



Tecumseh Chapter of the Indiana Society of Professional Land Surveyors  
309 Columbia Street, Suite 101 Lafayette, Indiana 47901

2003-2005 OFFICERS:

President: Patrick N. Cunningham, R.L.S.  
Vice President: Roger A. Fine, R.L.S.  
Secretary-Treasurer: Timothy A. Beyer, P.E., R.L.S.

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Timothy A. Beyer, P.E., R.L.S., Co-Chairman

Roger A. Fine, R.L.S., Co-Chairman

Members:

David N. Ayala, R.L.S.  
James A. Butcher, R.L.S.  
Robert W. Gross, R.L.S.  
John C. Nagy, R.L.S.

February 14, 2005

KD Benson  
Tippecanoe County Drainage Board  
20 North Third Street  
Lafayette, Indiana 47901

Dear KD,

We would like to take this opportunity to express our opinion regarding the proposed revision of the **Comprehensive Stormwater Management Ordinance of Tippecanoe County**. First, we would like to thank you for the opportunity to serve on the review committee who spent many months in 2004 providing comments that sparked some revisions to the proposed ordinance. Several representatives from our local surveying chapter and several representatives from the development community were actively involved with the review committee and we ultimately feel that the ordinance benefited from that process. Unfortunately, similar reviews were requested in several other Counties, but those requests fell on deaf ears and their Ordinances are in the process of being enacted without any review by the local engineering/surveying practitioners or the local development community.

Regarding the proposed Ordinance, 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 that, while we will make every effort to comply with these new ideas, there will, occasionally, be cases where strict application of those ideas is not practical and a variance would be warranted.

Examples of these new ideas and associated variances are as follows:

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- 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, local engineers, surveyors, and developers felt that a variable width easement (ranging from 10-12 feet 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.
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Respectfully yours,

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February 14, 2005

Ruth Shedd  
Tippecanoe County Drainage Board  
20 North Third Street  
Lafayette, Indiana 47901

Dear Ruth,

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February 14, 2005

John Knochel  
Tippecanoe County Drainage Board  
20 North Third Street  
Lafayette, Indiana 47901

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John C. Nagy, R.L.S.

February 14, 2005

Opal Kuhl  
City of Lafayette Engineer  
20 North Sixth Street  
Lafayette, Indiana 47901

Dear Opal,

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February 14, 2005

David Buck  
City of West Lafayette Engineer  
609 West Navajo Street  
West Lafayette, Indiana 47906

Dear David,

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Dayton Town Council  
721 Walnut Street  
Dayton, Indiana 47941

Dear Town Council Member,

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release rate from a site. This proposed table ignores those factors. 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. As you might imagine, since some factors are being ignored, the standardized rates contained in the table would almost always be lower than they might otherwise be if they were calculated including those factors. As a result, there 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.

- 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, local engineers, surveyors, and developers felt that a variable width easement (ranging from 10-12 feet 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.
- 3) 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. In our opinion, 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.

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 appreciate the proactive stance taken to incorporate our comments into the review process of the ordinance and hope that will continue in the coming years. If you have any questions, feel free to call Tim at 742-6479 or Roger at 448-1535

Respectfully yours,

Timothy A. Beyer, Co-Chairman

Roger A. Fine, Co-Chairman



Tecumseh Chapter of the Indiana Society of Professional Land Surveyors  
309 Columbia Street, Suite 101 Lafayette, Indiana 47901

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February 14, 2005

Battle Ground Town Council  
100 College Street  
Battle Ground, Indiana 47920

Dear Town Council Member,

We would like to take this opportunity to express our opinion regarding the proposed revision of the **Comprehensive Stormwater Management Ordinance of the Town of Battle Ground**. First, we would like to thank you for the opportunity to serve on the review committee who spent many months in 2004 providing comments that sparked some revisions to the proposed ordinance. Several representatives from our local surveying chapter and several representatives from the development community were actively involved with the review committee and we ultimately feel that the ordinance benefited from that process. Unfortunately, similar reviews were requested in several other Counties, but those requests fell on deaf ears and their Ordinances are in the process of being enacted without any review by the local engineering/surveying practitioners or the local development community.

Regarding the proposed Ordinance, 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 that, while we will make every effort to comply with these new ideas, there will, occasionally, be cases where strict application of those ideas is not practical and a variance would be warranted.

Examples of these new ideas and associated variances are as follows:

- 1) The ordinance contains a table of runoff release rates from a site based solely on a range of runoff curve numbers and the size (acreage) of the site. There are other factors that affect the release rate that we consider under the current ordinance when modeling the

release rate from a site. This proposed table ignores those factors. 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. As you might imagine, since some factors are being ignored, the standardized rates contained in the table would almost always be lower than they might otherwise be if they were calculated including those factors. As a result, there 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.

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