

February 1, 2019
Docket Nos CP18-46-000
Cp18-46-001

Charlestown Township Comments on the Adelphia Environmental Assessment (EA)

The Adelphia EA is primarily focused on new facilities that will be constructed as part of the project. None of these facilities are slated for Charlestown Township. However, the pipeline traverses our Township, passing through both rural and more densely populated residential areas, including sensitive historic areas and near important water bodies. Given the age of the pipeline and potential failures of any pipeline, as well as the impact to land in the Right of Way (ROW) and on waterways, our community is impacted and we offer the following comments:

1. The review period for the EA was short and, thus, our comments may not be comprehensive. We urge FERC to extend the comment period. We also ask that a full Environmental Impact Statement be conducted, incorporating full impacts of the project, including impacts of the entire pipeline given its dormant state, the repurposing, its age, and advancements in the field and in regulation since the pipeline was originally sited.
2. We join with Chester County in requesting that a public meeting be scheduled for our residents to learn about the project and raise questions, as has been provided in other Counties.
3. The life expectancy of the pipe should be determined and shared. In 1975 Bucks County noted before the Environmental Hearing Board that the Permits provided no conditions in the event of the abandonment of the Pipeline. We request that FERC investigate life expectancy and address closure considerations.
4. We have questions regarding how the integrity of the pipeline will be monitored, what activities will be automated and how. An integrity monitoring program should be developed and shared with municipalities prior to approval. Various commenters have asked if valve shutoff will be automatic in the event of an incident, for instance.
5. The information provided regarding emergency management is very limited other than promises for training local responders. We request a more detailed emergency response plan and cleanup procedures in the event of an incident, with more clarity of Adelphia's resource commitment and accountability in the event of an incident.
6. The EA indicates Adelphia is required to report on incidents within 20 days to PHMSA. There is no requirement mentioned for notifications to municipalities. This should be a requirement and notification should be immediate.
7. We support the requirement for odorizing of gas for leak detection but are not sure applying this to Class 3 locations only is sufficient.
8. The EA states that Adelphia has a storm water management plan that is confidential and not disclosed. Given the critical nature and presence of high value streams and bodies in the vicinity of the pipeline, it is essential that this information is shared with municipalities. We do not understand why this is confidential, as certainly storm water management is a core

focus area of municipalities.

9. Our residents have stated that right of ways have been accessed for clearing already. Adelphia has indicated that Right of Way clearing will be minimized, with maintenance of trees/vegetation where it does not present safety issues, that 25 foot riparian buffers will be maintained and that vegetative maintenance immediately adjacent to water bodies will be limited to a 10 foot wide strip centered over the pipeline. This should be required.
10. We ask that no herbicides be used in vegetative maintenance, clearing by mechanical means only, that only non-invasive native plants are utilized in restoration.
11. Chester County has indicated that certain ROW easements specifically allow for transport of oil products only through the pipeline. Has Adelphia reviewed the easements and can the provide a list of residents/parcels that require amendment of easements to permit transport of natural gas?