



# HOWARD COUNTY DEPARTMENT OF PLANNING AND ZONING

3430 Court House Drive ■ Ellicott City, Maryland 21043 ■ 410-313-2350

Lynda D. Eisenberg, AICP, Director

FAX 410-313-3467

August 8, 2023

Laura Rudolf  
Transcontinental Gas Pipe Line Company, LLC.  
P.O. Box 2400  
Tulsa, OK 74102-2400  
Via email: [laura\\_rudolf@williams.com](mailto:laura_rudolf@williams.com)

RE: WP-24-007 Transcontinental Gas Pipeline – Station 190

Dear Ms. Rudolf:

This letter is to inform you that your request for alternative compliance to the Howard County Subdivision and Land Development Regulations for the subject project was reviewed.

On August 4, 2023, and pursuant to Section 16.104, the Director of the Department of Planning and Zoning, considered and **approved** your request for alternative compliance with respect to **Section 16.115(c) and Section 16.155(a)(1)(i)** of the Subdivision and Land Development Regulations to disturb areas of floodplain for a maintenance project at the existing Station 190 Compressor Station and to substitute the alternative compliance exhibit for the site development plan.

The Department of Planning and Zoning hereby determines that you have demonstrated to its satisfaction that strict enforcement of Section 16.115(c) and Section 16.155(a)(1)(i) would result in an unreasonable hardship or practical difficulty. This determination is made with consideration of your alternative compliance application and the items you were required to address, pursuant to Section 16.104(a)(1):

## **Subtitle I, Article II, Section 16.115(c)**

### **1. Strict conformance with the requirements will deprive the applicant of right commonly enjoyed by others in similar areas;**

The applicant is requesting to complete maintenance work at the existing Station 190 Compressor Station, which will allow an alternative route to move natural gas through the existing pipelines, reducing potential disruptions to customers during times of required outages. The proposed modifications and improvements do not establish a new use or change in use onsite. The areas of excavation within the floodplain are limited to locations of existing pipelines and associated facilities, which have been previously disturbed for the development and maintenance of the Station. The proposed LOD is limited to the area required to complete the work and meets safety requirements, while avoiding impacts to the adjoining stream bank buffer. Strict conformance with the requirements would prohibit improvements to the existing utility.

### **2. Uniqueness of the property or topographical conditions would result in practical difficulty; other than economic, or unreasonable hardship from strict adherence to the regulations.**

Station 190 was originally constructed in 1950 and lies within an area of floodplain. For the site to comply with regulations and current standards implemented by the U.S. Department of Transportation Pipeline and Hazardous

Material Safety Administration, occasional impacts to the facility are required. The LOD was limited to avoid other environmental features that exist onsite, but access to the existing pipeline and associated facilities are located within the floodplain and there are no feasible options to avoid impacting that area. Strict adherence to the regulations would prevent compliance with current federal standards required for the safe transportation of natural gas.

- 3. The Variance will not confer to the applicant a special privilege that would be denied to other applicants and;**  
The proposed impacts are within areas of existing pipelines and associated facilities of the Station. The location of the Mainline valves and piping require that the impacts are within the floodplain. Proposed impacts are temporary and will be returned to original conditions once the project is completed. Due to the location of the proposed work, the characteristics of the floodplain, and the temporary impacts, this request will not confer special privileges to the applicant.
- 4. The modification is not detrimental to the public health; safety or welfare, or injurious to other properties.**  
The proposed improvements will not be detrimental to public health; safety or welfare, or injurious to other properties. The proposed improvements will allow for an alternative route to move natural gas through the existing pipelines, reducing potential disruptions to customers during times of required outages. The scope of the work is within areas that have previously been disturbed, and all locations of disturbance will be temporary and will be returned to their original conditions once the project is completed. The project proposes no new development and no net loss of existing floodplain volume. Improvements included in this alternative compliance request are to increase the applicant's ability to maintain and inspect the integrity of the existing pipeline and associated facilities.

#### **Subtitle I, Article V, Section 16.155(a)(1)(i)**

- 1. Unreasonable hardship or practical difficulties may result from strict compliance with the regulations.**  
Strict compliance with the regulations would require the applicant to submit a formal Site Development Plan for the proposed project. This would result in an unreasonable hardship since the alternative compliance plan exhibit contains all necessary information for permitting and construction. Modifications and improvements proposed with this submission do not establish a new use or change in use onsite. The maintenance project involves the installation of new valves, trap modifications, and a kicker line system at the existing station. No tree clearing is proposed, and all the excavated material will be stockpiled adjacent to the dig location and used as backfill. The exhibit provided, showing the proposed LOD and improvements, are to be retained by the County, and is sufficient to be used in reviewing the design in accordance with County Regulations. SRC agencies, including the Department of Public Works, the Department of Recreation and Parks, and the Soil Conservation District, have been consulted and have no objections to this alternative compliance request.


Approval of this Alternative Compliance is subject to the following conditions:

1. Any encroachment and grading within the floodplain must be designed to have no net loss of floodplain storage volume.
2. The encroachment is limited to the LOD as shown on the alternative compliance exhibit. Once the project is completed, the LOD shall be restored to its previous condition through stabilization.
3. Compliance will all applicable County and State Regulations and obtaining all necessary permits from the Department of Inspections, Licenses and Permits prior to initiating development onsite.
4. The applicant must obtain any required regulatory permits for floodplain from MDE and Army Corp of Engineers. Applicable permit numbers shall be referenced on any building or grading permit.

Indicate this alternative compliance petition file number, request, section of the regulations, action, conditions of approval, and date on all related plats, and site development plans, and building permits. This alternative compliance approval will remain valid for one year from the date of this letter or as long as a subdivision or site development plan is being actively processed in accordance with the processing provisions of the Regulations.

If you have any questions, please contact Kathryn Bolton at (410) 313-2350 or email at [kbolton@howardcountymd.gov](mailto:kbolton@howardcountymd.gov).

Sincerely,

DocuSigned by:  


1EB75478A22B49A...  
Anthony Cataldo, AICP, Chief  
Division of Land Development

AC/kb

cc: Research  
DLD - Julia Sauer  
Real Estate Services  
WHM Consulting, LLC, Paul Fisher – [paulf@whmgroup.com](mailto:paulf@whmgroup.com)



## ALTERNATIVE COMPLIANCE APPLICATION

<b>Site Description:</b>	The project site is located within the existing Station 190 Compressor Station.		
<b>Subdivision Name/Property Identification:</b>	Transcontinental Gas Pipe Line Company, LLC		
<b>Location of property:</b>	11910 Carroll Mill Road, Ellicott City, MD 21042		
<b>Existing Use:</b>	Existing Pipeline Compressor Station	<b>Proposed Use:</b>	Existing Pipeline Compressor Station
<b>Tax Map:</b>	23	<b>Grid:</b>	0007
		<b>Parcel No:</b>	90
		<b>Election District:</b>	3
<b>Zoning District:</b>	RR-DEO	<b>Total site area:</b>	3.57 acres

**Please list all previously submitted or currently active plans on file with the County (subdivision plans, Board of Appeals petitions, alternative compliance petitions, etc.). If no previous plans have been submitted, please provide a brief history of the site and related information to the request:**

Alternative Compliance Approval: (WP-023-022) - Expires September, 23, 2023.  
 Grading Permit: G22000178

Portions of the original project was delayed and will finish after the current Alternative Compliance Approval Expires. All work will be completed by the end of the year.

**In the area below, the petitioner shall enumerate the specific numerical section(s) from the Subdivision and Land Development Regulations for which an alternative compliance is being requested and provide a brief summary of the request. Please use the additional page if needed.**

Section Reference No.	Brief Summary of Request
No.16.155 (a)(1)(ii)(SDP)	1. Approval of a site development plan is required prior to issuance of Grading and Building Permits for non-residential development (which includes utility development).
No. 16.155 (c)(2)	1. No clearing, excavation, filing, altering drainage, or impervious paving may occur on land located in a floodplain unless required or authorized by the DEpartmentn of Planning and Zoning upon the advice of the Deaprtmetn of Ispectiosn, License, and Permits, the Department of Public Works, etc.

Section Reference No.	Brief Summary of Request

**Signature of Property Owner:**

*Laura Rudolf*

**Date:**

7/05/23

**Signature of Petitioner Preparer:**

*Paul Fisher*

**Date:**

7/05/23

**Name of Property Owner:**

Transcontinental Gas Pipe  
Line Company, LLC

**Name of Petitioner Preparer:**

Paul Fisher

**Address:**

PO Box 2400

**Address:**

366 Walker Drive  
Suite 300

**City, State, Zip:**

Tulsa, OK 74102-2400

**City, State, Zip:**

State College, PA 16801

**E-Mail:**

laura.rudolf@williams.com (primary Transco contact)

**E-Mail:**

paulf@whmgroup.com

**Phone No.:**

713-204-1283

**Phone No.:**

814-689-1650

**Contact Person:**

Laura Rudolf (713-204-1283)

**Contact Person:**

Paul Fisher



**Owner's Authorization Attached**