

## **ATTACHMENT 14**

### **STORMWATER MANAGEMENT ANALYSIS**

The proposed Project has been designed to satisfy Pennsylvania's stormwater management requirements and has incorporated best management practices identified in the Pennsylvania Stormwater Best Management Practices Manual. Stormwater will be managed during construction activities in accordance with the Project's Erosion and Sediment Control Plan. The Project does involve the construction of above ground stations and valve settings that will require grading, permanent access roads, and other impermeable surfaces, however these are all located outside of wetlands, streams, and the FEMA floodway. All of these sites are designed to manage stormwater runoff in accordance with the Pennsylvania Stormwater Best Practices Manual and are discussed and presented within the Project's Erosion and Sediment Control Plan.

Coordination with the local municipalities was initiated with letters and project maps sent between the dates of November 10 and December 22, 2015. As part of that process, the municipalities were requested to respond with any concerns regarding the proposed Project and its consistency with their comprehensive plans and/or ordinances.

### **FLOODPLAIN MANAGEMENT ANALYSIS**

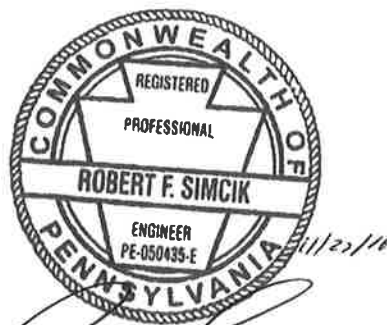
As presented in the Environmental Assessment (Attachment 11), the proposed Project does cross floodways delineated on FEMA maps. However, the Project will not involve the construction of any aboveground structures within these mapped floodways nor will the Project result in any change in the storage capacity of the floodways. All floodways temporarily impacted by the Project will be restored to their pre-existing contours and no additional/new fill will be placed in the floodways. There are no permanent impacts to FEMA floodways as a result of the proposed Project.

Coordination with the local municipalities was initiated with letters and project maps sent between the dates of November 10 and December 22, 2015. As part of that process, the municipalities were requested to respond with any concerns regarding the proposed Project and its consistency with their comprehensive plans and/or ordinances. A summary of the initial stormwater and floodplain management correspondence is included in this attachment as Table 14-1. Following Table 14-1 are copies of the consistency letter requests, delivery confirmations, and responses received to date.

A portion of the proposed Twin Oak Station modification in Delaware County would be located within a PADEP 50-foot floodway. However, this particular floodway is considered waived from a PADEP Chapter 105 permit requirements as it drains less than 100 acres and represents a stormwater drain. The impacts to the 50-foot floodway are quantified within the aquatic resource impact tables located in Attachment 11. Furthermore, the Project will implement a Post-Construction Stormwater Plan to ensure that increases in runoff or changes in stormwater flows do not occur. As such, Project impacts to the PADEP 50-foot floodway as a result of the Project would not result in adverse effects and would be negligible. A copy of the E&S Plan and PCSP for the Twin Oaks Station expansion is provided Attachment 12.

"I, Robert F. Simcik, do hereby certify to the best of my knowledge, information and belief, that the information contained in the accompanying plans, specifications, and reports has been prepared in accordance with accepted professional practice, is true and correct, and is in conformance with Chapter 106 of the rules and regulations of the Department of Environmental Protection."

"I, Robert F. Simcik, do hereby certify pursuant to the penalties of 18 Pa. C.S.A Sec. 4904 to the best of my knowledge, information and belief, that the information above, is true and correct, and is in conformance with Chapter 105 of the rules and regulations of the Department of Environmental Protection."



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