

May 8, 2005

Hendricks County Drainage Board
355 South Washington Street #214
Danville, Indiana 46122

Dear Commissioner,

We would like to take this opportunity to express our opinion regarding the recently passed revision of the **Stormwater Management Ordinance of Hendricks County**. First, we would like to request that, in the future, you form a review committee and include local engineering/surveying practitioners and members of the local development community so that they may have a reasonable opportunity to review proposed ordinances that affect their livelihood and profession and provide comments/feedback on proposed ordinances under your jurisdiction. Tippecanoe County formed a review committee who spent many months in 2004 providing comments that sparked some revisions to their proposed ordinance. Several representatives from their local surveying chapter and several representatives from the development community were actively involved with the review committee and the ordinance benefited from that process. Although, similar reviews were requested in your County, no such review committee was formed and the ordinance was enacted without any substantial review by the local engineering/surveying practitioners or the local development community. Furthermore, even though many comments were made in Tippecanoe County that resulted in changes to their ordinance, similar changes were not made in your ordinance. Apparently, one of the reasons that a review committee was not formed in your County was supposed to be that most, if not all, of the comments and revisions made to the Tippecanoe County ordinance were going to be incorporated into your ordinance.

The purpose of this letter is to highlight the items that were going to be incorporated your ordinance and also express our view that, while we generally support the Ordinance, there are many new ideas contained in the Ordinance both from a stormwater quantity and stormwater quality standpoint that have not been tested before. Our purpose in writing this letter is twofold. First, we would like you to open a discussion with engineering/surveying practitioners and the local development community regarding the ordinance so that they have an opportunity to express their concerns. Second we would like to state that, while we will make every effort to comply with the new ideas in the Ordinance, there will, occasionally, be cases where strict application of those ideas is not practical and a variance would be warranted.

Examples of the items of that should be further reviewed in a committee or examples of new ideas and associated variances are as follows:

- 1) The ordinance contains fixed release rates from a site based solely on the size (acreage) of the site and are fixed at 0.2 and 0.4 cfs per acre for a 10-year and 100-year storm, respectively. There are a number of factors that affect the release rate that we considered under the prior ordinance when modeling the release rate from a site such as existing use, ground cover, and slope of the site, to name a few. These factors can have a large influence on the amount of surface runoff that leaves a site, but these fixed release rates

completely ignore those factors. In fact in some cases, those fixed release rates actually permit a LARGER release rate than the prior ordinance; therefore, in those cases, LESS protection against potential downstream drainage and flooding impacts will be provided by this new ordinance. On the other hand, there will be cases, where the fixed release rate constitutes a significant reduction (as much as a 50% reduction or more) in release rate when compared to the prior ordinance. This could constitute a major hardship for a developer or property owner who wishes to divide or make improvements to their property. While we oppose the fundamental idea of proposed fixed “per acre” release rates, we also understand that there is a desire to standardize those rates. In Tippecanoe County, a table of runoff release rates from a site based on a range of runoff curve numbers and the size (acreage) of the site was created based on comments from the surveying/engineering/development community. Since some factors are being ignored in their County, the standardized rates contained in their table would almost always be lower than they might otherwise be if they were calculated including those factors. As a result, there still will be cases when the rate in the table is not practical and a variance would be warranted for a higher release rate. This would probably occur most commonly when dealing with smaller sites, “redeveloped” sites, or sites with rolling or steep terrain.

We would also suggest that a Huff rainfall distribution be utilized instead of the NRCS Type II rainfall distribution. A Huff rainfall distribution is utilized in both Indianapolis and Lafayette because it is believed to be more realistic and it results in lower release rates from sites than the NRCS Type II distribution. The NRCS Type II distribution is more appropriate for determining regulatory floodplains for large watersheds rather than being used to size an outlet structure from a detention pond. This and other rainfall factors should be discussed in a review committee to determine which are most appropriate for your County or at the very least you should consider allowing the Huff distribution to be utilized as an alternate distribution. In most cases, pond release rates will be at or below the fixed release rates that you currently have in your new ordinance when modeling a 24-hour storm duration. Should you decide to utilize a Huff distribution, then stormwater quality flowrates should also be based on a Huff distribution rather than NRCS Type II.

Your ordinance also requires that the hydrologic soil group be changed to the next less infiltrating classification (i.e. A to B, B to C, and C to D) in the developed condition. We question the validity of this requirement. If you have a sandy soil on-site, it will still be sand after development; therefore, modeling it as clay is not realistic and will only cause a significant hardship to a developer or property owner wishing to divide their property. In fact, in researching this subject, we found that the NRCS TR-55 manual seems to suggest that the opposite should occur, especially in dual Type D soil classifications. For example, if a soil is classified as B/D, they suggest utilizing D for undeveloped conditions and B for developed conditions. We are not necessarily advocating this practice, but it is counter to what your ordinance proposes. Without any justification for this, we strongly suggest that you eliminate this from your ordinance.

- 2) The ordinance contains a table for minimum elevation of a building pad above an emergency overflow route. There is also a statement in the ordinance that overflow

routes be contained in a 30-foot wide easement. First, we would like to point out that the 30-foot wide easement is excessive in most cases; therefore, you should expect to be granting variances on a frequent basis from this requirement. Based on discussion during the review process in Tippecanoe County, local engineers, surveyors, and developers felt that a variable width easement (ranging from 10-12 feet, or whatever minimum side setback width is, to 30 feet) that increases in size when the contributing drainage basin increases in size was more appropriate. The 30-foot easement width is generally applicable to cases when the contributing drainage basin is 100 acres or larger; however, almost every site that you will see will contain many drainage basins much smaller than this. As a result, a variance for a smaller easement width would be warranted. We would also like to mention that the table was created for building pads in residential subdivisions; therefore, such elevation difference is likely not necessary between finish floor elevation and the adjacent parking lot in commercial subdivisions.

Furthermore, the table contained in your ordinance seems to be a variation of the table contained in Tippecanoe County. The table for Tippecanoe County is attached and has several conservative assumptions built into it as discussed in the attached table (i.e if one were to actually calculate required pad separations, they would be less than those contained in the Tippecanoe County table); therefore, we would strongly suggest that you adopt the Tippecanoe County table as it was created for the exact purpose of providing pad separation with a freeboard of 1-foot above the 100-year flood elevation as your ordinance describes. For some reason, the values in your ordinance have been unnecessarily inflated. For example, your ordinance states that a pad with a contributing drainage basin of 30-50 acres must be situated 4.25 feet above the invert of the overflow swale path; however, 3 feet of pad separation provides the level of protection required. A separation of 4.25 feet would accommodate a contributing basin area of about 220 acres.

- 3) Your ordinance does not discuss situations when direct release (no detention storage) may be permitted. Attached is an applicable section that is utilized in many Ordinances throughout the State and the following discussion pertains to the discussion that occurred in Tippecanoe County about this section. *The ordinance contains a section that discusses direct release provisions (no detention storage). Within that section, it requires a watershed-wide study to be performed (if one does not already exist) for peak discharges in the stream before and after development and that the modeled stream reach needs to extend from the direct release point to a point downstream with a drainage area at least ten (10) times the drainage area of the proposed development and its offsite contributing drainage area. In other words, if someone is developing a 75-acre site that is adjacent to an existing drainage ditch with an upstream contributing area of 1.5 square miles, that would require them to model to a point until the ditch has a drainage area of at least 15 square miles. Variances to this requirement could be commonly warranted on various levels. First, a variance from performing a model on the stream may be warranted if peak discharge and volume of runoff from the site are the same or smaller after development (which can commonly occur with residential lot sizes of 1/2-3/4 acre or more, especially when the site is currently used for agriculture). If those decreases can be shown, then the stream will benefit. All other offsite and downstream drainage parameters will remain the same in the pre and post-developed condition; therefore, the*

stream discharge must decrease (it cannot increase) and a variance from the watershed study would be warranted. In the event that a watershed study is requested (perhaps to show only a negligible increase in stream discharge), we question the need to extend the study downstream of the site. Modeling the stream to the discharge point will show the effect on the stream. Again, downstream drainage parameters will remain the same in the pre and post-developed condition and may often involve including branches of other streams or tributaries that have nothing to do with the stream adjacent to the site; therefore, a variance from this requirement would be warranted.

- 4) In Tippecanoe County, a water safety committee was formed to look at the design of wet-bottom detention ponds and ways to improve the design to enhance safety. One of the changes involved modifying the pond cross-section for a wet-bottom pond without a fence to remove the safety ledge beneath the water and extend the 6:1 slope to a depth of 6 feet below the normal pool. A copy of their pond cross-section is attached. We would strongly recommend that you adopt this change as well.
- 5) A section in your ordinance requires that a backflow prevention device be provided on pond outlets when they are below the regulatory flood elevation of an adjacent stream. This was discussed in Tippecanoe County and was eliminated because it took away floodplain storage in the pond that could benefit the adjacent stream during flood events and pond storage below the floodplain cannot be credited towards required storage volume for a proposed site, anyway. We would suggest that you make the same change.
- 6) A section in your ordinance requires that if the site does not outlet directly into a County regulated drain, then the project cannot be approved until all owners between the site and a County regulated drain grant a drainage easement for the use of their property. This item was discussed in Tippecanoe County and was eliminated for several reasons as follows. First, this gives a downstream property owner much power and often results in blackmail. Second, in many cases a drainage channel already exists and has been the outlet from the proposed site for many years; therefore, the property owner has a legal right to continue to drain his property in the same direction and to the same channel as it has for many years. Third, the real issue was to develop a discussion between the site owner and downstream owners; therefore, a provision was added that the downstream property owner(s) must be notified of the drainage hearing (example attached). We would strongly suggest that you revise your ordinance in the same manner.
- 7) A section in the ordinance requires submittal of a boundary survey for the subdivision limits. We would like to just clarify that a survey of the boundary of the subdivision or a survey of a larger tract that completely contains the subdivision should be acceptable for meeting this purpose.
- 8) There are several other items that would deserve some discussion in a review committee setting or cases where variances could be commonly warranted. Examples of such items are 30-foot easement requirements for rear yard swales and along the top of bank of ponds, and bedding and backfill requirements for sewers.

As mentioned previously, there are many new ideas in the ordinance (i.e. the majority of the stormwater quality section is new) and we have mentioned a few of the likely variance scenarios above. However, because there are so many new ideas in the ordinance, we would anticipate that other variances may be warranted and we would like to suggest that a comprehensive review of the ordinance be performed after a year or two to address areas of concern.

Again, we would appreciate it if you would take a proactive stance to incorporate our comments into the ordinance and hope that in the future, you will include the surveying, engineering, and development communities in the review of ordinances. If you have any questions, feel free to call us at

May 8, 2005

Boone County Drainage Board

Lebanon, Indiana 46052

Dear Commissioner,

We would like to take this opportunity to express our opinion regarding the recently passed revision of the **Stormwater Management Ordinance of Boone County**. First, we would like to request that, in the future, you form a review committee and include local engineering/surveying practitioners and members of the local development community so that they may have a reasonable opportunity to review proposed ordinances that affect their livelihood and profession and provide comments/feedback on proposed ordinances under your jurisdiction. Tippecanoe County formed a review committee who spent many months in 2004 providing comments that sparked some revisions to their proposed ordinance. Several representatives from their local surveying chapter and several representatives from the development community were actively involved with the review committee and the ordinance benefited from that process. Although, similar reviews were requested in your County, no such review committee was formed and the ordinance was enacted without any substantial review by the local engineering/surveying practitioners or the local development community. Furthermore, even though many comments were made in Tippecanoe County that resulted in changes to their ordinance, similar changes were not made in your ordinance. Apparently, one of the reasons that a review committee was not formed in your County was supposed to be that most, if not all, of the comments and revisions made to the Tippecanoe County ordinance were going to be incorporated into your ordinance.

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Examples of the items of that should be further reviewed in a committee or examples of new ideas and associated variances are as follows:

- 1) The ordinance contains fixed release rates from a site based solely on the size (acreage) of the site and are fixed at 0.3 and 0.5 cfs per acre for a 10-year and 100-year storm, respectively. There are a number of factors that affect the release rate that we consider under the prior ordinance when modeling the release rate from a site such as existing use, ground cover, and slope of the site, to name a few. These factors can have a large influence on the amount of surface runoff that leaves a site, but these fixed release rates

completely ignore those factors. In fact in some cases, those fixed release rates actually permit a LARGER release rate than the prior ordinance; therefore, in those cases, LESS protection against potential downstream drainage and flooding impacts will be provided by this new ordinance. On the other hand, there will be cases, where the fixed release rate constitutes a significant reduction (as much as a 50% reduction or more) in release rate when compared to the prior ordinance. This could constitute a major hardship for a developer or property owner who wishes to divide or make improvements to their property. While we oppose the fundamental idea of proposed fixed “per acre” release rates, we also understand that there is a desire to standardize those rates. In Tippecanoe County, a table of runoff release rates from a site based on a range of runoff curve numbers and the size (acreage) of the site was created based on comments from the surveying/engineering/development community. Since some factors are being ignored in their County, the standardized rates contained in their table would almost always be lower than they might otherwise be if they were calculated including those factors. As a result, there still will be cases when the rate in the table is not practical and a variance would be warranted for a higher release rate. This would probably occur most commonly when dealing with smaller sites, “redeveloped” sites, or sites with rolling or steep terrain.

We would also suggest that a Huff rainfall distribution be utilized instead of the NRCS Type II rainfall distribution. A Huff rainfall distribution is utilized in both Indianapolis and Lafayette because it is believed to be more realistic and it results in lower release rates from sites than the NRCS Type II distribution. The NRCS Type II distribution is more appropriate for determining regulatory floodplains for large watersheds rather than being used to size an outlet structure from a detention pond. This and other rainfall factors should be discussed in a review committee to determine which are most appropriate for your County or at the very least you should consider allowing the Huff distribution to be utilized as an alternate distribution since this was permitted in your prior ordinance. In most cases, pond release rates will be at or below the fixed release rates that you currently have in your new ordinance when modeling a 24-hour storm duration. Should you decide to utilize a Huff distribution, then stormwater quality flowrates should also be based on a Huff distribution rather than NRCS Type II.

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subdivisions; therefore, such elevation difference is likely not necessary between finish floor elevation and the adjacent parking lot in commercial subdivisions.

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- 4) In Tippecanoe County, a water safety committee was formed to look at the design of wet-bottom detention ponds and ways to improve the design to enhance safety. One of the changes involved modifying the pond cross-section for a wet-bottom pond without a fence to remove the safety ledge beneath the water and extend the 6:1 slope to a depth of

6 feet below the normal pool. A copy of their pond cross-section is attached. We would strongly recommend that you adopt this change as well.

- 5) A section in your ordinance requires that a backflow prevention device be provided on pond outlets when they are below the regulatory flood elevation of an adjacent stream. This was discussed in Tippecanoe County and was eliminated because it took away floodplain storage in the pond that could benefit the adjacent stream during flood events and pond storage below the floodplain cannot be credited towards required storage volume for a proposed site, anyway. We would suggest that you make the same change.
- 6) A section in your ordinance requires street inlets to be spaced at intervals of 500 feet or less along the street. Perhaps this could remain as only a guideline, but if it does it should state that the maximum recommended gutter length before reaching a street inlet should be 500 feet or less unless appropriate calculations permit a larger spacing. Other sections in your ordinance spell out specific requirements regarding inlet capacity and “clear lane” widths and these requirements will dictate street inlet spacing; therefore, the 500-foot requirement is unnecessary and should be eliminated. If the street inlets can serve their intended purpose at a different spacing, then there is no need to provide them at a 500-foot or smaller spacing.
- 7) A section in the ordinance requires submittal of a boundary survey for the subdivision limits. We would like to just clarify that a survey of the boundary of the subdivision or a survey of a larger tract that completely contains the subdivision should be acceptable for meeting this purpose.
- 8) There are several other items that would deserve some discussion in a review committee setting or cases would variances could be commonly warranted. Examples of such items are 30-foot easement requirements for rear yard swales and along the top of bank of ponds, and bedding and backfill requirements for sewers.

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Again, we would appreciate it if you would take a proactive stance to incorporate our comments into the ordinance and hope that in the future, you will include the surveying, engineering, and development communities in the review of ordinances. If you have any questions, feel free to call us at

Release rates based on TR-20								
24-hour storm event:								
LAF: Lafayette (NRCS) Rainfall Data with Lafayette (50% Third Quartile Huff--less than 10 sq. mi.) Distribution								
IND: Indianapolis Rainfall Data with 50% Third Quartile Huff (less than 10 sq. mi.) Distribution								
NRCS: Indianapolis Rainfall Data with NRCS Type 2 Distribution								
NRCS-2: NRCS Rainfall Data with NRCS Type 2 Distribution								
Assumes a time of concentration of 60 minutes								
Actual Runoff Rates from TR-20								
2-Year Runoff rates per acre:					Proposed Release Rates:			
CN	LAF	IND	NRCS	NRCS-2	LAF Data			
60	0.052	0.035	0.047	0.073	Curve Number	10-Year	100-Year	
62	0.063	0.042	0.059	0.094				
64	0.075	0.052	0.074	0.120	65 or less	0.08	0.18	
66	0.088	0.063	0.097	0.150	66-69	0.11	0.22	
68	0.101	0.074	0.124	0.183	70-73	0.13	0.26	
70	0.115	0.086	0.153	0.219	74-77	0.16	0.29	
72	0.129	0.099	0.186	0.257	78-81	0.20	0.33	
74	0.144	0.112	0.221	0.297	82-85	0.23	0.36	
76	0.159	0.126	0.259	0.341	86 or more	0.26	0.39	
78	0.175	0.140	0.301	0.388				
80	0.190	0.155	0.344	0.438	IND Data			
82	0.206	0.170	0.391	0.489				
84	0.223	0.185	0.442	0.544	Curve Number	10-Year	100-Year	
86	0.239	0.201	0.494	0.600				
88	0.256	0.217	0.550	0.660	65 or less	0.05	0.15	
90	0.272	0.233	0.608	0.720	66-69	0.07	0.18	
10-Year Runoff Rates per acre:					70-73	0.10	0.22	
					74-77	0.13	0.25	
					78-81	0.16	0.29	
					82-85	0.19	0.32	
CN	LAF	IND	NRCS	NRCS-2	86 or more	0.22	0.35	
60	0.142	0.110	0.186	0.255				
62	0.159	0.126	0.224	0.300	NRCS Data			
64	0.177	0.142	0.265	0.347				
66	0.195	0.158	0.309	0.398	Curve Number	10-Year	100-Year	
68	0.213	0.175	0.355	0.450				
70	0.232	0.192	0.404	0.503	65 or less	0.07	0.27	
72	0.250	0.209	0.455	0.560	66-69	0.13	0.37	
74	0.269	0.227	0.508	0.619	70-73	0.20	0.47	
76	0.288	0.245	0.564	0.679	74-77	0.28	0.58	
78	0.306	0.263	0.622	0.740	78-81	0.36	0.69	
80	0.325	0.280	0.681	0.804	82-85	0.44	0.80	
82	0.344	0.298	0.741	0.868	86 or more	0.50	0.88	
84	0.362	0.316	0.805	0.934				
86	0.379	0.333	0.868	1.001	NRCS-2 Data			
88	0.396	0.350	0.932	1.067				
90	0.411	0.366	0.998	1.133	Curve Number	10-Year	100-Year	
					65 or less	0.14	0.35	
					66-69	0.20	0.46	
					70-73	0.27	0.57	
					74-77	0.35	0.69	
					78-81	0.44	0.81	
					82-85	0.54	0.93	
					86 or more	0.60	1.00	

Pad Elevations with respect to emergency route elevation			
unless otherwise evaluated:			
Drainage area	Pad elevation		Minimum Required
(acres)	(feet)		easement width--swale
			(feet)
	Swale	Street	
up to 3	1.5	1.25	12
3-8	2.0	1.25	12
8-25	2.5	1.5	15
25-55	3.0	1.5	18
55-100	3.5	1.75	21
over 100	to be evaluated		

Pad elevations are based on 1-foot of freeboard above elevation in channel using a grassed ($n=0.035$) triangular channel section with 3:1 side slopes and the difference in runoff between a 10-year and 100-year storm for a runoff coefficient of 0.45 and a time of concentration of 20 minutes. This analysis has the following safety factors built into it: (1) The storm sewer and inlets likely carry runoff from a 50-100 year storm when ponding depths reach the values that generate the use of the emergency channel. This analysis assumes storm sewer and inlets carry a 10-year storm (2) Some emergency routes will likely have cross sections that carry more capacity than a triangular section with 3:1 side slopes; (3) Ponding and storage of runoff is occurring in these conditions; however, it has been neglected in this analysis.

(4) Particularly for large drainage basins, such as those being 25 acres or larger, a 20 minute time of concentration is likely an underestimate of the actual time of concentration (5) The runoff rates utilized are based on the Rational Method and have used a relatively high runoff coefficient of 0.45 (about 45% impervious)--most typical subdivisions would have a smaller impervious coverage. (6) Generally, runoff rates produced by the Rational Method tend to be slightly larger than runoff rates generated by programs such as TR-20.

iii. Exemptions for Detention Requirements

Detention will not be required for the following:

- a. Land alterations where the primary basis on which a stormwater drainage permit is required is the construction, enlargement, or location (on a permanent foundation) of a one-family dwelling, two-family dwelling, or accessory structure appurtenant to either a one- or two-family dwelling.
- b. Approved fill areas or one-time additions to existing commercial buildings that do not increase the amount of impervious area on-site by more than a total of 0.5 acres, provided the existing runoff patterns and flow capacity of the property will not be altered by the filling operations.
- c. Notwithstanding the provisions of Section ii (downstream restrictions), those site developments where the stormwater management system has been designed such that:
 - I. after combining flows from both the off-site and on-site drainage areas, there will be no increase in the total peak discharge from the developed site during the 2-, 10-, or 100-year storm events; and
 - II. the volume of runoff for each project site outlet has not been increased for the entire range of storm events, up to the 100-year storm event; and
 - III. the flow width and velocity at the property boundary line for each subbasin is less than or equal to that flow width and velocity which existed prior to the development (for the entire range of storm events, up to the 100-year storm event).
- d. Where the direct release of runoff from the proposed development meets the conditions set forth in Section iv (below).

iv. Direct Release Provisions

It is the policy of the Tippecanoe County Drainage Board to allow the direct release (no detention) of runoff from a proposed development to an adjacent stream with more than 100 square miles of contributing drainage area at the direct release point. Therefore, direct release may be allowed for parcels adjacent to the following stream reaches in Tippecanoe County:

1. Wabash River – the entire reach within the County
2. Tippecanoe River – the entire reach within the County
3. Wildcat Creek – the entire reach within the County
4. South Fork Wildcat Creek – the entire reach within the County
5. Middle Fork Wildcat Creek – the entire reach within the County
6. Wea Creek – downstream of Dismal Ditch (a.k.a. Kenny Ditch)

Due to unknowns regarding the future development patterns and the associated proposed stormwater management systems within a watershed, it is the policy of the Tippecanoe County Drainage Board to discourage direct release to a stream with less than 100 square miles of contributing drainage area at the direct release point. However, in rare circumstances, where a comprehensive watershed-wide hydrologic study or watershed plan of a major stream adopted by the Tippecanoe County Drainage Board substantiates the benefits of (or allows for) direct release for a proposed development located adjacent to a major stream, the detention requirements set in Section i (above) may be waived.

In substantiating the potential benefits of direct release, the watershed-wide hydrologic study provided by the applicant must demonstrate that the peak discharge associated with 2-year, 10-

year, and 100-year precipitation events would not increase along the receiving stream. At a minimum, the stream reach to be examined needs to extend from the direct release point to a point downstream with a drainage area at least ten (10) times the drainage area of the proposed development and its off-site contributing drainage area. The required analyses must be done both for the existing land use and future potential land use (developed conditions) in the watersheds involved.

To be applicable to the development site, the sub-basin sizes for the watershed-wide hydrologic analyses of the major stream (including the sub-basin area containing the proposed development and its off-site contributing areas) must be generally uniform (between 0.5 and 2.0 times the average sub-basin size). Furthermore, the maximum size of the sub-basin area containing the proposed development and its off-site contributing areas should not exceed 5.0 times the area of the proposed development.

NOTICE TO INTERESTED PARTIES

XXXXXXXXXX COUNTY

DRAINAGE BOARD

Notice is hereby given that the XXXXXXXXX County Drainage Board, on the 5th day of March 2003, at 10:00 a.m. in the COUNTY OFFICE BUILDING at Street Address, City, Indiana will hold a public hearing on the final drainage approval for:

NAME OF SUBDIVISION OR PROJECT

The proposed residential development involves approximately 17.1 acres located in Section X, Township 24 North, Range 3 West, XXXXXXX Township, XXXXXXX County, Indiana.

Name of Owner/Engineer/Surveyor

INTERESTED PERSONS

Indicate names and addresses of owners of property and the COUNTY AUDITOR'S KEY NUMBER of that property for landowners downstream of the subject property prior to reaching a regulated drain or natural waterway.

KEY NUMBER

NAME & ADDRESS

List Key/Parcel Number

List Name and Address

xxxxxxxxxx County Drainage Board
County Office Building
Street Address, City, State
Phone Number

AFFIDAVIT OF NOTICE TO INTERESTED PARTIES

STATE OF INDIANA)
) SS:
COUNTY OF xxxxxxxxxxxxxx)

The undersigned does hereby certify that notice of public hearing by the xxxxxxxxx County Drainage Board, to consider Name of Subdivision or Project was certified and mailed to the last known address of each of the following persons owning property immediately downstream (prior to reaching a regulated drain or natural waterway) from the subject property.

OWNERS	ADDRESSES
(See Attached List)	

and that said notices were sent by certified mail on or before the 28th day of February, 2003, being at least five (5) days prior to the date of the public hearing in Lafayette, Indiana, at 10 AM.

Name of Owner/Engineer/Surveyor

STATE OF INDIANA)
) SS:
COUNTY OF xxxxxxxxxxxxxx)

Subscribed and sworn to before me this 26th day of February, 2003.

Name of Notary Public

My Commission Expires:
Resident of xxxxxxxxx County.