



# THE COUNTY OF CHESTER



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February 1, 2019

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

Re: OEP/DG2E/Gas Branch 1  
Adelphia Gateway, LLC  
Adelphia Gateway Project  
Docket CP18-46-000

Dear Ms. Bose,

The Chester County Planning Commission (Planning Commission) has reviewed the Draft Environmental Assessment (EA) for the Adelphia Gateway Project, issued by the US Federal Energy Regulatory Commission. In Chester County, Pennsylvania, this project would include the purchase and repurposing of the existing pipeline facilities owned by Interstate Energy Company, LLC from oil to natural gas, and would also include the installation of four Blowdown Assembly Valves identified as Chester Creek, Paoli Pike, French Creek, and Cromby, as well as Mainline Valve #2 primarily at locations that currently have existing above ground equipment or facilities.

The proposed project will affect the following Chester County municipalities: the townships of East Pikeland, Charlestown, East Whiteland, West Whiteland, East Goshen and Westtown through the development of Blowdown Assembly Valves (BAVs) or the acquisition of the Interstate Energy Company, LLC pipeline. The municipalities in which BAVs are being installed are East Goshen (1) and East Pikeland (3). East Whiteland Township will have a Mainline Valve #2 installed. The following comments are offered based on review of the Draft Environmental Assessment for the Adelphia Gateway Project and how the proposal directly impacts and affects Chester County, Pennsylvania:

### A. County Policy Plan – *Landscapes3*:

*Landscapes3*, 2018, is the adopted Comprehensive Plan for Chester County. *Landscapes3* identifies general land patterns, or “Landscapes,” of future development in the County and identifies policies for protecting these landscapes

and their many resources. The Adelpia Gateway Project is located within areas defined as Rural, Suburban and Suburban Center Landscapes. These locations are areas identified for both preservation and growth, respectively, in the county.

Those portions of the project that are proposed within the Rural Landscape are locations in which *Landscapes3* promotes the preservation of the open, rural character of Chester County, and are not appropriate for significant growth. The portions of the project that are located within the Suburban and Suburban Center Landscapes of the county are the areas identified for growth, and include predominately residential communities and regional economic centers with high employment densities.

Portions of the project are also located in areas within the Significant Natural Landscapes Overlay designation. These areas consist of a network of streams, forests, wetlands, floodplains, groundwater recharge areas, ridge tops and steep slopes, among others. These environmental features overlay all other landscapes and are typically protected by regulations or are subject to limited disturbance. Conservation practices should be applied to protect and restore these resources in the county.

While we recognize that the proposed project is primarily located within the existing right-of-way currently owned and occupied by Interstate Energy, LLC, with limited new construction proposed in Chester County, impacts during construction to sensitive natural and cultural resources are of concern. The Adelpia Gateway Project may be located in proximity to several areas designated by the PA DCNR as Core Habitat Areas or Supporting Landscapes for Chester County. Please refer to comment #19 for more information on Chester County's Natural Heritage Areas Inventory.

Chapter 9 of *Landscapes3* discusses the ways in which the county connects through different systems of infrastructure, including roadways, freight, public transportation, wastewater and drinking water utilities, and pipelines. **Connect Recommendation 8** supports the enhancement of pipeline safety through the provision of information, facilitation of communication and encouraging partnerships to reduce impacts on residents and the environment.

We recommend that the following issues be fully addressed to achieve better consistency with policies regarding environmental protection, public safety, and communication as identified in *Landscapes3*.

#### B. Comments:

1. Chester County is traversed by hundreds of miles of transmission pipeline rights-of-way and has a population of over 500,000 residents. This causes concern on behalf of residents, schools, businesses and others relating to safety and transparent information on projects. **Connect Recommendation**

#8 discusses the need for better and ongoing communication between municipalities, county departments, residents, schools, and environmental groups with the pipeline operators that are working in Chester County.

During the EA process, Adelphia held public meetings only in Bucks and Delaware counties, where the construction of Compressor Stations are proposed. Chester County, which will be the recipient of multiple Blowdown Assembly Valves, did not have the opportunity for a public hearing/meeting. We would request that Adelphia offer to hold a public meeting to answer any questions that the residents, municipalities, and businesses in Chester County have relating to this project. We note that because the Adelphia right-of-way is located in the same geographic areas that have been subject to sinkholes during construction of Energy Transfer Partners/Sunoco Mariner East 2, there is heightened concern in the County regarding pipeline impacts and the protection of personal property.

2. The Planning Commission requests that Adelphia establish a “hotline” for residents and property owners located along the path of this project. In the event of questions or concerns, residents, schools, businesses and other entities would have a point of contact for the Operator to answer questions and alleviate concerns. This would be helpful in providing immediate communication for potential safety and environmental concerns as well as maintaining a level of trust in the Operator and the process.
3. There are no maps included with the EA that show the project on a municipal or county level. This makes it difficult for readers to determine where different valve locations and construction spreads are proposed. Please include these maps for reference and context. For clarity and transparency, please also include a listing of the municipalities in the introduction and show them clearly on the mapping.
4. The Planning Commission has received questions regarding whether the proposed BAVs and Mainline Valve #2 will be automatic or manual, as well as why there are three proposed in very close proximity in the northern section of the line in Chester County, while the others are located approximately every five miles. Please clarify how the locations were chosen, and whether they will be automatically or manually controlled.
5. While Chester County will not have significant earth disturbance proposed that would require a PA Chapter 102 permit, there will be temporary soil erosion and sedimentation during the installation of the new valves. The operator should coordinate with the Chester County Conservation District as needed to prevent impacts from construction.
6. Table A-1 lists the proposed new facilities for the project. For the new Meter and Regulator Stations under the Transcontinental Gas Pipe Line,

“Lower Mount, Bethel” are listed for Delaware County. There is no “Lower Mount” Township. This location is likely Lower Chichester Township and Linwood when compared to the map. Please revise for consistency and accuracy. Also listed under “New Appurtenant Facilities” are two new mainline valves. East Whiteland Township is identified as being located in Delaware County. Please revise to reflect that the township is located in Chester County.

7. The mapping included in the draft EA is very small and difficult to read and interpret. The layers on top of the street names make them unreadable. Municipality names are not included on site specific maps. For example, in Figure 9 showing Main Line Valve 2 (located in East Whiteland Township) the map merely states “Chester County” rather than indicating that it is in East Whiteland Township.
8. The Planning Commission commends Adelpia Gateway, LLC for attempting to retain landscaping and trees within the right-of-way where it does not present safety issues, the maintenance of a 25-foot riparian buffer where possible, and the limiting of vegetative maintenance immediately adjacent to waterbodies to a 10-foot wide strip centered over the centerline of the pipeline.
9. Page 16. Construction, Operations, and Maintenance Procedures. The text discusses the implementation of additional plans that include Inadvertent Return Contingency, Residential Access and Traffic Management, Spill Prevention and others. The Planning Commission would request that these plans be filed with the municipalities as well as the Chester County Department of Emergency Services.
10. Page 16/17. General Pipeline Construction Procedures. Figure 3 shows a typical pipeline construction sequence. Please include an image or schematic of a Blowdown Assembly Valve so those impacted can identify such valves and what any physical or visual intrusion would look like.
11. Page 23. Above Ground Facilities. Adelpia indicates that all above ground facilities will be enclosed with fencing upon completion of the project. The operator should ensure that the fencing is adequate to protect these facilities from potential vandalism or unauthorized access.
12. Page 28. Public Review and Comment. The applicant should provide the contact information for the Environmental Inspector for use by county departments, including the Conservation District, Facilities and Parks, Health Department, Water Resources Authority, the Department of Emergency Services, and the Planning Commission as well as to assist with notification to Adelpia if there are issues or concerns on behalf of residents.

13. Page 36. Environmental Analysis. Geologic Hazards are discussed. While we understand that there is not significant earth disturbance proposed for the construction of the BAVs, we request that physical conditions at these sites be studied prior to any construction, particularly in the karst areas that are prone to develop sinkholes.
14. Page 38. The Planning Commission agrees with the FERC recommendation requiring that Adelphia file a Karst Monitoring Plan for the Existing System, including frequency and duration of monitoring, conditions requiring remedial action and the karst remediation measures Adelphia will implement along the Existing System.
15. Page 38. Flash Flooding. In review of the proposed BAV's for Chester County, it appears that the Main Line Valve 2, Paoli Pike BAV, and the Cromby BAV may be located in, or immediately adjacent to, a FEMA designated Special Flood Hazard Area. A potential concern would be how flooding could impact the integrity of the pipeline itself, and how first responders would access the location if there were an emergency during a flood.
16. Page 58. Sensitive Waterbody Crossings. While the project does not propose new crossings of streams in Chester County, the text indicates that there are no High Quality or Exceptional Value watersheds in the Project area, which is not accurate. The Blowdown Assembly Valves are located in watersheds that hold both designations listed above, including the French Creek, Ridley Creek and the Valley Creek, respectively. More information on these streams can be found at <http://www.chesco.org/water>
17. Page 64 – Table B-9 Wetlands Crossed by the Project. The Planning Commission supports the use of measures proposed for construction in wetland areas to minimize impacts to the greatest extent practical, as the Paoli Pike BAV proposes a permanent loss of approximately 436 square feet of wetlands at this site, which is identified as suitable habitat for the bog turtle. Is mitigation or construction of new wetlands proposed to offset this loss? If so, please include the location in the text.
18. Page 76. Existing Wildlife Resources. General Impacts and Mitigation. The Planning Commission supports the implementation of minimization measures described, including coordination with the county Conservation Districts, the maintenance of 35-foot vegetated buffers along waterbodies and the utilization of existing rights-of way to the maximum extent practicable, as these efforts support the **Protect Goal** of *Landscapes3* which seeks to protect and restore critical natural resources to ensure a resilient environment that supports healthy communities.

19. Page 78. Special Status Species. Upon a cursory review, Adelpia Gateway Project may be located in proximity to areas designated by the PA DCNR as Supporting Landscapes as part of the Chester County Cultural Natural Heritage Inventory. Please refer to the Pennsylvania Natural Heritage Program, managed by the Pennsylvania Department of Conservation and Natural Resources for additional information:  
[http://www.naturalheritage.state.pa.us/CNAI\\_PDFs/Chester\\_CNHI\\_Update2015.pdf](http://www.naturalheritage.state.pa.us/CNAI_PDFs/Chester_CNHI_Update2015.pdf).
20. Page 94. Public Land, Recreation, and Special Interest Areas. The text incorrectly identifies Chester County as the owner of all of the protected open space parcels listed in Table B-16. Please refer to the Chester County Protected Open Space Tracking map  
<http://chesco.org/OpenSpace/POST.cfm> to properly identify the owner or easement holder.
21. Page 96. The Planning Commission agrees with the recommendations of FERC to require consultation with the Schuylkill River Trail managing entity as well as mitigation measures that Adelpia will implement during construction and operation, including signage for trail users. The Schuylkill River Trail is managed by the Chester County Facilities and Parks Department. The staff person to contact for coordination is David Stauffer, Capital Projects Coordinator, 313 W. Market Street, Suite 5402, West Chester PA 19380.
22. Page 105. Public Services. Previous pipeline projects have provided advanced notice to school districts, municipalities and emergency service providers of traffic impacts, road closures, etc. Adelpia should coordinate with the Chester County Department of Emergency Services, affected school districts, and municipalities regarding potential impacts to traffic, emergency responder routes and bus routes, as these could have short-term changes or create potential delays.
23. Page 106. Property Values. The text indicates that Adelpia would compensate landowners for new easements along the pipeline routes and at the aboveground facilities. It is also our understanding that at least some of the existing easements specifically indicate that only “crude oil, fuel oil, including residual oil which can be transported through pipelines” is permitted in these agreements. How will the change in product be established in these existing agreements?
24. Page 113. Cultural Resources. The Planning Commission agrees with the recommendation of the State Historic Preservation Officer to perform archaeological surveys of the six sites listed, including Chester Creek, French Creek and East Perkiomen Creek BAVs, the access road to the Schuylkill River BAV and MLV2. Further, we support the FERC

recommendation to not commence construction until cultural resources reports, plans and comments are received and FERC staff review the data.

25. Page 125. Table B-19. It would be helpful to the reader if the referenced emissions standards for the 2019 Construction Emissions were included somewhere on the chart for comparison or reference point.
26. Page 133. Noise and Vibration. Adelphia has stated that it would comply with all local noise ordinances during construction and make all reasonable efforts to comply during operation. Below are references to the local noise ordinance language for the municipalities in Chester County:
  - i. Charlestown Zoning Ordinance, “#154-09 Section 1616– Environmental Controls” (Charlestown Township PA: July, 2009) [http://www.charlestown.pa.us/misc\\_docs/zoning\\_ordinance.pdf](http://www.charlestown.pa.us/misc_docs/zoning_ordinance.pdf), website accessed January 2019, Page 179.
  - ii. East Goshen Township Noise Control Ordinance, “No. 74, Chapter 156 – Noise” (East Goshen Township PA: March, 1986) <https://ecode360.com/7250332>, website accessed January 2019.
  - iii. East Pikeland Zoning Ordinance, “Article XVII Section 1713 – Environmental Standards” (East Pikeland Township PA: Amended 2017) [https://www.eastpikeland.org/vertical/sites/%7B3F7567AD-BA35-41A6-9117-FD7892D5A0DA%7D/uploads/19\\_Article\\_17\\_General\\_Regulations\\_Design\\_Standards\\_7-11-17.pdf](https://www.eastpikeland.org/vertical/sites/%7B3F7567AD-BA35-41A6-9117-FD7892D5A0DA%7D/uploads/19_Article_17_General_Regulations_Design_Standards_7-11-17.pdf), website accessed January 2019, Page 28.
  - iv. East Whiteland Ordinance, “Chapter 133, Article II Noise and Nuisances Peace and Good Order” (East Whiteland PA: 2001) <https://ecode360.com/6754220> website accessed January 2019.
  - v. West Whiteland Township Noise Ordinance, “Chapter 213” (West Whiteland Township PA: 2013) <https://ecode360.com/28606637>, website accessed January 2019.
  - vi. Westtown Township Zoning Ordinance, “Chapter 170 Section 170-1515 – Noise Standards” (Westtown Township PA: 2003) <https://ecode360.com/12398359> website accessed January 2019.
27. Page 143. Reliability and Safety. The Planning Commission agrees with the recommendation of the Pipeline Safety Coalition and commitment of Adelphia to comply with USDOT-PHMSA’s Guidance for the southern segment of the existing mainline, where conversion from oil to natural gas would occur, and to submit written procedures to the appropriate USDOT-

PHMSA regional office.

28. Page 146. Pipeline Safety. The Planning Commission supports Adelpia's odorizing of gas for additional leak detection and safety in all Class 3 locations.
29. Page 148. Emergencies. The Emergency Response Plan should be provided to all affected municipalities, emergency responders and the Chester County Department of Emergency Services in addition to a copy of their Risk Assessment. With the number of pipeline corridors in Chester County, it is extremely important for the operators and emergency responders to coordinate and share information.
30. Page 148. Pipeline Accident Data. The text indicates that US DOT requires all operators to notify PHMSA of any significant incident and submit an incident report within 20-days. Are insignificant incidents defined and logged with an outside entity or internally with the operator? This process should be clarified.
31. Page 157. Table B-30 lists proposed projects that could have potential cumulative impacts. The Chester County Planning Commission maintains an online map that includes proposed developments from 2012-present. Please visit our plan review interactive map at <http://www.chescoplanning.org/planreview/Maps.cfm>. Once there, you can view subdivision and land development proposals from 2012-present, as well as associated review letters, in the event that there are land development proposals that may have begun more recently than the EA was prepared. The municipalities should be contacted for specific development information.
32. Page 177. Adelpia Gateway Project System Alternatives Figure 5. Existing pipelines are shown on this map. In Chester County, the lines for both Columbia and Eastern Shore do not line up correctly with the mapping on the National Pipeline Mapping System, and in the case of Columbia/TransCanada, there appears to be a second line, also identified as Columbia/TransCanada running parallel to it, where we are not aware that there is an actual pipeline. Additionally, the Eastern Shore Natural Gas right-of-way crosses through West Sadsbury Township and intersects the Williams/Transco right-of-way prior to exiting Chester County, where the map in Figure 5 shows this intersection in Lancaster County, which is further west. Please review these locations and revise for clarity and accuracy.
33. Adelpia Gateway Project Paoli Pike BAV Site Alternatives. In Figure 10, the site of the BAV is shown on Paoli Pike, just north of the intersection with Boot Road. This area is currently involved with the construction of the

Sunoco Mariner East 2 pipeline project. Please coordinate with the Township, Sunoco, PennDOT and/or the PA PUC, to minimize further impact on the residents, schools, and emergency services in this area.

34. Page 194. Conclusions and Recommendations. Recommendations #4 and #5 require that all final alignment maps be provided to FERC prior to the start of construction. The Planning Commission asks that these maps be provided to the counties, municipalities, and school districts for reference purposes should inquiries arise from other departments, residents, and other impacted groups.
35. Page 196. Conclusions and Recommendations. Recommendation #6. The Chester County Department of Emergency Services be notified of all proposed compliance training.
36. Page 196. Conclusions and Recommendations. Recommendation #6h. The text indicates that each facility will have schedules established for commencement of construction, as well as the start and completion of restoration. Notification of these dates should also be kept on file with the affected municipalities, Chester County Conservation District and the Department of Facilities and Parks.
37. Page 197. Conclusions and Recommendations. Recommendation 7. This text discusses the role of the Environmental Inspectors (EI). The Planning Commission requests that if construction will be simultaneously occurring at different points along the right-of-way, that there be at least one EI located in each county to respond to potential compliance issues, implementation of mitigation measures, or other potential environmental violations.
38. Page 198. Conclusions and Recommendations. Recommendation 12. Please provide the final Karst Monitoring Plans to both the Chester County Department of Emergency Services and the Chester County Health Department.
39. Page 200. Conclusions and Recommendations. Recommendation 20. Chester County Department of Parks and Facilities should receive a copy of the consultation and mitigation measures that will impact the Schuylkill River Trail and its users.
40. Appendix A-1 mapping generally does not include road names, nearby water features, municipality name, etc. The maps are zoomed in to a point that it is not possible to reference where these BAV sites are located. Please change the scale of the mapping so that the reader can have a context as to where the BAVs are proposed in relation to roads, water features, etc.

41. Appendix A-1. The map for the Proposed Skippack Tap Valve is incorrectly labeled as being located in Chester County. It is located in Montgomery County.

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

Sincerely,



Brian N. O'Leary, AICP  
Executive Director

Cc: Chester County Commissioners  
Robert Kagel, Chester County Commissioners Office  
Chester County Water Resources Authority  
Chester County Conservation District  
Chester County Department of Facilities  
Chester County Health Department  
Charlestown Township  
East Goshen Township  
East Pikeland Township  
East Whiteland Township  
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