

**EROSION & SEDIMENT CONTROL AND
POST-CONSTRUCTION STORMWATER MANAGEMENT
PLAN NARRATIVE**

FOR

BIRDSBORO POWER, LLC.

MAJOR MODIFICATION - WATER MAIN

**BIRDSBORO BOROUGH & ROBESON TOWNSHIP
BERKS COUNTY, PENNSYLVANIA**

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PREPARED BY

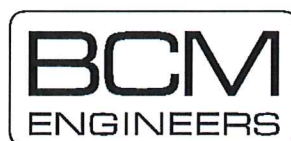


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ATTACHMENTS

- ATTACHMENT A Municipal and County Notification Letters and Certified Mail Receipts or Acknowledgement Letters
- ATTACHMENT B PNHP/PNDI Review Receipt
- ATTACHMENT C Experience of E&SC Plan Preparer
- ATTACHMENT D USGS Quadrangle Location Map
- ATTACHMENT E NRCS Soil Survey Maps
- ATTACHMENT F NRCS Soil Use Limitations and Resolutions
- ATTACHMENT G Experience of PCSM Plan Preparer
- ATTACHMENT H Wetlands Report
- ATTACHMENT I Preparedness, Prevention and Contingency (PPC) Plan

Introduction

This Major Modification Erosion & Sedimentation (E&S) Control Plan and Post-Construction Stormwater Management (PCSM) Plan presents a narrative description of the temporary and permanent erosion control measures required for successful installation of approximately 13,000 linear feet (~2.5 miles) of water main and related appurtenances to service the Birdsboro Power LLC Natural Gas Combine Cycle electric generation facility. The erosion and sedimentation control plans for the project are designed to be consistent with the PCSM Plan.

It should be noted that this project meets the requirements of 25 Pa. Code Chapter 102, sub-section 102.8(n) for “pipelines”, and thus will address the PCSM requirements of sub-sections mentioned in 102.8(n). Since Section 102.8(d) is not one of those requirements, a PCSM/Restoration Plan is not required to be separate from the E&S plan.

As this major modification is a pipeline (linear) project without changes to the grading and impervious area, no permanent structural PCSM BMP’s are proposed. All existing topography and ground cover will be returned to preconstruction conditions.

Project Description

Recently RAWA expanded its distribution system along PA Route 724 to the intersection with Cedar Hill Road. This was completed to service a development proposed in the area. In order to service the proposed power plant, a 16” water main will be extended easterly from this location, along PA Route 724 (Main Street) to Birdsboro Borough. Once in the Borough, it will follow Jackson Street and First Street. At the intersection of First Street and Jefferson Street a valve and tee will be installed for future emergency service connection for the Borough of Birdsboro. From here, the main will continue through the Borough of Birdsboro to the Power Plant. As this project is initially for the power plant use, it is being submitted as a major modification to the previously approved Birdsboro Power LLC NPDES Permit #PAG02 0006 15 032.

Most of the water main construction will be within the paved roads. The Route 724 alignment will also include some construction in the grassed shoulder. This portion also has 4 culvert crossings. The depth of the structures allows for the water main to be installed above the culverts. A drainage ditch along the side of the road has also been identified as a wetlands and Bog Turtle habitat. Every effort will be made to have the construction in this area completed between November and March. Should this be unavoidable, the following standard bog turtle avoidance measures will be used:

- Prior to performing any construction work in wetlands, streams, or uplands within 300 feet of the potential bog turtle habitat, all areas of expected disturbance will be surveyed by a Recognized Qualified Bog Turtle Surveyor for the presence of bog turtles immediately prior to construction;
- Prior to the survey, herbaceous vegetation will be cut to a height of 4 to 6 inches using a hand-held trimmer and carefully raked away by hand from searched areas;
- Immediately following the bog turtle survey, super silt fencing will be installed by and between the wetland and the construction zone, while the bog turtle surveyor

will be present to ensure that the fencing will be properly installed in the correct location;

- If bog turtles are located during the bog turtle survey, the USFWS and PFBC will be contacted immediately, and construction will not proceed until further consultation occurs; and
- All fencing will be removed immediately following construction.

As with all the construction associated with this project, all standard precautions and best management practices will be used to contain sediment.

General NOI Application Information

The fully completed, properly signed and notarized Notice of intent form is located on pages 1 to 14 of the Permit application.

The permit filing fee payable to the appropriate Clean Water Fund is attached to the application.

The disturbed acre fee payable to the Commonwealth of Pennsylvania Clean Water Fund is attached to the application.

Copies of the Municipal and County notification letters along with certified mail receipts or acknowledgement letters are provided in Attachment A.

Copies of the PNHP/PNDI Review receipt for the project area are provided in Attachment B.

Complete Erosion and Sediment Control (E&SC) Plans are included in the application submission.

Separate Post Construction Stormwater Management (PCSM) Plans are not required, therefore not included in the application. PCSM Plan information is included in the E&SC Plans.

A General Information Form (GIF) is not applicable and not included as the application is for a General Permit.

A PHMC is not applicable and not included as the application is for a General Permit.

Appendix A land use questions are included in the application.

E&S Plan Planning & Design 102.4(b)(4)

The Erosion and Sedimentation Control Plans for the project are labeled as "Construction, E&SC and PCSM (Restoration) Plan and Profile" and are the final construction plans. It should be noted that this project meets the requirements of 102.8(n) for "pipelines", and thus the PCSM Plan is not required to be separate from the E&S plan.

Documentation that the E&SC Plan was prepared by a person trained and experienced in E&SC design methods and techniques applicable to the size and scope of the project are provided in Attachment C.

The temporary erosion control measures provided during the pipeline construction activities are designed to minimize soil loss, prevent water pollution of adjacent streams and rivers, protect adjacent properties, and maximize protection of existing drainage features and vegetation. The following measures and Best Management Practices (BMP's) shown in the design and details on the E&SC Plans must be incorporated throughout the pipeline portion of the project's construction by the contractor:

- Limiting areas of disturbance and preservation of existing vegetation wherever possible.
- Temporary seeding and mulching to be applied immediately to all disturbed areas.
- Silt fence and/or filter sock sediment barriers installation and maintenance
- Stabilized construction entrance installation and maintenance
- Pumped water filter bags installation and maintenance
- Erosion control matting along stream banks and steep slopes
- Filter bag inlet protection installation and maintenance
- Cofferdams within creeks and flooded areas

The above measures, shown throughout the E&S Plans will:

- ✓ Minimize the extent and duration of earth disturbance;
- ✓ Maximizes protection of existing site drainage features and vegetation;
- ✓ Minimizes soil compaction; and
- ✓ Controls/minimizes the generation of increased stormwater runoff.

Where the trenching is in paved areas, the width of disturbance is anticipated to be reduced, to about 10 feet. The pavement trench will be a standard six feet wide, with the additional width to accommodate the excavator's treads on each side. The width of full-depth pavement reconstruction is considered by PaDEP as the limit of disturbance in paved areas; milled areas are not considered by PaDEP to be part of the disturbed area.

Existing topographic features 102.4(b)(5)(i)

The topography of the project site is shown on the drawings by use of contours at one-foot intervals.

A USGS quadrangle location map is provided in Attachment D and plan cover sheet.

The pipeline restoration project drawings have incorporated both the construction and E&SC information on each sheet to aid the contractor in the construction process.

Soil types, depth, slope, locations and limitations 102.4(b)(5)(ii)

The maps of soil types and limits related to the project were identified using the NRCS Web Soil Survey website. The complete set of soil survey maps pertaining to the project are provided in Attachment E and shown on the drawings.

Soil use limitations and resolutions obtained from the USDA NRCS Web Soil Survey are provided in Attachment F and shown on the drawings.

Being a pipeline restoration project without much construction notations on the plans, it is requested that the Construction Plans be included in the E&SC and PCSM (Restoration) Plans. Every effort will be made to ensure the information shown is legible.

Past, Present, and Proposed land uses 102.4(b)(5)(iii)

The past uses for the project site for the prior fifty years, from review of available online historical mapping, indicate that the land uses have remained as mainly urban with some light industrial.

The present land uses for the past five years have not changed.

The proposed alteration/land uses are shown on the drawings. As this is a restoration project, the proposed alteration will retain the existing uses.

Volume and Rate of runoff from the project site 102.4(b)(5)(iv)

The plans do not propose construction of any channels, basins, or traps. As such, drainage area maps are not applicable.

The plans do not propose construction of any channels. As such, runoff calculations are not applicable.

Surface waters locations and classifications 102.4(b)(5)(v)

The surface waters are shown and labeled on the drawings.

The designated use of the receiving stream basin, Schuylkill River (which includes the Unnamed Tributaries to the Schuylkill River), per the PADEP Chapter 93 classification, is WWF (Warm Water Fishes) and MF (Migratory Fishes); it is neither a HQ nor an EV designated watershed. There is no existing use listed.

The designated use of Hay Creek (from Birdsboro Boundary to Mouth), per the PADEP Chapter 93 classification, is CWF (Cold Water Fishes) and MF (Migratory Fishes); it is neither a HQ nor an EV designated watershed. There is no existing use listed.

Narrative description of onsite BMPs 102.4(b)(5)(vi)

The temporary erosion control measures provided during construction activities are designed to minimize soil loss, prevent water pollution of adjacent streams and rivers, protect adjacent properties, and maximize protection of existing drainage features and vegetation. The following E&SC Best Management Practices (BMP's) are incorporated in the design and details of the project:

- Limiting areas of disturbance and preservation of existing vegetation wherever possible.
- Temporary seeding and mulching to be applied immediately to all disturbed areas.
- Filter Sock sediment barrier
- Super Silt Fence possible Bog Turtle Habitat protection sediment barrier
- Stabilized construction entrances
- Pumped water filter bags
- Erosion control matting along stream banks and steep slopes
- Filter bag inlet protection
- Pipeline Trench Plugs

These measures and Best Management Practices (BMP's) are shown on the drawings along the entire length of the project and at all stream crossings

BMP installation and removal sequence 102.4(b)(5)(vii)

A general construction sequence for pipe and appurtenances installation including E&SC BMPs is shown on the drawings.

A specific construction sequence for each stream crossing including E&SC BMPs is shown on the drawings.

Supporting calculations and measurements 102.4(b)(5)(viii)

The plans do not propose construction of any channels, traps, or basins. As such, calculations are not applicable.

The plans do not propose construction of any channels, traps, or basins. As such, standard E&SC worksheets or equivalents are not applicable.

Plan Drawings 102.4(b)(5)(ix)

The drawings showing the proposed earthmoving are included in the application. The 2.0 acre limit of disturbance is shown on the plans. As a restoration project, the existing grading will be restored after the pipe construction is completed for each section. The existing contours will be unchanged. Therefore proposed contours are not applicable and not shown.

Details and/or typicals are shown on the drawings.

Maintenance program 102.4(b)(5)(x)

Erosion control and stormwater management measures included in this plan shall be maintained so that they individually and collectively perform the function for which they were designed. During construction, the contractor will assign one of their workers experienced in erosion control measures, to make inspections and reports weekly and after rainfall events to determine the maintenance and repair needs. As a result of these inspections, all preventative and remedial needs will be determined immediately and corrected accordingly.

Temporary features such as silt fences, temporary stream crossings, inlet protection, and erosion control matting shall be inspected and the needed maintenance or repair performed. Sediment and debris shall not be permitted to accumulate to a depth sufficient to limit the effectiveness of the proposed structures. After final site stabilization has been achieved, temporary erosion and sediment BMPs must be removed or converted to permanent post-construction stormwater management BMPs. Areas disturbed during removal or conversion of BMPs shall be stabilized immediately.

Maintenance of proposed BMPs is addressed in the notes on the drawings.

An inspection schedule for proposed BMPs is addressed in the notes on the drawings.

A written report documenting inspections and repairs is specified in the notes on the drawings.

Recycling and disposal of materials 102.4(b)(5)(xi)

Anticipated construction wastes will be soil, stone, rock, concrete, asphalt pavement and other materials normally associated with trenching within existing roadways. Construction equipment wastes are listed in the Preparedness, Prevention and Contingency (PPC) Plan.

Instructions are provided for proper recycling/disposal of materials in the notes on the drawings and in the Preparedness, Prevention and Contingency (PPC) Plan.

Geologic formations and soil conditions 102.4(b)(5)(xii)

There are no known Geologic or other soil conditions that have the potential to cause pollution.

As such, measures to avoid/minimize/or mitigate are not applicable.

Potential thermal impacts 102.4(b)(5)(xiii)

The restoration of the existing ground cover and conditions will not have the potential for thermal impacts. No new impervious surfaces are proposed.

As such, measures to avoid/minimize/or mitigate are not applicable.

E&S Plan consistent with PCSM Plan 102.4(b)(5)(xiv)

The pipeline construction and restoration project does not propose any structural PCSM BMPs. As such, none are shown on the plans.

The project site is not located within an exceptional value or high quality watershed. Therefore, the general requirements for mandatory riparian buffers are not applicable and the buffer was not mapped.

The pipeline construction and restoration project does not propose any infiltration BMPs. As such, none are shown on the plans.

Existing/proposed riparian forest buffers 102.4(b)(5)(xv)

The project site is not located within an exceptional value or high quality watershed. Therefore, the general requirements for mandatory riparian buffers are not applicable and the buffer was not shown on the drawings.

The project also meets the requirements for granting of a waiver listed in the following sections:

102.14(d)(2)(ii) – The project is a linear utility pipeline.

102.14(d)(2)(iv) – The project is construction of an underground pipeline causing a temporary surface disturbance which will be restored to its preexisting condition.

As there are no Riparian Forest Buffers associated with this project. Wetlands protection is shown on the drawings.

Antidegradation Analysis

The project is not within an exceptional value or high quality watershed, therefore an antidegradation analysis is not applicable and not provided.

PCSM Plan – General 102.8(b)

The Post Construction Stormwater Management Plans for the project are labeled as “Construction, E&SC and PCSM (Restoration) Plan and Profile” and are the final construction plans.

Being a restoration project without any change of use, subdivision, or land development, a Municipal or County Engineer consistency letter is not applicable and not provided.

The PaDEP approved Act 167 Plan, is not applicable due to Section 102.8(g)(ii)&(iii).

Documentation that the PCSM Plan was prepared by a person trained and experienced in PCSM design methods and techniques applicable to the size and scope of the project is provided in Attachment G.

The existing topography and ground cover of the project disturbance area will be restored at the completion of construction. This will preserve the integrity of stream channels and maintain and protect the physical, biological and chemical qualities of the receiving streams.

The existing topography and ground cover of the project disturbance area will be restored at the completion of construction. This will prevent an increase in the rate of stormwater runoff.

The existing topography and ground cover of the project disturbance area will be restored at the completion of construction. This will minimize (prevent) any increase in stormwater runoff volume.

No additional impervious area is proposed as shown on the drawings, thus minimizing the impervious areas.

The existing topography and ground cover of the project disturbance area will be restored at the completion of construction as shown on the drawings. The restorative process will maximize the protection of existing drainage features and existing vegetation.

The existing topography and ground cover of the project disturbance area will be restored at the completion of construction. The restorative process will minimize the land clearing and grading.

Construction equipment will not be allowed to travel on the surfaces being restored with native vegetation and ground cover, thereby minimizing soil compaction.

Although other structural and nonstructural BMPs are not incorporated in the design, the existing topography and ground cover of the project disturbance area will be restored at the completion of construction as shown on the drawings. This will minimize (prevent) any increase in stormwater runoff volume.

Existing topographic features 102.8(f)(1)

The topography of the project site is shown on the drawings by use of contours at 1 foot intervals.

A USGS quadrangle location map is provided on the drawings.

The types of cover are labeled throughout the drawings.

Soil types, depth, slope, locations and limitations 102.8(f)(2)

The maps of soil types and limits related to the project were identified using the NRCS Web Soil Survey website and are shown on the drawings.

Soil use limitations and resolutions obtained from the USDA NRCS Web Soil Survey are provided in Attachment F and shown on the drawings.

The site characterization of soil and geology (Soil Survey table) is provided in Attachment F and shown on the plans. As a pipeline construction and restoration project, the soil use limitations do not pertain to development use, only construction issues which may or may not be encountered.

The geologic features are not applicable to the pipeline project and not shown.

Past, Present, and Proposed land uses 102.8(f)(3)

The permit boundary, being the limit of disturbance, is shown on the drawings.

The limit of disturbance is shown on the drawings.

The total area of disturbance for the pipeline portion of the project is calculated to be about 2.0 acres (~80,000 SF), equal to the total project area.

As a restoration project, the existing grading will be restored after the pipe construction is completed for each section. The existing contours will be unchanged. Therefore proposed contours are not applicable and not shown on the drawings.

As a restoration project, the ground conditions will be restored after the pipe construction is completed for each section. No new improvements (i.e. roads, buildings, utilities, etc.) are proposed. Therefore proposed improvements are not applicable and not shown on the drawings.

The past uses for the project site for the prior fifty years, from review of available online historical mapping, indicate that the generally suburban residential, school, park and similar uses in the area existed in the 1960's.

The present land uses for the past five years have not changed.

The proposed land uses are shown on the drawings. As this is a restoration project, the proposed alteration will retain the existing uses.

The restoration project does not propose any waterways or stormwater management facilities. Therefore proposed waterways or stormwater management facilities are not applicable and not shown on the drawings.

No additional impervious area is proposed as shown on the drawings, thus minimizing the impervious areas.

Net Change of Volume and Rate of Runoff 102.8(f)(4)

The restoration project does not proposed any changes to the existing ground cover. Therefore Net Change of Volume and Rate of Runoff calculations are not required and not provided per Section 102.8(g)(2)(iv) and Section 102.8(g)(3)(iii).

Receiving surface waters 102.8(f)(5)

The streams, wetlands, floodways, and watercourses are shown and labeled on the drawings.

The designated use of the receiving stream basin, Schuylkill River (which includes the Unnamed Tributaries to the Schuylkill River), per the PADEP Chapter 93 classification, is WWF (Warm Water Fishes) and MF (Migratory Fishes); it is neither a HQ nor an EV designated watershed. There is no existing use listed.

The delineated wetland boundaries are shown on Drawing Nos. 201 & 204. A wetlands investigation report was prepared by AD Marble, Inc. for the area surrounding each stream crossing location. The wetlands report is provided as Attachment H.

Written description of the PCSM BMPs 102.8(f)(6)

Permanent pervious ground cover is essential for providing continued protection against soil loss and stormwater runoff, which can prevent pollution and reduce thermal impacts to adjacent water bodies. The design maintains and protects existing water quality and the designated use by maintaining the existing site characteristics and conditions. The project will comply with these items by replacement of the existing ground cover with the same type after construction, not increasing the impervious cover, and limiting the area to be disturbed at any one time, and by applying the E&SC BMP measures during construction.

The pipeline construction and restoration project does not propose any permanent PCSM BMPs. As such, a narrative is not applicable and not shown on the drawings.

The pipeline construction and restoration project does not propose any permanent PCSM BMPs. As such, specifications are not applicable and not shown on the drawings.

The pipeline construction and restoration project does not propose any proprietary BMPs. As such, none are shown on the drawings.

PCSM BMP implementation sequence 102.8(f)(7)

The pipeline construction and restoration project does not propose any PCSM BMPs. As such, a sequence of installation is not applicable and not shown on the drawings.

The pipeline construction and restoration project does not propose any structural PCSM BMPs. As such, none are listed in the construction sequence and not shown on the drawings.

The pipeline construction and restoration project does not propose any individual BMPs. As such, individual sequences are not applicable and not shown on the drawings.

The pipeline construction and restoration project does not propose any BMPs. As such, critical stages are not applicable and not shown on the drawings.

The pipeline construction and restoration project does not propose any infiltration BMPs. As such, providing protection is not applicable and not shown on the drawings.

Supporting calculations 102.8(f)(8)

The pipeline construction and restoration project did not utilize the Stormwater BMP Manual to meet design standards. As such, the worksheets are not applicable and not provided.

The pipeline construction and restoration project did not utilize the Stormwater BMP Manual to meet design standards. As such, the figures contained on the worksheets consistent with the NOI/Application are not applicable and not provided.

The pipeline construction and restoration project does not propose any permanent BMPs. As such, calculations are not applicable and not provided.

The pipeline construction and restoration project does not propose any permanent BMPs. As such, calculation methodology is not applicable and not provided per Section 102.8(g)(2)(iv) and Section 102.8(g)(3)(iii).

The pipeline construction and restoration project does not propose any BMPs. As such, a routing analysis is not applicable and not provided per Section 102.8(g)(2)(iv) and Section 102.8(g)(3)(iii).

Plan Drawings 102.8(f)(9)

The pipeline construction and restoration project does not propose any PCSM BMPs. As such, locations with tributary drainage areas are not applicable and not shown on the drawings.

The pipeline construction and restoration project does not propose any PCSM BMPs. As such, existing and proposed discharges and points of interest is not applicable and not shown on the drawings.

The PCSM Plan, being the same as the E&SC Plan is thereby consistent.

The pipeline construction and restoration project does not propose any PCSM BMPs. As such, construction details are not applicable and not shown on the drawings.

The pipeline construction and restoration project does not propose any PCSM BMPs. As such, dimensions and elevations consistent with supporting calculations are not applicable and not provided or shown on the drawings.

Long-term operation and maintenance schedule 102.8(f)(10)

The pipeline construction and restoration project does not propose any permanent BMPs. As such, inspection schedules are not applicable and not shown on the drawings.

The pipeline construction and restoration project does not propose any PCSM BMPs. As such, directions for maintenance and/or replacement are not applicable and not provided or shown on the drawings.

Recycling or disposal of materials 102.8(f)(11)

Anticipated project wastes, to be the same as the construction wastes, are shown in the notes on the drawings.

Instructions for proper recycling/disposal of materials are provided in the notes on the drawings.

Geologic formations and soil conditions 102.8(f)(12)

There are no known Geologic or other soil conditions that have the potential to cause pollution during construction.

Instructions for proper recycling/disposal of all materials (construction) which could cause pollution are provided in the notes on the drawings.

No typical details are required or provided other than instructions for proper recycling/disposal of materials which could cause pollution.

There are no specific materials, other than construction materials, which could cause pollution to be located on the drawings. The construction materials will be located within the limit of disturbance area as shown on the drawings.

Potential thermal impacts 102.8(f)(13)

Thermal impacts of stormwater runoff from the project site were avoided, minimized, and mitigated by restoring the disturbed areas to the conditions that existed prior to construction.

Riparian forest buffer management plan 102.8(f)(14)

The project site is not located within an exceptional value or high quality watershed. Therefore, the general requirements for mandatory riparian buffers are not applicable and the buffer was not shown on the drawings.

Although the project also meets the requirements for granting of a waiver listed in the following sections:

102.14(d)(2)(ii) – The project is a linear utility pipeline.

102.14(d)(2)(iv) – The project is construction of an underground pipeline causing a temporary surface disturbance which will be restored to its preexisting condition.

A waiver request is not necessary due to the non EV/HQ watershed status and exemption allowance.

As such, areas proposed to be waived are not applicable and not shown on the drawings.

Land Use Information – Appendix A

Zoning letter is not applicable due to the pipeline portion of the project being a utility line project.