



Civil Engineers, Surveyors & Land Development Consultants

March 25, 2021

Westtown Township
John Altshul, Township Manager
1039 Wilmington Pike
West Chester, PA 19395

**Re: Sawmill Court
Preliminary/Final Land Development
Response to Cedarville Review letter dated February 26, 2021
Inland Design Project No. 11541
CEG Project No. WTT-20-414**

Mr. Altshul:

We are in receipt of the review letter from Cedarville Engineering Group (CEG) dated February 26, 2021, for the above referenced project. Based on the comments contained in that letter we have revised the plans and offer the following responses:

Erosion and Sediment Control Comments:

1. Section 80-5.C – An improvements plan at the same scale as the topographical survey showing and describing all changes to the site, including cuts, fills, structures, paving and utilities:
 - The clean out elevation noted on the Compost Sock Sediment Trap detail (sheet 14, Sediment Trap Tabulation) exceed 1/3 the total height of the trap, as referenced on Note 3 of the detail. This shall be revised accordingly.
The Sediment Traps have been re-designed to ensure that the clean out elevation does not exceed 1/3 of the total height.
 - The drainage area associated with Sediment Trap 2 does not coincide with the limits of the trap berm. The drainage areas boundary shall be modified as required.
Sediment Trap 2 has been re-designed and the drainage area line revised as necessary
 - O&M notes shall be provided for the compost sock washout and erosion control matting, in accordance with the Erosion and Sedimentation Control Program Manual.
O&M Notes have been provided for the Compost Sock Washout and Erosion Control Matting (Erosion Control Blanket).
2. 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

Supporting calculations shall be provided to ensure compliance with the required sediment cleanout height as shown on the Compost Filter Sock Sediment Trap, as referenced above.

The Sediment Trap Calcs have been revised as required.

Stormwater Management Comments:

3. This comment has been satisfactorily addressed.

No response required.

4. Section 144-301.J – For all regulated activities, erosion and sediment control BMPs shall be designed, implemented, operated, and maintained during the regulated activities (i.e., during construction) as required to meet the purposes and requirements of this chapter, to meet the erosion and sediment control requirements of the municipality, if applicable, and to meet all requirements under Title 25 of the Pa. Code and the Clean Streams Law.

The information referenced in above Comments #1 and #2 shall be provided.

See responses for Comment # 1 and #2.

5. Section 144-301.K – The design of all BMPs and conveyances shall incorporate sound engineering principles and practices in a manner that does not aggravate existing stormwater problems as identified by the municipality. The municipality reserves the right to disapprove any design that would result in construction in an area affected by existing problem(s) or continuation of an existing stormwater problem(s).

The following shall be addressed:

- Additional information shall be included with the off-site existing pipe network in which the proposed BMPs discharge to, including but not limited to:
 - Storm structure top of grates/rims, and invert elevations associated with the existing stormmanhole located on the 933 Trellis Lane property, and the receiving inlet on Trellis Lane.
 - The existing pipe size, material, and slope associated with the pipe discharging from the above referenced manhole.
 - Flow arrow showing the direction of flow through this network.

Pipe size, materials, slopes, and flow arrows have been added to the plans. Partial copies of the reference plans have been included in the PCSWM report for more complete information.

- Applicable notes, specifications, and operation and maintenance requirements shall be provided for the "Permanent Compost Sock" to be utilized as a berm adjacent to the west property line. The following shall be provided:
 - The specifications shall note the internal fill, longevity, material and chemical properties, etc. The berm shall be designed fully contain runoff

and not permit water to flow through, as would be the intent of filter sock used for erosion and sedimentation control purposes.

- Maintenance requirements shall be applied which shall clearly state the frequency of inspections and the immediate steps to be taken in the event of failure.

Additional Specifications have been provided for the permanent Compost Sock along with Operations and Maintenance requirements on the PCSM plan.

- The current Plan references an existing 30-inch perforated pipe located to 'the rear of the properties located at 919-931 Trellis Lane; it appears that this pipe was installed as means of mitigating subsurface stormwater flow to these residences. As discussed at the February 17, 2021 Planning Commission Meeting, the following shall be provided, with applicable pipe profiles added, to minimize subsurface stormwater volume from the subject tract:
 - Combination storm sewer/underdrain, in accordance with the applicable detail set forth under PennDOT RC Standard RC-30.
 - Underdrain shall be provided downslope of BMP 2, from the north tract boundary line to Inlet 3. Underdrain shall be constructed in accordance with applicable detail set forth under PennDOT RC Standard RC-30, at an elevation below the lowest elevation of BMP 2.
 - Underdrain shall be provided downslope of BMP 3, from the south tract boundary to Inlet 1. Underdrain shall be constructed in accordance with the applicable detail set forth under PennDOT RC Standard RC-30, at an elevation below the lowest elevation of BMP 3.

Underdrain has been provided below BMP 2 & BMP 3 as requested and the pipe run from Inlet 3 to Inlet 1 has been specified as combination Storm Sewer/Underdrain. Details from PENNDOT RC-30 have been provided for both conditions.

6. Section 144-301.P(2)– Additional water quality requirements. The municipality may require additional stormwater control measures for stormwater discharges to special management areas, including, but not limited to: Any water body or watershed with an approved total maximum daily load (TMDL), Specifically Goose Creek Watershed. Total phosphorous is the assigned TMDL pollutant to Westtown Township within the Goose Creek Watershed, including but not limited to:

- [1] Rain gardens/bioretention.
- [2] Constructed wetlands.
- [3] Permanent compost filter sock.
- [4] Water quality inlet filter.

Section 144-305.G)– The municipality may require additional water quality and runoff control measures for stormwater discharging to special management areas such as those listed in Section 144-301. P.

The comments referenced in Comment 5 shall be addressed.

See responses to Comment 5.

7. This comment has been satisfactorily addressed.
No response required.
8. This comment is no longer applicable.
No response required.
9. This comment has been satisfactorily addressed.
No response required.
10. This comment has been satisfactorily addressed.
No response required.
11. This comment has been satisfactorily addressed.
No response required.
12. This comment has been satisfactorily addressed.
No response required.
13. This comment has been satisfactorily addressed.
No response required.
14. This comment has been satisfactorily addressed.
No response required.
15. This comment is no longer applicable.
No response required.
16. Section 144-310.G – Adequate erosion protection and energy dissipation shall be provided along all open channels and at all points of discharge. Design methods shall be consistent with the Federal Highway Administration Hydraulic Engineering Circular Number 11 (Publication No. FHWA-IP-89-016, as amended) and the PADEP Erosion and Sediment Pollution Control Program Manual (Publication No. 363-2134-008, as amended), or other design guidance acceptable to the Municipal Engineer.
 - The location of the proposed erosion control blanket shall be shown on the Plan, as previously referenced. The type of matting to be used shall be clearly referenced, with a designation provided in the legend.
 - Supporting calculations shall be provided demonstrating the stability of the blanket being proposed. These calculations shall be based upon flow conveyed through the channel of the swale. The slope stability calculation as provided are not applicable.***Erosion Control Blanket has been specified along the requested areas and is noted in the legend. Calculations are provided for the rear yards as swales in the Erosion Control Report.***
17. Section 144-311.B.(6) – Calculations shall be provided to show the flow in the system, pipe size, allowable flow, actual flow, and velocity.

Conveyance calculations shall be provided for the pipe run, from the existing manhole located on 933 Trellis Lane, to the existing receiving inlet on Trellis Lane.

Additional capacity calculations have been provided for the existing pipes discharging to Goose Creek.

18. This comment is no longer applicable.

No response required.

19. Section 144-311.B.(11) – Velocity within the storm sewer system shall be no less than three feet per second and no greater than 11 feet per second for the design storm peak flow.

The slope of the referenced pipe run shall be revised to comply with the referenced requirement

- 2.1 to 3

A 25-year storm frequency may be used to determine velocity.

The Pipes slope from 2.1 to 3 has been revised ensure that the pipes are within the allowable velocities.

20. Section 144-311.B.(12) – Storm sewer profiles shall be provided for all systems and shall show all applicable design information including, but not limited to, pipe size, material, slope, invert and grate/ground elevations, and cover.

A storm sewer profile shall be provided for the following storm sewer runs:

- Inlet 2.5 to Inlet 2.4.

The requested profile is included in the Outlet 1.1 to BMP 2 profile.

21. This comment is no longer applicable.

No response required.

22. This comment is no longer applicable.

No response required.

23. This comment is no longer applicable.

No response required.

24. This comment is no longer applicable.

No response required.

25. This comment is no longer applicable.

No response required.

26. This comment is no longer applicable.

No response required.

27. Section 144-402 – The SWM site plan shall consist of a general description of the project including items described in § 144-304, calculations, maps, and plans. A note on the maps shall refer to the associated computations and erosion and sediment control plan by title and date. The cover sheet of the computations and erosion and sediment control plan shall refer to the

associated maps by title and date. All SWM site plan materials shall be submitted to the municipality in a format that is clear, concise, legible, neat, and well organized; otherwise, the SWM site plan shall not be accepted for review and shall be returned to the applicant.

The Plans and Report must be revised to reference one another by title and date as required by the above referenced section of the Ordinance.

The PCSM Plan and Report and the Erosion Control Plan and Report have been revised to include notes referencing one another by title and date.

28. This comment has been satisfactorily addressed.

No response required.

29. This comment has been satisfactorily addressed.

No response required.

30. 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.

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.

The O&M Agreement shall be amended and re-recorded as required upon the applicant's conveyance of open space to the Homeowners Association.

The applicant will execute the Stormwater Management Operation and Maintenance Agreement after the plan has been approved and prior to plan recording.

SALDO Comments:

31. This comment has been satisfactorily addressed.

No response required.

32. 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..

The applicant has requested a waiver from submission of a Preliminary Plan. CEG defers consideration of this waiver request to Westtown Township.

The planning commission has indicated a willingness to recommend this waiver and the applicant is proceeding with the waiver request at this time.

33. This comment has been satisfactorily addressed.

No response required.

34. Section 149-602.B.(10) – Location and ownership of all existing sewer lines, water lines, fire hydrants, utility transmission line, culverts, bridges, railroads, water courses, trees, wetlands (or certification that are not present), soils, easements, rights-of-way and other significant man-made or natural features within the proposed subdivision and within 50 feet from the boundaries of the propose subdivision.

The following shall be provided pertaining to the referenced easements:

- The easement and associated storm sewer shall be shown to limits of the easement where it coincides with the right-of-way for Trellis Lane.
- The easement shall be clearly labeled on the Plan.
- The source of where the easement was obtained shall be noted on the Plan.

Easements have been shown and labelled on the plans. A note has been provided indicating the source of the easements. While the full extent of the easement is not included on our plans, the 50 feet closest to our property are, and the full extents are included for reference in the PCSM Report.

35. This comment has been satisfactorily addressed.

No response required.

36. Section 149-802.B – Tract boundaries and the zoning classification of all abutting properties. The zoning classification of all abutting properties shall be noted on the Plan as required by the above referenced section of the Ordinance.

The zoning classification of the properties abutting the south tract boundary (926 S. Concord Road and 611 Oakbourne Road) shall be shown.

The zoning classifications for all adjoining properties have been shown on each adjoining lot.

37. This comment has been satisfactorily addressed.

No response required.

38. Section 149-903.A(3)– Collector Street Right-of-Way shall be 60 feet and cartway width shall be 28 feet.

CEG defers to the Westtown Township Traffic Engineer regarding required widening along South Concord Road.

This issue is addressed in the response letter to the Traffic Engineer review.

39. This comment has been satisfactorily addressed.

No response required.

40. Section 149-911.B – Vertical curbs meeting the dimensional requirements for plain cement concrete curb contained in the PennDOT Standards for Roadway Construction (RC-64) shall be required on all streets.

The applicant is proposing vertical curb; therefore, the previously requested waiver is no longer applicable. The following shall be addressed pertaining to the Concrete Curb Detail (Sheet 17), in accordance with Section 149-911 of the Ordinance:

- Reveal, embedment, and total depth dimensions in accordance with PennDOT RC-64
- Bottom and top of batter width in accordance with PennDOT RC-64
- Detail 'A' associated with the contraction joint, as noted on the Detail, shall be provided on the Detail Sheet in accordance with PennDOT RC-64.

The curb detail has been modified to show all requested details.

41. Section 149-915.K – Driveway Design Requirements.

Section 149-915.K(1) – The grade of the driveway within 20 feet of the pavement edge or the curblines of the public road, Township or state, shall not exceed 4%. The maximum grade permitted beyond this point is 15%. Vertical curves shall be used a change of grades exceeding 5%.

Section 149-915.K(2) – Width of driveway within the legal right-of-way of the public road shall be at least 10 feet and shall be nine feet within the property line. Adequate turnaround surface shall be provided on the property so egress to the street is in a forward direction. Where the grade

of the driveway exceeds 10%, at least on level parking space shall be provided just within the property line for emergency parking.

Section 149-915.K(4) – Discharge of roof drains or downspouts onto the driveway which slopes toward the street shall not be permitted. No drainpipe for any basement sump pump, foundation drain, disposal field, terrace, roof or pavement shall be discharged onto the public right-of-way.

The following shall be provided:

- Large scale plan views shall be provided as requested above, with spot elevations and slopes provided at the following locations to demonstrate ordinance compliance at both driveway edges and to ensure that proper grading can be maintained between the driveways of the adjoining units:
 - o Spot elevations provided at intersection with Sawmill Court on both sides of driveway.
 - o Slopes shown at both sides of driveway.
 - o Cross slope of proposed grass strip between adjoining unit driveways.
- Roof drain locations shall be shown to ensure roof runoff is conveyed in accordance with the drainage area plan included with the calculations.

The applicant has requested a waiver from the reference section 149-915.K(2) of the Ordinance, as referenced above. CEG offers no objection to this request, provided that the above referenced comments are satisfactorily addressed.

Large Scale Grading Blow Ups have been added to the plans showing the requested details.

42. Section 149-916 – Sidewalks and paths. Sidewalks, bike paths and other paths may be required to be installed at the discretion of the Board of Supervisors upon the recommendation of the Planning Commission

Section 149-916.A – All materials entering into the construction of sidewalk and the method of construction and installation shall be in accordance with PennDOT Specification Publication 408, except that the compacted thickness of the aggregate bed shall be four inches. Sidewalk across driveways and driveway aprons shall be constructed with six inches of concrete reinforced with six-by-six s1.4 by s1.4 welded wire fabric place two inches from the finished surface. Sidewalks shall have a minimum width of four feet and be located four feet behind the curbline unless approved otherwise.

Section 149-916.B – Sidewalks at intersections shall be constructed to provide for handicapped access.

Section 149-916.C – Details and specification for the construction of bike paths and other paths shall be submitted with preliminary plans for review and approval by the Township Planning Commission and Township Engineer.

The following shall be addressed with respect to the proposed trail:

- The proposed trail as shown shall serve as the sole means of pedestrian access through the development. Trail grading shall be shown to demonstrate compliance with the applicable provisions of the ADA Standards and Specifications that the trail is constructable within

applicable best practices. Currently, the proposed grading of the trail adjacent to BMP 3 exceeds the maximum grade set forth in the referenced Standards and Specifications proposes 48% slopes adjacent to the trail.

The proposed trail is being designed according to United States Access Board 2014 Standards for Accessible Outdoor Developed areas. An effort has been made to minimize slopes and provide landing areas where possible.

- Handicap accessible ramp shall be provided approaching both crosswalks at Sawmill Court. The following shall be provided:
 - Handicap ramp details in accordance with applicable PennDOT RC Standards.
 - Large scale plan view details shall be provided with landing/ramp/detectible warning strips shown, along with spot elevations and slopes shown to demonstrate compliance with the referenced ADA Standards and Specifications.

Ramps have been provided at the trail crossings of Sawmill Court. The ramps are fitted with Detectable Warning Strips and the section of the trail between the two Sawmill Court crossings has been designed with a slope of less than 5%.

- Crosswalk pavement markings and signage shall be shown and labeled on the Plan. ***Crosswalk pavement Markings and signage are shown and labeled on the plan.***
- Specifications shall be provided clearly noting the material to be used for the "4" cinders" as shown on the Walking Trail Detail, Sheet 17.

The Trail Detail has been updated with additional detail on the materials to be used.

If sidewalk is not to be required, it is recommended that a fee in lieu of sidewalk be provided for future sidewalk and ADA compliant ramps along the frontage of the site.

The applicant is not providing a fee in lieu of sidewalk. Instead, as discussed at the March 17th Planning Commission meeting, a note has been added to the plan indicating that access easements are being provided to allow future connectivity from the proposed trail to the Northeast and Southeast portions of the site.

43. Section 149-918.B – Water distribution, approvals and reviews. No construction of any water distribution system shall commence prior to written approval and or comments from the DEP, CCHD, Fire Marshal, and Township Engineer.

The above referenced approvals shall be obtained, with correspondence provided to the Township, prior to plan recording.

The applicant is aware of the need for review and approvals from these agencies. All applicable correspondence will be forwarded to the Township.

44. Section 149-921.C(4) – The plan shall designate the use of common open space, the type of maintenance to be provided, and a planting plan or schedule. In designating use and maintenance, the following classes may be used.

Section 149-921.C(4)(a) – Lawn. A grass area with or without trees which may be used by the residents for a variety of purposes and which shall be mowed regularly to ensure a neat and tidy appearance.

Section 149-921.C(4)(b) – Natural area. An area of natural vegetation undisturbed during construction or replanted; such areas may contain pathways. Meadows shall be maintained as such. Maintenance may be minimal but shall prevent the proliferation of undesirable plants. Litter, dead trees and brush shall be removed, and streams kept in free-flowing condition.

Section 149-921.C(4)(c) – Recreation area. An area designated for a specific recreational use, including by way of example tennis, swimming, playfield and tot lots. Such areas shall be located and maintained in such manner as not to create a hazard or nuisance and shall perpetuate the proposed use.

Section 149-921.C(4)(d) – Stormwater detention/retention and sewage disposal areas. Detention or retention areas or land used for surface (land application) for subsurface sewage disposal and holding or settlement ponds.

The Open Space Management Plan must demonstrate compliance with Open Space Standards set forth in Section 170-907A of the Westtown Township Zoning Ordinance, as required per Zoning Ordinance Section 170-803.A.(10).

An Open Space Management Plan has been provided demonstrating compliance with the Open Space Standards.

45. Section 149-922.B(2) All buffers shall include a completion planted visual barrier to landscape screen. Such visual barrier shall be fully attainable within a three-year period. Where the existing tree masses do not fully screen the area or where there are no existing tree masses, planting shall be added to complete the visual barrier within the prescribed time period.

The plan currently does not show the preservation of existing tree masses along the north and west tract boundary lines. Proposed landscaping in these areas shall be increased to provide a complete visual barrier and shall eliminate the gaps between the landscaping as shown.

The above comment remains applicable and shall be subject to the pending site walk to include the applicant and Township.

As discussed at the March 17th PC Meeting, The plantings along the property boundaries to provide buffering will be designed in full once the arborist has made their recommendations regarding the condition of the existing trees, and the requirements for the compensatory tree replacement have been finalized.

46. Section 149-924.D(11) – A tree protection management plan must be submitted at the time of preliminary plan application if there are 10 or more viable trees proposed to be cut or removed from the property. The Tree Protection Management Plan shall contain the following information on a plot plan: A chart tabulating the diameter inches being removed, the required diameter inches to be replaced and the equivalent number of compensatory trees.

The Tree Protection Plan shall be revised as follows:

- a) Section 149-924.D.(3) - Lot owner's consent to the application.

The lot owner's consent to the application shall be added to the Plan.

The Lot Owner's Acknowledgement has been added to the plan.

b) Section 149-924.D.(9) - The limits of tree protection zone, according to the following distances from proposed improvements: a-d.

Tree protection zone limits shall be clearly shown on the Plan

The placement of the Tree Protection Zones will be provided following the recommendation of the Arborist as to which trees are viable and can be preserved during the construction.

47. Section 149-924.D(12)(b) – Compensatory planting. Compensatory trees shall be provided in the following ratios, based upon the sum totals of the diameter inches of trees being removed. The stands are applicable to both deciduous and evergreen trees. Compensation is not required for shrubs, unless otherwise required by the Board of Supervisors.
- i. For viable non-specimen: one inch of new tree caliper shall be provided for every four inches of existing tree diameter cut or removed. For example, if a single trunked, twenty-inch diameter oak is removed, five diameter inches shall be replanted.
 - ii. For viable specimen: one inch of new tree diameter for every one inch of existing tree diameter cut or removed. Where it has been determined by the Zoning Officer that a specimen tree has been or is proposed to be cut or removed, the person responsible shall be fined no more than \$1,000.
 - iii. For existing street trees within the right-of-way, one tree, with a caliper of 3 ½ inches shall be replanted as a canopy tree in accordance with Section 149-925I(6).

The applicant has requested a waiver from this section of the Ordinance. CEG does not support this request, as the existing vegetation which serves as a buffer to the properties to the north, west, and south will be removed as a result of the improvements proposed; therefore, warranting the provision of compensatory plantings.

As discussed at the March 17th PC Meeting, An Arborist has been retained to determine the viability of the existing trees on site. The applicant will base the calculations for compensatory tree replacement on this report. It is likely that a fee-in-lieu of tree plantings will be provided for a portion of the required trees.

48. This comment has been satisfactorily addressed.

No response required.

49. Section 149-927 – Sanitary sewage disposal and treatment facilities.

CEG defers comments pertaining to this Ordinance section to the Township Sanitary Sewer Engineer.

The comments from Carrol Engineering are addressed under a separate letter.

50. 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 singes, 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.

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.

The applicant will sign the Tri-party agreement and provide financial security prior to recording of the plans.

ZONING COMMENTS:

(WESTTOWN TOWNSHIP CODE, CHAPTER 170, ZONING):

51. This comment has been satisfactorily addressed.

No response required.

52. *Section 170--802.E(2) - Twin Dwellings – Maximum building coverage: 30% Section 170--802.E(3) - Twin Dwellings – Maximum impervious coverage: 30%*

The Individual Lot Zoning Chart (Sheet 1) shall be revised as follows:

- Actual building coverage, shown in square feet, shall be referenced with the percentages shown.
- An actual impervious coverage associated with each lot, as currently shown on the Plan, shall bereferenced on the Chart, along with the actual percentage of coverage.

The zoning table has been modified to include actual lot coverages for each lot, and a detailed impervious coverage chart has been added to the Site Plan.

53. *Section 170—1514.F(1) – Plan Submission -For subdivision and land development applications where site lighting is required for proposed, lighting plans shall be submitted to the Township for review and approval and shall include:*

A site plan, complete with all structures, parking spaces, building entrances, traffic areas (both vehicular and pedestrian), vegetation that might interfere with lighting, and adjacent use that might be adversely impacted by the lighting. The Plan shall contain a layout of all proposed fixtures by location and type.

Isofootcandle plots for individual fixture installations, or 10 feet by 10 feet illuminance-grid plots for multi-fixture installation, which demonstrate compliance with the intensity and uniformity requirements as set forth in the chapter. Also, vertical footcandles at property line, five feet above finished grade and horizontal foot candles at grade, at property line.

Description of the purpose equipment, including fixture catalog cuts, photometrics, glare reduction devices, lamps, on/off control devices, mounting heights, pole foundation details and mounting methods.

If site lighting is proposed, a Lighting Plan shall be provided in accordance with the above Ordinance section. This plan shall demonstrate compliance with the applicable criteria set forth in Section 170-1514 of the Ordinance. If no lighting is proposed, this shall be noted on the Plan.

The following shall be provided.

- The BUG rating of the proposed lights, and proposed locations for the light fixtures, shall be clearly shown on the Plan.
- Isofootcandle diagrams associated with the proposed lighting shall be provided.
- Ownership and maintenance responsibilities associated with the proposed lighting shall be noted on the Plan. The Plan currently shows one fixture on each proposed lot.

As discussed with the Planning Commission, the proposed lights are accent lights for the driveway areas, rather than Site Lighting. As agreed, the applicant has provided ISOfootcandle for the proposed lights. The BUG rating was not available for these lights but they do provide a very limited throw as shown by the footcandles shown and the bulbs are shielded to prevent glare. The plan notes clarify that the lights will be owned by each individual homeowner but maintenance and operation of the lights will be mandated by the Homeowner's Association.

GENERAL COMMENTS:

54. This comment has been satisfactorily addressed.

No response required.

55. This comment has been satisfactorily addressed.

No response required.

56. This comment has been satisfactorily addressed.

No response required.

57. This comment has been satisfactorily addressed.

No response required.

58. This comment has been satisfactorily addressed.

No response required.

59. The following inconsistencies shall be addressed:

- The top of storage for BMP 1 shall be revised to be consistent between the detail shown on Sheet 9 and the Pond Report on Page 87 of the PDF of the Stormwater Report.
- The top of storage for BMP 2 shall be revised to be consistent between the detail

shown on Sheet 9 and the Pond Report on Page 93 of the PDF of the Stormwater Report.

- The top of storage for BMP 3 shall be revised to be consistent between the detail shown on Sheet 9 and the Pond Report on Page 98 of the PDF of the Stormwater Report.

The BMP Details have been updated and checked for consistency with the PCSM calculations.

60. This comment has been satisfactorily addressed.

No response required.

61. This comment is no longer applicable.

No response required.

62. This comment has been satisfactorily addressed.

No response required.

63. The following information shall be provided as it pertains to the Homeowners Association Declaration and applicable documents:

- The proposed budget of the Homeowners Association, to ensure that proper funding for maintenance of the following is established:
 - i. Stormwater BMPs 1, 2, and 3
 - ii. The Permanent Compost Filter Sock
 - iii. Community Walking Trail
- Evidence that the BMP and Compost Filter Sock Operation and Maintenance Notes have been incorporated into the HOA Documents.
- The applicable section of the documents covering the Homeowners Association and the Township's responsibilities associated with the Off-Street Parking/Snow Removal Area shall be provided to ensure clarity as far as ownership and maintenance responsibilities.

No response required at this time.

64. Landscaping General Note 15 shall be removed as it is no longer applicable.

Landscaping Note 15 was removed from the plans.

65. Section 149-913.D - Where practicable, blocks along arterial highways and collector streets shall not be less than 1,000 feet long.

The applicant has requested a waiver from the referenced Ordinance requirement. CEG defers comment to the Township Traffic Engineer.

See Response letter to Al Federico Review Letter for response.

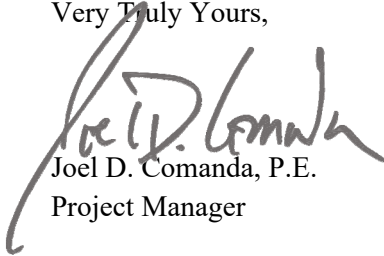
OTHER AGENCY APPROVALS:

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

- Township Fire Marshall

We trust that the plans adequately address the comments of the Township Consultants. Please feel free to contact me with any questions or comments regarding this matter.

Very Truly Yours,



Joel D. Comanda, P.E.
Project Manager

C: file