Delaware County Planning Department
and
Delaware County Regional Water Quality Control Authority

Delaware County
Act 537 Update for the Eastern Service Area

DRAFT
Plan of Action

May 23, 2011

1400 Weston Way
P.O. Box 2653
West Chester, PA 19380
1. INTRODUCTION

1.1 BACKGROUND

Delaware County Planning Department (DCPD) in conjunction with Delaware County Regional Water Quality Control Authority (DELCORA) and Weston Solutions, Inc. (WESTON), herein after referred to as the Planning Team, have developed a Project Plan of Action to complete the Delaware County Act 537 Update for the Eastern Service Area which follows DEP’s “Guide for Preparing Act 537 Update Revisions” (Document 362-0300-003, January 7, 2003). Throughout the Plan of Action, the term “Planning Team” will refer to DCPD and its partners; when referring to specific partners, the plan will refer to DCPD, DELCORA, or WESTON by name. This Project Plan of Action defines the key elements necessary to successfully complete the Plan Update in a timely manner and on budget. The Project Plan of Action is also structured for Act 537 Sewage Facility Planning Grants eligibility.

The wastewater flows generated in the DELCORA Eastern Service Area have been treated at the City of Philadelphia’s Southwest Water pollution Control Plant (PSWPCP) for over 30 years. The agreement with the Philadelphia Water Department (PWD) that allowed this treatment has expired (see attached letter from the Philadelphia Water Department dated 25 April 2007). DELCORA is commencing planning efforts to evaluate all options for treating wastewater in the study area. Preliminary studies for wastewater treatment indicate there are currently three viable options for treating wastewater from eastern Delaware County: (1) continued treatment at the PSWPCP, (2) treatment at an expanded Western Regional Treatment Plant (WRTP) in Chester, or (3) construct a new Eastern Regional Treatment Plant (ERTP) with discharge to the Delaware River.

DELCORA manages wastewater from 27 municipalities in eastern Delaware County. The sources in the Eastern Service Area currently flow through DELCORA collection systems and pump stations to the PSWPCP. Two additional municipalities (Millbourne and East Lansdowne) flow directly to the PSWPCP. The area flowing directly to the PSWPCP has been designated as the Cobbs Creek Service Area. Additionally, Tredyffrin and Easttown Townships, located in Chester County, contribute some flow to the collection system, and are included in this plan. The areas under evaluation for this plan are Central Delaware County Authority (CDCA), Muckinipates Authority (MA), Darby Creek Joint Authority (DCJA), Radnor-Haverford-Marple (RHM) sewer authority, and the Cobbs Creek Service Area. Flows from these areas arrive via gravity flow at three DELCORA owned and operated pump stations: Central Delaware County Pumping Station (CDCPS), Muckinipates Pumping Station (MPS), and Darby Creek Pumping Station (DCPS). All flow from the Cobbs Creek Service Area drains to the Cobbs Creek Pumping Station and is conveyed to the PSWPCP for treatment. A Planning Area Map for the study area for this Plan Update is attached to this Plan of Action as Appendix A, and includes the following municipalities:

1. Aldan
2. Clifton Heights
3. Collingdale Borough
4. Colwyn Borough
5. Darby Borough
6. Darby Township
7. East Lansdowne Borough*
8. Edgmont Township
9. Folcroft Borough
10. Glenolden Borough
11. Haverford Township
12. Lansdowne Borough
13. Marple Township
14. Millbourne Borough*
15. Morton Borough
16. Newtown Township
17. Nether Providence Borough
18. Norwood Borough
19. Prospect Park Borough
20. Radnor Township
21. Ridley Township
22. Ridley Park Borough
23. Rutledge Borough
24. Sharon Hill
25. Springfield Township
26. Swarthmore Borough
27. Upper Providence Township
28. Upper Darby Township
29. Yeadon Borough
30. Tredyffrin Township, Chester County
31. Easttown Township, Chester County
* Flow directly to PSWPCP

As the host community and location of the WRTP, the City of Chester will be included in the review and approval process for this Act 537 Plan. Tredyffrin and Easttown Townships in Chester County contribute some flow to the RHM, and will be included in the plan.

1.2 APPROACH

To develop the plan, the following tasks will be completed:

- Meet with DEP at the Southeast Regional Office in Norristown, PA;
- Develop a Plan of Action and Task/Activity Report Cost Estimate;
- Obtain municipal resolutions authorizing DCPD to prepare the Plan Update on behalf of each municipality;
- Prepare a draft plan that includes data collection; needs identification; alternatives development, analysis, and review; and recommendations with an implementation schedule;
- Prepare an Environmental Report using the Uniform Environmental Review Process (necessary for DEP funding);
• Publish a draft plan for review by the municipalities, DEP, PA Historical & Museum Commission, PA Natural Diversity Inventory, and the public;
• Present the draft plan to the public at one public meeting held in the service area;
• Prepare a final plan that incorporates relevant comments received on the draft and then prepare a comment/response document for submission to DEP; and,
• Publish a final plan for municipal adoption and subsequent submission to DEP for approval
• Obtain final municipal resolutions adopting the plan;
• Submit to PADEP for approval.

A planning team has been assembled comprised of staff from DCPD and DELCORA. In addition, a steering committee comprised of representatives of the municipal authorities within the study area will meet periodically and receive Plan Updates and draft sections for review as the plan is developed. Weston Solutions, Inc. (WESTON®) has been contracted to provide assistance to DCPD and DELCORA in the planning, preparation, and submittal of this Delaware County Act 537 Update for the Eastern Service Area.

2. ACT 537 PLAN UPDATE PLAN OF ACTION

The scope of this project will be to prepare a Sewage Facilities Plan Update for the areas served by the RHM, CDCA, MA, DCJA, and Upper Darby, Millbourne, and East Lansdowne in the Cobbs Creek Service Area. WESTON has developed this scope of work following the PADEP Guidelines and requirements to facilitate specific sewage facility planning cost reimbursement for eligible expenses under the 50 percent planning grant available from PADEP. The planning elements which may be eligible for an Act 537 planning grant are listed in the “Act 537 Plan Content and Environmental Assessment Checklist” (Document 3800-FM-WSFR0003, September 2005) and “Recognition of Selected Cost Items Associated with ‘Inflow and Infiltration Studies’ (I&I) as Planning Costs Considered for Sewage Facility Planning Grants” (Document 362-5512-003, December 2, 2002).

The following scope of work for stage one is presented in three phases corresponding to the primary focus of each phase:

Phase 1 – Planning and Funding.
Phase 2 – Plan Preparation.
Phase 3 – Plan Adoption.

2.1 PHASE 1 – PLANNING AND FUNDING

2.1.1 Develop Plan of Action for Act 537 Sewage Facilities Plan Update

The initial step in the process is the development of a Plan of Action for the Act 537 Update. A “Task/Activity Report” cost estimate for completion of each of the required planning elements will be prepared. This cost estimate will be submitted to DEP by DCPD, and will become the basis for DEP ultimately reimbursing DCPD and DELCORA 50 percent of the cost to prepare
the sewage facilities plan. This report of planning activities must be completed for all Act 537 Official Sewage Planning proposals, and it is a regulatory requirement for eventual planning grant eligibility. The purpose of this report is to provide DEP, DCPD, and DELCORA with a record of the specific activities, from the Act 537 Plan Content and Environmental Assessment Checklist, to be included in DCPD’s plan and the cost/time estimates to complete each activity.

In addition to the Task/Activity Report, a narrative and map of the planning area have been prepared for submittal to DEP. The narrative provides an overview of the proposed sewage planning project. The narrative also details the approach and methods which will be used to satisfactorily address the major planning elements found in DEP’s Act 537 Plan Content and Environmental Assessment Checklist.

2.1.2 Meeting with DEP

WESTON requested a meeting with PADEP’s Southeast Regional Office in which DCPD, DELCORA, WESTON, and PADEP will formally establish the required content of the sewage facilities Plan Update. The “Act 537 Plan Content and Environmental Assessment Checklist” is used to establish the specific planning elements which must be included in the plan.

2.2 PHASE 2 - PLAN PREPARATION

The following tasks correspond to the major planning elements listed in the “General Plan” section of the Act 537 Plan Content and Environmental Assessment Checklist. The Planning Team will use the data collected for the Eastern Delaware County Sewage Facility Plan Update to the maximum extent possible. In this Phase the Planning Team will:

- Prepare a Draft Plan and publish 70 copies for review by the municipalities, PADEP, PA Historical & Museum Commission, PA Natural Diversity Inventory, and the public.
- Present the draft plan to the public at a public meeting held in eastern Delaware County.
- Prepare the final plan that incorporates relevant comments received on the draft and the preparation of a comment response document for submission to PADEP.

The Delaware County Planning Department (DCPD) will submit the draft of the plan to the municipal planning agencies for comment. Comments received from any of the preceding agencies will be included with the submission to PADEP along with responses to these comments from the planning team. Evidence that the official plan has been before these agencies for 60 days without comment is sufficient to satisfy this requirement. Also, if no comments on the plan were received or made by the previously-mentioned planning agencies, a statement reflecting this fact will accompany the official plan submitted to PADEP.

The Planning Team will advertise a Public Notice and comment period (required as part of the Plan Update process). The public notice must appear at least once in a newspaper of general circulation in the legal notice section.

Once the Plan Update is adopted, the Planning Team will submit it to PADEP for review and approval. PADEP normally will review and act upon a complete sewage facilities Plan Update within 120 days of receipt. Once PADEP approves the plan, an application for planning grant
reimbursement of 50 percent of the DCPD and DELCORA’s costs associated with Plan preparation will be submitted to PADEP by DCPD and DELCORA. WESTON will assist DCPD and DELCORA in the applications for reimbursement by providing necessary invoice and cost data.

The following tasks are listed in the General Plan Content Checklist: however, the Planning Team does not believe that all items listed are necessary. Unnecessary items are denoted “Not Applicable.”

2.2.1 Task 1: Previous Wastewater Planning

The Plan will identify, describe, and briefly analyze past wastewater planning for its impact on the current planning effort.

2.2.2 Task 2: Physical and Demographic Analysis

The Plan Update will include a physical and demographic analysis using written description and mapping of the following items:

A. Identification of planning area, municipal boundaries, and sewer authority/management agency service area boundaries.

B. Identification of physical characteristics (streams, lakes, impoundments, natural conveyance, channels, and drainage basins in the planning area).

C. Soils – Not Applicable. There are no known planned connections to the public sewer system from existing on-lot systems within the planning area. Soils analysis was not required in the previous Act 537 Plan.

D. Geologic Features – Not Applicable.

E. Topography – Not Applicable.

F. Potable Water Supplies – Not Applicable.

G. Wetlands – Identify wetlands as defined in Title 25, Chapter 105 by description, and mapping.

2.2.3 Task 3: Existing Sewage Facilities in the Planning Area

A. The Planning Team will identify, map and describe municipal and non-municipal, individual, and community sewerage systems in the planning area including:

1. Location, size, and ownership of treatment facilities; main intercepting lines; and pumping stations and force mains, including their size, capacity, point of discharge. The name of the receiving stream, drainage basin, and the facility’s effluent discharge requirements will also be included.

2. A narrative and schematic diagram of the facility’s basic treatment processes, including the facility’s NPDES permitted capacity, and the Clean Streams Law permit number.

3. A description of problems with existing facilities (collection, conveyance and/or treatment), including existing or projected overload under Title 25, Chapter 94 (relating
4. Details of scheduled or in-progress upgrading or expansion of treatment facilities and the anticipated completion date of the improvements. Discuss any remaining reserve capacity and the policy concerning the allocation of reserve capacity. Also discuss the compatibility of the rate of growth to existing and proposed wastewater treatment facilities.

5. A detailed description of the municipality’s operation and maintenance requirements for small flow treatment facility systems, including the status of past and present compliance with these requirements and any other requirements relating to sewage management programs.

B. The Planning Team will identify wastewater sludge and septage generation, transport, and disposal methods. This information will be in the sewage facilities alternative analysis including:

1. Location of sources of wastewater sludge or septage (Septic tanks, holding tanks, wastewater treatment facilities).

2. Quantities of the types of sludges or septage generated.

3. Present disposal methods, locations, capacities and transportation methods.


5. A comparison of the types of on-lot sewage systems – Not Applicable.

6. An individual water supply survey – Not Applicable.

7. Detailed description of operation and maintenance requirements – Not Applicable.

C. The Plan Update will identify wastewater sludge and septage generation, transport, and disposal methods. The following information in the sewage facilities alternative analysis will include:

1. Location of sources of wastewater sludge or septage (septic tanks, holding tanks, wastewater treatment facilities).

2. Quantities of the types of sludges or septage generated.

3. Present disposal methods, locations, capacities and transportation methods.

**2.2.4 Task 4: Future Growth and Land Development**

A. The Plan Update will identify and briefly summarize all municipal and county planning documents adopted pursuant to the Pennsylvania Municipalities Planning Code (Act 247) including:

1. All land use plans and zoning maps that identify residential, commercial, industrial, agricultural, recreational, and open space areas.

2. Zoning or subdivision regulations that establish lot sizes predicated on sewage disposal methods.
3. All limitations and plans related to floodplain and stormwater management and special protection (Ch. 93) areas.

B. The Plan Update will delineate and describe the following through map, text, and analysis.

1. Areas with existing development or plotted subdivisions. The name, location, description, total number of EDU’s in development, total number of EDU’s currently developed and total number of EDU’s remaining to be developed will be included as well as the time schedule for EDU’s remaining to be developed.

2. Land use designations established under the Pennsylvania Municipalities Planning Code (35 P.S. 10101-11202), including residential, commercial and industrial areas. Include a comparison of proposed land use as allowed by zoning and existing sewage facility planning.

3. Future growth areas with population and EDU projections for these areas using historical, current and future population figures, and projections of the municipality. Discuss and evaluate discrepancies between local, county, state and federal projections as they relate to sewage facilities.

4. Zoning and/or subdivision regulations; local, county or regional comprehensive plans; and existing plans of any other agency relating to the development, use and protection of land and water resources with special attention to:
   - Public, ground, and surface water supplies.
   - Recreational water use areas.
   - Groundwater recharges areas.
   - Industrial water usage.
   - Wetlands.

5. Sewage planning necessary to provide adequate wastewater treatment for five and ten year future planning periods based on projected growth of existing and proposed wastewater collection and treatment facilities.

2.2.5 Task 5: Identify Alternatives to Provide New or Improved Wastewater Disposal Facilities

A. The Plan Update will identify conventional collection, conveyance, treatment, and discharge alternatives including:

1. Diverting flow, largely through existing infrastructure, for treatment at the WRTP.

2. Constructing a new Eastern Regional Treatment Plant to treat wastewater from the RHM, the CDCA, the MA, the DCJA, and the Cobbs Creek Service Area.

3. The potential for the continued use of existing municipal sewage facilities through one or more of the following:
   - Repair.
   - Upgrading.
   - Reduction of hydraulic or organic loading to existing facilities.
   - Improved operation and maintenance.
   - Other applicable actions that will resolve or abate the identified problems.
4. Repair or replacement of existing collection and conveyance system components.
5. The need for construction of new community sewage systems including sewer systems and/or treatment facilities.
6. Use of innovative/alternative methods of collection/conveyance to serve needs areas using existing wastewater treatment facilities.

B. The use of individual sewage disposal systems – Not Applicable in this urban environment.

C. The use of small flow sewage treatment facilities or package treatment facilities – Not Applicable in this urban environment.

D. The use of community land disposal alternatives – Not Applicable.

E. The use of retaining tank alternatives on a temporary or permanent basis – Not Applicable.

F. Sewage Management Programs – Not Applicable.

G. Non-structural comprehensive planning alternatives – Not Applicable.

H. The Plan Update will consider a no-action alternative which includes discussion of both short-term and long-term impacts on:
   1. Water Quality/Public Health.
   2. Growth potential (residential, commercial, industrial).
   3. Community economic conditions.
   4. Recreational opportunities.
   5. Drinking water sources.
   6. Other environmental concerns.

2.2.6 Task 6: Evaluation of Alternatives

A. This Act 537 Plan Update will evaluate technically feasible alternatives identified for consistency with respect to the following:
   1. Applicable plans developed and approved under Sections 4 and 5 of the Clean Streams Law or Section 208 of the Clean Water Act (33 U.S.C.A. 1288).
   2. Municipal wasteload management Corrective Action Plans or Annual Reports developed under PA Code, Title 25, Chapter 94. The recent Wasteload Management (Chapter 94) Reports for DELCORA and nearby facilities will be examined to determine if the proposed alternative is consistent with the recommendations and findings of the reports.
   4. Comprehensive plans developed under the Pennslyvania Municipalities Planning Code. The municipal comprehensive plans will be examined to assure that the proposed wastewater disposal alternative is consistent with land use and all other requirements stated in the comprehensive plans.
5. Anti-degradation requirements as contained in PA Code, Title 25, Chapters 93, 95 and 102 (relating to water quality standards, wastewater treatment requirements and erosion control) and the Clean Water Act.


8. County Stormwater Management Plans approved by PADEP under the Storm Water Management Act (32 P.S. 680.1-680.17). Conflicts created by the implementation of the proposed wastewater alternative and the existing recommendations for the management of stormwater in the county Stormwater Management Plan must be evaluated and mitigated. If no plan exists, no conflict exists.

9. Wetland Protection. Using wetland mapping developed under Checklist Section II.G, identify and discuss mitigative measures including the need to obtain permits for any encroachments on wetlands from the construction or operation of any proposed wastewater facilities.

10. Protection of rare, endangered or threatened plant and animal species as identified by the Pennsylvania Natural Diversity Inventory (PNDI). WESTON will prepare and submit the Request for PNDI Search document and provide a copy of the response letter from the Department of Conservation and Natural Resources’ Bureau of Forestry regarding the findings of the PNDI search.

11. Historical and archaeological resource protection under P.C.S. Title 37, Section 507 relating to cooperation by public officials with the Pennsylvania Historical and Museum Commission. A Cultural Resource Notice request of the Bureau of Historic Preservation (BHP) to provide a listing of known historical sites and potential impacts on known archaeological and historical sites will be prepared and submitted. A copy of the response letter from the BHP will be included in the final version of the Plan Update for submission to PADEP.

B. The Plan Update will provide for the resolution of any inconsistencies in any of the points identified above by submitting a letter from the appropriate agency stating that the agency has received, reviewed, and concurred with the resolution of identified inconsistencies.

C. The Plan Update will contain an evaluation of alternatives identified with respect to applicable water quality standards, effluent limitations or other technical, legislative or legal requirements.

D. The Plan Update will contain cost estimates using present worth analysis for construction, financing, on-going administration, operation and maintenance, and user fees for alternatives identified. Estimates shall be limited to areas identified in the plan as needing improved sewage facilities within five years from the date of plan submission.

E. The Plan Update will contain an analysis of the funding methods available to finance the proposed alternatives evaluated including documentation to demonstrate which alternative
and financing scheme combination is the most cost effective. A contingency financial plan to be used if the preferred method of financing cannot be implemented. The funding analysis shall be limited to areas identified in the plan as needing improved sewage facilities within five years from the date of the plan submission.

F. The Plan Update will include an evaluation of the need for immediate or phased implementation of each alternative proposed including:

1. A description of any activities necessary to abate critical public health hazards pending completion of sewage facilities or implementation of sewage management programs.
2. A description of the advantages, if any, in phasing construction of the facilities or implementation of a sewage management program justifying time schedules for each phase.

G. The Plan Update will include an evaluation of administrative organizations and legal authority necessary for plan implementation.

2.2.7 Task 7: Institutional Evaluation

A. The Plan Update will prepare a summary of DELCORA’s past actions and present performance including:

1. Financial and debt status.
2. Available staff and administrative resources.
3. Existing legal authority to:
   - Implement wastewater planning recommendations.
   - Implement system-wide operation and maintenance activities.
   - Set user fees and take purchasing actions.
   - Take enforcement actions against ordinance violators.
   - Negotiate agreements with other parties.
   - Raise capital for construction and operation and maintenance of facilities.

B. The Plan Update will prepare an analysis and description of the various institutional alternatives necessary to implement the proposed technical alternatives including:

1. Need for new municipal departments or municipal authorities.
2. Functions of existing and proposed organizations (sewer authorities, on-lot maintenance agencies, etc.).
3. Cost of administration, implementability, and the capability of the authority/agency to react to future needs.

C. The Plan Update will describe all necessary administrative and legal activities to be completed and adopted to ensure the implementation of the recommended alternative including:

1. Incorporation of authorities or agencies.
2. Development of all required ordinances, regulations, standards and inter-municipal agreements.
3. Description of activities to provide rights-of-way, easements, and land transfers.
4. Adoption of other municipal sewage facilities plans.
5. Any other legal documents.
6. Dates or timeframes for items 1-5 above on the project’s implementation schedule.

D. The Plan Update will identify the proposed institutional alternative for implementing the chosen technical wastewater disposal alternative. The Plan Update will provide justification for choosing the specific institutional alternative considering administrative issues, organizational needs and enabling legal authority.

2.2.8 Task 8: Implementation Schedule and Justification for Selected Technical & Institutional Alternatives

A. The Plan Update will identify the technical wastewater disposal alternative which best meets the wastewater treatment needs of the study area. The Plan Update will justify the choice by providing documentation which shows that it is the best alternative based on:
   1. Existing wastewater disposal needs.
   2. Future wastewater disposal needs. (Five and ten year growth areas).
   3. Operation and maintenance considerations.
   5. Available management and administrative systems.
   6. Available financing methods.
   7. Environmental soundness and compliance with natural resource planning and preservation programs.

B. The Plan Update will identify and describe the capital financing plan chosen to implement the selected alternative(s) and identify and describe the chosen back-up financing plan.

C. The Plan Update will identify and describe the implementation schedule for the recommended alternative, including justification for any proposed phasing of construction.

2.2.9 Task 9: Environmental Report (ER) generated from the Uniform Environmental Review Process (UER)

A. An Environmental Report will be completed as required by the UER process and as described in the DEP Technical Guidance 381-5511-111. This document will be included as “Appendix A” to the Delaware County Act 537 Plan Update for the Eastern Service Area.

2.2.10 Task 10: Public Participation

In this task, DCPD will:
• Submit a resolution to all affected municipalities accompanied by the Plan of Action as notification of the Delaware County Act 537 Plan Update for the Eastern Service Area. The executed resolutions will authorize DCPD and DELCORA to prepare the Act 537 Plan Update.

• Submit the draft of the plan to the municipal planning agencies for comment. Comments received from any of the preceding agencies must be included with the submission to the department along with responses to these comments from the planning team. Evidence that the official plan has been before these agencies for 60 days without comment is sufficient to satisfy this requirement. Also, if no comments on the plan were received or made by the previously-mentioned planning agencies, a statement reflecting this fact must accompany the official plan submitted to DEP.

• Advertise a Public Notice and comment period (required as part of the Plan Update process). The public notice must appear at least once in a newspaper of general circulation in the legal notice section.

• Conduct a public participation process by developing a presentation that describes the contents of the plan. Representatives from each municipality within the planning area and representatives from each municipal authority have been invited to a meeting to be held on June 1, 2011 to introduce the planning objectives and identify representatives to serve as liaisons during the study development.

• Request that DEP review the Draft Plan. DEP may agree to review draft plans to provide direction to the Planning Team prior to the final plan adoption. (This service is dependent upon the availability of DEP staff resources.)

• Provide a resolution to be executed by each affected municipality that adopts the Act 537 Plan Update as their official Act 537 Plan.

2.3 PHASE 3 – PLAN ADOPTION

In this Phase, plan adoption efforts will include:

- Publishing the final plan (70 copies) for municipal adoption and subsequent submission to DEP for approval.
- If requested, meet with individual municipalities to discuss the plan.

Once the Plan Update is adopted by the municipalities, DCPD will compile the municipal resolutions and submit it to DEP for review and approval. DEP normally will review and act upon a complete sewage facilities Plan Update within 120 days of receipt.

Once DEP approves the plan, an application for a planning grant reimbursement of 50 percent of the municipality’s cost of plan preparation will be submitted to DEP by DCPD and DELCORA. WESTON will assist DELCORA in the application for reimbursement by providing necessary invoice and cost data.
3. PROJECT SCHEDULE

An overall Project Schedule, located in Attachment B, was prepared in Microsoft® Project to establish a time frame in which the Project is to be accomplished. It was developed using the scope and tasks as called for in the Scope of Work, and is attached.

Microsoft® Project will be the tool used to track progress with respect to deliverables, resource requirements, and cost. The schedule, along with resource requirements and cost, will be updated once a month and presented at the Monthly Project Meeting.

A brief summary of the initial data entered into Microsoft® Project shows:

- Project start date of June 14, 2011;
- Projected Draft Plan Completion April 25, 2012;
- Projected Final Draft Completion on August 31, 2012;
- Projected approval from DEP on January 4, 2013.

4. ESTIMATED EFFORT

An estimate of the cost of the Plan Update is included on the attached Task/Activity Report located in Attachment C.
ATTACHMENT A

PROPOSED PLANNING AREA MAP
ATTACHMENT B
PROPOSED SCHEDULE