

County-wide Act 167 Stormwater Management Plan 45 Day Review Draft Comment Response Document

No.	Document & Section	Page	Comment Provided By	Comment	Response
1	Section 106	18	Warwick Township	Scope of Regulated Activities and Exemptions: Section 106 establishes thresholds for when the stormwater management requirements apply, benchmarked on the square footage of the Regulated Impervious Surfaces or Earth Disturbance. However, these thresholds do not take into account the size of the underlying property in relation to the proposed improvements. While 1,000 square feet of impervious coverage on a .5 acre property may have significant impacts on a neighboring parcel from a stormwater perspective, installation of the same impervious coverage on a 150 acre property may not have the same effect. In this regard, the limitations/thresholds do not properly account for the large lot, more open, less impervious character of Warwick Township. Rather than regulating based solely on square footage, the Township believes that the thresholds should be determined based on percentage of impervious coverage and proximity of any improvements/disturbance to lot lines.	Comment acknowledged. The scope of regulated activities and exemptions included in the updated model ordinance remain largely unchanged from the stormwater management model ordinance that was included in the County-wide Act 167 Stormwater Management Plan adopted by the County in 2013. Modifying stormwater management requirements to correspond to lot size, setback distances, and impervious surface coverage fails to take into account numerous other factors that influence how stormwater runoff impacts downgradient neighbors and local water ways. Implementing such standards would also require significant review of the each proposed project site that would prove time-consuming. One of the main goals of this ordinance is to reduce the volume of runoff and to improve the quality of any runoff that enters local waterways; it would be difficult to maintain the existing level of protection that is afforded to local water ways by the provisions of the current model ordinance if the proposed modifications were adopted. However, it is important to note that existing site features may contribute toward stormwater reduction requirements if appropriate peak runoff, infiltration, and water quality treatment is demonstrated. No change made.
2	Exemptions 106.C.5.c	18	County Resident	The language of the 167 amendment is flawed. What is the size a high tunnel can be and be exempt if there are no existing structures on the landowners contiguous land area? Can no exempt high tunnel built on land with no existing structures or can any size exempt high tunnel be built since 25% of nothing is undefined? Are previously built exempt high tunnels considered to be structures for purposes of calculating subsequent exemptions for a high tunnel? Is there a waiting period before a newly built exempt high tunnel can be counted in the calculation of the next exempt high tunnel? In the absence of language to the contrary any interpretation must favor the landowner. Hence there is no limit to the number high tunnels that can be constructed sequentially and be exempt under this model language.	Comment acknowledged. The language included in subsection 106.C.5.c regarding the exemption of high tunnel from provisions of the ordinance is directly from Act 15 of 2018, which was added verbatim to comply with this Act. No changes made.
3	Exemptions 106.C.	18	County Resident	Exemptions 106.C NOTE TO EDITOR states that "Municipality may, at its option, eliminate any or all of the items below from the list of exempted activities". The House bill states that "a high Tunnel" SHALL be exempt if it meets the specified requirements. This seems to conflict with the NOTE TO EDITOR for this section.	Language was added to the Note to Editor on Page 18 that states that Subsection 106.C.5.c cannot be removed from the list of exemptions.
4	Section 106.E	25	Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	Why are the impervious areas for the Modified Requirements for Agricultural Structures (106.E) separated into two categories? Impervious area is impervious area – can the areas be combined to just be 15,000 sf of impervious area?	Comment acknowledged. Modified the language in the ordinance to clarify that projects with less than 15,000 square feet of new Impervious Surface and vehicle parking and movement area can be eligible for exemption from the ordinance provisions outlined in Subsection 106.E. All other provisions of Subsection 106.E still apply.
5	Section 110	27	Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	Does the Simplified Approach (existing or updated) require financial security? Ordinance states any activities requiring submittal of a Stormwater Management Site Plan (which is defined as being required for an activity that is not exempt) requires financial security.	Section 110 notes that any activity requiring the submittal of a Stormwater Management Site Plan that involves subdivision or land development requires financial security. If a project submitted using the Simplified Approach meets the Municipality's standards of land development or subdivision, then the Municipality may require an applicant to post financial security according to the provision of Section 110. No changes made.

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6	Section 111.C	28	Schuylkill Township	The Schuylkill Township Board of Supervisors does not support this proposed revision, as it creates an undo hardship on both the Applicant as well as the Municipality in obtaining any/all necessary approvals during the review process, and additionally limits the Township's ability to enforce the ordinance in their own best interests. The Board recommends that the model ordinance be revised to permit Municipalities the ability to grant any request for a waiver or modification of the stormwater management ordinance without prior approval from the PADEP or the CCCD.	The changes made to Subsection 111.C were required to be consistent with the requirements of PA DEP's 2022 Model Stormwater Management Ordinance. No changes made.
7	Section 202	32	Londonderry Township	The ordinance should include the definition for "Developer" and should be defined as a person, company, or organization who seeks to undertake any Regulated Activities at a Site in the Municipality	The model ordinance includes a definition for Developer on page 32. Modified the definition to include "company or organization."
8	Section 202	33	Londonderry Township	Erosion and Sediment Control Plan should have E&S in parentheses for better identification by other readers.	Added "E&S" to the definition of Erosion and Sediment Control Plan.
9	Section 202	33	Londonderry Township	Another definition should be added: "Existing Condition – The dominant land cover during the 5 year period immediately preceding a proposed regulated activity."	The phrase "existing condition" occurs only twice in the model ordinance and in each instance the proposed definition would conflict with the intended meaning. Site conditions may change considerably over a period of five years as there could be multiple projects completed on a parcel in this time period, and thus land use is evaluated based on the conditions at the time of application. No changes made.
10	Section 202	36	Londonderry Township	under Limiting Zone part A, high water table should be spelled "high-water table".	Change incorporated.
11	Section 202	37	Londonderry Township	the definition of "NOAA" should be placed under "New Development" to be alphabetically sequenced	Change incorporated.
12	Section 202	38	Londonderry Township	Another definition should be added: "Project site - The specific area of land where any regulated activities in the municipality are planned, conducted, or maintained."	The phrase "project site" does not appear in the model ordinance; however, Municipalities may add a definition of project site to their ordinance. No changes made.
13	Section 301.D	43	Londonderry Township	Section 301.D, should read "Neither submission of a SWM Site Plan..."	Change incorporated.
14	Section 301.G		Warwick Township	Offsite Impact – Section 301.G states that any change in offsite discharge rate/volume requires written permission of the affected property owner(s) (i.e., adjacent or downgradient properties). The optional language in the draft ordinance allows municipalities to require only written notification to the affected property owners, but only for projects of a certain size. The Township recommends that the optional/alternative provisions not be limited in its scope. In other words, that the written notification option can be available regardless of project size, instead of any requirement for written permission. Since the ordinance and law already contain more fundamental provisions requiring the control of runoff rates/volume and the ability of those adjacent/downgradient properties to appeal a permit issuance or take other legal action, this provision appears to give legitimacy to situations where these standards are not upheld under mutual agreement by adjacent landowners. Involving the municipality in these agreements (or in cases where agreements cannot be secured), there is a risk of implicating the municipality in private disputes between individual property owners.	Comment acknowledged. The requirement for written permission from downgradient property owners when peak rate and runoff volume are altered was included in the 2013 model ordinance and are thus is not new a requirement. Note that written permission is needed only when peak rate discharges (up to the 100-year storm) and runoff volume (up the two-year storm) are altered. This requirement was included to promote communication with downgradient property owners to ensure that their properties are not negatively impacted by upgradient development. No changes made.
15	Section 303.A	49	Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	Can clarification that projects with 5,000 square feet and greater of earth disturbance require a 'letter of adequacy' from the Conservation District be added to Section 303.A.1.a?	The ordinance notes that a letter of adequacy is only required when it is applicable for Chapter 102 compliance. Review of E&S Plans by the District is only required for projects where earth disturbance exceeds one (1) acre, include pond dredging, or when earth disturbance is associated with certain Chapter 105 permit activities. Language was added to Section 303.A to clarify this requirement.

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16	Section 303.A	49	Franklin Township	Please clarify if Section 303.A.2 is requiring the municipality to review and approve an erosion and sedimentation control plan. Franklin Township prefers to require the Conservation District be the agency to review the erosion and sedimentation control plan. It is the Township's opinion that they are not responsible for reviewing and approving an erosion and sedimentation control plan.	The Conservation District is required to review Erosion and Sediment Control Plans where earth disturbance is associated with certain activities under Chapter 105 General Permits (GP), disturbance includes pond dredging, or earth disturbance exceeds one (1) acre. The Municipality can choose if they will also review projects that meet these criteria. Municipalities are encouraged to review Erosion and Sediment Control Plans for projects that do not meet these requirements rather than relying on Conservation District for review. No changes made.
17	Section 306	53-54	Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	The BMP manual dictates a 2 hr. infiltration period for calculating infiltration volume reduction of an infiltration basin and a subsurface infiltration bed (but not an infiltration trench). We are receiving a lot of designs utilizing a 6 hr. infiltration period or whatever time seems to make the system (be it a subsurface infil bed, infil basin, infil trench, drywell or seepage bed) meet water quality and runoff volume requirements. We question/reject this approach, but get kick back from some designers. Is this something DEP might address in the updated BMP manual? - If the model ordinance references the BMP manual to be used for design criteria of these systems, do designers have any flexibility in the design criteria they use? Our opinion is no. It would be helpful to all (designers and reviewers) if the infiltration period to be used is clearly stated in the ordinance or requiring the use of the BMP manual with no flexibility is clearly stated in the ordinance.	The County acknowledges that current PA SW BMP Manual design standards differ from other recent PA DEP guidance and tools, such as the Post Construction Stormwater Management (PCSM) Spreadsheet. Designers should ensure that their plans are consistent with either the PA BMP Manual or other more recent PA DEP guidance, such as the PCSM Spreadsheet. The following statement was added to Section 306.A: "Infiltration BMPs should be designed to be consistent with the design guidelines included in the PA BMP Manual or other PA DEP design guidance". The Ordinance does allow for waivers from infiltration requirements if approved by the Municipal Engineer.
18	Section 306	54	Resident	Section 306. Infiltration Requirements, Subsection H. Certified Soil Scientists should be specifically recommended as the qualified professional capable of conducting the detailed soils evaluation.	The current language notes that a "qualified professional" must conduct soil evaluations, and a "qualified Licensed Professional" shall be responsible for the general process of designing infiltration BMPs. This language was selected to allow other qualified professionals, such as geotechnical engineers or Professional Geologists, to complete soil evaluations. No changes made.
19	Section 306.H	54	Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	In Section 306.H, which outlines soils evaluation/infiltration testing, can the municipality add language that a representative from the municipality must witness the testing?	Municipalities are able to modify the ordinance to be more stringent than the County-wide Model Ordinance. The municipality may choose to add language requiring a representative from the municipality to be present to witness infiltration testing. No changes made.
20	Section 311	65	Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	An end parenthesis should be added to the NOTE TO EDITOR section "(as amended, as applicable)".	Change incorporated.
21	Section 312	65-66	Westtown Township	Westtown staff, elected officials, and commission members support the increase in the riparian buffer width but would like more guidance on how the riparian buffer easement would be enforced by the municipality especially related to vegetation removal or replacement. Would appreciate more guidance on the impacts of adopting or not adopting the "optional" regulations.	Municipalities will be responsible for determining how riparian buffer easements as described in the model ordinance would be enforced. Municipalities should ensure consistency with riparian buffer provisions in their Subdivision and Land Development Ordinance and Zoning Ordinance. Penalties levied for violations of this provision will need to be consistent with those included in the "Penalties" section of the Municipality's stormwater management ordinance (Section 905 in the model ordinance). No changes made.

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22	Section 312	65-66	Warwick Township	<p>Riparian Buffers – Section 312.B includes optional 100 foot buffer standards that are less rigorous than those in a number of Chester County municipalities, in particular those with HQ and EV streams. Although the section references PA Code Chapter 102, the enhanced 150 foot buffers in the state statute for special protection waterways have many exemptions and loopholes not found in municipal regulations. The concern is that special interests could use the more lax standards of the Act 167 stormwater ordinance to undermine the authority of appropriate municipal regulations for special protection watersheds.</p> <p>It is recommended that this section be revised to: require 150 foot buffers for HQ/EV streams, and 100 feet for all other waterways; or to otherwise expand the cross-reference to Chapter 102 to include reference to any applicable provisions in the municipal Zoning Ordinance.</p>	<p>This optional language is not meant to weaken existing regulations contained within municipal zoning ordinances. Municipalities should review the provisions in their Zoning and Subdivision and Land Development Ordinances and modify Section 312 to be consistent with these standards. Municipalities may choose to include additional language specifying that 150 foot buffers are required for Exceptional Value and High Quality streams. No changes made.</p>
23	Section 401.C	68	Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	<p>Clarification is requested regarding Section 401.C – as written, is it at the Township’s discretion to require the SWM Site Plan approval prior to preliminary plan approval? Or is SWM Site plan approval required prior to both preliminary and final plan approval?</p>	<p>SWM Site Plan approval is required for both the preliminary and final approval of subdivision and/or land development plans. No changes made.</p>
24	Section 706	97 & 99	Schuylkill Township	<p>The Schuylkill Township Board of Supervisors believes that the proposed inspection schedule of stormwater management facilities to be unduly excessive and does not support the proposed revisions for both Option 1 and Option 2. The Board’s understanding is that an annual inspection for the first three years followed by tri-annual inspections would satisfactorily identify any deficiencies in the operation of stormwater management facilities, and that routine maintenance will ensure proper function as intended.</p> <p>Additionally, the Board does not support the proposed inspection after a 10-year or greater storm event, as it will likely require the installation, maintenance, and continual tracking of multiple additional rain gauges throughout the Municipality, which will unduly burden municipal staff.</p> <p>The Board therefore recommends the following inspection schedule for stormwater management facilities:</p> <ol style="list-style-type: none"> 1) Annually for the first 3 years. 2) Once every 3 years thereafter. 3) Either (1) during or immediately after the cessation of a 25-year or greater storm, or (2) removal of this inspection requirement entirely. 	<p>The County acknowledges the challenges posed by requiring inspections after the cessation of 10-year or greater storm events, including the timely notification of all BMP owners and the increasing frequency of such events. The County has communicated these concerns to PA DEP. Given the challenges presented by requiring inspections after each 10-year event, the requirement to inspect BMPs after each 10-year rain event has been removed from the model ordinance. An option has been added allowing municipalities to inspect BMPs after 25-year storm events (for BMPs that the municipality inspects) and an option has been added allowing Municipalities to request inspection reports after 10-events if there is cause to believe that a BMP has suffered damaged that would impact its ability to function as designed or would result in damage to downgradient properties.</p>
25	Section 706	98-99	Westtown Township	<p>Related to post-construction responsibilities under Option 2 (landowner or owner’s designee), we would like additional clarity around who would be qualified to perform the required inspections (professional firms, the property owner themselves w/ or w/o training or certification), how property owners will know to perform an inspection after a 10-year storm, what sort of information would be relevant to include on an inspection form, and if that form needs to be uniform across the Township, or if property owners could submit whatever inspection write-up that may be prepared by themselves/firm that performed the inspection</p>	<p>The model ordinance does not include specific qualification requirements for inspecting BMPs. Option 2 was included in the model ordinance to allow landowners to inspect BMPs to reduce costs associated with the inspection requirements. The Municipality may create a template inspection form with specific instructions for landowner BMP inspections. The Municipality may also include additional qualifications or training requirement for anyone completing BMP inspections. No changes made.</p>

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26	Section 706	98-99	Warwick Township	<p>Operations/Inspections – Section 706 contains options for municipal or landowner post-construction inspections of stormwater facilities:</p> <ul style="list-style-type: none"> a. Annual for 1st 5 years b. Every 3 years thereafter c. During or immediately following 10-year or greater storm <p>The municipal option would add significantly to the obligations and expenses of local government and is not preferred by Warwick Township. Additionally, regardless of the option selected by a particular municipality, guidance and ongoing reporting from the County should be provided in order to assess and advise of the level of a particular rainstorm in a particular area. A standardized source for local storm-level determinations is becoming increasingly problematic and necessary given the patterns from the last several years.</p> <p>In either option, a 25- or 50-year event is recommended to decrease the frequency and burden of interim inspections on property owners and local government, and to place the emphasis properly on larger events that could result in catastrophic failure.</p>	<p>The County acknowledges the challenges posed by requiring inspections after the cessation of 10-year or greater storm events, including determining which precipitation events would necessitate inspections, the timely notification of all BMP owners, and the increasing frequency of such events. The County has communicated these concerns to PA DEP. Given the challenges presented by requiring inspections after each 10-year event, this requirement has been removed. An option has been added allowing municipalities to inspect BMPs after 25-year storm events (for BMPs that the municipality inspects) and an option has been added allowing Municipalities to request inspection reports after 10-events if there is cause to believe that a BMP has suffered damaged that would impact its ability to function as designed or would result in damage to downgradient properties.</p>
27	Section 801.C	101-102	Warwick Township	<p>Authorized Discharges – Section 801.C places the burden of determining the non-contaminated status of HVAC condensate, potable water, irrigation water, etc. on the municipality. These do not seem to be likely sources of contamination. Further, how is the municipality to determine whether these discharges are free of contamination?</p> <p>It is recommended that these discharges be permitted without qualification, and if regulated only above a certain rate/volume that could have downslope impacts.</p>	<p>The language in Section 801.C noting that discharges into a Municipality's separate storm sewer system or into waters of the Commonwealth from potable water sources, irrigation drainage, HVAC condensation, and hydrostatic test water discharges must not be contaminated and/or must not contain detectable concentration of total residual chlorine is required to be consistent with PA DEP's 2022 Model Stormwater Management Ordinance. These provisions are not intended to require regular Municipality inspection of such discharges, as it is the landowners responsibility to ensure discharges to the municipalities separate storm sewer system comply with the provisions of this ordinance. However, including this language in the ordinances allows the Municipality to enforce this provision if contaminated discharges are discovered. No changes made.</p>
28	Appendix A		Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	<p>Can a new impervious driveway addition/expansion be handled within the requirements of the updated Simplified Approach?</p>	<p>The updated Simplified Approach allows for offsetting impervious areas, such as driveways and patios, by capturing roof runoff from the same or greater area and directing that runoff into an infiltration trench. Thus, direct overland flow from a new driveway would not be directly routed into the infiltration trench, but rather runoff from an equal or greater area of roof would be directed into the trench via downspouts. No changes made.</p>
29	Appendix A		Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	<p>Does the Simplified Approach address a roof plus a driveway? i.e., a new single-family home will have a driveway as well – does the updated Simplified Approach allow for the roof runoff and the driveway runoff? Or does that automatically require a full Drainage Plan regardless of the total impervious area?</p>	<p>The updated Simplified Approach can allow for the management of stormwater from an addition to an existing building and a new driveway if the combined square footage of the new impervious surface added is less than 2,000 square feet. Runoff from an area of existing roof equal to or greater than the area of the new driveway will need to be captured and directed into an infiltration trench along with the runoff from the new addition to satisfy the requirements of Appendix A. No changes made.</p>
30	Appendix A		Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	<p>Understanding that the Simplified Approach is meant to not require infiltration testing, we suggest that the Simplified Approach clearly state infiltration testing is not required.</p>	<p>The updated Simplified Approach was designed to assume minimal infiltration, thus infiltration testing is not required but recommended. A statement was added to Subsection 106.D noting that infiltration testing is recommended but not required for projects using the Simplified Approach.</p>

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31	Appendix A	25	Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	Are filter fabric requirements for an infiltration bed clearly defined outside of the updated Simplified Approach which requires top and sides only. Is this applicable to all infiltration trenches/beds?	Infiltration bed requirements are not defined in the model ordinance outside of the Simplified Approach. The PA BMP Manual requires continuous non-woven geotextile on the top, bottom and sides of both infiltration trenches and infiltration beds. The design requirements in the updated Simplified Approach have been modified to be consistent with the PA BMP Manual.
32	Appendix A		Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	For the Simplified Approach, is there a certain type of yard inlet required? Can cast iron grates be required?	The updated Simplified Approach is designed to capture roof runoff that is piped directly into an infiltration trench to avoid the capture of overland flow. Thus, yard inlets should not be incorporated into a design unless a gutter is directly connected and the inlet prevents the capture of additional overland flow. No changes made.
33	Appendix A	8	Water and Wastewater Supplier	Page 8, #12. Please consider adding a distance to locating an infiltration basin in proximity to a water supply well. The concern is diverting stormwater runoff in the winter with increasing chloride levels in the region's groundwater supplies. Suggested language is to not locate an infiltration basin within any established well-head protection area.	Language was added to Appendix A noting that infiltration basins must be greater than 50 feet from existing water supply lines or water supply wells and 100 feet from community or Municipal water supply wells. Infiltration basins constructed using the Simplified Approach will only capture runoff from roof areas, thus runoff from these areas should not contain significant concentrations of chlorides.
34	General Comment		Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	It appears the Township has the option of choosing either the Township's 2013 Ordinance adoption date or the new/updated ordinance adoption date as the starting point for calculating cumulative impervious area. Is that correct?	Calculations of cumulative impervious surface area should include all impervious surface installed since the Municipality's adoption of the 2013 County-wide Act 167 Stormwater Management Model Ordinance. This is noted in the definition of Regulated Impervious Surface. No changes made.
35	General Comment		County Resident	Has any consideration been made to including additional mitigation measures when a waiver is sought? Municipalities are varied on when they grant waivers, and I believe it's onerous for a property owner to have to seek a waiver, for a property that the Municipal Engineer has acknowledged does not infiltrate, from a Board that does not understand the stormwater and just asks for more than what is initially presented, just so they can say to their constituents that they asked for more. My suggestion would be for the "more" to be quantified. The DEP MRC could be an option or something else that CCWR comes up with, but leaving the decision to those who do not understand, is not resulting in equitable solutions. In my professional opinion, it would be more advantageous to the watershed, to lower thresholds to require more stormwater management systems or more robust systems on property that do infiltrate, than it is to require larger systems for properties that do not.	Language was added to Section 306.A to allow the Municipal Engineer to approve alternative methods of managing the volume of runoff required in Section 305, as long as these methods are consistent with the PA BMP Manual or other PA DEP guidance. Language was also included noting that the Managed Release Concept is an acceptable alternative.
36	General Comment		Franklin Township, East Nantmeal Township, West Nottingham Township, Borough of Modena, North Coventry Township, West Vincent Township	In a proposed Redevelopment, can existing impervious area to be demolished be used as credit towards new proposed impervious area? If so, is there a time limitation? Is that at the Township's discretion?	Calculation methodologies for Redevelopment are detailed in Subsection 309.D.2. This section notes that municipalities can choose to require that calculations assume that between 20% and 40% of existing Impervious Surface to be disturbed in Redevelopment projects shall be classified as meadow ground cover. All other existing Impervious Surface that is removed in a Redevelopment project is considered Impervious Surface for stormwater calculations. There is no time limitation between the removal of Impervious Surface and Redevelopment Activities specified in the Model Ordinance; however, if Impervious Surfaces are removed prior to the submission of a preliminary or final Redevelopment plan, then the area of Impervious Surface removed prior to submission would be classified based on the ground cover conditions at the time of application. No changes made.

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37	General Comment		County Resident	<p>I moved into Chester County in 1975. I have seen many ordinances proposed and some passed and some not, but this is one of the worst.</p> <p>First of all, of the approximately 500,000 people living in Chester County, very few people know that this unfunded mandate is coming right for them. People have struggled and saved for years to purchase a home in Chester County. They are compelled to pay County, Township and School taxes and possibly other fees required by various townships. Now the County wants to impose more costs on the homeowner such as engineering fees to satisfy the County's agenda. I realize you are trying to prevent flooding and provide safe drinking water to the people of Chester County but what you are proposing will have the opposite effect. People will either ignore the problem or cover it up so they won't have to pay for any remediation.</p>	<p>Comment acknowledged. The concept of managing stormwater runoff from new development and redevelopment projects is not new in Chester County. The majority of the provisions in the updated model ordinance were also included in the County-wide Stormwater Management Model Ordinance that was adopted by the County Commissioners in 2013 and subsequently adopted by all 73 municipalities. These provisions were informed by thousands of public and stakeholder comments. The updated stormwater management ordinance contains a number of provisions designed to reduce the cost and complexity of stormwater management for small projects. No changes made.</p>
38	General Comment		County Resident	<p>In my opinion, in order for this proposal to be successful, you need to do several things. First, have educational/talking sessions throughout the County explaining the who, what, where, when and why of this proposed ordinance and do it in terms that everyone can understand and not just an engineer. Second, honestly explain how much this proposal may cost per property for whatever project they may need to do. Finally, after you've explained this proposal throughout the county and given the people real numbers for their projects, then put it on the ballot as a referendum and see what the people of Chester County want to do.</p> <p>I realize this is a state mandate, but the people pay the salaries of the bureaucrats and put the elected officials in office. The people need to know what their elected officials are about to do to them. If only one municipality says "no" to this proposal, others may follow and we will begin to see real change in Pa. The last time I looked, private property rights were still in the Constitution under the 5th and 14th Amendment. The state needs to be reminded of this.</p>	<p>Comment acknowledged. The updates to the model ordinance were informed by several hundred comments that were submitted at over two dozen public and stakeholder input events over the past three years. These events were held to discuss planned updates to the model ordinance and to receive input on the provisions of the updated County-wide stormwater management model ordinance. The County also collected over 160 public comments through online surveys throughout 2021. The majority of these comments were supportive of updating the model ordinance to improve stormwater management standards.</p>