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November 12, 2015

Maidencreek Township Board of Supervisors
c/o Diane Hollenbach, Township Manager
Maidencreek Township
P. O. Box 319
Blandon, PA 19510

Re: MS4 Permit
TMDL Strategy Plan
GVC File 3026-013

Dear Supervisors:

As you are aware, the Township has a Federal and State mandated MS4 Permit to manage stormwater. In summary, a portion of Maidencreek Township is subject to a TMDL or a maximum amount of sediment and phosphorous in runoff, for Lake Ontelaunee. When the MS4 permit renewal was submitted in 2013, the Township's engineer (SDE) submitted a required TMDL Strategy Plan with the renewal. DEP provided comments in a February 2015 letter to the Township requiring that the strategy plan be revised and resubmitted by December 31, 2015. We are finalizing a revised TMDL Strategy Plan that takes an alternative approach to SDE's previous plan. While the previous plan proposed annual street-sweeping of the Township's roads to mitigate the pollutants, we are instead proposing efforts to prevent the pollutants from entering the Township's roads and storm sewer facilities in the first place. The revised Strategy Plan relies on education and outreach to property owners in the drainage area, partnerships with local and county-level environmental regulatory and environmental stewardship organizations, and more thorough planning and mapping of the area for potential future projects.

Essentially, the type and volume of pollutants required to be mitigated as part of the Lake Ontelaunee TMDL are not generated by streets, but rather by other land uses in the drainage area. If the Township can successfully coordinate and administer other, more cost-effective measures in the drainage area to prevent the pollutants from entering the roadway, no structural BMPs will be necessary; however, if these efforts are unsuccessful or do not generate all of the required pollutant reductions, mapping and surveying of the drainage area will be the basis of developing future structural BMPs to meet the requirements of the program.

One of the main components of the DEP review letter is a requirement to solicit public participation and involvement in the development of the TMDL Strategy Plan, including a conventional 30-day comment period. Our proposed schedule is as follows: we will furnish a copy of the draft revised TMDL Strategy Plan to the Township for review tomorrow; upon review and subsequent revision by our office, a summary of the report can be advertised in the newspaper and the entire document can be placed on the Township's website for review and comment beginning November 23, 2015 and ending on December 23, 2015. During the duration

of this comment period, a brief summary can be presented at the December Board of Supervisors meeting to fulfill Public Outreach requirements. Upon completion of the comment period, any public commentary can be incorporated and addressed in the final week of December before submission to DEP.

We will continue to coordinate with the Township's staff to complete this revised Plan. It is our hope that the Plan will be accepted as submitted to DEP, as we feel it represents both the most practical and cost-effective solution for compliance with the Lake Ontelaunee TMDL.

Please feel free to contact our office with any questions.

Sincerely,

NICHOLAS R. JOHNSON, EIT

NRJ:emm

cc: Charles M. Jones, P.E.