



April 7, 2021

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

RE: Technical Deficiency Letter  
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 Technical Deficiency Letter – Erosion and Sediment Control General Permit (ESCGP) for Adelphia Gateway Project – Phase 1 Major Amendment, dated March 25, 2021.

The resubmission includes the following revised documents:

As per your direction for amendments, JMT is submitting only the revised documentation relevant to the Major Amendment and noted in Attachment A of the Chapter 102 FAQ. The following documents are provided for review:

Submitted to PADEP

- PNDI Clearance Letter from PA DCNR Bureau of Forestry, dated February 8, 2021
- PNDI Clearance Letter from PA Fish & Boat Commission, dated February 18, 2021
- PNDI Clearance Letter from US Fish & Wildlife Service, dated March 19, 2021
- PNDI Clearance Letter from PA Game Commission, dated March 17, 2021
- Response Letter from PA SHPO, dated January 27, 2021

Submitted to BCCD

- Wetland and Waterbody Identification and Delineation Report, Quakertown East Parcel – Revised, prepared by NV5, dated June 2020
- \$250 Administrative Re-filing Fee
- Bucks County E&S Application

Submitted to CCCD

- Revised Plan Sheets ES-16 to ES-20, last revised April 7, 2021
- \$562.50 Re-submission Fee
- Chester County E&S Application

The following are our responses to comments:

**Technical Deficiencies from BCCD:**

1. **BCCD Comment (03/25/21):** The revised limit of disturbance for the temporary workspace to the east of the compressor station includes areas previously delineated as wetlands. An updated wetland delineation report

was not provided. Please provide additional information justifying the change in wetland boundaries at the site.

**JMT Response (04/07/21):** An updated wetland delineation report, dated June 2020, was completed to reflect the change in wetland boundaries. The report is included in the re-submission.

### **Technical Deficiencies from CCCD:**

CCCD is in receipt of the Adelpia Pipeline Major Modification Plans sheets and revision dates as follows: T1- 1/22/21; ES 15- 11/25/20; ES 16 & ES 17- 1/22/21; ES 18 to ES 20- 11/25/20 and offer the following comments:

1. **CCCD Comment (03/25/21):** ES sheets 16 & 17 and 18 & 19 illustrate long access lanes that appear to be over existing grades. Please identify the existing ground cover of the proposed access lane and provide appropriate E&S controls to address any earth disturbance construction equipment and contractor access will create including perimeter controls, rock construction entrances, etc. 102.11(a)(1).

**JMT Response (04/07/21):** For French Creek Blowdown (ES-16 and ES-17), the long access lane is all grass, the existing "GRASS" text has been bolded for clarity. In addition, it is noted that disturbed areas are to be restored to existing condition land cover. Between Cromby Blowdown and Schuylkill River Blowdown (ES-19), the long access lane is an existing paved path (Schuylkill River Trail), a callout has been added for clarification. Leading to Cromby Blowdown (ES-18 & ES-18A), the long access lane is an existing gravel drive, a note has been added for clarification. Since these access lanes are gravel and stabilize, no additional E&S measures are noted on the plans. If unforeseen conditions present in the field, contractor is to address and provide the necessary E&S measures.

2. **CCCD Comment (03/25/21):** Site Inset Map on Sheet ES 17 shows mats overtop of the perimeter controls. Please revise plans to ensure E&S perimeter controls can be properly installed without conflict from other site work. 102.11(a)(1)

**JMT Response (04/07/21):** The perimeter controls at French Creek site have been revised so that there are no conflicts with the timber matting. A note has been added to clarify that the erosion control matting is to be installed after the timber matting is removed to stabilize the area during site restoration activities.

3. **CCCD Comment (03/25/21):** Please include E&S Detail and Note sheets, Construction Sequencing and Site Restoration note and detail sheets with the Chester County portion of the plan mapping. 102.11(a)(1)

**JMT Response (04/07/21):** The E&S Detail and Note Sheets ES-1 and ES-2 did not change based on revisions noted in the Major Amendment. Please refer to the Approved plans dated 05/18/2020. JMT spoke with Joe Sofranko on 3/31/2021, and he confirmed that submitting these sheets is not required if there were no changes to these plan sheets.

4. **CCCD Comment (03/25/21):** Please verify that perimeter controls are proposed on all downslope sides of disturbance at the Schuylkill River Blow Down. It appears perimeter controls are missing adjacent to the wetlands. The CCCD requests a minimum of 24" filter sock adjacent to streams and wetlands. 102.11(a)(1) and 102.4(c)

**JMT Response (04/07/21):** JMT has confirmed that perimeter controls are proposed on all downslope sides at the Schuylkill River Blowdown site, which includes perimeter controls adjacent to the wetlands. SSF and CFS are proposed to wrap around the eastern part of the site, see revised callout noting to "Extend 24" CFS-4".

### **Technical Deficiencies from DCCD**

No deficiencies noted at this time.

**Technical Deficiencies from MCCD**

No deficiencies noted at this time.

**Technical Deficiencies from DEP**

1. **DEP Comment (03/25/21):** Please provide clearance letters from each of the PNDI agencies and the PHMC for the above referenced ESCGP-3 permit application. If your team receives recommendations from any of the PNDI agencies and/or the PHMC in the form of conservation measures, avoidance measures, etc., please provide a demonstration for how your team will be addressing the recommendations with any cross references to the plan drawings.

***JMT Response (04/07/21):** Please find attached the clearance letters from PHMC and PNDI agencies for this project.*

If you have any questions or need further information, please do not hesitate to contact me at 215-496-4780 or [smathew@jmt.com](mailto:smathew@jmt.com).

Very truly yours,

JOHNSON, MIRMIRAN & THOMPSON, INC.



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

AH/sm

Enclosures

Cc: Keith Edmonds, NJR  
Andrew Westhoven, NJR  
Willie Keterson, HGA  
Joe Sofranko, CCCD  
Tori Jones Long, BCCD