



P.O. Box 187 Bynum NC 27228 919-542-5790 info@hawriver.org

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Comments on Chatham Park Additional Elements

The Planned Development District Ordinance for Chatham Park requires protection of Critical Environmental Resources. What are those resources that should be preserved in Chatham Park under the Open Space Additional Element?

Stream Buffers: The “Open Space” Additional Element provides 100' buffers for perennial and 50' on intermittent streams but does not include protection of ephemeral streams, the headwaters of tributaries. Without this protection these smaller headwaters streams will be destroyed as forest is cleared for development, requiring more on-site stormwater management. We recommend that that 30 ft. buffers on are required on ephemeral streams to match the higher standards set by Chatham County.

Wetland Buffers: Wetlands are protected by state and federal law, but if the land surrounding them is not also protected by a buffer, the wetlands are damaged or destroyed by mud during construction. Chatham County requires wetlands to be protected by 50 foot of surrounding buffers. and we recommend that this is also required in the Open Space Additional Element, Section 2.

Floodplains: Protection and no-building in 100 year floodplains is standard, but will this be adequate in coming years when storms are expected to be more severe? The high density of impervious surface in Chatham Park being proposed will result in much greater potential for more flooding.

Steep Slopes: The “Open Space” Additional Element does not specify how steep slopes will be protected. Chatham Park has a **350 Ft. elevation change** over the highest and lowest parts of the land, much of which is close to the Haw River and Jordan Lake. Chatham County’s *Soil Erosion and Sedimentation Control Ordinance* defines “STEEP SLOPES” to include all land on gradients of 25% or greater, or 20% or greater on soils with a RUSLE K-Factor of 0.49 or higher (greater erosion risk). We again urge you to require this language in the Open Space Additional Element.

Haw River protection Chatham Park should conform to the 2000 foot Haw River buffer in the Pittsboro Land Use Plan. This would provide much better protection of water quality and wildlife habitat along the Haw River and for the beautiful Lower Haw River State Natural Area.

Significant Natural Heritage Areas: under the Open Space Additional Element only isolated small areas would be preserved. These special habitats and communities include the Pittsboro Wilderness Area, the Haw River Levees and Bluffs and the Robeson Creek Ravine. What's left of these special habitats for plants and wildlife will be fragmented and degraded under the current plan.

The acreage in the above recommendations for stream and wetland buffers, flood plains, steep slopes, the Haw River 2000 ft. buffer and preservation of Significant Natural Heritage areas adds up to 2895 acres. This is our recommendation for Critical Resource Protection under the Open Space Additional Element.

Stormwater Additional Element

The two pages of information that makes up the Stormwater Additional Elements is inadequate and does not give us the important details of how stormwater will be managed and how Chatham Park can meet their proposal for no change in hydrology on site. There needs to be more information on how Low Impact Development best management practices (BMPs) will be utilized, as stated in the Master Plan. The Low Impact Development (LID) standards need to be spelled out in this Element as well as the details of how they will be maintained and enforced.

We are very concerned about the omission of point #5 from the Master Plan section III (2) on Stormwater in this newer version in the Stormwater Additional Element. ***“5. Standards specified above are established as minimum standards.”*** This sentence as originally included in the Master Plan, would allow the Town of Pittsboro to require higher stormwater management control than is provided in the standards listed in the Master Plan (and unchanged in the Additional Elements.) It should be re-inserted in the Stormwater Additional Element

The Water Quality Design Storm Standard being proposed is to design BMP's for a 1 inch storm. We believe Chatham Park should be held to a higher standard- the 1-year, 1-hour storm (1.43 inches) captured and drawn down over 48 – 120 hours, which provides more infiltration into groundwater.

The **Peak Flow Attenuation Standard which** sets the standards for controlling runoff from impervious areas is also inadequate. With more frequent large storm events we recommend Peak Flow Control for the 1-, 2-, 5-, 10-, and 25-year, 24 hour storm events. Flooding in Pittsboro during the Dec. 23, 2015 storm was an example of how current Town of Pittsboro stormwater management is not good enough, and Chatham Park will have much higher density. Regulations to slow down water from larger storms will require more BMP's, or much greater preservation of the existing forested land and natural areas to take up stormwater naturally, by slowing the flow and allowing more to infiltrate groundwater.

Tree Protection Additional Element

This section is at the heart of what is worst about the current vision of Chatham Park. It would basically allow clearing of 90 to 100% of the existing forest - only requiring the new rebuilt landscape to have 10% tree coverage. It is the antithesis of tree protection. If the recommendations we made above for the Open Space and Stormwater Additional Elements were adopted, there would be tree coverage of 30 to 40% of the total land area in Chatham Park. These forested areas would provide better air quality, less sediment erosion and better water quality, on-site stormwater management, more habitat for native plants, birds and other wildlife, and less noise and light pollution. Saving more of the natural forest in Chatham Park will provide more resilience in a world where climate change is the wild card.

Submitted by Elaine Chiosso
Haw Riverkeeper