

August 26, 2016

EGOS 0730

Mark Gordon, Zoning Officer
East Goshen Township
1580 Paoli Pike
West Chester, PA 19380

RE: Sunoco Pennsylvania Pipeline Project

Dear Mark:

As requested, we have reviewed the following information, prepared by Tetra Tech, in connection with the referenced project:

- *“Pennsylvania Pipeline Construction Spread 6, Chester County Conservation District, E&S Control & Site Restoration Plan”*, dated March 18, 2016, Sheets ES-0.01 to 0.11 and ES-6.56 to ES-6.69.

The plans propose six (6) separate boring pit/staging area locations associated with the pipeline installation within the Township; no wetland or stream crossings are proposed. Per correspondence from Tetra Tech dated July 22, 2016, they are seeking confirmation from the Township that the noted plan submission conforms to the *Chester Creek Act 167 Plan* and the subsequent County-wide update, which has been adopted as the Township’s Stormwater Management Ordinance (§195). The Chester County Conservation District requires this confirmation as part of their permit review process.

We have reviewed the submission and offer the following comments:

STORMWATER MANAGEMENT (§195)

1. An East Goshen Township Stormwater Management (SWM) Permit is required, as this project meets the definition of *“regulated activity”*. (§195-15.A)
2. Persons proposing to construct regulated activities with one (1) acre or more of proposed earth disturbance that do not discharge directly to waters of the Commonwealth shall provide the Township with a copy of the easements authorizing such discharge or confirmation from PaDEP that an easement is not required. (§195.15.G) Based on the plans provided, it is unclear if this situation occurs; additional plan information is necessary, addressed further below.
3. In the referenced correspondence, it is indicated that *“the project limits of disturbance will be restored to meadow...”*. However, some of the areas proposed to be disturbed (and returned to meadow) are currently heavily vegetated or wooded. Furthermore, it is unclear how each area is intended to be restored; no meadow plantings or seed mixes are proposed, and it is more likely a ‘lawn’ condition would be established. Therefore, different runoff coefficients may be applicable, possibly causing the total post-construction runoff volume to exceed that of predevelopment. Further analysis may be warranted to confirm that the requirements of §195-19 through §195-24 are being met.

4. Any facility located within a PennDOT right-of-way shall comply with PennDOT minimum design standards and permit submission and approval requirements. Copies of approved Highway Occupancy Permits and associated detour plans, where applicable, shall be provide with the SWM Permit submission. (§195-24.F)
5. Regarding the SWM site plan contents, the following shall be provided:
 - a. A listing of all regulatory approvals required and the status for each. Proof of application or documentation of approval for each shall be part of the SWM site plan. (§195-27.A.(2))
 - b. The statement and signature block signed and/or sealed by the applicant and/or engineer per §195-27.A.(3) & (4).
 - c. Plans shall be provided in 24-inch by 36-inch format. (§195-27.B)
 - d. Tax parcel numbers, names, address and phone numbers of the owners of the subject properties. (§195-27.B)
 - e. Additional detail regarding the legal property boundaries, per §195-27.B.(7).
 - f. A list of potential PNDI impacts and clearances, if the total earth disturbance exceeds one acre. (§195-27.B.(8)(g)).
 - g. Any steep slope areas. (§195-27.B.(8)(j))
 - h. Soil names and boundaries, hydrologic soil groups. (§195-27.B.(8)(k))
 - i. Any contaminated subsurface areas. Note the Sunoco gas station at the northwest corner of the intersection of North Chester Road and Paoli Pike is currently subject to a PaDEP Remedial Action Plan (DEP Facility ID No. 15-20353). (§195-27.B.(8)(m))
 - j. Location of existing wells and recharge areas on the project properties. (§195-27.B.(8)(n))
 - k. Description of existing and proposed ground cover and land use, including the type and total area. (§195-27-B.(10)).
 - l. The location of all existing utilities within the site and with 50 feet of the proposed limits of disturbance. (§195-27.B.(15))
 - m. The total disturbed area in square feet and acres. (§195-27.B(16)) We recommend it be provided for each separate area.
 - n. A written description of the information required within §195-27.C shall be included in SWM site plan, notably: existing conditions (C).(1); the effect of the project on various features (C).(5); proposed nonpoint source pollution controls (C).(6); project time schedule (C).(7); and construction stages/phases, if applicable (C).(8).
6. As there are no permanent BMPs currently proposed, nor any changes to existing elevations, it does not appear plan recording, an O&M plan/agreement, nor as-built plans would be warranted.
7. The Township should confirm anticipated fees and expenses will be covered by the applicant. (§195-35)
8. It is unclear if the Township will have right of entry to the multiple properties involved with the project. (§195-46)

E&S PLANS

9. General:
 - a. Are the proposed limits of disturbance sufficient for all construction activities, including material storage, deliveries, equipment and parking?
 - b. It is unclear why Note 18, Sheet ES-0.01 indicates Uwchland Township only.
 - c. Please confirm the proposed infiltration berm referenced on Sheet ES-0.02 (amongst other sheets) is not located within East Goshen Township; it was not apparent on the design plans.

- d. Please clarify what specific seed mix is intended for the disturbed areas within East Goshen Township, as 'lawn' areas are not indicated on the provided tables (Sheet ES-0.07).
 - e. What is the method for replacing existing vegetation? For example, along Boot Road in front of the shopping center where the pipeline is to be excavated. Decorative screening including mature trees and shrubs extend throughout this entire area. Other areas present similar concerns.
 - f. Do the plans provided to the Township reflect the changes documented in the March 2016 "Workspace Changes" plan set?
 - g. Various boring locations include monument signs for business or neighborhoods; these potential conflicts do not appear on the plans.
 - h. Inlet protection is not provided.
10. Regarding Sheets ES-6.56/ES-6.57:
Note: Though located within West Goshen Township, the staging area in this location drains to East Goshen Township.
- a. The proposed access location for this staging area is a very challenging location of a four lane cross section of North Chester Road between the SR 202 on-ramp and Greenhill Road intersection.
 - b. It is unclear what is proposed by the "Riparian Forest Buffer"; no detail is provided.
 - c. No E&S controls are proposed on the south side of the tributary to Ridley Creek, a High Quality (HQ) stream that drains to East Goshen Township. However, E&S controls are proposed on the north side of the same tributary; it's unclear why the limit of disturbance extends to the opposite side of the stream.
 - d. It is unclear what material is proposed for the "Proposed Parking Area"; the limits of this area are unclear. Stormwater management controls may be required.
11. Regarding Sheets ES-6.58/ES-6.59:
- a. The limit of disturbance extends much further north than the boring pit area; it's unclear why the LOD is so large and if no excavation proposed, why the E&S controls are proposed in these areas. Further, the LOD appears to include driveways and parking of the adjacent sites; it's unclear why the LOD extends into these areas. Further information should be provided if access between these adjacent sites it be impeded or limited and if parking spaces, drive aisles and/or driveways are to be unavailable for users and emergency services.
 - b. The plans do not indicate an existing concrete median in the shopping center driveway, limiting ingress/egress. We recommend the proposed construction entrance location be reviewed due to the presence of the median and its location immediately adjacent to an existing traffic signal.
 - c. The compost filter sock and aggregate stockpile leaders are incorrect.
12. Regarding Sheet ES-6.60:
- a. Silt fence and the LOD are shown within the cartway.
13. Regarding ES-6.61/ES-6.62:
- a. The plans do not indicate an existing concrete median within Enterprise Drive, limiting vehicle ingress/egress. This staging area proposes four (4) construction entrances. We recommend the proposed entrances be reviewed and consolidated to the most appropriate location(s).
 - b. The purpose of the proposed LOD area extending south towards Paoli Pike is unclear. Currently it's a stormwater management basin and does not appear to be an appropriate location for material storage, parking or similar activities.
 - c. It appears the compost sock filter leader should state silt fence.
 - d. A portion of the LOD appears to extend into the cartway of North Chester Road.

14. Regarding Sheet ES-6.64:
 - a. Multiple buildings are not indicated on the east side of North Chester Road.
 - b. We recommend the proposed construction access at the intersection of East Boot Road and North Chester Road be reviewed due to its close proximity to an existing signal.
 - c. The plans do not indicate an existing concrete median within Eldridge Drive, limiting vehicle ingress/egress. We recommend the proposed construction entrance location be reviewed.
 - d. The limit of disturbance extends much further north than the boring pit area; it's unclear why the LOD is so large and if no excavation proposed, why the E&S controls are proposed in these areas.
15. Regarding Sheet ES-6.66:
 - a. An existing residence at the northeast corner of the intersection of North Chester Road and Bow Tree Drive is not indicated.
 - b. The plans do not indicate an existing concrete median within Bow Tree Drive, limiting vehicle ingress/egress. We recommend the proposed construction entrance location be reviewed.
16. Regarding Sheet ES-69:
 - a. Please be advised that the proposed staging areas is a low-lying area that frequently ponds with water and may not be appropriate for the proposed activities.

MISCELLANEOUS

17. We recommend sight distances for all proposed accesses meet minimum PennDOT requirements.
18. It is unclear if the construction access locations have been designed to accommodate all anticipated vehicles utilizing the same.
19. All contractors and subcontractors will be required to register with the Township. (§124)
20. Much of the construction will take place in or near residential areas; it is unclear if the project will comply with the sound level limits of §156.
21. It may be appropriate to have the Township's designated emergency services personnel review the plans.

Should you have any further questions or comments, please contact me.

Sincerely,

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Nathan M. Cline, PE
Township Engineer

cc: Rick Smith, Township Manager (via email)