



# THE COUNTY OF CHESTER



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## PLANNING COMMISSION

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September 15, 2015

Robert Simcik, PE  
Tetra Tech  
661 Andersen Drive  
Pittsburgh, PA 15220

Re: 67 and 68 Notice of Permit Notification for Sunoco Pipeline, LP  
Elverson Borough, East Goshen, East Nantmeal, East Whiteland, Upper Uwchlan,  
Uwchlan, Wallace, West Goshen, West Nantmeal, West Whiteland, and Westtown  
Townships

Dear Mr. Simcik:

On August 28, 2015, the Chester County Planning Commission (CCPC) received the above referenced Notice that Sunoco Pipeline LP is applying for coverage under the Erosion and Sediment Control General Permit (ESCGP-2) for Earth Disturbances Associated with Oil and Gas Exploration, Production, Processing or Treatment Operations, or Transmission Facilities.

Sunoco Pipeline LP proposes to construct and operate an expanded pipeline system within a 50-foot wide right-of-way and additional associated temporary workspaces. As proposed, this project will traverse the 10 townships and one borough in Chester County, noted above. The CCPC stresses the need to consider safety and other issues in the most densely developed areas of the project, especially where the existing pipeline comes within feet of residences, in some cases abutting the right-of-way with the foundations of homes and other facilities. Furthermore, we are requesting restoration to the greatest extent possible of all disturbed features, particularly those that are within the Natural Features Overlay of *Landscapes*- the County Policy Plan (2009), those in High Quality and Exceptional Value watersheds, and those containing steep slopes, historic resources, and residential areas.

Sunoco Pipeline LP's project crosses all of the County's Livable Landscapes as depicted in *Landscapes2* <http://www.landscapes2.org/mapping/InteractiveMap.cfm>. As proposed, the project is generally consistent with the following policies and objectives related to Utilities and Infrastructure:

- Objective UI 1, "Coordinate land use and utility planning efforts between municipalities, counties, state and federal agencies, and utility service providers, to ensure effective, consistent, and cooperative planning for the logical expansion and upgrading of infrastructure throughout the county;"
- Policy UI 4.1, which states: "Assess both the positive and negative impacts of future expansions of electrical transmission infrastructure, fuel pipeline corridors, and their easements on land use and local municipalities in the development of comprehensive plans;" and
- Policy UI 4.5, which states: "Support coordination between franchise owners, service providers and municipalities in planning the expansion of facilities so that franchise areas remain consistent with municipal and county planning efforts and will minimize impacts to natural and protected resources."

Conversely, this project has the potential to be generally inconsistent with the following objective and policies if all proper safeguards are not followed during the course of this project:

- Objective UI 4, "Encourage the use of efficient, reliable, affordable, and environmentally sensitive energy supplies that support planned growth and the protection of natural, cultural, and open space resources in Chester County;"
- Policy LU 1.5, "Encourage protection of the rural and agricultural landscapes as designated rural resource areas;"
- Policy LU 4.7, "Promote context sensitive design for infrastructure improvements to maintain rural character;" and
- Policy LU 5.2, "Limit infrastructure improvements to those supporting the agricultural industry and use context sensitive design to maintain community character," if care is not taken to properly restore the landscape throughout the County.

This project involves land located within multiple High Quality and Exceptional Value watersheds, as designated by the Pennsylvania Department of Environmental Protection, including French Creek, West Branch Brandywine Creek, Pickering Creek, Valley Creek and Ridley Creek. Failure to properly restore these lands would be inconsistent with the following Landscapes Policies:

- NR 2.1, “Manage invasive plants, and restore, re-vegetate, and expand ecologically sustainable plant communities and woodlands on steep slopes, floodplains, and riparian buffers;”
- NR 3.10, “Restore degraded and impaired streams and ground water to achieve state designated water quality standards and support upgrades in state stream designations where justified by stream conditions and uses;”
- NR 3.11, “Encourage implementation of strategies that reduce or eliminate soil erosion to conserve soil resources and reduce in-stream siltation and pollutants;”
- NR 3.8, “Preserve high priority, sensitive natural resource areas, including riparian buffers, 100-year flood plains, first order streams and their drainage areas, sources of public water supplies, and wellhead protection areas;”
- NR 3.16, “Encourage implementation of municipal stormwater management criteria, plans, and regulations for land development and transportation projects;” and
- NR 3.17, “Support the implementation of Pennsylvania Act 167 stormwater management plans.”

If full restoration does not occur, this project would be inconsistent with the following Land Resources policies of *Landscapes2*:

- NR 1.2, “Protect, enhance and restore wooded or vegetated steep slopes to protect soil stability and reduce flooding;”
- NR 1.5, “Conserve Class I and II soils for agriculture in both rural and agricultural landscapes;” and
- NR1.6, “Protect soils that support economically sustainable clusters of cultivated land, livestock, orchard, nursery, and other agricultural operations.”

As proposed, this project will pass through two Protection Areas of National Significance, including the Hopewell Big Woods and the Schuylkill River Heritage Area. These are both overlay features which contain natural, cultural, and historic resources of national significance. While the plan does not provide any direct protection to these areas, the County recognizes them and supports the ongoing efforts to protect the resources contained within.

*Landscapes2* notes that Chester County is second, only to Philadelphia, for having the highest number of historic resources listed on the National Register of Historic Places in the Commonwealth. Unless these resources are fully protected, the potential impacts of this project would be inconsistent with the following policies of *Landscapes2*:

- “HR 2.2. Protect historic resources and their context which is integral to their meaning and significance,” and
- “HR 2.8 Sustain the historic agricultural and conservation legacy of Chester County’s rural landscapes.”

CCPC recognizes that in addition to pipelines being part of the infrastructure, they are also a mode of transportation that moves a product from one location to another. With the appropriate restoration, the proposed project would be generally consistent with the following policies related to transportation in *Landscapes2*:

- T 1.7 “Promote a transportation system that is flexible and sensitive to environmental, scenic, and community impacts.”
- T 7.4 “Mitigate the environmental and community impacts of goods movement.”

For further information on project consistency with *Landscapes2*, the applicant is invited to visit <http://www.landscapes2.org> where you may locate your project site on the Livable Landscapes map and view the goals, objectives, and policies regarding the applicable landscape designation.

Sincerely,



Carrie Conwell  
Environmental Planner

Cc: Elverson Borough  
East Goshen Township  
East Nantmeal Township  
East Whiteland Township  
Upper Uwchlan Township  
Uwchlan Township  
Wallace Township  
West Goshen Township  
West Nantmeal Township  
West Whiteland Township  
Westtown Township