

## RESPONSES TO ACT 537 PUBLIC COMMENTS

The Township appreciates all of the comments received and the interest in the Township's future.

Responses to Public Comments Received from March 1 to March 30, 2013 on the Cheltenham Township Act 537 Plan are listed in the order received. Responses to comments are for the Act 537 Plan only. Comments unrelated to the Act 537 Plan will not be addressed here.

### **Date Sent: March 2, 2013**

Comments from: Bob Sharp

1. See the Implementation Schedule on page ES-5. Funding, Design, and Permitting need to be in place in order to provide a more defined schedule.
2. This question cannot be answered at this time since it will specifically need to be evaluated during the design phase of the Phase 2B project.

### **Date Sent: March 6, 2013**

Comments from: Ann L. Rappoport, Ph.D.

1. See Page 60 of the Plan. The main reason is the costs associated with selecting the 36 cfs. alternative. The goal of the Plan is to reduce I/I; therefore, 29 cfs is sufficient to handle future flows.
- 2.a The Phase 1A Replacement option was not selected due to the proximity of the pipe to existing structures, utilities, and stream crossings, making the project very difficult. This would also mean very extensive engineering and complex construction of the pipe line, resulting in higher design, permitting, and construction costs.
- 2.b The only other cost estimate at this time is for Phase 1A – Lining of Interceptor A. The cost exceeds other phases since it includes the cost to construct a pump station and force main. Replacement is not considered because it is not a viable option.
- 2.c No examples are available at this time. A wet well/ dry well configuration for the pump station was used to estimate costs. No other specifics relative to the structure can be provided at this time; specifics with regard to layout and structure will occur during the design of the project.
- 2.d The disadvantages to pumping stations are operation costs such as power to the pumps, alarms, and lights, and maintenance of the pumps and force main.
- 2.e The only option for providing the additional necessary capacity is to construct a larger pipe. The force main provides the additional capacity in place of a larger gravity main.
- 2.f See Appendix T for Collection/ Conveyance System Upgrade Map.

- 2.g. Pump Stations do not directly reduce flow, but are used to redirect flow against gravity conditions. For example: Abington Township would need to determine if they are able and have capacity to redirect flow to another discharge point.
3. The Township owns the sanitary sewer mains and will be paying for the lining of the connection of the lateral at the main and 12-inches up the lateral. The Township will need to determine how it plans to proceed with any other necessary repairs on private property.
4. The other municipalities have their own Ordinances. All contributing municipalities will have to comply with the Act 537 Plan by adopting a resolution. Please refer to other municipal planning documents and ordinances to answer your questions specifically, since the documents are not part of this Act 537 Plan.

**Date Sent: March 19, 2013**

Additional Comment from: Ann L. Rappoport, Ph.D.

1. The flood water management question does not apply to the 537 Plan. The location of the Pump Station may be near the Perley Bird Sanctuary and/or the creek and will be addressed at the time of design.

**Date Sent: March 20, 2013**

Comments from: Suburban Realtors Alliance

1. This recommendation is in place per the Corrective Action Plan (CAP), enforced by the PA DEP. Page 23 of the CAP, found in Appendix H, states the following:

**4.9 Roof Drain Inspections and Disconnection**

Roof drains that are connected to the sanitary sewer system are a significant inflow source. Concurrent with any private sewer lateral rehabilitation program, the same properties where lateral rehabilitation will occur should be checked for roof drains connected to the sanitary sewer system. Any connected roof drains must be disconnected from the sanitary sewer system and rerouted to the surface or to storms sewers. Other areas can also be noted for inspection independent of any lateral rehabilitation efforts.

The Township should also establish an ordinance that requires during the sale of a property the inspection of all roof drains on the property and, if necessary, the disconnection and redirection of any roof drains that are connected to the sanitary sewer.

The Act 537 Plan restates the Corrective Action Plan recommendation. The Township currently has Code No. 211 – Sump Pump and Groundwater Standards in place. A link to the Code is located on the Township’s website. In order to reduce Township costs, the Township has received recommendations to also allow the inspections be performed as a condition of sale. Roof drains currently connected to the system are illegal and must be addressed by property owners. Requiring this inspection at the time of sale does not preclude the existing Ordinance 211 from being enforced.

**Date Sent: March 22, 2013**

Comments from: Roy Hollinger

1. This recommendation is in place per the Corrective Action Plan (CAP), enforced by the PA DEP. Page 23 of the CAP, found in Appendix H, states the following:

**4.9 Roof Drain Inspections and Disconnection**

Roof drains that are connected to the sanitary sewer system are a significant inflow source. Concurrent with any private sewer lateral rehabilitation program, the same properties where lateral rehabilitation will occur should be checked for roof drains connected to the sanitary sewer system. Any connected roof drains must be disconnected from the sanitary sewer system and rerouted to the surface or to storms sewers. Other areas can also be noted for inspection independent of any lateral rehabilitation efforts.

The Township should also establish an ordinance that requires during the sale of a property the inspection of all roof drains on the property and, if necessary, the disconnection and redirection of any roof drains that are connected to the sanitary sewer.

The Act 537 Plan restates the Corrective Action Plan recommendation. The Township currently has Code No. 211 – Sump Pump and Groundwater Standards in place. A link to the Code is located on the Township’s website. In order to reduce Township costs, the Township has received recommendations to also allow the inspections be performed as a condition of sale. Roof drains currently connected to the system are illegal and must be addressed by property owners. Requiring this inspection at the time of sale does not preclude the existing Ordinance 211 from being enforced.

The Act 537 Plan is available for public review and comment on the Township’s website and at the Township building. Any “Time of Sale Ordinance” will be made available to the public for review and comment as well.

**Date Sent: March 27, 2013**

Comments from: Beverly Milestone Maisey

1. Title 25, Chapter 71, Section 71.31.c of the Commonwealth of Pennsylvania Code requires a notice be placed in a local newspaper and a 30 day period be provided to the public to allow their review and comment on the Plan. In addition to meeting those requirements, the Township has placed the Act 537 Plan on its website and provided notifications via email to resident who have signed up for the email program. The Act 537 Plan has also been discussed at regular public Township meetings, which are televised as well.
2. After the approval of the Act 537 Plan, the Township will be working with its Engineer to determine the methodology to be utilized on the lateral replacement project. All of the details associated with the lateral replacement project will be discussed at a future point in time.

3. There is a Planning Module process developers must follow. The Township must sign off, stating there is capacity in the collection and conveyance system. Developers are assessed connection fees according to the Township fee structure.
4. No, flow meters will not be placed on new development laterals.
5. The flow metering that occurred during the Act 537 Plan was performed by John Marsh of Savannah Environmental, Inc. The flow meters recently purchased by Cheltenham Township are outside of the scope of the Act 537 Plan.
6. Page 45 of the Act 537 Plan refers to the Operations and Maintenance Asset Management Program.

**Date Sent: March 27, 2013**

Comments from: Tom McHugh

The Public Comment Period was completed on March 30, 2013. No further comments will be addressed. All comments received and official responses will be incorporated as part of the Final Plan.

1. The Plan includes costs for the recommended alternatives only. The Phase 1A Replacement option was not selected due to the proximity of the pipe to existing structures and utilities causing extremely difficult access, and stream crossings, making the project very difficult. This would also mean very extensive engineering and complex construction of the pipe line resulting in higher design, permitting, and construction costs.
2. No.
3. Although other options were evaluated as part of the Plan, the Plan includes costs for the recommended alternatives only. The Phase 1A Replacement option was not selected due to the proximity of the pipe to existing structures and utilities causing extremely difficult access, and stream crossings, making the project very difficult. This would also mean very extensive engineering and complex construction of the pipe line resulting in higher design, permitting, and construction costs.
4. The Phase 1A Replacement option was not selected due to the proximity of the pipe to existing structures and utilities causing extremely difficult access, and stream crossings, making the project very difficult. This would also mean very extensive engineering and complex construction of the pipe line resulting in higher design, permitting, and construction costs.
5. No.

**Date Sent: March 27, 2013**

Comments from: Chris Blazic

1. This is a system-wide requirement. The roof drain inspection and disconnection recommendation is in place per the Corrective Action Plan (CAP), enforced by the PA DEP. Page 23 of the CAP, found in Appendix H, states the following:

**4.9 Roof Drain Inspections and Disconnection**

Roof drains that are connected to the sanitary sewer system are a significant inflow source. Concurrent with any private sewer lateral rehabilitation program, the same properties where lateral rehabilitation will occur should be checked for roof drains connected to the sanitary sewer system. Any connected roof drains must be disconnected from the sanitary sewer system and rerouted to the surface or to storms sewers. Other areas can also be noted for inspection independent of any lateral rehabilitation efforts.

The Township should also establish an ordinance that requires during the sale of a property the inspection of all roof drains on the property and, if necessary, the disconnection and redirection of any roof drains that are connected to the sanitary sewer.

The Act 537 Plan restates the Corrective Action Plan recommendation. The Township currently has Code No. 211 – Sump Pump and Groundwater Standards in place. A link to the Code is located on the Township’s website. In order to reduce Township costs, the Township has received recommendations to also allow the inspections be performed as a condition of sale. Roof drains currently connected to the system are illegal and must be addressed by property owners. Requiring this inspection at the time of sale does not preclude the existing Ordinance 211 from being enforced.

**Date Sent: March 27, 2013**

Comments from: Myron Goldman

1. If the Township completes a roof drain inspection it will be at the expense of the Township. There is currently no established Township fee for this inspection. The disconnection cost will vary by what needs to be disconnected and the contractor performing the disconnection. The Township currently has Code No. 211 – Sump Pump and Groundwater Standards in place. A link to the code is located on the Township’s website.
2. Roof drains illegally connected to the sanitary sewer system are a source of rain water into the sanitary sewer system. This rainwater is called “inflow” and contributes to the sanitary sewer system overflows. Each time a sanitary sewer overflow occurs within the system, the Township must pay fines to PA DEP.
3. This is unknown until the Ordinance is written.

4. Commercial and institutional properties are not exempt, they are covered in existing Code No. 211– Sump Pump and Groundwater Standards.
5. The Township currently has Code No. 211 – Sump Pump and Groundwater Standards in place. A link to the code is located on the Township’s website. Any future Ordinances will be reviewed by the Township solicitor prior to adoption.
6. The lateral rehabilitation program is not fully defined.
7. The Township has been directed by the PADEP to locate and reduce sources of infiltration in the Township’s sanitary sewer system. Laterals are a source of ground water that contributes to additional flow into the sanitary sewer system. This groundwater is called “infiltration” and contributes to the sanitary sewer system overflows. The Township pays fines to the PADEP each time there is a sanitary sewer overflow that occurs in the Township. For more information refer to page 16 in the Act 537 Plan.
8. This is unknown until the program is defined.
9. They are not exempt. Private lateral does not mean residential.
10. The lateral inspection program will be reviewed by the Township’s solicitor prior to execution.

**Date Sent: March 27, 2013**

Comments from: Lora Draving

1. Refer to the Executive Summary in the Act 537 Plan for the nature and scope of the work. The Act 537 Plan was advertised in the Philadelphia Inquirer, it has been placed on the Cheltenham Township website for residents to review, and it has also been discussed at regular public Township meetings, which are televised. The Township also has an email notification program that residents may sign up for.
2. It is outside the scope of an Act 537 Plan to complete this request. There was a Power Point presentation provided to the Township at the January 9, 2013 Public Meeting. The Presentation is on the Township’s website. The Executive Summary that is included with the Act 537 Plan is also located on the Township website.
3. The Act 537 Plan comments will become part of the final plan, which will be posted on the Cheltenham Township website.
4. The Township will take your comments into consideration; however, the actual specifics of the sewer lateral rehabilitation program is not mandated to be part of the 537 Plan and will be later defined as a separate program.
5. Non-residential properties are not exempt, they are covered in existing Code No. 211– Sump Pump and Groundwater Standards.

6. Once the collection and conveyance system has additional capacity, the additional flow will be managed through the Connection Management Plan or through the Planning Module Process.
7. See Appendix O – Planned/Future Development Map and Tables. Any future changes to Zoning or other Comprehensive Planning will be dealt with at that time using a PA DEP Planning Module to determine capacity in the system.
8. Tapping Fees are handled by the Township and are not part of this Plan.
9. A curb vent removal program is currently not a recommendation in the 537 Plan or mandated by the PA DEP Corrective Action Plan.
10. The Act 537 Plan is not recommending any change in drainage discharge areas.
11. Flow meters are used throughout the Township as necessary. The flow meters are operated and maintained per manufacturer's recommendations. Any upgrades to the Sanitary Sewer System are conducted within Good Engineering Practices. Refer to Page 45 for the Operation and Maintenance Program Recommendations.
12. Tallying of all of the project costs of projects being performed in the Township is not a requirement of Title 25, Chapter 71, which describes the costs to be developed required for Act 537 Planning.
13. The current Township fee structure per Code 238-23 is based on fixtures and not usage. Refer to page 68 for the recommendation of a rate and tapping fee study.

**Date Sent: March 28, 2013**

Comments from: Ronald Dunbar

- 1-1.3 The ACOE (ACE) study is not associated with the Act 537 Plan. The only comments that can be addressed through this comment period are about the Act 537 Plan.
- 1.5 The Act 537 Planning efforts were not coordinated with the ACOE study; the Act 537 Plan's purpose is to provide a comprehensive sewage planning mechanism to identify and resolve existing sewage disposal problems, to avoid potential sewage problems resulting from new land development and to provide for the future sewage disposal needs of a municipality.
- 2.1 See page 60 for the 25 year present worth amount.
- 2.2 Refers to the 25 year analysis amount on page 60. The only requirement for the 537 Plan is to perform a present worth analysis.
- 2.3 A 30% contingency was assumed for the Cost Opinions.
- 2.4 Refer to Page 54 in the Act 537 Plan. Project costs are broken up by the proportionate share by the contributing municipality. The Intermunicipal Agreements state

proportionate share language as well. Overruns will be handled the same way as the other costs are proportioned.

- 3.1 Tallying of all of the project costs of various projects being performed in the Township is not a requirement of Title 25, Chapter 71, which describes the costs to be developed required for Act 537 Planning.
- 3.2 Refer to the funding analysis section starting on page 61.
- 4.1 These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.
- 4.2 These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.
- 4.3 These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.
5. Wording will remain.
- 5.1 The last sentence in that section on Page 44 states the following “the disconnection and redirection of any roof drains found connected to the sanitary sewer prior to completion of the sale.”
- 5.2 Again the roof leader disconnection program refers to connections to the sanitary sewer.
- 5.3 Per current Code 211, Township employee or a designated representative shall perform the inspections. The new ‘roof drain disconnection at the time of sale’ Ordinance may have similar language. The expense and specifics of the inspection will be defined in the new Ordinance.
- 5.4 Yes, roof water management does apply to all properties.
- 5.5 These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.
6. The Act 537 Plan was advertised in the Philadelphia Inquirer, it has been placed on the Cheltenham Township website for residents to review, and has also been discussed at regular public Township meetings, which are televised. The Township also has an email notification program that residents may sign up for.

**Date Sent: March 28, 2013**

Comments from: Grahame Maisey, P.E.

1. The Township is unclear of your questions. However, our reply refers to Septage Management. PA DEP does not require a Septage Management Program/Ordinance as part of this Act 537 Plan. The Septage Management Program/Ordinance relates to on-lot

disposal systems (OLDS) only. See pages 21, 23 and 30 on the number of OLDS in the Planning Area and how they will be handled in the future.

**Date Sent: March 29, 2013**

Comments from: David Cohen, AICP

1. The Act 537 Plan does not incorporate the consideration of EDU transfer. EDUs are managed under the Connection Management Plan or Planning Modules.
2. Your comment is noted, but not relevant to this Act 537 Plan.
3. A tapping fee and rate study fees are recommended in the Plan. Your comments on additional fees are not part of this Act 537 Plan. OLDS to be connected to the sewer will be charged a Connection Fee as in Township Code Chapter 238 Sewers. Storm water fees are addressed separately from the Act 537 Plan.
4. EDUs are addressed through the Connection Management Plan and Planning Modules. The Act 537 Plan addresses inflow and infiltration, but not storm water management. Storm water surface run-off management is handled separately.
5. Each municipality provided their future growth data for anticipated build out based on zoning, open parcels, municipal personnel knowledge, and current submitted Planning Modules.
6. Your comment is noted. See page 26 of the Corrective Action Plan in Appendix H.
7. Refer to page 73, where the municipalities in the Planning Area may consider creation of an Authority in the future.
8. A sewer rate study will determine the exact methodology for rate structure.
9. The map will be reviewed and revised accordingly.
10. Each municipality provided their future growth data for anticipated build out future development. This information was based on zoning, open parcels, municipal personnel knowledge, and current submitted Planning Modules. The recommendations in the Plan need to take place even if build out does not occur. However, these improvements will incorporate full build out and make the improvements cost effective to the municipalities. The Montgomery County Planning Commission has reviewed the Act 537 Plan in accordance with the current Planning and found it to be acceptable. The letter received from the Montgomery County Planning Commission will be made part of the final Plan.

**Date Sent: March 29, 2013**

Comments from: Ted Cerebi

1. After the approval of the Act 537 Plan the Township will be working with its Engineer to determine the methodology to be utilized for the lateral replacement project. All of the details associated with the lateral replacement will be discussed at a future point in time. Funding opportunities and financial responsibility will be evaluated at the time of Program Development. Residents have every right to be part of the process. The ways residents can be part of the process and stay informed are through attending public meetings, accessing the website, watching the televised public meetings, signing up for e-mail notification and providing comments.
2. All properties are considered equal and have a shared responsibility in the sanitary sewer system.
3. The Act 537 Plan was advertised in the Philadelphia Inquirer, it has been placed on the Cheltenham Township website for residents to review, and has also been discussed at regular public Township meetings, which are televised. The Township also has an email notification program that residents may sign up for. The Township appreciates your suggestions.

**Date Sent: March 29, 2013**

Comments from: Robert Hyslop

1. These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.
2. These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.
3. The recommendations in the Act 537 Plan are meant to increase capacity, thus reduce sanitary sewer overflows. The issue raised regarding damage to private property is not within the purpose of the Act 537 Plan and cannot be addressed as such.
4. These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.
5. These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.
6. The current sanitary sewer system capacity is being addressed by the projects and programs outlined in the Act 537 Plan. The EDU projections that you reference are for the full build out and these additional EDU connections cannot occur until the Act 537 projects are completed. To assist in economic growth within the Township and to give people the ability to connect to the sanitary sewer, the PADEP allows the limited release of EDUs as the system is repaired and system capacity is available per the Township's Connection Management Plan.

7. Your references to previous EDU connections from 1997 to 2010 are not part of this Act 537 Plan. The Township is not currently requesting 3,880 EDU connections, the 3,880 EDU connections are to accommodate the future growth, if it occurs. Each municipality provided their future growth data for anticipated build out based on zoning, open parcels, municipal personnel knowledge, and current submitted Planning Modules. The Act 537 Plan was generated in accordance with PA code Title 25, Chapter 71 and approved by the Montgomery County Planning Commission, since it is consistent with existing planning documents.
8. The Township is under a PA DEP Corrective Action Plan and manages EDUs currently through the Connection Management Plan and Planning Modules, which are both PA DEP regulated programs. The flow metering performed in the Act 537 Plan will be used as pre-improvement flow data. Flow metering will take place post-construction for quantifying the reduction in flow and increased system capacity. PA DEP does not release regulatory authority.
9. These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.

The Act 537 Plan's purpose is to provide a comprehensive sewage planning mechanism to identify and resolve existing sewage disposal problems, to avoid potential sewage problems resulting from new land development and to provide for the future sewage disposal needs of a municipality.

10. The Act 537 Plan's purpose is to provide a comprehensive sewage planning mechanism to identify and resolve existing sewage disposal problems, to avoid potential sewage problems resulting from new land development and to provide for the future sewage disposal needs of a municipality. The issues are being addressed by the projects in the Act 537 Plan.
11. The purpose of this current Act 537 Plan is to provide a comprehensive sewage planning mechanism to identify and resolve existing sewage disposal problems, to avoid potential sewage problems resulting from new land development and to provide for the future sewage disposal needs of a municipality.

The Township is under a PA DEP Corrective Action Plan and manages EDUs currently through the Connection Management Plan and Planning Modules, which are both PA DEP regulated programs. The flow metering performed in the Act 537 Plan will be used as pre-improvement flow data. Flow metering will take place post-construction for quantifying the reduction in flow and increased system capacity.

12. SSO reporting is not part of the Act 537 Plan.
13. Reporting in public meetings is not within the purpose of the Act 537 Plan and cannot be addressed as such.
14. Previous actions with regard to backflow prevention, property damage and etc. are not within the purpose of the Act 537 Plan and cannot be addressed as such.

15. These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.
16. These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.
17. The Act 537 Plan does not incorporate the consideration of EDU transfer. EDUs are managed under the Connection Management Plan or Planning Modules.
18. These comments are not within the purpose of the Act 537 Plan and cannot be addressed as such.

**Date Sent: March 29, 2013**

Comments from: John Dunphy

- 1.a ARRO is a civil engineering and environmental consulting firm employing professionals in eight offices throughout the mid-Atlantic region.
- 1.b-d The property owner financial responsibility is based on the sanitary sewer rates and taxes that are paid to the Township. The Act 537 Plan does not set rates, nor does it distribute costs per household. The Township will be determining financing and/ or its funding at the time of the Project.
2. This is not part of the Act 537 Plan. If you would like information on your lateral your questions should be directed to the Township Zoning, Inspections and Engineering Department.
3. The lateral rehabilitation is not fully defined. This is unknown until the program is defined.
4. The Township has yet to define a timeframe on these projects.
5. This is unknown until the program is defined.
6. This is unknown until the program is defined.
7. Yes, the properties pay rates as determined by Sewer Code 238.
8. Yes, the commercial properties pay rates as determined by Sewer Code 238.
9. The recommendation has been made on page 45 of the Act 537 Plan and on page 26 of the Corrective Action Plan in Appendix H.
10. To assist in economic growth within the Township and to give people the ability to connect to the sanitary sewer, the PADEP allows the limited release of EDUs as system capacity is available per the Township's Connection Management Plan.
11. The lateral inspection program will be reviewed by the Township's Solicitor prior to execution.

12. The Act 537 Plan addresses a phased approach for making improvements to the collection and conveyance system. Previous work is listed on page 16 of the 537 Plan and you can also refer to the Corrective Action Plan in Appendix H. Sanitary sewer main rehabilitation has been on-going and continues to be addressed in the Township. Laterals are not the only focus of the repairs to the system.
13. The intent of the recommendations is to provide capacity to the collection and conveyance system. The flow metering performed in the Act 537 Plan will be used as pre-improvement flow data. Flow metering will take place post-construction for quantifying the reduction in flow and increased system capacity.
14. For reference on capacity need with or without growth see Appendix S Hydraulic Analysis. The exact capacity of the system after repairs are made will be quantified using flow meters.
15. This is unknown until the program is defined.
16. Refer to Page 16 for on-going sanitary sewer improvement efforts. The purpose of the plan is not to evaluate what was done or not done in the past. The Act 537 Plan's purpose is to provide a comprehensive sewage planning mechanism to identify and resolve existing sewage disposal problems, to avoid potential sewage problems resulting from new land development and to provide for the future sewage disposal needs of a municipality.

**Date Sent: March 29, 2013**

Comments from: Theresa Abraham

1. Any future Ordinances and Programs will be reviewed by the Township solicitor prior to adoption and/ or execution.
2. If, after inspection, it is determined by the Township that the lateral is not defective in any way, it will not have to be replaced. The specifics of the program are unknown until the program is defined.
3. This is unknown until the program is defined.
4. This is unknown until the program is defined.
5. This is unknown until the program is defined.
6. This is unknown until the program is defined.
7. All properties are considered equal and have a shared responsibility in the sanitary sewer system.
  - 7a. All properties are considered equal and have a shared responsibility in the sanitary sewer system. They will be addressed at the same time as the other properties in the Township.

8. Each municipality provided their Future growth data for anticipated build out based on zoning, open parcels, municipal personnel knowledge, and current submitted Planning Modules.

The Act 537 Plan does not dictate the certainty of the EDUs, however it accommodates the future growth, if it occurs.

9. Any ACOE studies and/or work is not associated with the Act 537 Plan. The only comments that are able to be addressed through this comment period are about the Act 537 Plan.
10. The only comments that are able to be addressed through this comment period are about the Act 537 Plan.

**Date Sent: March 30, 2013**

Comments from: Olga McHugh

1. The 3,880 EDU connections are to accommodate the future growth, if it occurs. Each municipality provided their Future growth data for anticipated build out based on zoning, open parcels, municipal personnel knowledge, and current submitted Planning Modules. The EDU projections that you reference are for the full build out, and these additional EDU connections cannot occur until the Act 537 projects are completed.

The Act 537 Plan was generated in accordance with PA code Title 25, Chapter 71, and approved by the Montgomery County Planning Commission, and is consistent with existing planning documents.

- 2.1 The Township is under a PA DEP Corrective Action Plan and manages EDUs currently through the Connection Management Plan and Planning Modules, which are both PA DEP regulated programs. The flow metering performed in the Act 537 Plan will be used as pre-improvement flow data. Flow metering will take place post-construction for quantifying the reduction in flow and increased system capacity. The Township and PA DEP are working together on resolving the sanitary sewer issues within the drainage area.
- 2.2 The 3,880 EDU connections are to accommodate the future growth, if it occurs. Each municipality provided their future growth data for anticipated build out based on zoning, open parcels, municipal personnel knowledge, and current submitted Planning Modules. The EDU projections that you reference are for the full build out, and these additional EDU connections cannot occur until the Act 537 projects are completed.
- 2.3 The Act 537 Plan recommends that the Township use low flow fixtures and implement a water conservation program on page 45. The Township fee structure per Code 238-23 is based on fixtures and not usage. Refer to page 68 for the recommendation of a rate and tapping fee study.
- 3.1 The non-residential properties pay rates as determined by Sewer Code 238. All properties will be treated equally in Roof Drain Inspection and Lateral Inspection Programs.

- 3.2 Refer to page 60 of the Act 537 Plan for sewage costs.
- 3.3 Although planning level project costs have been developed, the exact method of funding of the projects has yet to be determined. This will be performed at the time of implementation of each Project.
- 3.4 Tapping Fees are handled by the Township and are not part of the Act 537 Plan. Refer to page 68 for the recommendation of a rate and tapping fee study.
- 3.5 After the approval of the Act 537 Plan, the Township will be working with its Engineer to determine the methodology to be utilized on the lateral replacement project. All of the details associated with the lateral replacement will be discussed at a future point in time.
- 3.6 The lateral inspection program will be reviewed by the Township's Solicitor prior to execution.
- 3.7 The non-residential properties pay rates as determined by Sewer Code 238.
- 3.8 Per current Code 211, a Township employee or a designated representative shall perform the inspections. The new 'roof drain disconnection at the time of sale' Ordinance may have similar language. The expense and the specifics of the inspection are unknown until the programs are defined.
- 3.8a-e. The lateral rehabilitation program is not fully defined.
- 3.9. It is not known at this time. Refer to page 68 for the recommendation of a rate and tapping fee study.
- 3.10 The non-residential properties pay rates as determined by Sewer Code 238.
- 3.11 The non-residential properties pay rates as determined by Sewer Code 238.
- 3.12 The lateral rehabilitation program is not fully defined.
- 3.13 The lateral rehabilitation program is not fully defined.
- 3.14 The lateral rehabilitation program is not fully defined.
- 3.15 The lateral rehabilitation program is not fully defined.
- 3.16. The lateral rehabilitation program is not fully defined.
- 3.17 This does not apply to the Act 537 Plan. Roof drains currently connected to the system are illegal and need to be addressed by property owners. The expense and the specifics of the inspection are unknown until the program is defined.
- 3.18 The Act 537 Plan shows consistency with the PHMC for the planned projects (refer to Appendix Y for PHMC correspondence). The PHMC needs to perform a review during the project design process prior to construction, which is a requirement of the permitting process.

- 3.19 The property owner financial responsibility is based on the sanitary sewer rates and taxes that are paid to the Township. The Act 537 Plan does not set rates, nor does it distribute costs per household. The Township will be determining financing and/ or its funding at the time of the Project.
- 3.20 The recommendation has been made on page 45 of the Act 537 Plan and on page 26 of the Corrective Action Plan in Appendix H.