

# THE COUNTY OF CHESTER

CHESTER COUNTY  
WATER RESOURCES AUTHORITY  
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May 20, 2016

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First St. NE Room A1  
Washington, DC 20426

Re: OEP/DG2E/Gas Branch 4  
Transcontinental Gas Pipe Line Company, LLC  
Docket CP15-018-001

Dear Ms. Bose,

The Chester County Water Resources Authority (CCWRA) is submitting the following comments in response to a review of the Draft Environmental Assessment for the Eastern Shore Natural Gas Company's (ESNG) White Oak Mainline Expansion Project, issued by the US Federal Energy Regulatory Commission. In Chester County, Pennsylvania, this project would include construction and operation of 3.3 miles of 16-inch diameter looping pipeline (Daleville Loop) and 2.1 miles of 16-inch diameter looping pipeline (Kemblesville Loop) in Franklin Township, Highland Township and Londonderry Township in Chester County, Pennsylvania. These comments represent a review of the currently available information regarding the proposed project; the proposed project's consistency with *Watersheds*, Chester County's Integrated Water Resources Management Plan; consistency with the *County-wide PA Act 167 Stormwater Management Plan for Chester County, PA*; and consideration of other potential impacts of the proposed project. Comments are provided to assist the FERC staff in determining the issues that need to be evaluated and documented more closely.

CCWRA has reviewed the White Oak Mainline Expansion Project and System Reliability Project Environmental Assessment (herein referred to as the "EA") and respectfully submits the following comments regarding the Chester County portion of the EA and requests they be addressed prior to approval of the project by FERC.

1. CCWRA strongly supports all comments submitted by the Chester County Planning Commission (CCPC) (letter dated May 19, 2016) and requests all CCPC comments be addressed prior to approval by FERC.
2. FEMA is currently updating the flood zone delineations in portions of Chester County, PA. All three municipalities (Franklin Township, Highland Township and Londonderry Township) will be receiving revised flood zone delineations. CCWRA requests that these preliminary FEMA maps, or if more conservative, the current floodplain mapping be used to assess the environmental effect of the White Oak Mainline Expansion Project. These preliminary maps and the GIS layer are available from FEMA's Map Service Center website. Alternatively, an

interactive map displaying the differences between the current and proposed flood mapping can be viewed here: <http://maps.riskmap3.com/pa/ChesterCo/>. It is anticipated that the final revised maps will go effective in mid-2017.

3. All construction and staging area activities should be conducted to minimize any water quality impacts:

- a. Pipeline staging and construction of the Daleville Loop will occur in the Doe Run subwatershed of the Brandywine Creek and the Big Elk Creek subwatershed of the Chesapeake Bay. Both watersheds have TMDLs in effect.

The tributaries of the East Branch of the Big Elk Creek are High Quality – Trout Stocking and currently unimpaired. However, they have recently been reassessed for water quality by PADEP and the draft assessment has found these tributaries now to be impaired for siltation and habitat alteration. (Source: <http://www.depgis.state.pa.us/emappa/>).

- b. Pipeline staging areas and construction of the Kemblesville Loop will occur in the West Branch White Clay Creek Watershed and the Big Elk Creek Watershed. Both watersheds have TMDLs in effect.

PADEP has declared the West Branch White Clay Creek impaired for nutrients and siltation and the Christina Basin TMDL applies with municipal wasteload reduction requirements in effect.

The two tributaries of East Branch of the Big Elk Creek have recently been reassessed in 2014 by Pennsylvania Department of Environmental Protection (PADEP) and found to be impaired for siltation and habitat alteration. (Source: <http://www.depgis.state.pa.us/emappa/>).

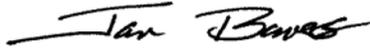
4. CCWRA supports FERC's requirement that Eastern Shore complete their consultation with the National Park Service before finalizing the construction and restoration plan for the crossing of the tributaries of White Clay Creek watershed since it is designated a Wild and Scenic River. CCWRA requests that the result of this "consultation" allow NPS's comments on the final plan to strongly influence and guide the Kemblesville Loop project to ensure the intent of the designation of the Wild and Scenic River is met.
5. CCWRA strongly supports additional short term and long term protective measures for the project areas involving steep slopes and in areas where the potential for erosion is a concern. The Brandywine/Christina Basin watershed and the Chesapeake Bay watersheds both have impaired streams and TMDLs in place for sediment and nutrients.
6. CCWRA requests more details regarding the groundwater hazards and risks to groundwater quality and nearby wells that exist in several areas along or adjacent to the Daleville and Kemblesville Loops. There was only a brief mention of this in the EA, and no details were given to comment on.
7. CCWRA strongly recommends that FERC make it a requirement that Eastern Shore conduct pre- and post- construction monitoring of well yield and water quality for all private wells within 150 feet of pipeline construction. However this monitoring distance should be significantly expanded if blasting will occur. There is no mention as to whether or not any well or groundwater impacts are anticipated, and if so what remedial measures are to be taken by Eastern Shore.

8. Please provide more details regarding the re-vegetation of disturbed areas. There is no mention of required monitoring of the disturbed areas to ensure re-vegetative success that is critical in impaired watersheds with TMDLs.
9. Please provide the number and location of all sub-surface wastewater (e.g. onlot septic systems) and stormwater (e.g. residential surface and subsurface best management practices within at least fifty feet of the proposed Daleville Loop and Kembleville Loop project areas and ensure that all these features are protected from disturbance, or if disturbance cannot be avoided, describe what measures are to be taken to be sure they are restored or replaced with equal function features.
10. Tree removal should be avoided in every place possible to minimize increased flooding, terrestrial and instream erosion and sedimentation, loss of nutrient pollutant removal, stream bank erosion, and thermal stream pollution. If mature trees are replaced with shrubs and vegetation allowed to attain its natural height, additional post-construction stormwater runoff controls will be needed to compensate for the loss of critical runoff reduction that existing tree canopies currently provide in these TMDL watersheds. This is especially critical where tree removal will occur within the 100 foot riparian buffer on each side of a waterbody or where a canopy has been removed from steep slopes.
11. Any reforestation plan should specify sufficient size, type and protection of tree plantings and follow-up inspection and replacement by the applicant to assure at least 85% survival of plantings. This is particularly critical on steep slopes and within the 100-foot riparian corridors.
12. Wetlands and riparian buffer areas should not be disturbed beyond the width of the corridor necessary for the pipe installation. To the maximum extent practicable, these areas within the limits of construction or staging areas should be avoided as they serve as critical buffer features.
13. The EA incorrectly titled the “Chester Water Authority” as “Chester County Water Authority”. Please correct. For your clarification, Chester Water Authority is a public water supplier active in this area; Chester County Water Resources Authority (CCWRA) is a county-wide flood control and water resources management agency. The references to CCWRA in the EA are correct.
14. The EA indicates that the applicant will be discharging the water used in the hydrostatic testing back onto well-vegetated upland areas adjacent to the right-of-way. Information should be provided indicating what if any water quality impacts may occur from internal pipe residues, chemicals or metals (if any) from the hydrostatic testing, and what measures will be taken to insure the discharge rate does not create instream turbidity or erosion conditions.
15. All work in stream banks and within stream channels should be conducted to insure that stable stream channel processes and geomorphology conditions will remain during and after completion of construction. CCWRA recommends follow-up monitoring by the applicant of streambank stability where stream crossings occurred by the applicant and where necessary stream channel/bank restoration or repair be conducted.

CCWRA submitted comments regarding the Kemblesville Loop Alternative Route on August 7, 2015. Please consider those comments as well as the comments provided above.

Thank you for your consideration of these comments. Please contact us if you have any questions or wish to discuss the above comments.

Sincerely,

A handwritten signature in black ink that reads "Janet Bowers". The signature is written in a cursive, flowing style.

Janet L. Bowers, P.G.  
Executive Director

cc: Carol Stauffer, Chester County Planning Commission  
Chris Strohmaier, Chester County Conservation District