

REQUIREMENT U  
DEPARTMENT OF CONSERVATION AND NATURAL  
RESOURCES (DCNR) SCENIC RIVERS REVIEW

# Transmittal

1828 Good Hope Rd, Suite 202, Enola, PA 17025

PROJECT: Birdsboro 16" Natural Gas Pipeline  
216097.01

DATE: 8/17/2017

SUBJECT: Birdsboro Pipeline - DCNR Scenic Rivers Submission 08-17-2017

TRANSMITTAL ID: 00053

PURPOSE: For your review and comment

VIA: Info Exchange

FROM

NAME	COMPANY	EMAIL	PHONE
Jacob Yealy 1828 Good Hope Rd, Suite 202 Enola PA 17025 United States	Dawood Engineering, Inc.	jyealy@dawood.cc	717.732.8576 x1227

TO

NAME	COMPANY	EMAIL	PHONE
Kelly Rossiter 400 Market Street, 5th Floor Harrisburg PA 17101 United States	Pennsylvania DCNR	krossiter@pa.gov	717.772.3319

REMARKS:

Kelly,

Available for download is the requested additional mapping and project description for your review and use. Please note that the included site plan doesn't reflect that we have removed the proposed HDD-5 (although this is shown on the E&S plans I sent earlier today). The E&S Plans can be considered to be correct up to this point, everything else can be used for reference.

Please let me know if you require anything else in regard to this project.

Thanks,

Jacob

DESCRIPTION OF CONTENTS

QTY	DATED	TITLE	NOTES
1	8/17/2017	Birdsboro Pipeline - DCNR Scenic Rivers Review Package 08-17-2017.pdf	

COPIES:

Kevin Rucker (Dawood Engineering, Inc.)

The 08-17-2017 DCNR Scenic Rivers Review Package contained the Project Description, Location Map, and project mapping. An up-to-date Project Description can be found in Requirement J. The Location Map is included in Requirement I. Project mapping is located in Requirements H and M within the application. It was not included here to avoid confusion.



October 16, 2017

Mr. Jacob Yealy  
Dawood Engineering Inc  
1828 Good Hope Road, Suite 202  
Enola PA 17025

**RE: Scenic River Reviews – 2017**

**Project Name:** Birdsboro Pipeline and Birdsboro Transmission Line

**Description:** Natural Gas Pipeline and Electric Transmission Line

**Location:** *Pipeline*-Borough of Birdsboro, Amity, Rockland, Oley, and Union Townships, Berks County; *Electric Transmission Line*- Borough of Birdsboro, Robeson and Exeter Townships, Berks County

**Applicant Code:** 860 and 849-Revised

**Request Date:** 8/17/2017

Dear Mr.Yealy:

Information submitted regarding the subject applications have been reviewed. Both projects lie within the Schuylkill River Pennsylvania Scenic Rivers Corridor System. Because of Scenic River involvement compliance with Sec 2. of the "Pennsylvania Scenic Rivers Act" of 1972, P.L. 1277, No. 283 as amended May 7, 1982, P.L. 379, No. 110, is necessary:

*"Many of the rivers of Pennsylvania or sections thereof and related adjacent land areas, possess outstanding aesthetic and recreational values of present and potential benefit to the citizens of Pennsylvania. It shall be the policy of the Commonwealth to protect these values and to practice sound conservation policies and practices within this scenic rivers system."*

To improve efficiencies and coordination with the Department of Environmental Protection (DEP), I have presented DCNR's review of these two projects in this one response letter.

To summarize submitted project information for the **Birdsboro Pipeline Project:**

The pipeline will cross the Schuylkill River via horizontal directional drilling (HDD) with no loss of channel or wetland acreage anticipated as a result. HDD entry and exit points will be at least 200 feet from the river bank, largely shielded from view (from the river) by currently in-tact

---

**conserve      sustain      enjoy**

P.O. Box 8475, Harrisburg, PA 17105-8475 | Phone 717.772.3319 | Fax717.787.9577

riparian forest buffers. Riverside vegetation clearing is not anticipated, but if minor clearing is required, the landscape will be returned to its previous condition through replanting. Minor aboveground facilities associated with the project will be constructed away from of the

Schuylkill scenic river and therefore will not impact the aesthetic or recreational characteristic of the waterway. An ATON plan was developed (and approved by PA Fish & Boat Commission) for the HDD under the Schuylkill River to mitigate threats to watercraft during construction activities. An approved erosion and sedimentation control plan will be utilized throughout the duration of the construction project.

To summarize submitted project information related to the **Birdsboro electric transmission line project**:

The line will aerially cross the recreational designated Schuylkill River along a new alignment in two locations—Exeter and Robeson Townships. The locations were chosen as a result of an alternatives analysis where 7 potential alignments were evaluated. Route A -Option 1 is the alignment that is moving forward at this time, with other alignments being deemed infeasible by the applicant due to engineering issues, conflicts with current utility lines, inability to obtain access permission from private landowners, or prohibitive costs. The proposed alignment will include steel monopoles to support the line in locations where it is not sited underground. All monopoles will be sited at least 100 feet from the river's edge with a forested riparian buffer between the waterway and the utility right of way. Vegetation clearing near and adjacent to sensitive areas, including the river's edge, will be limited to hand-clearing—no construction equipment will be used. Monopoles along this route can be sited up to 1,000 feet apart, allowing for minimal disturbance to wetlands and watercourses. An approved erosion and sedimentation control plan will be utilized throughout the duration of the construction project.

Based on this project information, the cumulative impacts of these two projects on the Schuylkill Scenic River are visual impacts to the scenic nature of this valued natural resource. The two projects, when combined, will result in three additional right-of-way clearings (two for the electric transmission line and one for the natural gas pipeline), two locations where aerial transmission lines will be added to the landscape, and intermittent stretches of electric transmission lines along the scenic river.

To support the integrity of the scenic river, DCNR would prefer alignments for both projects that minimize visual impacts to the waterway by collocating rights-of-way and placing the electric transmission line underground. Both right-of-way collocation and underground conduits would minimize the visual impacts of these projects and reduce the loss of beneficial riparian vegetation.

DCNR advocates for full exploration of the collocation of the natural gas pipeline right-of-way with the electric transmission right-of-way (aerial and/or underground) as an alternative to the current proposal, which includes different rights-of-way and several river crossings where riparian zones will be cleared. If this further analysis results in the selection of the currently proposed alignments, thus creating several right-of-way clearings along the river and additional





11 Grandview Circle, Suite 116,  
Canonsburg, PA 15317  
P) 724.746.0730 F) 717.732.8596

October 30, 2017

PA Department of Conservation and Natural Resources  
Bureau of Recreation and Conservation  
400 Market St, 5<sup>th</sup> Floor  
Harrisburg, PA 17101

**Attention:** Ms. Kelly Rossiter, AICP – Rivers Program Specialist

**Re: Birdsboro Pipeline and Birdsboro Transmission Line**

Dear Ms. Rossiter:

Thank you for your coordination letter dated October 16, 2017. Dawood Engineering Incorporated (Dawood) has reviewed the letter and is providing this supplemental information about the proposed projects to help address some of DCNR's concerns.

Project Summary- Birdsboro Pipeline

As pointed out in the letter our HDD entry and exit pits are buffered substantially from the edge of the river and these sites will be "largely" shielded from view. Dawood would like to emphasize that no clearing or alterations to the existing in-tact riparian buffer are proposed as part of the pipeline HDD and the pits will be entirely shielded from view when considering the perspective of a paddler in the river. There will not be any discernable visual evidence of ROW clearing for the proposed pipeline HDD crossing of the Schuylkill. It is our belief that the proposed HDD crossing of the pipeline beneath the Schuylkill River will not impact the Modified Recreational capacity of the watercourse in any way as described within the Pennsylvania Scenic Rivers Act.

Cumulative Impacts Discussion

The letter states that three additional ROW clearings will be added to the landscape. Dawood believes that only two ROW clearings will be added to the landscape since the ROW associated with the pipeline crossing will not be visible from any vantage within the Schuylkill River or its banks. Dawood requests that consideration of the proposed pipeline as a cleared ROW should be removed from this discussion.

DCNR Colocation and Underground Installation Discussion

DCNR stated its preference that the projects minimize visual impacts to the waterway by collocating rights-of-way and placing the electric transmission line underground. The projects have evaluated co-location of the proposed electric line both with the existing transmission lines in the area as well as with the proposed natural gas line. Both of these options are not feasible. First Energy and Met-Ed have crossed the river at two locations near the site but these lines have their own easements and the proposed lines are not permitted within those easements, so separate buffered easements are required.

Corporate Office: Enola, PA  
Canonsburg • Grantville • Philadelphia • Sayre, PA  
Caldwell, OH • Bridgeport, WV • Sturbridge, MA • Houston, TX  
www.dawood.cc

In addition, colocation of the electric line and natural gas pipeline is not feasible. While these lines originate and terminate respectively at the same location, they do not share any other routing. The TETCO natural gas pipeline, which supplies the facility, is approximately 13 miles north of the proposed powerplant while the required tie-in location to the electric grid is approximately 4 miles west of the plant. At no point is it feasible for those lines to be collocated. Furthermore, the transmission line tie-in location with the electric grid is determined by the independent public utility, and it was their transmission feasibility and impact studies that determined that the Birdsboro plant should connect to the 230 kV transmission system located west of the plant.

Most of the electric line ROW running parallel to the river will not be readily visible from the river since it will be buffered from view by at least 100' of mature forest that will remain in-tact between the river's edge and cleared ROW. Electric transmission line ROW clearings will be visible at the river crossing locations but there are no viable options to place the line underground. It is believed the railroad will not authorize an underground crossing and the slope limitations on the north bank will make placement of the HDD drilling machine difficult.

We hope the above information is helpful to clear up any discrepancies and provide supplemental information to the agency about the proposed projects. We find the mitigation actions recommended in the letter generally acceptable; please find the signed mitigation certification attached.

We appreciate your time and consideration of this matter. If you have any questions, please do not hesitate to contact us.

Respectfully,  
Dawood Engineering, Inc.



Kevin Rucker  
Environmental Permitting Manager

Attachment



### DCNR Mitigation Actions

The DCNR requests that the following actions are integrated into both projects to further protect river values along the scenic Schuylkill River:

1. The portion of the project within the scenic river corridor should be completed in late fall or early spring when recreational use of the river is minimal.
  - a. The pipeline crossing beneath the Schuylkill River is required to occur between April 16 and October 14 to minimize potential impacts to a sensitive species. The installation will begin as early as possible in the allowable construction window and be completed as fast as possible. Implementation of the HDD will be planned to produce as little impact to local recreation and businesses as possible and provide as much notice to local landowners, organizations, businesses, and government entities as possible so they can proceed with alternative plans.
  - b. Applicable portions of the electric transmission line will be installed in accordance with this recommendation.
2. Once construction is underway, appropriate safety signage should be on the Schuylkill River to notify waterway users that they are entering a construction area.
  - a. Both project areas will utilize safety signage during construction.
3. Minimize ROW width in riparian zones as much as possible by crossing the river at a perpendicular angle and hand clearing as little vegetation as possible.
  - a. Both projects have been designed with minimum ROW widths and river crossings are at near perpendicular angles. Furthermore, hand clearing will be required within the limit of the FEMA regulatory floodway on the electric transmission line. No tree clearing is required within the Schuylkill River riparian buffer in association with the proposed pipeline.
4. Native vegetation shall be incorporated in any disturbed areas to maintain the natural character and scenic qualities of the waterway.
  - a. Disturbed areas will be re-vegetated in accordance with approved erosion and sedimentation control plans for the projects, which will include native vegetation.
5. (*Transmission Line Project*) Where possible, the aerial transmission line and monopoles shall be sited to blend into the natural landscape. Finishes should include natural colors and matte textures.

Monopoles were designed to be buffered from view to the extent practicable by maintaining a minimum 100' of separation between the edge of clearing and the river's edge. Proposed poles are matte galvanized finish and intended to blend in with the sky.

## Kevin Rucker

---

**From:** Rossiter, Kelly <krossiter@pa.gov>  
**Sent:** Tuesday, October 31, 2017 1:39 PM  
**To:** Kevin Rucker  
**Subject:** RE: Birdsboro Scenic River Review follow up

**Categories:** Filed by Newforma

Kevin,

Thanks for sending this along. Your subsequent comments provide necessary clarification and make sense to me. I have shared this with others at DCNR that have been engaged with this project in various capacities, so if they come back with any questions or concerns, I will let you know. For now, this concurrence meets the requirements of the scenic rivers program.

**Kelly Rossiter, AICP** | Rivers Program Specialist  
Department of Conservation and Natural Resources  
Bureau of Recreation and Conservation  
400 Market St, 5<sup>th</sup> Floor | Harrisburg, PA 17101-2301  
Phone: 717.772.3319 | Fax: 717.787.9577  
<http://www.dcnr.state.pa.us/brc> | [www.ExplorePAtrails.com](http://www.ExplorePAtrails.com)



---

**From:** Kevin Rucker [mailto:krucker@dawood.cc]  
**Sent:** Monday, October 30, 2017 9:14 AM  
**To:** Rossiter, Kelly  
**Subject:** RE: Birdsboro Scenic River Review follow up

Hi Kelly,

Please see attached for the signed letter and our supplemental information that will be supplied to DEP. Thanks for your help on all of this. Please let me know if you have any questions.

Thanks Again,  
Kevin

---

**From:** Rossiter, Kelly [mailto:krossiter@pa.gov]  
**Sent:** Thursday, October 19, 2017 11:44 AM  
**To:** Kevin Rucker <krucker@dawood.cc>  
**Subject:** Birdsboro Scenic River Review follow up

Kevin,

In reference to your voicemail, our main concern is the disruption of public access and safe recreation during the construction period.

As you know, the Schuylkill River is a heavily utilized waterway for recreation. Additionally, organizations carry out their conservation-related missions and collect fees to support their work from event fundraisers held on or adjacent to the

river, and local outfitter businesses rely on recreation business along the river to support their bottom line and keep their doors open, among other factors. It is important to us that this construction does not interrupt the vibrant economy and stewardship that happens along the river, most notably in the summer months. If habitat/species avoidance measures requested by PFBC require you to complete construction in the summer months, the disruptions should be planned to produce as little impact to local recreation and business as possible and provide as much notice to local landowners, organizations, businesses, and government entities as possible so they can proceed with alternative plans.

If you'd like to talk about this further, I am in the office and available for a call today (1-4pm) and tomorrow (11-4pm).

**Kelly Rossiter, AICP** | Rivers Program Specialist  
Department of Conservation and Natural Resources  
Bureau of Recreation and Conservation  
400 Market St, 5<sup>th</sup> Floor | Harrisburg, PA 17101-2301  
Phone: 717.772.3319 | Fax: 717.787.9577  
<http://www.dcnr.state.pa.us/brc> | [www.ExplorePAtrails.com](http://www.ExplorePAtrails.com)

