



April 15, 2021

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

RE: Sawmill Court Subdivision  
Land Development Review  
Westtown Township  
WTT-20-414

Dear Mr. Altshul,

As requested, CEDARVILLE Engineering Group LLC (CEG) has completed a review of the Land Development Plan for Sawmill Court Subdivision. The site (UPI#67-4-82) comprising of roughly 6.31 acres, is located on the southwest side of S. Concord Road in the M-U Multi-Use Zoning District of Westtown Township. The project includes: the demolition of existing structures, the construction of a Residential Subdivision consisting of 10 twin units (20 dwellings), a roadway, public sewer, drainage systems and infiltration BMPs to manage the increased impervious coverage.

The following information was received by our office on March 29, 2021:

- A. Full size plan titled "Preliminary/Final Land Development", prepared by InLand Design, LLC, consisting of nineteen (19) sheets dated December 7, 2020 and last revised March 25, 2021.
- B. Post Construction Stormwater Plan Narrative, prepared by InLand Design, LLC, dated December 7, 2020 and last revised March 25, 2021.
- C. Erosion and Sedimentation Report, prepared by InLand Design, LLC, dated February 10, 2021 and last revised March 25, 2021.
- D. Response Letter dated March 25, 2021, prepared by InLand Design, LLC., to Albert Federico Consulting, LLC review letter dated February 25, 2021.
- E. Waiver Request letter prepared by InLand Design, LLC, dated March 25, 2021.
- F. Response Letter dated March 25, 2021, prepared by InLand Design, LLC., to CEG review letter dated February 26, 2021.
- G. Response Letter dated March 25, 2021, prepared by InLand Design, LLC., to CEG review letter dated December 29, 2021.

The following waivers have been requested by the applicant from the Westtown Township Stormwater Management and Subdivision & Land Development Ordinances:



- Section 149-700: Requiring the plans to be submitted and approved as a separate preliminary and then final Land Development Plan submission.
- Section 149-913.D to allow a block length of less than 1,000 feet.
- Section 149-915.K(2) to waive the requirement for a turnaround area in the on-site driveways.
- Section 149-924.D(12)(b) to waive the requirement of planting the required number of compensatory trees.

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.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:*

January 6, 2021 Comment: The following shall be addressed:

- Grading associates with the proposed Sediment Traps shall be shown on the Plan.
- Details associated with the three proposed sediment traps shall be provided.
- Operation and maintenance notes associated with all proposed erosion and sedimentation control facilities shall be provided.

February 26, 2021 Comment: The following shall be addressed:

- 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 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.
- 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.

**Current Comment:** The following shall be addressed:

- The berm associated with Sediment Trap 2 shall be extended to the accommodate the drainage area as shown on the Erosion and Sedimentation Control Plan.

2. *This comment has been satisfactorily addressed.*

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

3. *This comment has been satisfactorily addressed.*



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.*

January 6, 2021 Comment: The information referenced in above Comments #1 and #2 shall be provided.

February 26, 2021 Comment: The above comment remains applicable.

**Current Comment:** The above comment remains applicable.

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).*

January 6, 2021 Comment: The following shall be addressed:

- The outlets of BMP 2 and BMP 3 proposed discharge to a proposed storm sewer which ultimately conveys flow to both an existing 12-inch CMP (Inlet 2) and an existing 24-inch HDPE, contained within an existing easement. Clarification shall be provided as to the amount of discharge proposed at each pipe, with supporting calculations provided demonstrating that these pipes have adequate capacity to convey the discharge flows.
- The emergency spillway proposed for BMP 3 shall be relocated in an area away from the outlet pipe. A berm and inlet shall be provided downslope of the emergency spillway and shall convey flow discharged from the spillway to the storm sewer run between Inlets 1 and 3.
- A berm shall be provided upslope of the west tract boundary to ensure unmanaged flow is adequately conveyed to Inlets 1-3.
- The overflow structure associated with BMP 2 shall be identified. A berm and inlet shall be provided downslope of this structure and shall convey flow to the proposed storm sewer run between Inlets 1 – 3.

February 26, 2021 Comment: 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 storm manhole 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.
- 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.
- 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.

**Current Comment:** The following shall be addressed:

- Product specifications and maintenance requirements for the proposed MKB “Growsock” are to be provided on the Plans. The following items from the above comment remain applicable:
    - Because the filter sock is to be utilized as a permanent improvement, the specifications shall note the internal fill, longevity, material and chemical properties of the filter sock. The berm shall be designed to 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. The above specifications shall be approved by Westtown Township prior to consideration of Final Plan approval.
    - 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.
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.*

January 6, 2021 Comment: Additional BMPs including but not limited to rain gardens, water quality inlet filters, and compost material shall be provided to meet a pollution load reduction of 85%, as set forth in the Pennsylvania Best Management Practices Manual. BMP Worksheet 12, “Water Quality Analysis of Pollutant Loading from All Disturbed Areas” shall be provided with the Post Construction Stormwater Management Report and shall be used to compute the required reduction. Worksheet 13 shall be completed for each individual BMP proposed, with the BMPs achieving the required pollution reductions as specified by the BMP Manual.



February 26, 2021 Comment: The comments referenced in Comment 5 shall be addressed.

**Current Comment:** The items referenced in Comment 5 shall be addressed.

7. *This comment has been satisfactorily addressed.*
8. *This comment is no longer applicable.*
9. – 14. *These comments have been satisfactorily addressed.*
15. *This comment is no longer applicable.*
16. – 17. *These comments have been satisfactorily addressed.*
18. *This comment is no longer applicable.*
19. – 26. *These comments have been satisfactorily addressed.*
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.*

January 6, 2021 Comment: 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.

February 26, 2021 Comment: The above comment remains applicable.

**Current Comment:** The reference notes shall be revised to include the most recent revision date.

28. – 29. *These comments have been satisfactorily addressed.*
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.*

January 6, 2021 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.

February 26, 2021 Comment: The above comment remains applicable. The O&M Agreement shall be amended and re-recorded as required upon the applicant's conveyance of open space to the Homeowners Association.

**Current Comment:** The above comment remains applicable.

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

31. *This comment has been satisfactorily addressed.*

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.*

January 6, 2021 Comment: The applicant has requested a waiver from submission of a Preliminary Plan. CEG does not support consideration of this request based upon the extent of improvements proposed.

February 26, 2021 Comment: CEG defers consideration of this waiver request to Westtown Township.

**Current Comment:** CEG defers consideration of this waiver request to Westtown Township. **If this waiver is to be considered, CEG recommends that the applicable comments noted in this letter be addressed prior to consideration of Final Plan approval.**

33. *This comment has been satisfactorily addressed.*

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 proposed subdivision.

January 6, 2021 Comment: The following information shall be shown on the Plans:

- Easements associated with the storm 12" and 24" storm sewer along the adjacent properties to the west.
- Certification that no wetlands exist on site.

February 26, 2021 Comment: 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.

**Current Comment:** The following shall be addressed:

- 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.

35. – 37. *These comments have been satisfactorily addressed.*

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

January 6, 2021 Comment: CEG defers to the Westtown Township Traffic Engineer regarding required widening along South Concord Road.

February 26, 2021 Comment: The above comment remains applicable.

**Current Comment:** The above comment remains applicable.

39. – 40. *These comments have been satisfactorily addressed.*

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 curblin 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.*

January 6, 2021 Comment: The following shall be provided:



- Large scale plan views of the proposed driveways, showing spot elevations, slopes, and dimensions to demonstrate compliance with the above referenced criteria.
- Locations of all proposed roof drains shall be shown to demonstrate compliance with the above referenced criteria.

February 26, 2021 Comment: 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:
  - Spot elevations provided at intersection with Sawmill Court on both sides of driveway.
  - Slopes shown at both sides of driveway.
  - 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.

**Current Comment:** The following shall be addressed:

- Slope direction arrows shall be checked and revised where required, to ensure the arrow coincide with the direction of flow.
- Building roof drain locations shall be revised to correspond to the Drainage Areas shown on the “Inlet Drainage Area Plan”, as provided in the Stormwater Management Calculations. The following lots have roof areas within multiple drainage areas with only one roof drain shown, and shall be revised:
  - Lot 8
  - Lot 11
  - Lot 13
  - Lot 15
  - Lot 19

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.*





January 6, 2021 Comment: The following shall be addressed:

- A sidewalk detail has been provided on Sheet 15; however no proposed sidewalk has been shown on the Plan. CEG recommends the Township consider sidewalk along both sides of Sawhill Court, and along the tract frontage abutting South Concord Road.
- If deemed required, the Plans and Typical Roadway Cross Section Detail shall clearly show the sidewalk location in accordance with the above criteria.
- ADA ramps shall be provided at the intersections of Sawhill Court and South Concord Road. Large scale details, showing spot elevations, slopes, and dimension in accordance with the latest ADA Standards shall be provided.
- Details and specifications associated with the proposed 4-foot trail shall be provided.
- Details for the apron to be provided at the driveway crossing shall be provided.

February 26, 2021 Comment: 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.
- 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.
- Crosswalk pavement markings and signage shall be 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.

**Current Comment:** As discussed at the April 7, 2021 Planning Commission Meeting, sidewalks are to be provided along the site frontage abutting South Concord Road, and within the interior of the site. The following shall be provided:

- Four (4) handicap accessible ramps shall be provided along the South Concord Road sidewalk approaching 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.
- Crosswalk pavement markings and signage shall be shown along both Sawmill Court crossings and labeled on the Plan.
- The following details shall be provided, in addition to those listed above:
  - Typical section of concrete sidewalk.
  - Concrete driveway aprons.

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.*



January 6, 2021 Comment: The above referenced approvals shall be obtained, with correspondence provided to the Township, prior to Plan recording.

February 26, 2021 Comment: The above comment remains applicable.

**Current Comment:** The above comment remains applicable.

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.*

January 6, 2021: An Open Space Management Plan shall be provided in accordance with the above referenced criteria and the applicable criteria set forth in Section 149-921.

February 26, 2021 Comment: The above comment remains applicable. 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).

- **Current Comment:** The following shall be addressed pertaining to the Open Space Management Plan, in accordance with the Ordinance sections referenced above, and shall be adequately addressed prior to consideration of Final Plan approval: Sections 190-907.A(2 & 3): This section requires the provision of a minimum of 10% of the Open Space to be set aside as “active recreation”. The recreation definitions set forth in Section 170-201 list hiking under “passive” recreation, that the Township may require that the area be prepared and developed for such purposes, and list activities including “playgrounds, ball courts, golf courses, and swimming pools” under “active” recreation. Subsection 3 does indicate that area associated with walking trails does not need to be in addition to the 10% active recreation requirement, unless the Board determines that the 10% minimum is to be designated for active recreation. The Planning Commission shall evaluate whether the walking trail adequately addresses this Ordinance requirement, or if additional area and improvements for active recreation shall be provided.



- The applicant must clearly designate the specific uses proposed for the open space, along with required maintenance associated with each use, based upon the uses specified in Section 170-907.A(5). This designation shall be included on the Plan view or in the Legend for clarity.
- The applicant must demonstrate compliance with Section 170-907.A(7)(a), which requires that the areas which qualify to meet minimum open space requirements be not less than 75 feet in width at any point and not less than ½ acre of contiguous area.

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 compete the visual barrier within the prescribed time period.*

January 6, 2021: 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.

February 26, 2021 Comment: The above comment remains applicable and shall be subject to the pending site walk to include the applicant and Township.

**Current Comment:** The following shall be provided and shall be completed prior to consideration of Final Plan approval:

- If the applicant's arborist is to perform an evaluation regarding the health of the existing trees and their effect on the compensatory trees to be provided, this evaluation shall be completed in Report form, submitted to the Township for review, and approved by Westtown Township.
- In lieu of the above referenced arborist evaluation, a site walk with the Township shall be scheduled to determine the health of the existing trees and the effect on the compensatory trees to be provided.

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.*

January 6, 2021 Comment: A Tree Protection Management Plan must be provided as referenced above, based upon the extent of tree removal depicted on the Existing Conditions and Demolition Plan, and as verified by aerial photography. The Landscape Plan shall be revised to clearly demonstrate that the compensatory trees proposed meet the requirements set forth in Section 149-924.D(12) of the Ordinance. The Tree Protection Management Plan shall include all applicable criteria set forth in Section 149-924.D.

February 26, 2021 Comment: 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.

- 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 applicant has requested a waiver from providing the total amount of compensatory trees. Consideration of this request shall be deferred until the above referenced site walk has occurred. Revisions to the Tree Protection Management Plan may be required based upon the outcome of this meeting.

**Current Comment:** This comment shall remain applicable until Comment 45 is adequately addressed.

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).

January 6, 2021 Comment: 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.

February 26, 2021 Comment: See Comment #46, above.

**Current Comment:** The above comment remains applicable.

48. *This comment has been satisfactorily addressed.*

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

January 6, 2021 Comment: CEG defers comments pertaining to this Ordinance section to the Township Sanitary Sewer Engineer.

February 26, 2021 Comment: The above comment remains applicable.

**Current Comment:** The above comment remains applicable.

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 sings, 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.*

January 6, 2021 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.

February 26, 2021 Comment: The above comment remains applicable.

**Current Comment:** The above comment remains applicable.

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

51. – 52. *These comments have been satisfactorily addressed.*

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. 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. Th Plan shall contain a layout of all proposed fixtures by location and type.*
- b. 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.*
- c. 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.*

January 6, 2021 Comment: 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.

**Current Comment:** It is confirmed that the lighting as proposed shall not produce glare in excess of the requirements set forth in the above referenced section of the Zoning Ordinance. CEG defers to the Westtown Township Zoning Officer as to the applicability of the above referenced Zoning Ordinance sections applicable to minimum illuminance to be provided.

**GENERAL COMMENTS**

54. – 58. *These comments have been satisfactorily addressed.*



59. January 6, 2021 Comment: The following clarifications shall be provided on the PCSWM Detail Sheet (Sheet 7).

- A portion of the text at the top of the Detail from BMP 2 is missing and shall be included with the Detail.
- The invert elevation shown on the section view of the BMP 2 outlet structure (shown as 447.00) is incorrect and needs to be revised.

February 26, 2021 Comment: 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.

**Current Comment:** Additional supporting information shall be provided to support the volume calculations indicated in the Pond Reports for BMPs 1, 2, and 3, to clearly show volume associated with the tank modules (100% voids) and the surrounding stone (40% voids).

60. *This comment has been satisfactorily addressed.*

61. *This comment is no longer applicable.*

62. *This comment has been satisfactorily addressed.*

#### **NEW COMMENTS:**

63. February 26, 2021 Comment: The following information shall be provided as it pertains to the Homeowners Association Declaration and applicable documents:

- a. 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
- b. Evidence that the BMP and Compost Filter Sock Operation and Maintenance Notes have been incorporated into the HOA Documents.
- c. 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.

**Current Comment:** The above comment remains applicable. The above referenced budget shall also include proposed sidewalks to be maintained by the Homeowners Association. The above information shall be submitted for review and approved by the Township prior to consideration of Final Plan approval.

64. *This comment has been satisfactorily addressed.*

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



February 26, 2021 Comment: The applicant has requested a waiver from the referenced Ordinance requirement. CEG defers comment to the Township Traffic Engineer.

**Current Comment:** The above comment remains applicable.

**OTHER AGENCY APPROVALS:**

- Chester County Conservation District (NPDES Permit)
- Pennsylvania Department of Environmental Protection (Sewage Facilities Planning Module Exemption)
- Township Fire Marshal
- Township Zoning Officer

Please do not hesitate to contact me with any questions.

Best Regards,  
**CEDARVILLE Engineering Group, LLC**

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Senior Municipal Engineer

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