

COMMENT RESPONSE DOCUMENT

PENNSYLVANIA TURNPIKE COMMISSION
MILEPOSTS 320 TO 326 TOTAL RECONSTRUCTION AND WIDENING PROJECT

CHAPTER 102/NPDES CONSTRUCTION PERMIT APPLICATION NO. PAI01151214
CHAPTER 105/WATER OBSTRUCTION AND ENCROACHMENT PERMIT
APPLICATION NO. E15-824

CHESTER AND MONTGOMERY COUNTIES, PENNSYLVANIA

PUBLIC COMMENT PERIOD
JULY 1, 2015 TO JULY 31, 2015

JULY18, 2016

PROJECT DESCRIPTION

The project area begins at Milepost 320 (Rt. 29 EZ Pass Only Interchange) and continues east to Milepost 326 (Valley Forge Interchange) of the Pennsylvania Turnpike. The project involves the total reconstruction and widening of six miles of the Turnpike's east-west mainline (Interstate 76). The project area traverses Tredyffrin and Upper Merion Townships in Chester and Montgomery Counties.

This project will include the full depth total roadway reconstruction of six miles of the Pennsylvania Turnpike. Upon completion of this project, the existing 4-lane facility with a 10-foot median and 12-foot shoulders will be converted into a 6-lane facility with three 12-foot travel lanes east and westbound, a 26-foot median, and 12-foot shoulders. The new 26-foot median will be comprised of two inside paved shoulders 12 feet wide and a concrete barrier 2 feet wide.

LIST OF COMMENTATORS

Name	Affiliation	Date Received
Stephen Kline	Concerned Citizen	7/14/2015, 7/23/15
Suzanne Kline	Concerned Citizen	7/14/2015, 7/23/15
Craig Nowacki	Concerned Citizen	7/14/2015, 7/31/15
Richard Kunin	Trout Creek Watershed Residents Association	7/14/2015, 7/28/15 7/30/15
Deirdre Gibson	Valley Forge National Historical Park	7/14/2015
Frank Donohoe	Valley Forge Chapter of Trout Unlimited	7/14/2015
Pete Goodman	Valley Creek Coalition	7/14/2015, 7/31/15
Katie Batolotta	PennFuture	7/14/2015
Robbi Freisem	Valley Forge Chapter of Trout Unlimited	7/14/2015, 7/31/15
Barbara Tighe	Concerned Citizen	7/14/2015
Patricia Goodall	Concerned Citizen	7/17/2015
Craig Smith	Concerned Citizen	7/19/2015
John S. Kirk	Concerned Citizen	7/20/2015
John R. Munshour	Concerned Citizen	7/20/2015
Ashlie Smith	Concerned Citizen	7/22/2015
John Loi	Concerned Citizen	7/22/2015
Jeff Kosterich	Concerned Citizen	7/22/2015
Rosemary and Jim McKinley	Concerned Citizen	7/22/2015
Patty and Jeff Hersh	Concerned Citizen	7/22/2015
Michael F. Wilson	Open Land Conservancy of Chester County	7/23/2015
Carol & Frank Schmidt	Concerned Citizen	7/25/2015
Frank and Gail Guthridge	Concerned Citizen	7/26/2015
Michael Tighe	Concerned Citizen	7/26/2015
Eileen D. Atkinson	Concerned Citizen	7/27/2015
Kimberlee Miller	Concerned Citizen	7/21/2015, 7/31/2015
Hope Miller	Concerned Citizen	7/31/2015
George D. Poole II	West Chester Fish Game & Wildlife Assoc.	7/31/2015
Kate Hammond	Valley Forge National Historical Park	7/31/2015
Meliora Environmental Design, LLC	Consultant for Trout Unlimited and Valley Forge National Historical Park	7/31/2015

COMMENTS AND RESPONSES

- 1. Approximately 61% of the total Turnpike impervious area in the proposed condition is not managed for volume but is “slow released.”**

The comment does not accurately reflect the project proposal. Based on the information submitted, PTC exceeded the PCSM requirements for volume management through infiltration for new impervious surfaces for the entire project. The project also proposes slow release which provides for additional management of volume beyond the DEP requirement. Refer to the stormwater management summary table provided in the permit application documents.

- 2. Volume managed in one tributary “offsets” areas that do not have volume management. Runoff will often be piped from an existing watershed to another and be discharged in a stream that did not previously convey this volume of stormwater.**

The stormwater changes and impacts to each point of interest have been analyzed to demonstrate that the proposed BMPs will not have an adverse impact to the receiving water courses or to the watersheds to which the stormwater is conveyed in the pre-construction condition. Refer to permit application documents for details.

- 3. The engineering criteria used does not conform to the typical engineering criteria for stormwater management. It allows for cumulative impacts to the nearby exceptional value stream that go un-mitigated in this proposed design.**

DEP disagrees. Every discharge to both Valley Creek and Trout Creek has been evaluated, both individually and for cumulative impacts. In addition, discharges to Valley Creek were evaluated as part of the Anti-degradation Analysis. The results of these analyses demonstrate compliance with applicable regulatory requirements. Refer to permit application documents for details.

- 4. The proposed design does not strive to improve upon the existing condition of Turnpike runoff entering exceptional value stream Valley Creek and Valley Forge National Historical Park property. Because this project aims to expand the width of the roadway, it should not be subject to an exception in §102.8 (g) (2) of the Pennsylvania Code due to the fact that the roadway will not be put back as existing following reconstruction.**

DEP applies the “reconstruction” stormwater provisions in 102.8(g) to existing roadways that are being reconstructed. Widening of roadways beyond the existing configuration is handled as “new” construction for stormwater management purposes. As such, for areas widened from existing conditions, a 20% meadow condition is applied to existing impervious areas while a 100% meadow condition is applied to all areas within the area of widening.

- 5. The project does not comply with the *Valley Creek Coalition Settlement Agreement*.**

DEP disagrees. The regulatory requirements that apply to the project are more stringent than those contained in the 2001 *Valley Creek Coalition v. DEP and Vanguard Group* (EHB Docket No. 2000-068-MG) Settlement Agreement.

6. Stormwater calculations are inconsistent and often arbitrarily apply engineering coefficients to develop required volumes and rates of runoff to be managed.

DEP disagrees. PTC has provided stormwater calculations that are consistent with regulatory standards. Refer to the permit application documents for more information.

7. The stormwater management system concentrates 64% of the volume management for the Valley Creek section of roadway into just 3 of 22 proposed facilities.

Many alternatives were investigated during the course of design and the final design reflects the maximum control practicable given project and right-of-way constraints. As previously noted, volume management for the project exceeds the amount required which was handled in each individual watershed. Refer to permit application documents for more information.

8. Each and every discharge point to waters of the U.S. should be evaluated for discharge compliance.

DEP agrees. PTC did consider and evaluate all points of discharge from the project. Refer to permit application documents for more information.

9. Concerns that the Turnpike stormwater basin located on Glenhardie Road, near the Turnpike overpass, will worsen the flooding problems downstream of the Turnpike.

Basin 14 is a detention basin being proposed adjacent to Glenhardie Road and the Turnpike. With the rate control provided by the proposed basin, the peak flow rates will be reduced for all storm events downstream of the basin discharge point. This will help reduce the flooding in the Trout Creek watershed area. Refer to the PCSM narrative in the permit application documents for additional information.

10. Recommend that the PTC reconstruct the Richards Road Bridge over Trout Creek.

The Richards Road Bridge is on a Township Road located downstream from the Turnpike and was constructed by Tredyffrin Township. Modifications to this bridge are beyond the scope of this project.

11. Recommend that the PTC reconstruct the Route 363 culvert downstream of the Turnpike to eliminate the “funnel effect”.

The Route 363 culvert is located downstream from the Turnpike and carries Trout Creek underneath a state highway. Modifications to this culvert are beyond the scope of this project.

12. Concern about some adjacent properties not receiving noise walls.

Whether or not a noise wall is proposed for a particular property is beyond the scope of environmental permitting for this project. Any noise wall that is proposed must be constructed in accordance with applicable regulatory requirements, including the erosion control and post-construction stormwater requirements of Permit PAI01151214 and requirements for water obstructions and encroachments in Permit E15-824.

13. Request that grass and shrubs remain in a 10 foot diameter around the Trout Creek banks.

The project design avoids disruption to the riparian buffer of all watercourses to the greatest extent practicable.

14. Concerns with carbonate geology and sinkhole formation risk at Basin 2A site.

PTC's geotechnical professionals concluded that there is no evidence of sinkhole activity at the Basin 2A site. In reaching this conclusion, PTC prepared geotechnical reports that analyzed test borings for infiltration studies, field studies, and historically available data. Refer to permit application documents for more information.

15. Comments that the PTC has not complied with the Tredyffrin Township stormwater ordinance.

Refer to settlement agreement between Tredyffrin Township and PTC on this issue.

16. Requests for geophysical testing and comments on the geophysical test results at Basin 2A.

Refer to updated permit application documents for more information (geophysical tests included).

17. Comments questioning the location of Basin 2A relative to the source of runoff.

The basin location and configuration were determined based on the evaluation of multiple possible basin locations and alternatives over several years. The chosen location provides favorable infiltration conditions for stormwater runoff from the project. Refer to permit application documents for more information.

18. Concerns with existing sinkholes reported by residents in the Salem Way area.

The permit application documents provide detailed information regarding this concern. Also see response to Comment #14.

19. Concerns with the contributing drainage area and loading ratio for Basin 2A exceeding guidance in the BMP Manual.

PTC conducted a site specific analysis for sizing infiltration BMPs, and their geotechnical professional evaluated the loading ratio in this analysis and recommended sizing of the BMPs. PTC's design is based on these analyses. Refer to the permit application documents for more information.

20. Comments on infiltration tests at Basin 2A.

PTC geotechnical professionals performed infiltration tests following the Pennsylvania Stormwater BMP Manual. Refer to the reports and plans in the permit application for details.

21. Concerns with use of appropriate design safety factor for Basin 2A.

The safety factors are recommended by PTC's geotechnical professional based on onsite testing and analysis. For more information refer to the reports in the permit application.

22. Concerns that the inability of Basin 2A to infiltrate per the application calculations will allow polluted stormwater into stream S-52 which is a tributary of Valley Creek.

Basin 2A has been designed in accordance with DEP criteria set forth in 102.8(g)(2) and PA Stormwater BMP Manual through an analysis demonstrating that the PCSM BMPs will meet the volume reduction and water quality requirements through management of the net change for storms up to and including the 2-year/24-hour storm event when compared to preconstruction runoff volume and water quality. For more information refer to the reports in the permit application.