school property. In addition to the horizontal separation, there is a considerable grade separation. The pipeline route, adjacent to the school, lies along a rock cut approximately 30 feet high with the school sitting atop the bluff, as indicated previously.

The Briarcliff High School is located to the east of the Taconic State Parkway at approximately MP 11.7. The horizontal separation between the pipeline centerline and the nearest building on school property will be approximately 725 feet. The horizontal separation between the pipeline and the nearest school property boundary will be approximately 350 feet. Construction will not affect school property. As in the case of the Todd School, the Briarcliff High School is also located at a much higher elevation than the pipeline route. The vertical separation between the high school and the pipeline will be approximately 70 feet.

Additionally, the segment of the pipeline located in the vicinity of both schools will be over-designed to the stringent standards of the Supplemental MOU between the NYS PSC and Millennium.

- h. A rock-trenching machine could be used to excavate portions of the trench adjacent to the ConEd Offset/Taconic Alternative. However, a relatively level workspace (less than + or – 5 degrees across the construction ROW) is required for the rock-trencher to work properly. Millennium anticipates that this workspace would be created by grading the surface with bulldozers where possible. These grading activities would not be possible in areas where hard, consolidated rock is encountered near the surface, but soil and/or fractured rock could be effectively graded. Given the complex geology of the area, the precise locations where grading could not be accomplished cannot be determined prior to construction. In these areas, blasting would be required not only to create the work area for construction equipment but also to fracture the rock where the trench would be excavated. All blasting would be done in accordance with the blasting specifications that ConEd filed with the Commission on October 23, 2000.

There are a few locations along the ConEd Offset/Taconic Alternative such as those listed in response to “j” below that are too steep for the rock-trencher. In addition, the area surrounding the Croton River (MPs 3.7 to 4.1) is also too steep for the rock-trencher.

- j. Millennium’s construction engineers have completed a walkover of the proposed ConEd Offset/Taconic Alternative. Based upon that review, Millennium believes that the ditch line excavation can be characterized as one of the following for the entire alignment:
- Solid rock: there are several areas where there is surface evidence that the ditch line will be situated in solid rock. This rock is granite or metamorphosed granite, i.e., schist and gneiss.
 - Rock and soil: the great majority of surface evidence along the ditch line indicates that the underlying materials are a combination of rock and soil. The rocks vary in size from that of a car to that of bowling ball and range in weight from several tons to a few pounds. The soil is generally “sandy” in nature and composed of weathered granite constituents, i.e., mica, quartz and feldspar.
 - Rock or soil overlaying solid rock.

With the exception of those areas where the surface is characterized by solid rock, it is difficult to state with certainty what trenching conditions will be encountered. It is anticipated that the entire alignment can be excavated with a crawler backhoe supported by compressed air hammers (independent or backhoe mounted) and blasting. Use of a rock trenching machine might be possible in some areas

however these cannot be determined until construction grade is established. These trenching and support activities will be utilized for the entire reach of the pipeline along the ConEd Offset/Taconic Alternative. Although Millennium cannot determine exactly where blasting would be required, Millennium will conduct pre- and post-blast structural inspections of any residential structures within 150 feet of the blast area in accordance with its Environmental Construction Standards. The locations by MP where Millennium predicts with relative certainty that blasting will occur are listed below:

- MP 1.08 near Watch Hill Road
- MP 1.30 – MP 1.32 to Furnace Brook Pond
- MP 1.58 near Furnace Dock Road
- MP 3.37
- MP 3.50 200 feet north of Batten Road
- MP 4.46 just north of Quaker Bridge Road
- MP 4.50 – MP 4.54 north of dam
- MP 4.97 – MP 5.29
- MP 5.31
- MP 5.74 south side of Teatown Lake
- MP 6.45 Route 134 north of fire station
- MP 8.31 – MP 8.74 from pond to bike path
- MP 9.49 – MP 9.55 bike path to the Taconic Parkway

- k. The groundwater resources affected by the ConEd Offset/Taconic Alternative are similar if not identical to those affected by the original route filed in 1997. Primary and sole source aquifer area designations generally cover extensive geographic areas. Thus, the shifting of the route to the southern side of the ConEd ROW has little effect in terms of the aquifers affected.

The ConEd Offset/Taconic Alternative crosses 1 primary aquifer designated by NYSDEC. This aquifer is located in the Croton River valley and includes an area that extends from the ridge top on the west side of the river to the ridge top on the east side of the river. Water supply wells serving the Village of Croton-on-Hudson are located adjacent to the Croton River within this area. In a meeting with the Town of Croton on Hudson it was mentioned that the well logs for the town water wells showed top of rock to be 65 feet below the surface. Therefore Millennium does not anticipate that any blasting will be performed in close proximity to the well field. The ConEd Offset/Taconic Alternative crosses this primary aquifer area between MPs 2.9 and 4.4. All of the alternative pipeline routes previously considered in this section of Westchester County have crossed this designated area.

Table DR1.3 identifies public and private water wells within 150 feet of the construction work space. Five wells are located within 150 feet of the construction

work area for the ConEd Offset/Taconic Alternative. Of these, 2 are private wells and 3 are water supply wells for the Village of Croton-on-Hudson.

Of the 3 public water supply wells, only 1 is presently in service. The remaining 2 village wells are not presently used, but are maintained as standby water sources.

Information previously filed with the Commission identifies methods that will be used to protect groundwater resources during construction and operation of the Project. These include Millennium's Environmental Construction Standards (ECS), the Commission's Upland Erosion Control, Revegetation, and Maintenance Plan and the Commission's Wetland and Waterbody Construction and Mitigation Procedures.

In general, Millennium believes that groundwater resources will not be affected by this route. Of the resources contained in Table 1.3, the most sensitive in terms of potential project impacts is the private well near MP 3.2. According to the land owner, this is a shallow artesian well. Construction will occur approximately 65 feet upslope from this well. If the landowner permits, Millennium will inspect the well before and after construction to ensure that it is not damaged by construction activities. Further, Millennium will not blast within 150-feet of this artesian well. Millennium also met with representatives from the Village of Croton-on-Hudson regarding its wells. Based on those discussions, Millennium does not believe that the Project will impact those wells. Further, due to the relatively deep soils in this area, Millennium does not expect that blasting will be required near these wells. In addition, Millennium agreed to a specific request from the Village to bury the pipeline with extra cover (minimum 8-foot) to prevent interference with possible future water lines through this area. Finally, as with other private and public wells along the pipeline route, Millennium will remediate any effects resulting from Project construction.

On May 3, 2001, Millennium spoke with Mr. Dennison, Regional Director – Region 8, regarding the ConEd Offset/Taconic Alternative. Though no impediment to this alternative is apparent, a meeting will be conducted on May 15, 2001 to review the specifics of the routing along the Taconic Parkway. NYS DOT landscape architects are planning to attend. The results of the meeting will be reported to the Commission.

- m. Construction along the Taconic State Parkway will require the removal of a few trees between MP 8.0 and 8.3, MP 9.4 and 9.5, MP 10.0 and 10.1, MP 11.4 and 11.5, and MP 13.2 and 13.3. The area from MP 8.0 to 8.3 is in a location where the route leaves the Taconic State Parkway shoulder at the NY Route 100 overpass. The area from MP 9.4 to 9.5 is the location where the route leaves the North County Trail and ascends a hillside to return to the shoulder of the Taconic State Parkway. The area from MP 10.0 to 10.1 involves clearing of recently planted landscaping trees. The area from MP 11.4 to 11.5 is the location where the route diverges from

the shoulder of the Taconic State Parkway in order to cross the Pocantico River. The area between MP 13.2 and 13.3 is the southern end of the ConEd Offset/Taconic Alternative, where the route leaves the highway shoulder and crosses mostly forested land to the North County Trail.

- n. As indicated in the previous response, virtually all of the construction along the Taconic State Parkway can be conducted within the "clear zone" adjacent to the highway or along the shoulder. The "clear zone" is generally at least 15 to 20 feet wide in most places, which provides adequate space for construction to occur within a narrowed footprint along the highway.
- o. Millennium will continue to consult with NYSDOT on restoration requirements for construction along the Taconic State Parkway. . Millennium has been informed that replacement of trees and other landscaping must be in like kind and number but not necessarily the same size. A formal agreement will be negotiated and filed with the Commission prior to the start of construction. Also, as stated above, Millennium will be meeting on May 15, 2001 with the NYS DOT's landscape architects. The results and requirements from that meeting will also be reported to the Commission.
- p. On May 2, 2001, Millennium contacted the New York State Office of Parks, Recreation, and Historic Preservation; Field Services Bureau (NYSHPO) via faxed letter (attached, Weed to Kuhn and Mackey). The letter outlined the results of a footprint survey conducted by the Millennium team between 23 and 29 April 2001. By letter dated May 3, 2001 (attached), the NYSHPO concurred with the recommendations that 1) CRM survey be completed on the ConEd Offset portion of the route; 2) that no Phase I survey will be required of the Taconic Parkway portion of the route except for the section near Echo Lake (about MP 8.27); and 3) that all CRM work will be completed under the guidelines outlined in the Project work plans (Gray & Pape 1997, Schuldenrein et al. 1997) and in the Route 9/9A work plan (Weed to Mandzy and Kuhn, 19 May 2000).

Because cultural resources were identified during the course of the footprint survey, Millennium authorized completion of any necessary Phase I survey and complete site recording in advance of receipt of formal concurrence from the NYSHPO. The management summary (attached) details the results of the survey completed to date. The full Phase I report will be submitted to the Commission by May 31, 2001.

- q. The following provides a summary of environmental resources affected by the entire length of the ConEd Offset/Taconic Alternative and a comparison of the environmental resources affected by the State Route 100 variation of that route with the portion of the ConEd Offset/Taconic Alternative that would be replaced by the State Route 100 Variation.

Description of the ConEd Offset/Taconic Alternative

The ConEd Offset/Taconic Alternative (the Alternative) will replace approximately 14 miles of routing between Milepost (MP) 391.2 (9/9A Alternate) and MP 403 (9/9A Alternate) with approximately 15 miles of new line. In 1997, Millennium proposed to follow the ConEd ROW for its length through Westchester County to the vicinity of the Grassy Sprain Reservoir near Yonkers. That plan was modified in 1998 when Millennium proposed to deviate from the ConEd ROW near Route 117 onto the North County Trail and then deviate back onto the ConEd ROW near Elmsford. The 1998 plan remained effectively unchanged until 2000 when the routing was altered to eliminate most use of the ConEd ROW. This final routing was called the Route 9/9A Alternate.

The ConEd Offset/Route 100 Alternative was proposed by the FERC in their Supplemental Draft Environmental Impact Statement (FERC 2001a) and further modified by letter dated 16 April 2001 (FERC 2001b). Millennium, the Public Service Commission of New York, and ConEd reached a Supplemental Memorandum of Understanding concerning the proposed route of the ConEd Offset/Taconic Alternative in April 2001. For the ConEd Offset portion of the Alternative (MP391.2 to about 399.0A), the Project centerline would be 100 feet offset from the west/southernmost ConEd conductor.

The Alternative deviates from the Route 9/9A Alternate near MP 391.2 on the edge of U.S. Route 9 at the base of a valley slope below the ConEd ROW. The Alternative then follows along the south or southwest side of the ConEd ROW, offsetting 100 feet from the nearest conductor, as indicated above. With the exception of a handful of short deviations from this 100-foot offset, the Alternative follows this route to the vicinity of the Taconic State Parkway.

Beginning about MP 7.6 of the Alternative, Millennium will deviate from the ConEd ROW and onto the Taconic State Parkway. It will follow the Taconic to a point of intersection with Route 9/9A Alternate near MP 403 of the alternate. On the Taconic portion of the Alternative, the CWA typically will be narrower than the ConEd CWA. The centerline will be located in the vicinity of the west guardrail. In one area, south of Route 133 and north of Pleasantville Road, the Alternative will lie between the Taconic and Route 100/North County Trail.

There will be 2 typical construction work space configurations for the ConEd Offset/Taconic Alternative. Along the ConEd ROW, the construction work space will typically include a 60-foot-wide work area to the north or northeast of the centerline. On the south or southwest side of the Alternative centerline, the construction work space will include a 15-foot-wide travel space. The total typical width of the construction work space will be approximately 75 feet.

The construction work space along the ConEd ROW varies from this typical configuration at several locations where the work space is narrowed due to presence of residences or in locations where the route passes through public lands.

The work space is expanded in some instances for sidling and storage areas.

The typical construction work space along the Taconic State Parkway includes the right southbound travel lane and, generally an area approximately 30 to 60 feet wide adjacent to the highway. The width of the adjacent work space is determined primarily by the width of available clear space along the highway shoulder and topography.

Environmental Resources Affected by the ConEd Offset/Taconic Alternative

Waterbodies. The ConEd Offset/Taconic Alternative will cross 17 waterbodies. These include 2 impoundments (Furnace Brook Lake and Teatown Lake), 9 perennial streams (including the Croton River), and 6 intermittent streams. These crossings are identified in Table DR1.4. The table also identifies construction timing restrictions, crossing construction methods, and equipment crossing requirements.

Ground Water Resources. As indicated above in response to item k, the ConEd Offset/Taconic Alternative will pass through one designated primary aquifer area. In addition, the locations of the 5 public and private water supply wells within 150 feet of the construction work space were also discussed in item k, above. Table DR1.3 identifies the locations of those resources. As indicated, all of these resources are located along the ConEd Offset portion of the route.

Wetlands. The ConEd Offset/Taconic Alternative will affect 21 wetlands. These wetland crossings are listed in Table DR1.5. The total length of wetland crossings for the Alternative is approximately 3,365 feet. Approximately 4.05 acres of wetland will be affected by construction. Approximately 2.33 acres of wetland will lie within the permanent ROW for the Alternative, but this total includes wetland that will not be affected by construction or operation of the pipeline, due to the configuration of the construction work space.

Land Use. The construction work space for the ConEd Offset/Taconic Alternative will include approximately 168.7 acres. The present land use classification of this acreage is given in Table DR1.6. The majority of the acreage affected is open land along the Taconic State Parkway or within the existing ConEd ROW, or forest land along the edge of the ConEd ROW. Land identified in Table DR1.6 as Other Land includes public use areas such as the Teatown Lake Reservation.

The permanent ROW for the ConEd Offset/Taconic Alternative will include approximately 80.6 acres. As indicated in Table DR1.6, the majority of this land is presently forest land or open land. The open land is predominantly located along the shoulder of the Taconic State Parkway.

Table DR1.7 provides a listing of extra work spaces required for the construction of the ConEd Offset/Taconic Alternative. The extra work spaces consist primarily

of staging areas at road, waterbody, and wetland crossings and the existing access roads within the ConEd ROW.

Residences. Five residences are located within 50 feet of the construction work space of the ConEd Offset/Taconic Alternative. These residences were identified and discussed in the response to item g, above. Table DR1.1 contains a listing of these residences and their locations. All of these residences are located within the ConEd Offset portion of the route. Also attached are site-specific drawings for the 4 residences within 25 feet of the construction work area.

In addition, screening trees in the vicinity of residences will be removed at locations identified in Table DR1.8. At all of these locations, the trees being removed screen residences along the ConEd ROW from views of that ROW.

Parks and Public Use Areas. Table DR1.9 identifies parks and other public use areas that are affected by the ConEd Offset/Taconic Alternative. Millennium has entered into discussions with representatives of most of the organizations responsible for these lands concerning effects of construction on these locations and post-construction restoration of affected lands.

Trails. Table DR1.10 identifies trails that will be affected by construction of the ConEd Offset/Taconic Alternative. The major impact will be to the North County Trail in the area where the alternative centerline follows that trail.

Comparison of ConEd Offset/Taconic Alternative to ConEd Offset/Route 100 Alternative

The ConEd Offset/Route 100 Alternative would deviate from the ConEd Offset/Taconic Alternative at the NY Route 100 crossing near MP 8.1. The ConEd Offset/Route 100 Alternative would follow NY Route 100 around the west side of Echo Lake, rejoin the ConEd Offset/Taconic Alternative south of Echo Lake for a distance of approximately 4,000 feet, then follow the North County Trail south across Chappaqua Road back to NY Route 100. On rejoining NY Route 100, the ConEd Offset/Route 100 Alternative would follow that highway to the NY Route 9A/100 interchange, where the route would rejoin the Route 9/9A Alternative in the vicinity of MP 401.5 on the Route 9/9A Alternative.

The ConEd Offset/Route 100 Alternative would follow the Route 9/9A Alternative south to the point where the ConEd Offset/Taconic Alternative intersects the Route 9/9A Alternative near MP 404.1.

As indicated above in the response to item f, a major environmental impact associated with the use of the ConEd Offset/Route 100 Alternative would occur along the section of the North County Trail north and south of Chappaqua Road. The ConEd Offset/Route 100 Alternative in this area would contain an

approximately 2,000-foot-long crossing of NYSDEC regulated wetland O-14. For at least a portion of this distance, the pipeline would need to be sited within this wetland to avoid the sewer line presently occupying the right-of-way for the North County Trail.

The attached table (Table DR1.11) provides a comparison of the ConEd Offset/Route 100 Alternative to the ConEd Offset/Taconic Alternative for the portions of the alternatives between their divergence in the north to the point where the ConEd Offset/Taconic Alternative joins the Route 9/9A Alternative in the south.

Economic Analysis

Due to the close proximity and similarity of the ConEd Offset/Route 100 Alternative and the ConEd Offset/Taconic Alternative, costs would be the same for either route.

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Position: MPL Design Manager/Acting Facility Project Manager
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MILLENNIUM PIPELINE COMPANY, L.P.

Data Request No. 6

Provide all correspondence related to the 24 aquifer protection areas identified in table 4.3.1-1 of the draft environmental impact statement (DEIS) that would be crossed by the proposed Millennium Project and specific mitigation measures that Millennium, in consultation with the public water supply districts, would use during construction.

Further, Ms. Jenine Tankoos for the New York City Department of Environmental Protection stated during the May 18, 1999 comment meeting in Yonkers, New York, that a short section of the proposed pipeline crosses the New York City watershed in Westchester County. Please identify by milepost the location for this watershed area and the specific mitigation measures Millennium would use during construction.

Response:

Millennium has contacted all towns crossed by the Project by letter and by telephone (recent correspondence attached, other correspondence and contacts filed with the Commission on December 22, 1997) with regard to special features (including protected aquifers and water supply watersheds) and permit requirements.

Millennium has noted on the CAS filed with the Commission on November 20, 1998, the limits of public water supply watersheds to be crossed. Letters have been sent to these public water supply districts requesting their comments on the specific mitigation measures (attached). The replies will be filed with the Commission when available.

Millennium's standard construction techniques will not impact the 24 aquifer protection areas identified in table 4.3.1-1 of the Draft Environmental Impact Statement (DEIS); therefore, they were not specially noted on the CAS.

To date, only the NYCDEP has been identified as having special requirements in the form of erosion and sedimentation control regulations for crossing the New York City water supply (Croton Watershed) watershed. Millennium is aware that the Project crosses the Croton watershed in Westchester County. This has been identified as PWW4 on the CAS (sheets numbered 128, 129 and 130) filed with the Commission on November 20, 1998. Millennium has subsequently received detailed watershed boundary mapping from NYCDEP and will revise the CAS accordingly prior to

construction. The revised mileposts and stations for the Croton watershed are begin MP 395.8 and end MP 398.5 (begin Station 20917+00 and end Station 21062+00).

Prepared by: Richard E. Hall, Jr.
Position: Permitting Manager
Telephone Number: 607.773.9116



June 23, 1999

Ms. Jenine Tankoos
Department of Environmental Protection
Bureau of Water Supply,
Quality and Protection
465 Columbus Avenue
Valhalla, NY 10595-1336

Re: Millennium Pipeline Project

Dear Ms. Tankoos:

The Millennium Pipeline Company, L.P. (Millennium) has applied to the Federal Regulatory Energy Commission (FERC) for a certificate to construct through a New York City Department of Environmental Protection (NYCDEP) regulated water supply watershed. A Draft Environmental Impact Statement (DEIS) has been prepared by the FERC and a copy was sent to you.

Millennium's proposed construction techniques are designed to protect water quality within your public water supply watershed. In addition to our own Spill Prevention Control and Countermeasures (SPCC) plan, included in Appendix E of the DEIS which will be revised to address FERC comments, Millennium will incorporate appropriate parts from SPCC plans developed by your watershed authority.

Enclosed are the Construction Alignment Sheets (CAS) specific to the NYCDEP watershed and table PWW: Public Water Supply Watersheds from Millennium's Specific (CAS) Notes. The New York City watershed is represented as PWW4. Millennium has received, subsequent to our filing with FERC on November 22, 1999, a detailed watershed boundary map from NYCDEP. Millennium will revise the CAS and table PWW accordingly prior to construction. As indicated in table PWW, equipment refueling will only take place in specified areas that are protected with silt fence and sorbent booms. Sorbents will be available in all vehicles working within the public water supply watershed.

Millennium is requesting comment from your agency on the mitigation measures noted above. If you have any questions, please do not hesitate to contact me at (607) 773-9116.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard E. Hall, Jr.', written over a light blue rectangular background.

Richard E. Hall, Jr.
Permits Manager

Enclosures



COLUMBIA GAS TRANSMISSION CORP.

P.O. Box 2002, Binghamton, NY 13902-2002

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MILLENNIUM PIPELINE COMPANY, L.P.

Data Request No. 3

The New York City Department of Environmental Protection (NYCDEP) stated at the April 9, 2001 SDEIS comment meeting that it still has concerns about the proposed crossing of the Catskill Aqueduct at MP 418.2. The NYCDEP continues to request an independent engineering analysis of the pipeline crossing that would be done at Millennium's expense. Millennium indicated it had agreed to do this. What is the status of the analysis? Provide details of the information the study will include. When will an independent engineering consultant be retained? Discuss how long the analysis is expected to take to complete and when Millennium will file the final report with the Secretary of the Commission.

Response:

Millennium has only recently received permission from the NYCDEP to commence the field work necessary to develop the preliminary design for crossing the Catskill Aqueduct (correspondence attached). Millennium has previously retained an engineering consultant to conduct the following:

- Perform any required research of the aqueduct system and the surrounding area
- Perform any site surveys of the surrounding area including verification of the exact configuration of the aqueduct
- Perform any geotechnical investigations required to complete and support the design
- Provide a report detailing the forces associated with a catastrophic failure of the pipeline system
- Provide a complete design package including drawings and calculations proving the ability of the design to withstand the forces associated with a catastrophic failure of the pipeline system
- Provide a complete construction package including installation drawings, construction specifications and installation procedures
- Make a formal presentation and defense of the design

This work has now commenced. Millennium expects to complete the preliminary design by August 2001. Per Millennium's previous commitment to the NYC DEP, Millennium will also retain (at its expense) the independent engineering consultant, selected by the NYCDEP, who will review and comment on the preliminary design. Once agreement

is reached, Millennium will complete and submit the final design/report to the NYCDEP. Millennium expects to file the final report with the NYCDEP and Commission by September 2001.

Prepared by: James R. Albitz/Richard E. Hall, Jr.
Position: MPL Design Manager/MPL Acting Facility Project Manager
Telephone Number: 607.648.1115/607.648.1116



April 26, 2001

**Department of
Environmental
Protection**

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Corona, New York
11368-5107

**Joel A. Miele Sr., P.E.
Commissioner**

Bureau of Water Supply

**Michael A. Principe, Ph.D.
Acting Deputy Commissioner**

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5 Columbus Avenue
Alhambra, New York
10595-1336

Mr. Jim Albitz
Design Manager
Millennium Pipeline Project
Columbia Gas Transmission
P.O. Box 2002
Binghamton, New York 13902

Dear Mr. Albitz

I am writing in response to the Millennium Pipeline Company's investigation of a proposed crossing of the Catskill Aqueduct at the Bryn Mawr Siphon. The City of New York has been made aware of a proposed route of the Millennium pipeline and their consideration of an aqueduct crossing at the Bryn Mawr Siphon. As stated in the New York City Department of Environmental Protection's (NYCDEP) letter of November 17, 2000, the DEP has agreed to consider the crossing if more detailed design information can be provided.

As agreed in January 2001, prior to the design of the crossing at the Bryn Mawr Siphon, a site investigation is to be completed. The DEP will cooperate with whichever firm Millennium selects to design the proposed crossing. As requested, enclosed please find copies of the available engineering drawing of the Catskill Aqueduct at the Bryn Mawr Siphon.

As previously discussed, a permit will be required to be on City property during the site investigation phase of the design. Please contact Marilyn Shanahan in the Office of Water Supply Lands for details regarding a permit for site access. Marilyn Shanahan can be contacted at (914) 742-2071.

I would reemphasize that the DEP has not agreed to the proposed Bryn Mawr crossing, but rather has agreed to consider the crossing design in coordination with a design review by an independent consultant selected by DEP. The DEP maintains significant reservations about the feasibility of an aqueduct crossing in this area due to the limited vertical separation and the potential threats to the aqueduct's integrity.

If you have any questions or concerns regarding the preliminary site investigation work, please contact Michael Meyer at (914) 742-2098

Sincerely,

Michael A. Principe, Ph.D.
Acting Deputy Commissioner



www.ci.nyc.ny.us/dep

(718) DEP-HELP

For more information about the maps referred/attached to this document, please send an email inquiry to gcoss.inquires@noaa.gov.