

Top Ten list of causes for deficient planning submissions, not in any particular order:

10. Public notification is not included or does not meet the requirements of the regulations (71.53(d)(6))/planning module instructions. There are specific items that need to be presented in the public notice and many times, they are not.
9. Incomplete Project Narrative or Alternative Analysis. It is important to answer the questions in the instructions. It is not enough to select an alternative, a full discussion of other alternatives needs to be included. Available public sewers requires minimal alternative response, however there are items in the instructions that need to be addressed, such as a description of the surrounding properties.
8. PNDI results and/or clearances are not included, have expired or are not complete. It is important that the PNDI search cover the project boundary area, not a pin point in the center of the property.
7. Municipal assurances for long-term sewage facilities for marginal sites are not included or are inadequate (for example- include Operation and Maintenance Agreements or Sewage Management Ordinances)
6. Plot plan deficiencies - Not all of the information is included on the plot plan. Each planning module specifically lists what is required to be shown on the plan. Frequently, soils testing information or connections to existing sewers are not shown. Show existing conditions as well as new conditions, plot boundary, ROW, sewer connection plan, etc. The sewer connection to the STP is supposed to either be shown on the plot plan, USGS map, or described clearly in the narrative. Not showing or incorrectly showing wetlands are a big problem.
5. Completed and signed Site Investigation and Percolation Test Results for each test pit/percolation test are not provided. Must use DEP field Sheets. All results need to be submitted and identified on the map. We generally get 'selective' results- this is not acceptable.
4. Chapter 94 Certification sections are incomplete (table, signatures) or do not include Connection Management Plans, where appropriate. For hydraulically overloaded or projected-overload facilities, connections are managed by the township through the CMP and these tables need to accompany all planning submissions to show that the project is being allowed by the Twp. Because the Twp manages the connections, they can make changes to these tables at any time, which is why we need to see the table with every submission.
3. Inconsistencies between information presented in Project Narrative, Alternative Analysis, Plot Plan and Planning Module form.
2. No evidence that the municipality considered the comments of reviewing agencies (municipal and county planning commission, county health department) prior to adoption. The municipality must respond to all comments in the Component 4 forms, in writing, to the commenting agency with a copy included in the planning module, prior to adoption.
1. Premature Adoption. The municipality adopts the planning module as a revision to their 537 Plan before any of the Component 4 forms are completed or permittees of sewer system have certified capacity. Townships may not adopt planning modules before sewer capacity certification is received.

We have one additional issue, raised to us by some townships, which presents a problem. Developers forcing townships to adopt and submit incomplete planning modules.