

THE COUNTY OF CHESTER



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September 29, 2014

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

Re: OEP/DG2E/Gas I
Columbia Gas Transmission, LLC
East Side Expansion Project Environmental Assessment
Docket CP14-17-000

Dear Ms. Bose:

The Chester County Planning Commission has reviewed the Draft Environmental Assessment for the Columbia Gas Transmission, LLC East Side Expansion Project, issued by the US Federal Energy Regulatory Commission. This project would include the construction of approximately 9.5 miles of 26-inch diameter pipeline in Chester County, Pennsylvania, known as the Line 1278 Loop, in addition to modifications to the Eagle Compressor Station. Additionally, it proposes an additional 9.6 miles of pipeline loop in Gloucester County, New Jersey, known as the Line 10345 Loop, abandonment of existing compressors and installation of new compressors in Pike County, Pennsylvania and Northampton County, Pennsylvania, modifications to a compressor station in Harford County, Maryland, and modification of meter and regulation stations in Bucks County, Pennsylvania and Orange County, New York.

The proposed project will affect the following Chester County municipalities: the townships of West Vincent, Upper Uwchlan, Uwchlan, East Brandywine, Caln and West Bradford, and Downingtown Borough.

The following comments are offered based on review of the 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 Columbia East Side

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Expansion Project is located within an area primarily defined as Suburban Landscape. These are locations in which *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 (Objective LU 3). Although generally consistent with the overall objective of the Suburban Landscape, as presented on the Livable Landscapes Map, the proposed Columbia East Side Expansion Project is not consistent with specific policies found in *Landscapes2*, as outlined in Section B "General Comments."

Portions of the proposed project are also located within the Natural Resources Overlay. The objective of this landscape is to encourage the preservation and restoration of sensitive natural resources. While this overlay does not preclude development, it does indicate major areas of natural resources that should be protected, or subjected to limited disturbance, as the natural landscape contains the highest concentrations of important natural resources in the county. Without the use of proper mitigation techniques that would minimize impacts of pipeline activity, the proposed project would be inconsistent with the following policies of *Landscapes2*, Policy LU 6.1, which states: "Encourage land use decisions and development design that protect natural resources," and Policy LU 6.4, "Protect and enhance ground water recharge, in-stream resources, first order perennial streams, sensitive resources (including high quality and exceptional value watersheds), and riparian buffers to preserve water quality and quantity."

In addition, the northern portion of the proposed Columbia East Side Expansion Project 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. As with the Natural Landscape Overlay, if proper mitigation techniques are not taken to minimize impacts on these resources, the proposed project would be inconsistent with Natural Resources Objective NR 1 of *Landscapes2*, "Protect and manage land resources including geology, topography, and soils to support the county's economy and ecosystems."

B. General Comments:

1. The Chester County Planning Commission supports the comments issued in the Chester County Conservation District's Technical Deficiency Letter, dated September 9, 2014.

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2. Insufficient mapping was included with this Environmental Assessment. Mapping provided in the Environmental Assessment was limited to a set of Residential Construction Drawings that showed only residential dwellings to be impacted and one map located in Appendix A, which shows a single red line on a scale of 1 inch = 6,000 feet scale. Nowhere in the submission were maps included that showed any detail for the entire proposed pipeline path.

The Chester County Planning Commission had previously received maps for a different review of this Project on July 10, 2014, which we have used for this review. Additionally, a call was placed to Columbia East Side Expansion Project on Wednesday, September 17, 2014, requesting the maps, and the call was never returned. A second call was placed to the resident Land Agent for Chester County. Though he was willing to assist, he also did not have the maps. The Land Agent contacted a representative from Columbia East Side Expansion Project who did not readily have the maps available. That representative was contacting others within the company to verify that the maps we used, dated June 18, 2014, are the most recent version. A reviewing agency should not be required to undertake this much outreach to gather information that should have been included with the document. This detailed mapping should be a required item in any Environmental Assessment and must be included for all reviewing agencies, prior to Federal Energy Regulatory Commission issuing approval.

3. Other questions relating to the mapping include: information not on the legend, such as a purple line, yellow polygons with yellow x's inside; missing permanent ROW lines on several sheets (that must exist); and parcel numbers not included. Additionally some information on the maps is difficult to read.
4. There are multiple properties throughout the Columbia East Side Expansion Project area that have easements on them. They include municipalities, land trusts, and homeowner's associations. The Project area also includes park properties that are municipally held, as well as the Struble Trail, which is owned by Chester County. Please provide information regarding if Columbia has reached agreements with the landowners and easement holders? If not, approximately what percentage of parcels are still outstanding?

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5. Page 1-11. Land Requirements. The text indicates that for Line 1278, in Chester County, approximately 25 acres classified as agriculture will be utilized for pipe/contractor ware yard. This section indicates that the ware yards will “be allowed to revert to previous use.” Chester County Planning Commission requests that these agricultural fields be treated as those experiencing active construction – with care being taken of the topsoil, for future agricultural use. Failure to properly mitigate these lands would be inconsistent with Policy LU 5.2, “Limit infrastructure improvements to those supporting the agricultural industry and use context sensitive design to maintain community character,” and Policy NR 1.5, “Conserve Class I and II soils for agriculture in both rural and agricultural landscapes.”
6. Page 1-16. Trenching. The Chester County Planning Commission requests that Columbia Gas Transmission, LLC coordinate with the Chester County Conservation District, as the delegated agency that would address the minimum requirements for how to best deal with different classes of soils.
7. Page 1-16. Trenching. The text indicates that Columbia Gas Transmission, LLC will segregate and store topsoil from subsoils “at the landowner’s request.” It is our opinion that this should be required in any area of sensitivity, not something that falls to a landowner to negotiate.
8. Page 1-16. Lowering In and Backfilling. The text indicates that soil would be mounded and left over the pipe trench to settle over time, unless otherwise requested by landowners. If there are other options for how backfilling can occur, please include them, as well as why a soil mound is the preferred method over restoration of the landscape.
9. Page 1-19. Road and Railroad Crossings. Please clarify whether the Federal Energy Regulatory Commission will require Columbia Gas Transmission, LLC to apply to the Pennsylvania Public Utilities Commission for approval of all road and rail crossings or alterations that will be required, or if Federal Energy Regulatory Commission approval deems all crossings approved. Additionally, Chester County Planning Commission requests coordination with the rail company (Amtrak) whose service may be adversely impacted through this process.

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10. Page 1-19. Road and Railroad Crossings. This section discusses which methods would be used in crossing specific features, such as Interstate 76. While the text indicates that there will be "little or no disruption on traffic," Chester County Planning Commission requests that there be at least 48-hours of notice provided to residents of the affected areas, as well as the municipality in which the road or railroad is located.
11. Page 1-20. Mini-Crew Construction. Please provide more information regarding this method as it would appear to be a preferable way of proceeding for the overall line installation. Based on the text provided, this method would "proceed over a shorter time period," "uses a reduced size workforce," and would "limit the effect to landowners and their property."
12. Page 1-21. Steep Slopes. The text indicates that temporary slope breakers would be installed at least every 100-feet, to channel water from the ROW. Please be aware that Chester County recently developed a county-wide Act 167 Stormwater Management Plan that was adopted by the Chester County Board of Commissioners and approved by Pennsylvania Department of Environmental Protection in July of 2013. Since that time, all 73 municipalities have adopted minimum standards in their ordinances. This would include sheet flow across adjacent properties, etc. The Act 167 Plan can be found here: <http://www.chesco.org/water> and select "Act 167 Plans" 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 2.1, "Manage invasive plants, and restore, re-vegetate, and expand ecologically sustainable plant communities and woodlands on steep slopes, floodplains, and riparian buffers," 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."

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13. Page 1-21. Karst Terrain. Please be aware that portions of the US Route 30 corridor have experienced issues with sinkholes, as well as other portions of the study area. While these areas (listed on page 2-3) are found between areas MP 6.1 and MP 8.6, there may be other areas, unmapped, that are susceptible to these features. Chester County Planning Commission supports the Federal Energy Regulatory Commission's decision to require a final geotechnical report for any portion of the project that has a higher potential for ground subsidence.
14. Page 1-21. Karst Terrain. The Chester County Planning Commission requests that any additional information and plans for maintaining groundwater safety in areas where karst geology has been identified, and where an increased risk of contamination to groundwater occurs, be included in an appendix, or clearly outlined in the referenced Karst Plan. *Landscapes2* policy NR 1.1 encourages land development that is appropriate for the underlying geology. We also request coordination with the Chester County Health Department, Chester County Water Resources Authority, and Pennsylvania Department of Environmental Protection to ensure that public health and safety, as it relates to water supply, are being maintained.
15. Page 1-21. Above Ground Facilities Construction Procedures. The text indicates that pressure testing will be conducted. For clarity, please explain the difference between pressure testing listed here, and hydrostatic testing.
16. Page 2-6. Blasting. The Chester County Planning Commission requests that Columbia Gas Transmission, LLC coordinate with Pennsylvania Department of Environmental Protection to ensure that all pre-event permits and inspections of affected buildings take place in accordance with state regulations and requirements.
17. Page 2-6. Blasting. The text indicates that blasting will be conducted during daylight hours and not until occupants of nearby buildings and farms have been notified. The Chester County Planning Commission requests that there be a minimum of 72-hours' notice provided. We also request that landowners with on-site wells located within 150-feet of these activities be notified and drinking wells monitored, in the event of damage to their drinking water system.
18. Page 2-7. Soils. The text describes how impacts to soils will be avoided or minimized. The Chester County Planning Commission recommends that Columbia Gas Transmission, LLC be in constant coordination with the Chester

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County Conservation District for all matters relating to Erosion and Sedimentation in an effort to be consistent with the following policies of *Lanscapes2*: Policy NR 1.3 "Protect hydric and environmentally sensitive soils from disturbance and development," Policy NR 1.4 "Promote stormwater best management practices to protect soil from erosion and reduce sedimentation in streams," and Policy NR 1.5 "Conserve Class I and II soils for agriculture in both rural and agricultural landscapes."

19. Page 2-9. Compaction Prone Soils. The Line 1278 Loop is proposed to cross two parcels currently owned and operated by Upper Uwchlan Township for use as their spray and drip wastewater disposal. Due to issues of compaction, and integrity of the wastewater disposal system, the Chester County Planning Commission requests that Columbia work cooperatively with the Upper Uwchlan Municipal Authority, Chester County Conservation District, Chester County Health Department and Pennsylvania Department of Environmental Protection, to ensure that the construction method provides the least amount of impact on the system possible. Additionally, the Environmental Assessment later refers to three parcels owned and operated by the same entity. Please verify which is correct and resolve inconsistencies. (See comment 47)
20. Page 2-12. Right of Way Restoration. Chester County Planning Commission requests that implementation of local stormwater standards resulting from the Countywide Act 167 Stormwater Management Plan is required to reduce impacts to adjacent properties, waterways, and wastewater systems, among others. Application of these standards would be consistent with *Lanscapes2* Policies NR 3.16 "Encourage implementation of municipal stormwater management criteria, plans, and regulations for land development and transportation projects," and Policy NR 3.17, "Support the implementation of Pennsylvania Act 167 stormwater management plans."
21. Page 2-13. Pennsylvania Surface Water Resources. The proposed Columbia Gas Transmission, LLC project would cross 27 water bodies in Pennsylvania. There are several surface water intakes located within five miles downstream, including the Downingtown Municipal Water Authority and Aqua Pennsylvania's intake at Ingram's Mill. The Chester County Planning Commission requests coordination with the Chester County Conservation District and Chester County Water Resources Authority regarding these crossings to cause the least possible amount of disruption to stream flow and aquatic habitat.

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Failure to coordinate with these local agencies could result in improper mitigation, which would be inconsistent with the following objective and policies of *Landscapes2*: Objective NR 3 for Water Resources states, "Protect, sustain, and enhance the quality and quantity of all water resources as envisioned in *Watersheds*, the Chester County Integrated Water Resources Management Plan, and Pennsylvania Department of Environmental Protection-approved Act 167 Stormwater Management Plan. To view the document, visit: <http://www.chesco.org/water> and select "Act 167 Plans" from the side banner.

Additionally, if not mitigated properly, the Columbia Gas Transmission, LLC would be inconsistent with *Landscapes2* Policies:

- NR 3.1: "Support planning and protection efforts to ensure sufficient water resources that provide a safe, clean, long-term supply of water, which meets the needs of all residents and aquatic habitats;"
- NR 3.5 "Protect and enhance existing sensitive water resources, including reservoirs and in-stream sources of community water supplies;"
- NR 3.6 "Protect and enhance state-designated sensitive aquatic habitats;"
- 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 3.9 Protect surface and ground water from contamination by all sources to sustain aquatic habitats, recreational uses, and safe and reliable water supplies;"
- 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 3.13 "Encourage scientifically sound techniques and practices that reduce pollutants from point source and stormwater discharges, non-point source runoff, and on-lot and community wastewater land disposal systems;" and
- NR 3.14 "Protect recharge areas and sources of private and public water supplies from pollution."

22. Page 2-15. Sensitive Waters or Special Status Waters. As stated, the project will cross waters that are designated as High Quality Waters for the Commonwealth, according to PA Code Title 25, Chapter 93 for Water Quality Standards.

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Columbia Gas Transmission, LLC should coordinate with Pennsylvania Department of Environmental Protection, Chester County Water Resources Authority and the state Fish and Boat Commission, 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."

23. Page 2-16. Sediment Impacts. The text indicates that any streams listed as impaired or TMDL will be crossed in a method that will decrease the amount of sediment or turbidity. The Chester County Planning Commission requests any supporting information and timeline on how Columbia will remediate issues, though anticipated to be little to none, should trees be cleared, habitat lost, pollutants discharged, chemicals discharged, etc., considering that the Brandywine Creek watershed has TMDLs for bacteria, sediment, nutrients, low dissolved oxygen, PCBs, and Chlordane. The interactive map titled Chester County Watersheds that have TMDLs can be found here: <http://www.chesco.org/water> and select "TMDLs/Water Quality Improvement" from the side banner. Although Columbia Gas Transmission, LLC may view impacts as short term, the TMDL program enforced by Pennsylvania Department of Environmental Protection could impact municipalities for a much longer time and at a financial and staff burden to mitigate. Failure to address this issue would be inconsistent with *Landscapes2* Policies NR 3.10, "Restore degraded and impaired streams and ground water to achieve state designated water quality standards and support upgrades in stream designations where justified by stream conditions and uses;" Policy 3.16 "Encourage implementation of municipal stormwater management criteria, plans, and regulations for land development and transportation projects;" and Policy NR 3.17 "Support the implementation of Pennsylvania Act 167 stormwater management plans."
24. Page 2-20. Groundwater Hazards. The text indicates that there are areas known to have potentially affected groundwater or soils. The Chester County Planning Commission requests coordination with both the Chester County Health Department and the regional Pennsylvania Department of Environmental Protection office, to ensure that no public health threats occur, and that there are no shifts in potentially contaminated groundwater plumes. Failure to properly mitigate groundwater hazards would be inconsistent with *Landscapes2* Policy NR 3.2, "Protect the recharge, quantity, and quality of ground water in order to sustain streams, wetlands, and water supplies."

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25. Page 2-20, 21, and 22. Public and Private Water Supply Wells. The text and Table 2.2-3 indicate that there are several public water supply wells along the Line 1278 Loop through Chester County. The Chester County Planning Commission requests that Columbia work with the Chester County Health Department, Chester County Water Resources Authority, and Pennsylvania Department of Environmental Protection to ensure that these water supplies, as well as the others listed, are not negatively impacted. The coordination would be consistent with the following policies of *Landscapes2*: Policy NR 3.1 "Support planning and protection efforts to ensure sufficient water resources that provide a safe, clean, long-term supply of water, which meets the needs of all residents and aquatic habitats;" NR 3.2, "Protect the recharge, quantity, and quality of ground water in order to sustain streams, wetlands, and water supplies;" and NR 3.14 "Protect recharge areas and sources of private and public water supplies from pollution." Further, the Chester County Planning Commission would request that Columbia Gas Transmission, LLC minimize potential effects on groundwater resources to the maximum extent practical.
26. Page 2-24. Pennsylvania Wetlands. The Chester County Planning Commission would request coordination with the Chester County Conservation District and Chester County Water Resources Authority for both state and county regulations and requirements. In doing this, Columbia Gas Transmission would be consistent with the following objectives and policies of *Landscapes2*: Objective N2 "Protect, restore, and manage biotic resources such as plants, animals and habitats to sustain biodiversity ecosystems, and protect public health," and Objective N3 "Protect, sustain, and enhance the quality and quantity of all water resources as envisioned in *Watersheds*;" and Policies NR 2.2 "Protect and manage wetlands for their hydrologic and ecological functions, and identify opportunities to mitigate, restore, and create wetlands," and NR 3.7 "Establish a network of protected riparian buffers along ponds, lakes, wetlands, and streams, while recognizing existing constraints of densely developed areas."
27. Page 2-26. Pennsylvania Wetlands. The document indicates that approximately 3.06 acres of wetlands will be permanently impacted, either through conversion or through the loss of trees. Chester County Planning Commission requests supporting text indicating why these wetlands could not be avoided through re-routing, especially because the text indicates that the PFO wetlands that are not permanently affected would still take between 10-30 years to return to the pre-construction conditions. These conversions and impacts are inconsistent with the following objectives and policies of *Landscapes2* Objective N2 "Protect, restore,

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and manage biotic resources such as plants, animals and habitats to sustain biodiversity ecosystems, and protect public health;" and Objective N3 "Protect, sustain, and enhance the quality and quantity of all water resources as envisioned in *Watersheds*," and Policies NR 2.2 "Protect and manage wetlands for their hydrologic and ecological functions, and identify opportunities to mitigate, restore, and create wetlands," and NR 3.7 "Establish a network of protected riparian buffers along ponds, lakes, wetlands, and streams, while recognizing existing constraints of densely developed areas."

28. Page 2-26. Avoidance and Mitigation Strategies. The Chester County Planning Commission requests that no ruling be made by Federal Energy Regulatory Commission until information regarding the negotiation of an identified wetlands mitigation site in the Brandywine-Christina watershed are resolved. Doing so would be inconsistent with *Landscapes2* Policy 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." Once resolved, Chester County Planning Commission supports the coordination between Columbia Gas Transmission, LLC, Pennsylvania Department of Environmental Protection, US Army Corps of Engineers, Chester County Water Resources Authority, and the Chester County Conservation District to implement permit requirements.
29. Page 2-28. Vegetation/Existing Environment. The document references the Natural Areas Inventory for Chester County. Our office, in cooperation with the Western Pennsylvania Conservancy and Pennsylvania Department of Conservation and Natural Resources, is in the process of updating this information. This fall, the County Natural Heritage Inventory is anticipated to be available. We ask that Columbia Gas Transmission, LLC use this information where possible, as it is anticipated that the upcoming information will include more than one hundred new species. While many of these are specific to the Serpentine Barrens, located in the southwestern portion of the county, many are located across other regions of the county.
30. Page 2-29, 30. Pipeline Facilities. The text discusses how construction of pipeline facilities would result in temporary, long term and permanent loss of vegetation, and how this loss could alter sheet flow and infiltration of water. Chester County Planning Commission requests that Columbia coordinate with the Chester County Planning Commission, Chester County Conservation District, Chester County Health Department, Chester County Water Resources Authority,

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and affected municipalities to implement the requirements set forth Chapter 102 for erosion and sedimentation, local municipal planning, drinking water wells, sewage facilities, and the minimum requirements for stormwater management found in the Countywide Act 167 Plan, and *Landscapes2*, among others.

31. Page 2-38. Construction and Operation Impacts and Mitigation. The text indicates coordination with “resource trust agencies” to determine risks from blasting to endangered or threatened species. For clarity, please indicate who these agencies are. The protection of these species is consistent with Policy NR 2.5, “Protect, restore, and manage unique habitats, migration corridors, and plant and animal species that are designated as rare, threatened, or endangered by federal or state agencies, and encourage efforts to plan, fund, and establish viable habitats for these species.”
32. Page 2-44. Bald Eagle. The text does not include any information on the Bald Eagle in Chester County, Pennsylvania. According to eBird.org, which was created by the Cornell Lab of Ornithology and the National Audubon Society, there are more than one hundred sightings, over the past 24 months, listed within the stretch of Chester County that extends from the Marsh Creek State Park, located approximately ½ mile from the Eagle Compressor Station, and Downingtown Borough. Chester County Planning Commission requests that Federal Energy Regulatory Commission or Columbia reference this mapping tool, or similar resource, in an effort to properly portray the Bald Eagle population that exists throughout Chester County (This comment relates to comment 29). Discussions with our Parks and Facilities Department indicated during a site visit for a separate pipeline crossing of the Struble Trail this month, the foreman related that a bald eagle flew directly over the work crew performing work on the trail. Failure to protect this species would be inconsistent with Policy NR 2.5, “Protect, restore, and manage unique habitats, migration corridors, and plant and animal species that are designated as rare, threatened, or endangered by federal or state agencies, and encourage efforts to plan, fund, and establish viable habitats for these species.”
33. Page 2-46. Agricultural Land. The Chester County Planning Commission requests Columbia Gas Transmission, LLC to coordinate closely with the Chester County Conservation District, as many farms impacted could have Agricultural Conservation Plans in place. This coordination would be consistent with Objective LU 5 of *Landscapes2* which states “Preserve the agricultural industry

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and cultural heritage of Chester County by supporting a productive agricultural network and preserving prime soil resources.”

34. Page 2-48. Residential Land. The text indicates that Columbia Gas Transmission, LLC would communicate work schedules with land owners regarding hydrostatic testing near residences, maintain access, and schedule work to avoid commuter traffic. If construction and/or testing are to occur during the school year, impact to bussing schedules and access to the school itself, must also be considered and clearly communicated. Columbia Gas Transmission, LLC should coordinate with Downingtown Area School District.
35. Page 2-49. Residential Land. In regard to restoration, under what circumstances would a final restoration be different than something specified in a landowner agreement?
36. Page 2-49. Residential Land. Regarding landowner complaint resolution, the Chester County Planning Commission would also request that complaint registration procedures be submitted not only to each landowner, but also to each affected municipality as well as the county, so that information can be posted online and made available at http://www.chescopagreen.org/Chester_County_Planning_Commission/Pipeline/projectsColumbia.cfm.
37. Page 2-50. Residential Land. The text indicates that 29 residences in the Line 1278 Loop are within 50 feet of construction work areas, some of which appear to now have permanent ROWs across the front and rear of their properties. For clarity, please include any additional information on how Columbia Gas Transmission, LLC will proceed in those instances where an additional ROW envelopes a home. Mitigation information should be included regarding future sales of these homes, as the property value of these residents may be greatly impacted by their location within a permanent ROW, or being surrounded by pipelines.
38. Page 2-50. Residential Land. The text indicates that owners of affected residences are encouraged to provide Federal Energy Regulatory Commission comments on the plan for their individual property. Please clarify this statement, and what Federal Energy Regulatory Commission would like to see in correspondence from landowners.

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39. Page 2-50. Residential Land. The Chester County Planning Commission notes that there are seven properties that will eventually be located within fifteen feet of the construction work area. In regard to the finished pipeline, please include how far from the centerline of the pipeline these homes will be located. Additionally, if there are greater risks to some of these residences than others, due to proximity, please include it here, as well as what type of emergency planning will be employed during construction. The Chester County Planning Commission would encourage Columbia Gas Transmission, LLC to coordinate not only with local emergency responders, but also with the Chester County Department of Emergency Services, as they can also assist in a mass-casualty situation. This effort would support *Landscapes2* Policy UI 1.4 "Promote the preparation of utility hazard mitigation, and emergency response and contingency plans that ensure the protection of public health and safety in the event of sabotage, terrorist attack, or environmental disasters or accidents."
40. Page 2-54. Other Land. Much of the workspace in this category is proposed to be located on properties classified as institutional uses, such as schools and churches. We would suggest utilizing similar coordination, as listed in Comment 39, for the safety and well-being of the citizens of Chester County.
41. Page 2-54. Other Land. As stated above, most of this category includes institutional uses. The Columbia East Side Expansion Project fails to include Shamona Creek Elementary School and the Downingtown Area School District 6th Grade Center. Also, it does not include the Downingtown Middle School, Downingtown High School – West Campus, or STEM Academy campus that are bordered by both US Route 30 and PA Route 322, where the ROW is located.
42. Page 2-55. Planned Recreational, Commercial, Residential, and Other Land Development Recreational. The proposed East Side Expansion Project, though proposed to be crossed via Horizontal Directional Drilling, in addition to the Brandywine Creek, could still be negatively impacted by construction or malfunction of the line. We request cooperation and coordination with Chester County Facilities and Parks to ensure that impacts to the Trail are as limited as possible.
43. Page 2-55. Planned Recreational, Commercial, Residential, and Other Land Development. The Chester County Planning Commission notes that although this project is occurring after the Williams/Transco crossing of the Brandywine, these projects could have had some level of joint planning to minimize impacts.

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The Struble Trail recently re-opened after being closed for several months for a crossing of the trail and the Brandywine Creek by Williams/Transco . Both companies, and the county, could have saved staff time, engineering time, money, and most importantly not inconvenienced the residents of the county, for what could be two concurrent summers, through the unavailability of the trail and creek, for the installation of gas pipelines that are not delivering gas locally.

44. Page 2-56. Planned Recreational, Commercial, Residential, and Other Land Development. The Chester County Planning Commission is not assured that Columbia Gas Transmission, LLC and Federal Energy Regulatory Commission have taken into full consideration the sensitivity of performing work of this type on a school campus. There will be impacts on access to schools, including but not limited to safety of the children and staff, impact to playing fields, access to the campus through driveways and walking paths, potential for noise and air pollution, and potential for stormwater impacts – specifically to those owned and operated by the Downingtown Area School District.
45. Page 2-58. Special Interest Areas. The text indicates that there are no State Parks within one mile of the Project area. According to our information, Marsh Creek State Park is approximately ½ mile from the existing Columbia Gas Transmission, LLC pipeline and the Eagle Compressor Station.
46. Page 2.58. Special Interest Areas. As stated in the beginning of this letter, the northern end of this project 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, 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. Improper 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.
47. Page 2-58. Special Interest Areas. The text indicates the Line 1278 Loop would cross three properties that are part of Upper Uwchlan Township's wastewater treatment and disposal system. On Page 2-9, the text indicates that the Line 1278 Loop proposes to cross two parcels. Please revise to reflect the accurate number. (See comment 19)

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48. Page 2-61. Housing and Property Values. The text indicates median housing values ranging from \$193,900 in Pike County, to \$309,400 in Bucks County. According to Table 2.6-2, Chester County has a median housing value of \$324,100. Please revise.
49. Page 2-64. Cultural Resources/Archaeological Surveys. The Chester County Heritage Preservation Coordinator/Preservation Officer has reviewed this section and indicated that the Chester County Planning Commission should have been invited to be a consulting party for the Section 106 Reviews (as Chester County Planning Commission typically is), as consistent with Landscapes2 Goal for Historic Resources, "Protect and maintain Chester County's fabric of historic and archeological resources and cultural landscapes for the benefit of current and future generations while promoting sustainable development."

The Chester County Heritage Preservation Coordinator/Preservation Officer requests copies of documents filed with the Pennsylvania Historical and Museum Commission that relate to historic structures within Chester County, and would like to be recognized as a consulting party during the Section 106 Process, which is standard procedure for all Section 106 reviews that occur within Chester County. Additionally, the Chester County Heritage Preservation Coordinator/Preservation Officer requests the letters of concurrence from the Pennsylvania Historical and Museum Commission in relationship to each of the survey reports that were filed on the identified archaeological and above ground sites, to make any necessary comments as a consulting party within the 30-day comment period, which did not occur.

There are several additional historic sites that we believe will be impacted, though not confirmed, due to the lack of mapping, specifically the route generated from the Pennsylvania Historical and Museum Commission database. The survey forms and mapping would verify this information. The sites in question, include: the Strickland Todd House in Upper Uwchlan Township, Dowlin Forge in Uwchlan Township, and the Ship Tavern (now called the Orangery at Glen Isle) in Downingtown Borough.

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50. Page 2-85. Air Quality Impacts and Mitigation. Chester County Planning Commission requests continued coordination with Pennsylvania Department of Environmental Protection and the Environmental Protection Agency to ensure that air quality standards continue to be met or exceeded for the duration of this project.
51. Page 2-89. Air Quality Impacts and Mitigation. The text indicates that open burning is not anticipated, but that it would follow local ordinances on open burning, and acquire appropriate permits. Under what situations would this be necessary? Please include here for clarity. Additionally, municipalities that are mandated to recycle are all required to have "no burning ordinances." The ordinances allow for certain exceptions, which require Pennsylvania Department of Environmental Protection approval.
52. 2-106. Safety Standards. The text discusses High Consequence Areas. According to the total length of the segment and the length described as being located in the High Consequence Areas, the Chester County portion of the Line 1278 Loop is 82.3% within a High Consequence Area. The Environmental Assessment indicates that the Department of Transportation requires emergency plans for these High Consequence Areas. The Chester County Planning Commission would recommend that the Chester County Department of Emergency Services be included in the emergency personnel for this plan, if they are not already. Additionally, Columbia Gas Transmission, LLC should be in communication with more than "several police and fire departments" along the lines, they should be in communication with all of the municipal or regional departments as well as any county emergency responders and state police.
53. Page 2-107. Pipeline Accident Data. Text indicates that the frequency of significant incidents is strongly dependent on pipeline age, and pipelines installed prior to 1971 are at a higher risk due to protective coatings and cathodic protection systems. The Chester County Planning Commission would ask that Columbia Gas Transmission, LLC consider the age of their infrastructure in the county, and when addressing replacement of aging infrastructure, to perform it with as little impact as possible to the residents of the county who have endured multiple pipeline projects over the past decade.

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54. Page 2-114. Vegetation and Wildlife. The text in this paragraph is unclear and contradictory. It indicates that there will be disturbance and impacts, however, the following sentence indicates that there is no significant cumulative impact on resources. It also refers to the rural environment as having a "general disturbed character." Please discuss this further.
55. Page 2-119. Conclusions About Cumulative Impacts. The text indicates that the Project would not contribute to cumulative long-term impacts. The Chester County Planning Commission disagrees with this blanket statement. It is anticipated that there will be no long-term effects to the Project area, as defined by Columbia Gas Transmission, LLC, but that is unknown. Based on all of the potential impacts listed throughout the Environmental Assessment, it is likely that there could be impacts, be it small or large scale, over the lifetime of the Line 1278 Loop.
56. Page 3-1. Alternatives. The text indicates that Columbia has revised the Line 1278 Loop to accommodate minor adjustments. The first site, located on Waterplan Way and Parkside Drive is in close proximity to the Downingtown Municipal Water Authority drinking water intake. There has been little to no discussion of this in the text. The Chester County Planning Commission requests documentation indicating cooperative planning efforts between Columbia and Downingtown Municipal Water Authority that outlines how the public water supply intake will or will not be adversely impacted by construction activities, beyond a general discussion of Horizontal Directional Drilling/open cut methods to cross the creek.
57. Page 3-7. Alternatives for the Line 1278 Loop. Figure 3.3-2 shows three lines that were considered in the planning of the East Side Expansion Project. The Chester County Planning Commission notes that the line selected, depicted in red, runs generally through an area within which another pipeline company is exploring locating. Has Columbia sought out any partnerships with other companies located in the area, regarding collocating lines to minimize disruption to the citizens and resources of the county? Coordination between utility providers is one of the Objectives of *Landscapes2*, which states, "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."

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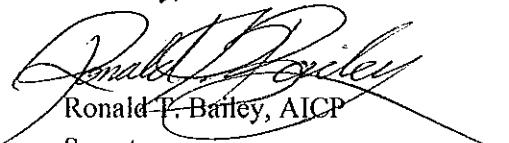
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58. Page 4-1. Conclusions and Recommendations. The Chester County Planning Commission requests that Federal Energy Regulatory Commission require Columbia to meet the suggested recommendations and not just consider them. The requests made by Federal Energy Regulatory Commission would show the responsibility and stewardship that Chester County is relying upon for this project.
59. Page 4-2. Conclusions and Recommendations. The Chester County Planning Commission requests a copy of the detailed alignment maps, as listed in item 5, to keep on file for the duration of the project.
60. Appendix C. Agricultural Impact Minimization Plan. Does Columbia Gas Transmission, LLC intend to utilize this Plan where the pipeline crosses the Upper Uwchlan Township wastewater reclamation fields?

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

Sincerely,



Ronald P. Bailey, AICP
Secretary

RTB/CC/yg

cc: Chester County Commissioners
Mark Rupsis, Chester County Commissioners Office
Chester County Water Resources Authority
Chester County Conservation District
Chester County Facilities & Parks Department
Calm Township
East Brandywine Township
Downingtown Borough
Upper Uwchlan Township
Uwchlan Township
West Bradford Township
West Vincent Township