

## **Home Builders Associations of Southeastern Pennsylvania**

HBA of Bucks & Montgomery Counties  
721 Dresher Road #1200  
Horsham, PA 19044  
(215) 657-1300

HBA of Chester & Delaware Counties  
1502 McDaniel Drive  
West Chester, PA 19380  
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### **MEMORANDUM**

**To:** HBA Membership

**From:** Craig Poff, MJJ Investments  
HBA of Chester & Delaware Counties

Steve Yates, Del Val Soil & Environmental  
HBA of Bucks & Montgomery Counties

**Date:** December 10, 2007

**Subj:** Onlot Sewage Planning Issues

Over the course of the past couple years, the Home Builders Association has been responding to member concerns with the onlot sewage planning process in southeastern Pennsylvania. With the aid of several builder-, engineer- & attorney-members, the HBA has sought to ensure a fair & reasonable regulatory process.

On September 27, 2007, representatives of the Home Builders Associations of Southeastern Pennsylvania met with personnel from DEP's Central & Southeast Regional offices to discuss the region's implementation of onlot sewage planning regulations & policies. In particular, the HBA presented concerns with various regional policies that our organization felt exceeded or conflicted with regulatory requirements. And, as a direct result of your association's involvement, several positive policy changes have been achieved.

A complete letter from the Department dated November 20<sup>th</sup> can be viewed on the Government Affairs section of the association's website (Bucks/Montgomery: [www.HBAHomes.com](http://www.HBAHomes.com); Chester/Delaware: [www.BuilderPA.com](http://www.BuilderPA.com)). However, the following list itemizes some of the agreements reached by the group on the re-statement and/or change in Department sewage planning policy within the SERO.

- For onlot sewage planning purposes, one EDU equals one house; EDU values will no longer be calculated based upon number of bedrooms
- SERO will no longer require technology, sewage flows or bedroom requirements during planning
- SERO will not require revised planning modules for changes in the number of bedrooms sought during permitting
- Municipalities can select from one of the four available options to provide long-term sewage facilities (versus mandating only the use of O&M Agreements) with reasonable justification

MORE...

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- SERO may accept draft (versus executed) O&M agreements for Department-issued permits in the planning module package
- Valid PNDI determinations are “frozen” during the life of the planning module review process as long as the PNDI is not expired when the initial planning module submission is made to the PA DEP
- PNDI conflicts are determined by the response received from the responsible agency not the preliminary determination
- Preliminary hydrogeologic evaluations are triggered when a subdivision proposes more than 50 LOTS with density of more than ONE LOT PER ACRE versus density calculations based upon EDU values and number of bedrooms
- When conducting preliminary hydrogeologic evaluations, a flow of 262.5 gallons per house will be used regardless of proposed number of bedroom

In many ways, the HBA has been successful in revising DEP SERO policies that were incorrectly reducing density and/or limiting the number of available lots. This action should translate into lower costs & higher unit volume for local builders.

If you have any questions, please feel free to contact the association office, or Mark Mitman directly at [mark@mitman-group.com](mailto:mark@mitman-group.com).

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