



THE COUNTY OF CHESTER

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September 17, 2019

Honorable Danielle Friel-Otten
Pennsylvania House of Representatives
102B East Wing
House PO Box 202155
Harrisburg, PA 17120-2155

Dear Representative Friel-Otten,

In recent weeks, we were asked by some of our constituents to support HB1735, your legislation establishing the Pipeline Early Detection and Warning Board. We have reviewed the language with senior staff in our Planning Commission, Department of Emergency Services, Health Department, and the County Commissioners Association of Pennsylvania, and based on that review, have some feedback we'd like to share with you. The intent of our recommendations is to enhance your legislation in a meaningful and impactful way, so to address our collective goal of improving pipeline safety.

1. We are curious to learn more about the rationale as to why this Board would be established in the Department of Community and Economic Development and not the Pennsylvania Emergency Management Agency.
2. Under Definitions:
 - a. "Early detection and warning system" says it would be directly linked to local first responders. Because fire companies do not have personnel in the station at all times, County emergency services are the first stop and originating dispatch agency to local first responders. In addition, if Hazmat or other specialty services are required, that would also be provided from the County. Due to these circumstances, at a minimum, County emergency management agencies and 9-1-1 centers should be linked to the system too.
 - b. "Municipalities" does not list counties and we believe it should. In addition, by giving the ability to municipalities to develop and implement early warning detection systems, there is a good chance the Commonwealth would end up with a variety of different systems scattered throughout any given County. This would not be ideal. Instead, we recommend a countywide approach, at a minimum, which should include municipal input and coordination into the process. We also think the word "develop" should be defined in the proposed legislation. We want to be clear that municipalities would not be responsible for inventing an early warning detection system but instead designing or selecting a system and then implementing said system.

3. Under Section 3, Board:
 - a. We recommend including county representation on the board, as described in 2a above, due to our connection with emergency management and 9-1-1.
 - b. When you say the Secretary of Environmental Protection, we assume you mean the Secretary of the Department of Environmental Protection.

4. Under Section 5, Pipeline Early Detection and Warning System fee:
 - a. "Pressure in the pipeline" should be "Maximum pressure in the pipeline."
 - b. "Volume of product flowing through the pipeline" should be "Maximum volume of product flowing through the pipeline."
 - c. "Pipeline construction" should be defined in Section 2.
 - d. We recommend language be included to allow for a multi-municipal/regional grant as well as a countywide grant.

5. Under Section 6, Risk Assessments: Copies of risk assessments should be submitted to the county emergency management agency.

Thank you for being a consistent voice on this matter and for considering all of these recommendations. If you would like to discuss them further we would be happy to arrange a time for you to meet with our senior department staff who are intimately involved in pipeline regulations and safety. We would also welcome the opportunity to provide comment or guidance on any future legislation you may have interest in introducing.

Sincerely,



Michelle Kichline
Chair



Kathi Cozzone
Commissioner



Terence Farrell
Commissioner