



June 19, 2020

Christopher Smith, P.E.
Chief, Construction Permits Section
Waterways and Wetlands
PADEP Southeast Region
2 East Main Street
Norristown, PA 19401

RE: Incompleteness Review Letter- Adelphia Gateway Project- Tilghman and Parkway Lateral- Phase 2A
Erosion and Sediment Control General Permit (ESCGP)
Permit Application No. ESG 01 00 19 001
JMT Job No. 18-00672-001

Dear Mr. Smith:

Johnson, Mirmiran & Thompson (JMT) is pleased to submit the Comment Resolution Summary letter in response to the Incompleteness Review Letter – Erosion and Sediment Control General Permit (ESCGP) for Adelphia Gateway Project – Phase 2A, dated June 15, 2020.

The re-submitted ESCGP permit includes the following documents. Please note the documents in bold text were updated per comments in the Incompleteness Review Letter.

- **Notice of Intent for ESCGP-3 for Adelphia Gateway Project- Tilghman and Parkway Lateral Phase 2A, signed and notarized, with completed Checklist**
- **Adelphia Gateway Project, Tilghman and Parkway Lateral- Phase 2A, E&SC and Site Restoration Plans dated 5/22/20, revised 6/19/20 (11 sheets)**
- Erosion and Sediment Control Report, Adelphia Gateway Project- Tilghman and Parkway Lateral Phase 2A, dated May 2020
- Post Construction Stormwater Report, Adelphia Gateway Project- Tilghman and Parkway Lateral Phase 2A, dated May 2020
- **Act 14 Notification Letters with Proof of Receipt for Delaware County and Lower Chichester Township dated 6/16/20**
- Pennsylvania Natural Diversity Inventory Receipt dated 4/4/20 and associated clearance letters
- HDD Design and Constructability Review Report dated 8/26/19 prepared by Laney
- Inadvertent Release Contingency Plan dated 5/2020 prepared by NV5
- PHMC Response Letter to Phase 1 Archaeological Survey for Tilghman Lateral dated July, 2019.
- Preparedness, Prevention, and Contingency Plan dated May 2020 prepared by NV5
- Resource Delineation Report Letter for Phase 2A dated 5/22/20 prepared by NV5
- **Adelphia Gateway Project - Master Plan dated 6/19/20**
- **Notice of Intent for ESCGP-3 for Adelphia Gateway Project- Phase 1 from original submission to PADEP on March 25, 2019, Page 4**
- **Scanned check for \$1,900 dated March 14, 2019**
- **Scanned check for \$1,000 dated March 21, 2019**

Items for Resubmittal or Submission of Additional Information:

1. **PADEP Comment (6/15/20):** Please provide a copy of evidence of municipal receipt of the Act 14 notification for all municipalities and counties within the project site. The municipal and county notifications provided with the ESCGP-3 application for Phase 2A are from the original submission and do not reference the proposed Tilghman or Parkway Laterals. Please address. [Application and Checklist, 102.4(c), 102.8(f)(15)]

JMT Response (6/19/20): Act 14 notifications were sent to Lower Chichester Township and Delaware County. Proof of receipts are included in the submission. Please note that the receipts are in form of the electronic tracking via USPS and indicate that the packages were delivered to each municipality.

2. **PADEP Comment (6/15/20):** Please provide a copy of proof of consultation with the Pennsylvania Natural Heritage Program (PNHP) regarding the presence of a State or Federal threatened or endangered species on the project site. Please note that for expedited review per the application instructions, any potential impacts must be resolved at the time the NOI is submitted as demonstrated by a PNDI clearance letter, determination or other correspondence from the resource agency. There was no response from US Fish and Wildlife provided with the ESCGP-3 application. Also, there is a plan recommendation from the PA Fish and Boat Commission. [Application and Checklist, 102.4(c), 102.8(f)(15)]

JMT Response (6/19/20): The PNDI was submitted for the entire Adelpia Gateway Project (Phases 1, 2A and 2B). The plan recommendation from the PA Fish and Boat Commission is applicable to the Schuylkill River site which is included in Phase 1. There are not any plan recommendations that pertain to Phase 2A. A clearance letter was received from the US Fish and Wildlife on 6/18/2020 and attached to the Pennsylvania Natural Diversity Inventory document within the submission.

3. **PADEP Comment (6/15/20):** On each E&S and Site Restoration plan drawing, please identify the name of the receiving stream, the designated and existing use under Chapter 93 of the receiving stream, the status of the receiving stream as siltation-impaired water, and the direction and distance to the receiving stream from the drawing sheet limits. [102.4(b)(5), 102.8(f)]

JMT Response (6/19/20): Notes 1 and 2 on SR-9, SR-10 and SR-11 were each revised to identify the name of the receiving stream, the designated and existing use under Chapter 93 of the receiving stream, the status of the receiving stream as siltation-impaired water, and the direction and distance to the receiving stream from the drawing sheet limits.

4. **PADEP Comment (6/15/20):** Please provide a copy of the Master Plan for all phases - Phases 1, 2A, and 2B. [Application Checklist for Phased Projects]

JMT Response (6/19/20): A master plan is provided to show Phases 1, 2A and 2B.

5. **PADEP Comment (6/15/20):** In the ESCGP-3 application checklist for Phase 2A, the applicant noted that the filing fees were paid for the entire project and submitted with Phase 1. Please provide proof of total disturbed acres for this phased project and the amount of fee already provided.

JMT Response (6/19/20): A copy of the original NOI (Page 4) dated March 25, 2019 is included in this submission. The original NOI indicates a fee of \$2,900. Two scanned checks for \$1,000 and \$1,900 are included in this submission to indicate the fee amount already provided.

6. **PADEP Comment (6/15/20):** It is uncertain if the Parkway Lateral is part of Phase 2A. If the Parkway Lateral is not part of Phase 2A, please remove the reference to it in all places in the application

documents and plans. If the Parkway Lateral is part of Phase 2A, please identify its location on the plan drawings.

JMT Response (6/19/20): *The Parkway Lateral is included in Phase 2A. It is a small segment (roughly 50 LF) located near the Pennsylvania/Delaware State Line and connects to the Marcus Hook Compressor Station. Refer to the T-1, I-1 and SR-7 which labels Parkway Lateral included in Phase 2A.*

If you have any questions or need further information, please do not hesitate to contact me at 610-496-4780 or smathew@jmt.com.

Very truly yours,

JOHNSON, MIRMIRAN & THOMPSON, INC.



Shiny M. Mathew, P.E.
Senior Associate
Water Resources