



# BUCKS COUNTY PLANNING COMMISSION

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July 13, 2012

Paul DeBarry  
NTM Engineering, Inc.  
130 West Church St.  
Suite 200  
Dillsburg, PA 17019-1232

### **Transmitted: Via Email**

Re: Bucks County Planning Commission review of the Poquessing Creek Watershed Stormwater Management draft Plan and Model Ordinance.

Dear Mr. DeBarry,

Thank you for the opportunity to provide feedback regarding the draft Plan and Model Ordinance for the Poquessing Creek Watershed Stormwater Management Plan. See our comments below.

### **Comments with regard to the Plan**

1. Criteria and Standards for New Development and Redevelopment, Section V –
  - a. Missing Narrative – Section V.C and D addresses the Stormwater Management Criteria for infiltration and water quality which are Sections 405 and 406 of the model ordinance. However, the model ordinance's streambank erosion (Section 406) and the peak rate control requirements (Section 407) are not discussed at all. We recommend including a short narrative of these requirements to complete the discussion of what is required by the ordinance.
  - b. Section Organization – We recommend that the infiltration, water quality, streambank erosion, and peak rate control criteria all be made subsections of Section V.C, as each of these classifies as the section title, stormwater management criteria.

2. Stormwater Improvements, Section VI – We commend the plan development team for their extensive research and effort to develop detailed solutions to solve the existing flooding and water quality problems within the watershed. However, the Act 167 program only requires local governments to adopt the standards and criteria set forth in the plan to regulate stormwater from new development and redevelopment. Municipalities are not required to address existing stormwater problems. We recommend adding narrative either in Section VI or Section VIII.D stating that the stormwater system improvements recommended in the plan are suggestions only and landowners and municipalities are not required to fulfill the recommended solutions. We also recommend removing the phrases ‘will be required’ or ‘will require’ from Section VI.A.2 and replacing it with ‘will be necessary’ or ‘will be needed’ so it will not be misinterpreted that some type of action must be made to amend the identified problem areas.
3. Editorial -
  - Please revise the “Designated WPAC members” list. There are a few names repeated twice.
  - The last sentence on page IV-1 should spell out ‘Seventy-one’ in Section IV.B.
  - We believe the word ‘lead’ should be used, not ‘led’ in Section IV.D.8 on pg IV-16, the first paragraph, third sentence.

### Comments on the Model Ordinance

1. Repeated Requirements –
  - Section 106.D.5 requires future subdivisions to cumulatively consider current impervious surfaces. This is already stated word-for-word in Section 106.B.5. We recommend removing one of the two to avoid repetition.
  - Section 301.C.2 requires an E&S control plan and is very similar to the requirement to provide an erosion control plan in Section 301.A.4. Unless the two requirements are somehow expressly different, we recommend removing one of the two.
  - We recommend removing Section 301.D.1, as this is already required by Section 301.A.2.
2. Missing Figure – Section 408.C references the peak rate map as Figure 408.1. However, it is not evident where this is located within the ordinance. Is this the same as Ordinance Appendix A? If so, only one map is necessary.
3. Management District Map – We recommend displaying the required peak rate control for each district on the actual map located in Ordinance Appendix A.

## 4. Editorial Comments –

- On pg A-42, ‘Table 409-1’ should be ‘Table 409.1’ (period, no hyphen), to be consistent with the other references in the ordinance.
- On pg A-59, Figure 1. The Sample Site Sketch Plan, the dry well in the bottom right corner should be labeled with a ‘4’.

Sincerely,



Alice J. Lambert  
Environmental Planner

AJL:

cc: Joanne Dahme, Philadelphia Water Department  
Paul Racette, Pennsylvania Environmental Council  
Drew Shaw, Montgomery County Planning Commission

