



THE COUNTY OF CHESTER



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WATER RESOURCES AUTHORITY
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June 14, 2021

Robert Simcik, PE
Tetra Tech
661 Andersen Drive, Suite 200
Pittsburgh, PA 15220

Sent via email to Robert.Simcik@tetrattech.com

RE: 67 and 68 Notice of Major Permit Modification Notification for Sunoco Pipeline, LP HDD290 Upper Uwchlan Township

Dear Mr. Simcik:

The Chester County Water Resources Authority (the Authority) received the above referenced Notice from the Chester County Planning Commission on May 11, 2021. Sunoco Pipeline LP proposes to change the pipeline route and installation method for the 20-inch diameter pipeline, previously permitted as S3-0290 Horizontal Directional Drill (HDD). The amendment involves the conversion of the entire HDD installation to an open cut construction method across wetland H17 and dry open cut construction methods across streams S-H10 and S-H11 and their associated floodways. The modification letter notes that the typical limit of disturbance (LOD) has been reduced to 50 feet across the entire 200-foot length of the S-H10/S-H11/WL-H17 stream and wetland complex. The letter also notes that impacts to the palustrine forested (PFO) portion of WL-H17 have been avoided through siting of the construction workspace. The additional limit of disturbance is 5.42 acres.

Upon reviewing the above referenced Notice, the Authority respectfully submits the following comments for consideration.

1. The Authority strongly supports all comments submitted in the Chester County Planning Commission's letter dated June __, 2021.

Protecting Residents

2. The proposed pipeline route will result in open trench installation close to existing residences on Highview Road, Little Conestoga Road, and Milford Road. Chester County Health Department records indicate that these residences are serviced by on-lot septic systems. Please identify, locate, and determine the dimensions of all infrastructure associated with septic systems, including storage tanks and drain fields, located within 50 feet of the proposed pipeline corridor. Any disturbance of these features should be mitigated to ensure equal functioning post-construction.
3. The proposed modified pipeline route will be located within Aqua Pennsylvania's water service area. Design sheets included in the modification request do not show the location of any subsurface water lines. Prior to construction, the contractor should coordinate all excavation activities with Aqua Pennsylvania to identify the location, depth, and dimensions of all lines within 50 feet of the proposed pipeline corridor. The contractor should also identify any nearby public water supply wells and coordinate with the operating water supplier to ensure they will not be impacted.

Protecting Streams

4. The proposed modification will result in an open trench and additional soil disturbance within in the riparian area of two unnamed tributaries (stream S-H10 and S-H11). We acknowledge the erosion and sediment reduction measures described in the Erosion and Sediment (E&S) Control Plans; however, the installation of open trenches within the stream channel and adjacent floodway increases the risk of unintended sediment delivery to streams, particularly before the re-establishment of vegetation post-construction. Runoff from this project will flow into Marsh Creek Lake, which is a public water supply reservoir and a popular recreational destination. Additionally, these streams both flow into an unnamed tributary to Marsh Creek that has been designated a High Quality-Trout Stocking stream. Heightened vigilance in monitoring E&S control measures is necessary to protect the receiving streams and water bodies from increased sediment deposition. Please inspect E&S measures (e.g. compost filter socks, waterbars, trench plugs, and erosion control blankets) daily to ensure that they are functioning as intended.
5. Please demarcate the planned limit of disturbance along the entire 200 foot length of the S-H10/S-H11/WL-H17 stream and wetland complex with orange construction fencing to minimize unintended intrusion by construction equipment into woodlands, wetlands, or other sensitive areas.
6. An open trench will be constructed across streams S-H10 and S-H11. To limit long-term impacts to this stream, please ensure that the natural features of the channel, including depth, bankfull width, streambank slope and height, and channel gradient, are restored back to their original conditions. Grade and channel stabilization structures should be incorporated to limit streambed erosion and lateral channel migration and to prevent the formation of a head cut that could affect the stability of the berm of Pond H2.
7. Plan design drawings indicate that water from streams S-H10 and S-H11 will be pumped around the stream crossing during construction and will be directed back into the stream channel at the downstream end of the limits of disturbance.
 - a. Please ensure that the outlet is placed in a location within the channel with moderately-sized cobble substrate to minimize the erosive impacts of concentrated discharge to the stream channel.
 - b. Regular inspections of the outlet location should be made to monitor for erosion or discharge of excessive sediment.
8. The proposed modifications will result in excavation and soil disturbance through and directly upslope of Wetland-H17). To avoid impacting the hydrology of this wetlands, please restore all surface topography to its original contours to reduce changes to overland flow patterns. Care should be taken to minimize ground disturbance and compaction in areas adjacent to wetlands and other water bodies to retain natural flow paths and infiltration rates.
9. All areas of disturbance should be re-vegetated with native species that are suited for site-specific conditions shortly after ground disturbance activities are completed.
10. Authority staff are willing to meet with the applicant and/or the Department of Environmental Protection to further discuss these recommendations.

The Authority appreciates the opportunity to provide comments on the permit modification. If you have any questions, please feel free to contact me at 610-344-5581.

Sincerely,



Seung Ah Byun, PhD, PE
Executive Director

cc: Chester County Conservation District
Chester County Planning Commission