



October 26, 2015

West Norriton Township Planning Commission
Attn.: Jason Bobst, Township Manager
1630 West Marshall Street
Jeffersonville, PA 19403

RE: Westover Sports Complex Land Development Application
Recommended Improvements - NPDES Permitting
WNR-15-060

Dear Members of the Planning Commission:

As you may be aware, West Norriton Township has been under the permitting regulations of the Federal National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) since 2003. The basis of the permitting requirements administered by the Pennsylvania Department of Environmental Protection (DEP) is authorized by the Federal Clean Water Act of 1972 and supported further by the Clean Streams Law. During the initial phase of the permitting program, the Township's responsibilities were to identify the infrastructure owned and maintained by the Municipality; to develop an inspection schedule; identify pollution sources; create good housekeeping protocols; educate the general public on the importance of the program; and the commitment to uphold the Erosion and Sedimentation Control Regulations of PA Code Chapter 102.

In March of 2013, the permit renewal package required that West Norriton Township address stormwater releases to impaired waters. The Township is tasked with the identification of outfalls that discharged to impaired waters, identification of additional BMPs to ensure that new discharges do not further the impairment, and ensure proper implementation of these BMPs.

We have studied the contributing drainage basins included in the regulatory obligation and have determined that the Township should undergo a strategy of stream bank stabilization and restoration, and floodplain reconnection, to reduce the continued stress on impaired streams by development and meet the regulatory obligations associated with the Federal permit.

As the Township is considering the Westover Sports Complex application, we implore the Township to consider this application as having significant impact to the "impaired" Indian Creek Watershed. The Indian Creek Watershed, including the unnamed tributaries, is mapped by eMapPA, a Pennsylvania Spatial Database maintained by the PaDEP, as Impaired Waters of Commonwealth, also known as being listed on the Pennsylvania 303d list. According to PaDEP, Indian Creek is classified as impaired for aquatic life due to the following causes:

Small Residential Runoff - Cause Unknown ; Removal of Vegetation - Water/Flow Variability ; Road Runoff - Water/Flow Variability ; Road Runoff - Siltation ; Golf Courses - Cause Unknown

We request the Township consider requiring the Applicant, during the process of the Land Development application, to require these additional measures that are necessary for compliance with the NPDES MS4 Permit:



1. Provide a level spreader on the discharge pipe from Stormwater Management Basin 4 (SWM #4).
2. Provide bio-retention in proposed Stormwater Management Basins 1 through 4 and the forebay of Stormwater Management Basin 5.
3. Perform the feasibility of a Riparian Buffer enhancement along the western property boundary. A drainage channel connects along the western property boundary a drains into a tributary to Indian Creek approximately 200 feet south west of the property.
4. Quantify the pollutant load reduction for land cover changes and the installation of the proposed Best Management Practices (BMPs).
5. Provide additional information for the proposed land management of the remaining golf course areas as well as the proposed athletic fields (fertilization, pesticide use, etc). In this submittal, please include information relative to the existing land management of the entire golf course. This information will be needed in order to quantify the amount of nutrients that are currently being applied to the golf course compared to what is proposed.

The increase in density, change in land cover, and impact of urban/suburban and human activity on the landscape will continue to increase the Township's burden for water quality and quantity mitigation unless projects are designed specifically to address those concerns and obligations. This project offers an opportunity for the partnering with the development community that has historically impacted water resources to be part of the solution and the Township MS4 Program moving forward.

Please do not hesitate to contact me with any questions.

Best Regards,
CEDARVILLE Engineering Group, LLC



April M Barkasi, PE

Cc: Mike Valyo, Director of Public Works and Planning