



January 6, 2021

Jon Altshul, Township Manager
Westtown Township
1039 Wilmington Pike
West Chester, PA 19382

RE: Westtown-Thornbury Elementary School
Land Development Review
Westtown Township
WTT-20-395

Dear Mr. Altshul,

As requested, CEDARVILLE Engineering Group LLC (CEG) has completed a review of the Preliminary/Final Land Development Plan for Westtown-Thornbury Elementary School. The site (UPI#67-5-13) comprising roughly 11 acres, is located on the south side of Westbourne Road in the Rural Suburban Residential R-1 Zoning District of Westtown Township. The project includes: the construction of a proposed building addition, 27 additional parking spaces, and infiltration BMPs to manage the increased impervious coverage.

The following information was received by our office on December 30, 2020:

- A. Full size plan titled "Preliminary/Final", prepared by D.L. Howell and Associates, Inc., consisting of twelve (12) sheets dated November 13, 2020 and last revised December 22, 2020.
- B. Post Construction Stormwater Plan Narrative, prepared by D.L. Howell and Associates, Inc., dated November 13, 2020 and last revised December 22, 2020.
- C. Full size plan titled "Partial First Floor Plan - Lighting", prepared by KCBA Architects and Snyder Hoffman Associates, Inc., dated September 18, 2020.
- D. Waiver Request letter dated November 13, 2020.
- E. 150"x100" exhibit titled "Westtown-Thornbury Elementary School" depicting the pickup/drop-off circulation route, prepared by D.L. Howell and Associates, Inc.
- F. Erosion & Sediment Control Plan (Narrative) prepared by D.L. Howell and Associates, Inc., dated December 21, 2020.
- G. Response Letter dated December 30, 2020 to Albert Federico Consulting, LLC Review dated December 1, 2020.
- H. Response Letter dated December 4, 2020 to Westtown Township Planning Review dated November 25, 2020.



- I. Response Letter dated December 30, 2020 to CEDARVILLE Engineering Group, LLC Review dated December 4, 2020.

The following waiver has been previously requested by the applicant:

- Section 149-602: Requiring the plans to be submitted and approved as a separate preliminary and then final Land Development Plan submission.

This project was granted a Special Exception by the Westtown Township Zoning Hearing Board on September 15, 2020. The conditions set forth in the Order have been referenced on the Plan Title Sheet.

The referenced documents have been reviewed for compliance with Chapter 80 – Erosion, Sediment Control and Grading, Chapter 144 – Westtown Township Stormwater Management, Chapter 149 – Subdivision of Land, and Chapter 170 – Zoning Ordinances.

The following comments are offered for your consideration:

EROSION AND SEDIMENT CONTROL COMMENTS (WESTTOWN TOWNSHIP CODE, CHAPTER 80, EROSION, SEDIMENT CONTROL AND GRADING):

1. *Section 80-5.D – A written description of soil erosion and sediment and control measures (with appropriate plans and specifications), in accordance with standards and specifications of the USDA Soil Conservation Service, Chester County Conservation District and township ordinances, including, without limitation, retention basins or other control measures necessary to limit the rate of stormwater runoff to comply with the requirements of §80-6C hereof.*

December 4, 2020 Comment: An Erosion and Sedimentation Narrative and Report shall be included as part of the submission. Calculations supporting the size of compost filter sock proposed shall be provided with the Report.

Current Comment: Calculations shall be provided and included in the Erosion and Sedimentation Narrative and Report for the two unlabeled compost filter socks to the south of the proposed building addition.

STORMWATER MANAGEMENT COMMENTS (WESTTOWN TOWNSHIP CODE, CHAPTER 144, STORMWATER MANAGEMENT):

2. This comment has been satisfactorily addressed. Copies of the Letter of Adequacy and NPDES Permit, to be issued by the Chester County Conservation District, shall be received by the Township prior to Plan recording.
3. *Section 144-301.U(1) – Where a development site is travestied by perennial or intermittent water courses, riparian buffers shall be provided conforming to the line of such watercourses. The riparian buffer shall be created to extend a minimum of 75 feet to either side of the top of the band of the channel, unless a wider riparian buffer is required by the provisions of Pennsylvania Code Chapter 102, as amended, in which case the greater of the two shall apply.*

Section 144-301.U(3) – The buffer shall be maintained with appropriate native vegetation as defined in the appendices of the Pennsylvania Stormwater Best Management Manual, dated December 30, 2006. Excavating, placing fill, building structures, or making any alterations that may adversely affect the flow of



stormwater within any portion of the riparian buffer shall be prohibited unless the propose work is associated with a regulated wetlands mitigation program.

Section 144-301.U(4) – The buffer must be defined through a deed restriction

December 4, 2020 Comment: The riparian buffer as defined above shall be shown on the Plan. Areas of the riparian buffer that encroach on the subject tract shall be clearly shown, defined by easement, and shall be subject to deed restriction incorporating the restrictions referenced above.

Current Comment: The following shall be addressed:

- The restrictions set forth in Section 144-301.U.(3) shall be included on the Plan to be recorded, along with a reference to the required deed restriction.
- The proposed landscaping shown on the Landscape Plan shall be relocated outside of the Riparian Buffer.

4. This comment has been satisfactorily addressed.

5. This comment has been satisfactorily addressed.

6. This comment has been satisfactorily addressed.

7. This comment has been satisfactorily addressed.

8. This comment has been satisfactorily addressed.

9. This comment has been satisfactorily addressed.

10. This comment has been satisfactorily addressed.

11. This comment has been satisfactorily addressed.

12. This comment has been satisfactorily addressed.

13. *Section 144-402.B.(4) – The following signature block signed and sealed by the qualified licensed professional responsible for the preparation of the SWM site plan:*

"I (name), on this date (date of signature), hereby certify to the best of my knowledge that the SWM site plan meets all design standards and criteria of the Westtown Township Code, Chapter 144, Stormwater Management."

December 4, 2020 Comment: The referenced signature block shall be signed and sealed.

Current Comment: The above referenced comment remains applicable.

14. This comment has been satisfactorily addressed.

15. This comment has been satisfactorily addressed.

16. This comment has been satisfactorily addressed.



17. *Section 144-402.G – Inspections, operation, and maintenance requirements. The following documents shall be prepared and submitted to the Township for review and approval as part of the SWM site plan, in accordance with the requirements of Article VII, for each BMP and conveyance included in the SWM site plan (including any to be located on any property other than the property being developed by the applicant);*
- (1) An O&M plan.*
 - (2) An O&M agreement.*
 - (3) Any easement agreements that are needed to ensure access, inspection, maintenance, operation, repair and permanent protection of any permanent BMP(s) and conveyances associated with the regulated activity.*
 - (4) Any written deed, deed amendment or equivalent document (if needed) to be recorded against a subject property, as shown on the SWM site plan maps or plan sheets, or recorded plan sheets for the purpose of protecting and prohibiting disturbance to a BMP or conveyance; and*
 - (5) Written approval, easement agreements, or other documentation for discharges to adjacent or down-gradient properties when required to comply with § 144-301G and Article VII of this chapter.*

Section 144-701.D - General Requirements for protection, operation and maintenance of stormwater BMPs and conveyances - For any BMP or man-made conveyance (including any to be located on any property other than the property being developed by the applicant) to be owned by a person other than the Township:

- (1) An O&M agreement shall be submitted to the Township for review and approval; and*
- (2) The O&M plan shall be attached to, incorporated within, and recorded as a public record along with a fully executed O&M agreement, all of which shall be recorded as a restrictive covenant that runs with the land and shall be binding upon the landowner and any heirs, administrators, successors in interest or assigns of the landowner.*

December 4, 2020 Comment: A Stormwater Management Operation & Maintenance Agreement will need to be executed and recorded for the proposed stormwater BMPs, to include all BMPs shown on the PCSM Plan. The O&M Agreement shall be provided by Westtown Township upon approval of the Plan. The applicable signatures included under the Stormwater Management Operation & Maintenance Statement, Sheet 1, must be signed by the property owner prior to recording. The Operation & Maintenance Agreement shall be recorded concurrently with the Land Development Plan.

Current Comment: The above referenced comment remains applicable and has been acknowledged by the applicant.

SUBDIVISION AND LAND DEVELOPMENT COMMENTS (WESTTOWN TOWNSHIP CODE, CHAPTER 149, SUBDIVISION OF LAND):

18. *Section 149-600.C – If the preliminary plan and all supporting data comply in all respects with the requirements for final plans (see Article VII), the Township may, in the case of small subdivisions involving no new streets or limited development of land, proceed to final action at the first consideration of the plan if a written request for final approval is made by the applicant and agreed to by the Board of Supervisors.*

December 4, 2020 Comment: The applicant has requested a waiver from submission of a Preliminary Plan. CEG offers no objection to consideration of this waiver request based upon the justification provided by the applicant.

Current Comment: The above comment remains applicable.



19. This comment has been satisfactorily addressed.

20. This comment has been satisfactorily addressed.

21. This comment has been satisfactorily addressed.

22. This comment has been satisfactorily addressed.

23. This comment has been satisfactorily addressed.

24. *Section 149-925.I.(6) – Unless specifically required otherwise by the Township, or where it is impractical because of the location of existing trees, canopy trees required by this § 149-925 along the street frontage shall be planted with the trunk between five feet and 15 feet from the street right-of-way. These trees shall be intended to provide a canopy over the edges of streets. The Board of Supervisors may approve alternative locations for these trees, such as within a street right-of-way or less than five feet from the right-of-way. The species of these trees shall be subject to approval by the Township.*

December 4, 2020 Comment: The following shall be provided on the Landscape Plan:

- The canopy tree plantings along the property frontage shall be adjusted to be located within fifteen (15) feet of the street right-of-way. A noted clearly referencing the required location of the trees may be considered sufficient.
- The right-of-way line shall be shown on the Landscape Plan.

Current Comment: The above comment remains applicable.

25. *Section 149-403.A – Before the final plan is signed by the Board of Supervisors, the applicant shall submit an agreement, subject to the approval of the Board of Supervisors, provided for, but not limited to , the following where applicable: In accordance with the approved final plan, the applicant will layout and construct all street and other improvements, including , but not limited to, grading, paving , curbs, gutter, sidewalks, streetlights, fire hydrants, water mains, street singses, shade trees, storm and sanitary sewers, stormwater management structures, landscaping, traffic control devices, open space areas, and erosion and sediment control measures.*

Section 144-403.C – The applicant shall sign a tri-party agreement with a financial institution and the Township guaranteeing and securing completion of the improvements listed in Subsection A, except as provide for in Subsection E, within one year of the date of the approved plan.

December 4, 2020 Comment: Financial security in an amount acceptable to the Township shall be provided prior to Plan recording. A Construction Cost Estimate shall be submitted for review and approval, with the required financial security incorporated into a Developer’s Agreement to be executed prior to Plan recording.

Current Comment: Receipt of the Construction Cost Estimate is pending. Prior to plan recording, the estimate shall be approved by the Township, the required financial security posted, and the Developer’s Agreement executed. The applicant has acknowledged that a Construction Cost Estimate will be provided.

ZONING COMMENTS (WESTTOWN TOWNSHIP CODE, CHAPTER 170, ZONING):



26. Section 170-1514.D.(1).(e) – Examples of illumination levels for typical outdoor applications, as extracted from the IESNA RP-33-99 and RP-8-00 Recommended Practices, are presented below.

Classification	Maintained Average Illumination Levels (Lux/ Footcandles) (See Note 2)	Uniformity Ratios	
		(Average: Minimum) (Note 3)	(Maximum: Minimum)
Streets and roadways			
Local commercial	9/0.9 average minimum 12.0/1.2 average maximum	6:1	
Local residential	4/0.4 average minimum 7/0.7 average maximum	6:1	
Parking (Commercial/ institutional, industrial/municipal use)			
High activity (e.g., major athletic/civic/ cultural events; fast food, etc.)	10/1 average minimum 20/2 average maximum	5:1	20:1
Medium activity (e.g., hospitals, community shopping centers, office parks, commuter lots, etc.)	5/0.5 average minimum 10/1 average maximum	5:1	20:1
Low activity (e.g., schools, churches, neighborhood shopping, multifamily developments, etc.)	2/0.2 average minimum 5/0.5 average maximum	5:1	20:1
Sidewalks and bikeways	5/0.5 average minimum 20/2.0 average maximum	4:1	
Building entrances (Commercial/industrial/ institutional)	25/2.5 average minimum 50/5.0 average maximum	5:1	

December 4, 2020 Comment: The lighting plan shall be revised as follows:

- Additional lighting shall be provided at the Proposed Building Addition entrance to meet the requirements referenced above.
- Additional Illumination shall be provided at the north and south ends of the proposed building sidewalk to meet the requirements referenced above.

Current Comment: The following needs to be addressed as it pertains to the Lighting Plan included with the Land Development Plan Set (Sheet 10) and the Partial First Floor Plan – Lighting prepared by KCBA Architects:

- The illumination data shown at the building entrances on the KCBA Plan should be shown on the Lighting Plan included as part of the Land Development Plan Set.
- The entrances as shown on the KDBA Plan shall coincide with the building entrances shown on the Land Development Plan Set.

27. This comment has been satisfactorily addressed.

28. This comment has been satisfactorily addressed.

29. This comment has been satisfactorily addressed.



30. This comment has been satisfactorily addressed.

GENERAL COMMENTS

31. The proposed routing of the 6-inch sanitary sewer line underneath the proposed building addition shall be reviewed by the Township Sewer Engineer.

The applicant has acknowledged this comment and stated it is their understanding that the Township Sewer Engineer will not be reviewing these plans. Concurrence shall be provided by the Township Sewer Engineer, or the line shall be relocated outside of the footprint of the building addition.

OTHER AGENCY APPROVALS:

- Chester County Conservation District (NPDES Permit)
- Pennsylvania Department of Environmental Protection (Sewage Facilities Planning Module)

Upon receipt of the revised information addressing the comments identified in this letter, CEG will confirm that the application is compliant with the Westtown Township Ordinances.

Please do not hesitate to contact me with any questions.

Best Regards,
CEDARVILLE Engineering Group, LLC

Robert E. Flinchbaugh, P.E.
Senior Municipal Engineer

cc: Mila Robinson, Township Planner
John Snook
Justin W. Brewer, P.E., D.L. Howell & Associates, Inc., Engineer
West Chester Area School District, Applicant