



THE COUNTY OF CHESTER



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April 25, 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 CP15-527-000

Dear Ms. Bose,

The Chester County Planning Commission (CCPC) has reviewed the Draft Environmental Assessment for the Transcontinental Gas Pipe Line Company, LLC New York Bay Expansion Project, issued by the US Federal Energy Regulatory Commission. In Chester County, Pennsylvania, this project would include an uprate to Compressor Station 200 from 30,860 horsepower to 33,000 horsepower in East Whiteland Township, and the installation of various appurtenances and modifications at the meter and regulation station in East Brandywine Township. The project also proposes an uprate to a unit of Compressor Station 303, in Essex County, New Jersey; additional horsepower of compression to Compressor Station 207 (located in Middlesex County, New Jersey); installation of various appurtenances and modifications at two additional meter and regulation stations (in Middlesex County, New Jersey and Richmond County, New York); the replacement of three segments of the existing 42-inch diameter Lower New York Bay Lateral pipeline, totaling 0.25 miles; and uprating the lateral operating pressure from 960 to 1,000 psi in Middlesex County, New Jersey.

The proposed project will affect the following Chester County municipalities: the townships of East Brandywine and East Whiteland. The following comments are offered based on review of the Draft Environmental Assessment and how the proposal directly impacts and affects Chester County, Pennsylvania:

A. Consistency with the County Policy Plan – *Landscapes2*:

Landscapes2, 2009, is the adopted Comprehensive Policy Plan for Chester County. *Landscapes2* identifies general land patterns, or “Landscapes,” of future development

in the County – Urban, Suburban, Rural, Agricultural, and Natural. The Transcontinental (Transco) Gas Pipe Line Company’s New York Bay Expansion Project is located within an area defined as Suburban Landscapes. These are locations in which Objective LU3 of *Landscapes2* promotes development that accommodates anticipated population and employment growth, using appropriate density, sustainable design and smart transportation principles, in addition to the provision of the necessary infrastructure to enable this type of development to occur.

In addition, the portion of the proposed New York Bay Expansion Project that contains Compressor Station 200, is located within the Schuylkill River National and State Heritage Area. CCPC does recognize that all work to be performed on Compressor Station 200 will be occurring on Transco-owned property, and as such, impacts to the Schuylkill River National and State Heritage Area should be minimal, if any. Please see comments #11 and 12 for additional information regarding this resource.

B. General Comments:

1. There are multiple properties throughout the Chester County portion of the New York Bay Expansion Project area which contain preservation easements on them. While the CCPC recognizes that these parcels are not directly impacted, Transco should be aware that there are multiple parcels within ½ mile or less of both Compressor Station 200 in East Whiteland Township and the M&R Station in East Brandywine Township that are protected open space preserved by municipal, land trust, homeowner’s association, or agricultural preservation easements.
2. While the proposed project does not meet the minimum requirements to obtain an Erosion Control Permit, the Chester County Conservation District and the PA DEP require all earth disturbance activity be compliant with PA Chapter 102.
3. According to parcel information, mapping in Chester County indicates that there is a PECO right-of-way located between Compressor Station 200 and Malvern Hunt subdivision. CCPC recommends contacting PECO to coordinate any construction activity that may be occurring near their right-of-way.
4. Page 7. Construction, Operation & Maintenance Procedures. The text indicates that Transco will clear and grade the relevant portion of properties to prepare for construction, and that erosion control devices will be installed to prevent offsite impacts. Please be aware that Chester County has developed a county-wide Act 167 Stormwater Management Plan that was adopted by the Chester County Board of Commissioners and approved by

the Pennsylvania Department of Environmental Protection in July of 2013. Since that time, both East Brandywine and East Whiteland townships have updated minimum standards in their ordinances, in December 2013 and January 2014, respectively. The Act 167 Plan can be found here: <http://www.chesco.org/water> and select “Stormwater Management” from the side banner.

Failure to meet these requirements would be inconsistent with the Chester County Stormwater Management Plan and the following policies of **Landscapes2**: Policy NR 3.15, “Support initiatives to improve water quality for the Delaware Estuary/Bay, Chesapeake Bay, and Christina River Basin;” Policy NR 3.16, “Encourage implementation of municipal stormwater management criteria, plans, and regulations for land development and transportation projects;” Policy 3.17, “support the implementation of PA Act 167 stormwater management plans;” Policy UI 6.1 “Encourage proper design and maintenance of stormwater management infrastructure that will reduce runoff, erosion, flooding and drainage problems;” and Policy UI 6.6, “Support the implementation of PA Act 167 stormwater management plans.”

5. Page 11. Permits, Approvals & Consultations. For the Chapter 102 NPDES hydrostatic test water discharge, please include where the test water will be drawn from and how it will be disposed of.
6. Page 13. Land Subsidence and Karst Terrain. Please be aware that portions of the US Route 30 corridor have experienced issues with sinkholes. While there may not be areas directly involved with construction that have sinkholes, please be aware that there may be unmapped areas that are susceptible. Chester County Planning Commission requests the inclusion of geotechnical reporting for any portion of the project that has a higher potential for ground subsidence.
7. Page 14. Soils. While there are approximately 71 acres of temporary and permanent impact involved with this project, the CCPC notes that in Chester County, the total impacted area is indicated to be 0.06 acres, and should have little to no negative impact.
8. Page 20. Hydrostatic Testing. The text indicates that the M&R Station in East Brandywine Township will utilize municipal water that will be transported in, utilized to perform hydrostatic testing, and then hauled away. Please include where it is being withdrawn from and where it will be disposed of. If water is being transported across watershed boundaries, it would be inconsistent with **Watersheds** Objective 6-8, which states: “Plan

water supply and wastewater sources and facilities that seek to maintain the natural watershed water balance of each subbasin.”

9. Page 28. Aquatic Resources. The text indicates that no waterbodies are being crossed in Chester County as a result of this project. However, the M&R Station located in East Brandywine Township is located in the East Branch Brandywine Creek, which is part of the Christina Basin, and is designated as High Quality Waters of the Commonwealth, according to PA Code Title 25, Chapter 93 for Water Quality Standards. Transco should coordinate with the Pennsylvania Department of Environmental Protection and Chester County Water Resources Authority, to ensure compliance with the standards of this regulation. This coordination would be consistent with *Landscapes2* Policy NR 3.6, which states: “Protect and enhance state-designated sensitive aquatic habitats.”
10. Page 30. Threatened, Endangered, and Other Special Status Species. The East Brandywine Township M&R Station is located within an area designated by DCNR as the Supporting Landscape for the Great Marsh. While it appears unlikely that there would be a direct impact on the Great Marsh Core Habitat Area, please refer to the Pennsylvania Natural Heritage Program, managed by the Pennsylvania Department of Conservation and Natural Resources. Please see the following website for additional information: <http://www.naturalheritage.state.pa.us/HomePage.aspx>.
11. Page 38. Cultural Resources. As stated at the beginning of this review, the portion of the proposed New York Bay Expansion Project that contains Compressor Station 200, is located within an area of National Significance, specifically, the Schuylkill River National and State Heritage Area. While *Landscapes2* does not provide additional protection to these areas, it does recognize them, and supports ongoing efforts that protect the important resources they contain. For more information on this Overlay area, you can visit the National Park Service’s website at: <https://www.nps.gov/scrv/index.htm> and the organization’s website here: <http://www.schuylkillriver.org/>. CCPC recognizes that all work to be performed on Compressor Station 200 will be occurring on Transco-owned property, and as such, impacts to the Schuylkill River National and State Heritage Area should be minimal, if any.
12. Page 38. Special Interest Areas. As noted above, Compressor Station 200 is located within an area of National Significance, specifically, the Schuylkill River National and State Heritage Area. While the County cannot provide special protection to these areas, Chester County does recognize them, and supports ongoing efforts to protect the nationally significant natural, cultural,

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and historic resources which they contain. For those reasons, Chester County Planning Commission requests that this area be included in this section of Special Interest Areas. Insufficient mitigation would be inconsistent with the goals of *Landscapes2*, as these protection areas help to define the rural, natural and cultural heritage of Chester County.

13. Page 51. Cumulative Impacts. As discussed in a previous information request, Chester County Planning Commission maintains an online map that includes proposed developments from 2011-present. If additional information is needed on development proposed in the vicinity of Compressor Station 200 or the East Brandywine M&R Station, please visit our plan review interactive map at <http://www.landscapes2.org/PlanReview/prMaps.cfm>. Once there, you can enter an address and view subdivision and land development proposals from 2011-present, as well as associated review letters.
14. Page 56. Conclusions and Recommendations. The CCPC requests that the County be given the contact information for the Environmental Inspector for use by county departments, such as the Conservation District, Facilities, Health Department, and Water Resources Authority, as well as to assist with notifications to Transco if there are issues or concerns on behalf of residents.

Thank you for the opportunity to comment on this project. If you have any questions, please contact Carrie Conwell or Carol Stauffer of the Chester County Planning Commission at 610-344-6285.

Sincerely,



Brian N. O'Leary, AICP
Executive Director

BNO/CJC/ncs

Cc: Chester County Commissioners
Mark Rupsis, Chester County Commissioners Office
Chester County Water Resources Authority
Chester County Conservation District
Chester County Parks & Recreation Department
East Brandywine Township
East Whiteland Township
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