

# THE COUNTY OF CHESTER

CHESTER COUNTY  
WATER RESOURCES AUTHORITY  
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August 7, 2015

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

RE: Proposed Eastern Shore Natural Gas Company: White Oak Mainline Expansion Project, Chester County, PA  
Docket No. CP15-18-000  
Kemblesville Loop Alternative Route 2 (July 9, 2015 Request for Comments)

Dear Ms. Bose:

The Chester County Water Resources Authority (CCWRA) respectfully submits the following comments to the Federal Energy Regulatory Commission (FERC) with regard to the proposed Eastern Shore Natural Gas Company: White Oak Mainline Expansion Project in Chester County, Pennsylvania and requests that they be addressed in Environmental Assessment scoping process. The following comments address only key water resources related items to the Kemblesville Loop Alternatives. We recognize there are numerous other community and resources issues and impacts that must be considered in evaluating the original proposal and the proposed alternatives.

Having reviewed the proposed routes to determine their potential impacts on Chester County's water resources, we note that both the Alternate Route 2 and the currently proposed route propose stream crossings close to a watershed divide and therefore the pipeline will cross very small and very vulnerable streams. It was noted that both the original and the alternate routes will cut through FEMA floodplains. Also noted, was that the Alternative Route 2 (2.1 miles) within the existing right-of-way will cross some tributaries to the White Clay Creek and several tributaries of the Big Elk Creek (this watershed directly drains to the Chesapeake Bay). And, the White Clay Creek watershed has been designated a National Wild and Scenic River to protect water quality and rare plant and animal species.

From a water resources perspective, we request your consideration of the following comments for both Kemblesville routes, so that they may be addressed with regards to the environmental assessment of the alternative routes.

## **Proposed Original Route**

1. In the Supplemental Notice, regarding the 3.9 mile currently proposed route, two horizontal directional drill crossings have been proposed for tributaries of the White Clay Creek. However, using the Chester County's GIS stream layer it appears that this route will also cross two additional unnamed tributaries to the White Clay Creek. What method will be used to cross these two tributaries?

### **Protecting Headwater Streams in the White Clay Creek Watershed**

2. We request that the comments and recommendations of the White Clay Wild and Scenic Steering Committee and the U.S. National Park Service be addressed.
3. If there will be disturbance or the open cut method, implementation of additional erosion and sediment control measures and additional inspection and maintenance requirements of all E&S control measures should be encouraged. The unnamed White Clay tributaries drain directly to the West Branch of White Clay that is impaired for sediment and nutrients.

### **Protecting Headwater Streams in the Chesapeake Bay/Big Elk Creek Watershed**

4. Because the Chesapeake Bay Total Maximum Daily Load (TMDL) has established target reductions for sediment and nutrients through Pennsylvania's Watershed Implementation Plan, the Alternative Route 2 that will cut through the Big Elk Creek Watershed should ensure that all actions will maintain or improve current water quality in the headwater streams.
5. The tributaries to be crossed are designated as "High Quality" by PA DEP. Have HDD crossings been considered or evaluated for the Big Elk Creek tributaries?
6. If there will be disturbance or the open cut method, implementation of additional erosion and sediment control measures and additional inspection and maintenance requirements of all E&S control measures should be encouraged.

### **Protecting Existing Sub-surface Drainage Features**

7. Please identify, locate, and determine dimensions and function (purpose and volume) of all existing sub-surface wastewater (e.g. onlot septic) and stormwater (e.g. residential surface and subsurface best management practices (BMPs)) features within at least fifty feet of the proposed pipeline and ensure that all wastewater and stormwater features are protected from disturbance, or if disturbance cannot be avoided, are restored or replaced with equal function features.

### **Protecting Trees**

8. Please minimize the disturbance and removal of trees, particularly mature trees, and minimize the right-of-way width and disturbance, both to the maximum extent possible.
9. Where trees will be removed within floodplains, please consider replanting with at least six-foot trees to help more quickly re-establish forested conditions and minimize the loss of trees to flooding or deer browse.

Thank you for your consideration of these comments. CCWRA is willing to meet with FERC and the applicant to provide relevant information and/or to discuss the above comments.

Sincerely,



Janet L. Bowers, P.G.  
Executive Director

cc: Carol Stauffer, Chester County Planning Commission  
Chris Strohmaier, Chester County Conservation District