

# Letort Regional Authority

415 Franklin Street  
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[www.letort.org](http://www.letort.org)

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John Quigley, Secretary  
Department of Environmental Protection  
Commonwealth of Pennsylvania  
400 Market Street  
Harrisburg PA 17101

Re: Sunoco Mariner East 2 Pipeline  
Chapter 105 Permit Application – Public Comment

Dear Secretary Quigley

On March 17, 2016 the Authority wrote a letter to you and the Department of Environmental Protection requesting that the Department coordinate with us about this project and its potential impact to the Letort Spring Run. One of the Authority's responsibilities is to review development plans for projects in the watershed and recommendations to protect the qualities that make this stream Exceptional Value and a Scenic River. There has been no effort from the Department to include us in the review or decision making for this project.

Much of the permit application documentation is relatively general in nature (county based) and specific impacts within the watershed are sometimes difficult to tease out. While we still have overall concerns of the proposed project's adverse impact to forest fragmentation, wetland conversion, and water quality; we recognize that these actual adverse effects are related to the project implementation and active and strict monitoring of the construction by the DEP and Conservation District will be required to ensure that minimal damage is inflicted on the environment.

We do offer the following specific comments on the project:

1. Throughout the plan, they identify "Existing Road to be Used for Access, No Proposed Improvement". There should be a specification in the contract requiring repair of these largely dirt roads and trails during and following construction due to the inevitable damage inflicted by heavy construction vehicles. Because of potential damage to these roads caused by the construction, additional E&S measures may be required along these roads. None is currently proposed.
2. There needs to be provision to maintain the drainage of the UNT at Station 10113+50 L.

3. We appreciate that the proposed crossing of the Letort Spring Run will be accomplished by HDD and that the crossing is co-located in close proximity to the PA Turnpike to avoid introducing another disturbance along the stream.
4. The limits of the HDD staging/pull back area on the east side of the Letort Spring Run (Station 10129) is very close to the PEM wetland adjacent to the stream. This area should be pulled back to provide more buffer to the wetland.
5. Along the "existing" access road located at Station 10141, protection for the adjacent PFO wetland should be provided. Also there is no indication that a culvert is provided to maintain and protect the UNT crossing. Finally, the proposed aggregate stockpile on this road should be moved away from the wetland.
6. There are apparent trench/drainage features located at Station 10158+50 to 10159+50 and Station 10166+00 to 10169+50. The water bars depicted in these locations may require revision? Erosion control mat should be applied at the Station 10158+50 to 10159+50 location. Any potential drainage in these features needs to be accounted for.

We appreciate this opportunity to comment on this proposed pipeline project permit application. While impacts are inevitable with this type of project, strict and vigorous enforcement of the law, regulations, and best management practices as they apply to this pipeline is required to protect the environment.

Respectfully,



Andrew C. Parker, Chairman  
LeTort Regional Authority

pc: Kathy Russell, LRA Administrator