

ORIGINAL



CONSULTING ENGINEERS

350 NORTH PINE STREET  
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CP15-558

February 26, 2016

Towamensing Township Supervisors  
120 Stable Road  
Lehighton, PA 18235

FILED  
SECRETARY OF THE  
COMMISSION  
FEDERAL ENERGY  
REGULATORY COMMISSION  
2016 MAR -7 P 4: 39

Re: PennEast Pipeline  
Stormwater Management Consistency Review  
Towamensing Township, Carbon County, Pennsylvania  
CEI # 016-0031-005

Dear Supervisors:

I am writing in response to the letter received from Sarah K. Binckley, Project Manager of AECOM, dated February 1, 2016, which requests a review of the provided information concerning the above referenced project for consistency with any stormwater management control ordinance that the Township has adopted under the Pennsylvania Stormwater Management Act.

The information provided includes:

- Cover letter
- Portions of USGS Maps provided at a scale of 1" = 2,000' showing the location of the proposed pipeline route (as of December 2015).
- Stormwater Management Consistency Review form (blank)

I have reviewed the provided information and offer the following comments.

1. Section 602.G. Stormwater of the Towamensing Township Zoning Ordinance (ZO) states that all developments shall control stormwater runoff in accordance with the requirements of the Towamensing Township Subdivision and Land Development Ordinance (SALDO). Section 520. STORMWATER MANAGEMENT of the SALDO contains requirements for subdivisions and land developments in accordance with the Pennsylvania Stormwater Management Act. Because construction plans have not been provided, I cannot state that the project is consistent with the township's SALDO.
2. The cover letter states that "The pipeline facilities will be restored to pre construction grade and revegetated following construction in accordance with PennEast's Erosion and Sediment Control Plan (E&SCP) and the Federal Energy Regulatory Commission's (FERC's) Upland Erosion Control, Revegetation and

PennEast Pipeline  
Stormwater Management Consistency Review by *CARBON ENGINEERING INC.*  
February 26, 2016

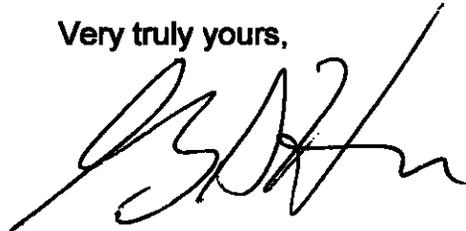
Maintenance Plan; therefore not affecting stormwater drainage." I cannot verify this sentence as these Plans have not been provided.

3. Furthermore, the cover letter states that "In addition, the aboveground facilities 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." Again, I cannot verify this sentence as the Plans and design calculations have not been provided. Also, this statement relates to aboveground facilities and access drives, not cross-country lines. I assume within the line areas that in many cases the cover types will change from woods or meadow to open space (grass). This change in itself increases runoff 'curve numbers' and thus peak discharge rates, thus being inconsistent with the requirements of the Pennsylvania Stormwater Management Act and the township's SALDO.

In conclusion, I have completed the provided form and referenced this letter and have checked that "adverse effects" will be caused by the project.

If you have any questions regarding this matter, please contact me at your convenience.

Very truly yours,



Gregory S. Haas, P.E.  
*CARBON ENGINEERING INC.*  
Towamensing Township Engineer

Enclosure (copy of form)

cc: Thomas S. Nanovic, Esquire, Towamensing Township Solicitor  
(via e-mail only: [nanolaw@ptd.net](mailto:nanolaw@ptd.net)) (with scanned image of form)  
Carl E. Faust, Towamensing Township Zoning Officer  
(via e-mail only: [bmisinspector@gmail.com](mailto:bmisinspector@gmail.com)) (with scanned image of form)  
Sarah K. Binckley, AECOM, 625 West Ridge Pike, Suite E-100,  
Conshohocken, PA 19428 (with original form)  
Carbon County Commissioners, P. O. Box 129, Jim Thorpe, Pa. 18229 (with copy  
of form)

**PennEast Pipeline  
Stormwater Management Consistency Review by CARBON ENGINEERING INC.  
February 26, 2016**

**Lower Towamensing Township Supervisors, 595 Hahns Dairy Road, Palmerton, PA  
18017 (with copy of form)**

**Penn Forest Township Supervisors, 2010 State Route 903, Jim Thorpe, PA 18229  
(with copy of form)**

**Pennsylvania Department of Environmental Protection, Northeast Regional Office,  
Bureau of Waterways Engineering and Wetlands, 2 Public Square,  
Wilkes-Barre, PA 18701-1915 (with copy of form)**

**Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC  
20426 (with copy of form)**



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

**TOWAMENSING TOWNSHIP**

**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:

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see attached letter from CARBON ENGINEERING INC. to the  
Towamensing Township Supervisors dated February 26, 2016

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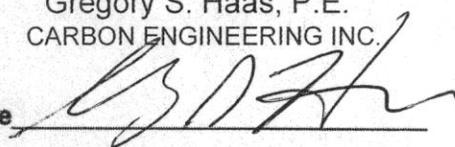


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Gregory S. Haas, P.E.  
CARBON ENGINEERING INC.

Signature 

Title Towamensing Township Engineer

Date February 26, 2016



CONSULTING ENGINEERS

350 NORTH PINE STREET  
SUMMIT HILL, PENNSYLVANIA 18250

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February 26, 2016

Towamensing Township Supervisors  
120 Stable Road  
Lehighton, PA 18235

Re: PennEast Pipeline  
Floodplain Management Analysis Review  
Towamensing Township, Carbon County, Pennsylvania  
CEI # 016-0031-005

Dear Supervisors:

I am writing in response to the letter received from Sarah K. Binckley, Project Manager of AECOM, dated February 2, 2016, which requests a review of the provided information concerning the above referenced project relating to pipeline crossings of Federal Emergency Management Agency (FEMA)-mapped floodplains.

The information provided includes:

- Cover letter
- Portions of USGS Maps provided at a scale of 1" = 2,000' showing the location of the proposed pipeline route (as of December 2015).
- Floodplain Management Analysis review form (blank)

I have reviewed the provided information and offer the following comments.

1. Section 602.A. Floodplains of the Towamensing Township Zoning Ordinance (ZO) references the current Towamensing Township Floodplain Ordinance. Because construction plans have not been provided, I cannot state that the project is consistent with the township's Floodplain Ordinance.
2. Section 510. FLOODPLAIN MANAGEMENT of the Towamensing Township Subdivision and Land Development Ordinance (SALDO) contains requirements for subdivisions and land developments to be in accordance with the township's Floodplain Ordinance. Because construction plans have not been provided, I cannot state that the project is consistent with the township's SALDO.
3. The cover letter states that "Pipeline construction across waterbodies will be performed in accordance with applicable permit conditions, the Federal Energy Regulatory Commission's (FERC's) Wetland and Waterbody Construction and

PennEast Pipeline  
Floodplain Management Analysis Review by *CARBON ENGINEERING Inc.*  
February 26, 2016

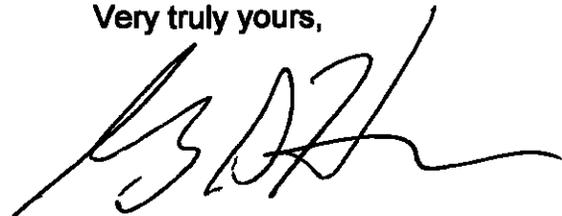
Mitigation Procedures, and PennEast's Erosion and Sediment Control Plan (E&SCP)." I cannot verify this sentence as these Plans have not been provided.

4. Furthermore, the cover letter states that "Pre-construction contours will be restored after construction is complete; therefore, impacts within floodplains will be temporary in nature. The Project is not anticipated to result in increased flood elevations or encroachments within floodplains. There are no aboveground facilities or proposed permanent access roads sited in FEMA Special Flood Hazard Areas." Again, I cannot verify these sentences as Plans have not been provided. Also, any runoff that is not controlled due to changes in cover types that may occur due to the proposed project may increase floodplain levels.

In conclusion, I have completed the provided form and referenced this letter and have checked that "adverse effects" will be caused by the project.

If you have any questions regarding this matter, please contact me at your convenience.

Very truly yours,



Gregory S. Haas, P.E.  
*CARBON ENGINEERING Inc.*  
Towamensing Township Engineer

Enclosure (copy of form)

- cc: Thomas S. Nanovic, Esquire, Towamensing Township Solicitor  
(via e-mail only: [nanolaw@ptd.net](mailto:nanolaw@ptd.net)) (with scanned image of form)  
Carl E. Faust, Towamensing Township Zoning Officer  
(via e-mail only: [bmisinspector@gmail.com](mailto:bmisinspector@gmail.com)) (with scanned image of form)  
Sarah K. Binckley, AECOM, 625 West Ridge Pike, Suite E-100,  
Conshohocken, PA 19428 (with original form)  
Carbon County Commissioners, P. O. Box 129, Jim Thorpe, Pa. 18229 (with copy of form)  
Lower Towamensing Township Supervisors, 595 Hahns Dairy Road, Palmerton, PA 18017 (with copy of form)  
Penn Forest Township Supervisors, 2010 State Route 903, Jim Thorpe, PA 18229 (with copy of form)  
Pennsylvania Department of Environmental Protection, Northeast Regional Office,

**PennEast Pipeline**  
**\*Floodplain Management Analysis Review by *CARBON ENGINEERING Inc.***  
**February 26, 2016**

**Bureau of Waterways Engineering and Wetlands, 2 Public Square,  
Wilkes-Barre, PA 18701-1915 (with copy of form)**  
**Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC  
20426 (with copy of form)**



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**Municipal Floodplain Management Analysis**  
**PennEast Pipeline**  
**Northampton County, Pennsylvania**  
Carbon

TOWAMENSING TOWNSHIP

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

- The Floodplain Management Analysis of the proposed pipeline crossings indicated no adverse effects.
- The Floodplain Management Analysis of the proposed pipeline crossings indicated the following adverse effects:

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see attached letter from CARBON ENGINEERING INC. to the

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Towamensing Township Supervisors dated February 26, 2016

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Gregory S. Haas, P.E.  
CARBON ENGINEERING INC.

Signature

Title Towamensing Township Engineer

Date February 26, 2016

Document Content(s)

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