



Township Council of Lower Saucon Township

Officials:
Ron Horiszny, President
Sandra Yerger, Vice President
Priscilla deLeon
Glenn Kern
Donna Louder

February 18, 2016

Sarah Binckley
AECOM
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Re: Municipal Stormwater Management Consistency Review
PennEast Pipeline Project Municipal Notification
Lower Saucon Township in Northampton County, PA

Dear Ms. Binckley:

Lower Saucon Township is in receipt of your letter dated February 1, 2016 regarding the above referenced subject. The letter was written to request "Township review for consistency with stormwater management control ordinance that may have been adopted under the Stormwater Management Act (32 P.S. Sections 680.1-680.17)." In summary, your letter notified the Township of your intent to submit an application for a Chapter 105 Joint Permit Application (JPA for authorization of wetland and stream crossings for the PennEast Pipeline Project to construct pipeline of various diameter, launchers and interconnect facilities within the Township.

The letter provided a project location map and a Stormwater Management Analysis Form and requests that the Township execute the Form within 30 days of receipt. The Township received the letter on February 4, 2016 and as such the Township's response deadline to your office is March 5, 2016.

The Township Zoning Officer, Christopher Garges, has reviewed the information that was provided and has executed the Stormwater Management Analysis Form. Mr. Garges' response indicates that the proposed project **does not** meet the provisions of the Township's Stormwater Management Ordinance (Chapter 137) and that the Township **has not** received detailed information and an application for said approval. In general, the Township does not have enough information to confirm the project is consistent with our municipal stormwater management ordinance provisions.

More specifically, the Mr. Garges and Township representatives have reviewed the letter and at this time offer the following comments for your consideration:

- The letter states that "*the pipeline facilities will be restored to pre-construction grade and revegetated following construction.*" The project includes several interconnect, launcher and receiver facilities as well as access roadways. Please provided detailed grading plans so the Township may determine the extent of disturbance, grading, impervious coverage and stormwater management impacts. Additional approvals may be required after review of the requested information.

- The letter states that *“the aboveground and proposed permanent access road will include stormwater management facilities and best management practices that meet or exceed the standard design criteria in the Pennsylvania Stormwater BMP manual.”* Please provide detailed grading plans so the Township may determine the extent of disturbance, grading, impervious coverage and stormwater management impacts. Additional approvals may be required after review of the requested information.

As mentioned above, as requested I have enclosed a copy of the executed Stormwater Management Analysis Form. At this time the Township has responded that the **does not** meet the provisions of the Township's Stormwater Management Ordinance (Chapter 137) and that the Township **has not** received detailed information and an application for said approval. As such Lower Saucon Township would request that additional information as outlined above be provided to the Township for review. The Township also respectfully requests an extension to the March 5, 2016 comment deadline so it may have the ability to review the project in the detail necessary to determine compliance with the provisions of the Township's zoning ordinance as you requested.

Should you have questions or comments about this letter or the Township stormwater management permit application process, please contact me at 610-865-3291.

Sincerely,

Leslie Huhn
Township Manager

Enclosure: Stormwater Management Analysis

cc: Council
B. Lincoln Treadwell, Township Solicitor
C. E. Elliott, Environmental Counsel
Senator Lisa Boscola
Representative Robert Freeman
Representative Justin Simmons
Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426
Pennsylvania Department of Environmental Protection, Northeast Regional Office, 2 Public Square,
Wilkes-Barre, PA 18701-1915



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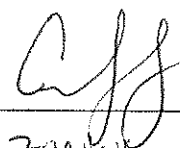
610 832 3500 tel
610 832 3501 fax

**Municipal Stormwater Management Consistency Review
PennEast Pipeline
Northampton County, Pennsylvania**

**Stormwater Management Analysis
(Please check one of the following)**

- No** Municipal Stormwater Management Ordinance has been adopted at this time; therefore no analysis will be undertaken.
- The Stormwater Management Analysis of the proposed structure based on the Stormwater Management Ordinance indicated **no** adverse effects.
- The Stormwater Management Analysis of the proposed structure based on the Stormwater Management Ordinance indicated the following adverse effects:

THE TOWNSHIP HAS NOT RECEIVED AN APPLICATION FOR
A STORMWATER MANAGEMENT PERMIT (137-5) NOR
HAS THE TOWNSHIP BEEN PROVIDED DETAILED ENGINEERING
PLANS OR DOCUMENTS TO VERIFY COMPLIANCE WITH
CHAPTER 137 OF TOWNSHIP CODE (STORMWATER MANAGEMENT
ORDINANCE)

Signature 
Title ZONING OFFICER
Date 2/12/16