

April 16, 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

During a site visit in April, 2015, there was evidence of eroded channels on the Westover property as well as evidence of impairment of an unnamed tributary to Indian Creek. The pictures below are evidence of the impact of the urbanization of the watershed and opportunities for improvement.



Eroded channel leaving the golf course property.



Eroded channel downstream of golf course property.



Evidence of algae adjacent to golf course property.



Direct drainage discharge from the golf course.

We request the Township consider requiring the Applicant, during the process of the Land Development, to complete the stream bank restoration necessitated for compliance with the NPDES MS4 Permit. This would require the applicant to design, apply for and obtain the necessary PaDEP permits (General Permit 3) for the restoration of drainage channels located with the subject parcel. The plans must consider the existing rate and volume of water in the stream system from the upstream drainage area. Stream bank restoration must be reviewed and approved by the Township, and provide a Riparian Buffer to secure the necessary reduction of pollutant sources to the Waters of the Commonwealth by overland flow and direct discharge. Additionally, the Township must be offered a perpetual easement on the stream channels for inspection and maintenance purposes in the future.

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.

Sincerely,
CEDARVILLE Engineering Group, LLC

April M Barkasi, PE

cc: Mike Valyo, Director of Public Works and Planning