



September 27, 2023

Ms. Mila Carter  
Director of Planning and Zoning, Asst. Township Manager  
Westtown Township  
1039 Wilmington Pike  
West Chester, PA 19382

RE: Westtown School – Oak Lane Project  
Land Development Plans  
Review Response (CEG Review Letter #1)

Dear Ms. Carter:

On behalf of the Westtown School, we offer the following responses to CEG's review letter dated September 1, 2023. CEG's review comments appear below in regular typeface and our responses immediately follow each review comment and appear in ***bold italics***.

The plan has been granted conditional use approval on June 19, 2023 with the following conditions:

1. The Applicant shall consider during land development the installation of emergency backup lighting to illuminate segments of the pathway leading from the parking lot to the athletic field where the pole lights will be installed.

CEG Comment: The Land Development Plan shall be revised to include the referenced lighting.

***The referenced lighting is shown on the Layout and Utility Plans (see Sheets 11 and 21)***

2. Lighting for all parking lots associated with the use of the athletic fields shall comply with all applicable Township Ordinances and regulations.

CEG Comment: CEG defers to the Township's Lighting consultant to confirm compliance.

***Noted.***

3. All conditions of the conditional use approval imposed by the Board shall be clearly set forth on the Land Development Plans and recorded as conditions of final Land Development Approval.

CEG Comment: The conditions set forth by the Conditional Use decision have been shown on Sheet 1 of the Land Development Plans. This condition has been satisfactorily addressed.

***Noted.***

4. The Applicant shall provide truck turning templates to the Township demonstrating that emergency vehicles may safely access the parking lot located closest to the athletic fields.

CEG Comment: CEG defers to the Township's Traffic Engineer to confirm compliance.

**Noted.**

5. The Applicant shall provide the specifications for the scoreboard which must meet all relevant Township Ordinance requirements.

CEG Comment: CEG defers to the Township's Lighting Consultant to confirm compliance.

**Noted.**

6. Applicant shall analyze the intersection of Oak Lane and Westtown Road and coordinate improvements with the Township and its consultants to the extent necessary to address visibility and ensure appropriate sight distance.

Comment: CEG defers to the Township's Traffic Engineer to confirm compliance.

**Noted.**

7. If required by PennDOT or Township criteria, the Applicant shall obtain a permit for the existing flashing signal that was installed on Oak Lane.

CEG Comment: CEG defers to the Township's Traffic Engineer to confirm compliance.

**Noted.**

8. The Applicant shall provide specifications for the public announcement system and such system must comply with all relevant Township Ordinance criteria.

CEG Comment: The Noise Propagation Survey prepared by Everbach Acoustics shall address comment number 7 in CEG's May 5, 2023 Conditional Use Review Letter.

***The Noise Propagation Survey has been amended to address the referenced comment.***

9. If the Applicant or its agent(s) obtains conditional use approval for the installation of solar panels on its property, it shall provide consistent landscaping buffers on the Land Development Plan associated with the athletic fields improvements as well as the plans for solar panel installation.

CEG Comment: Comments pertaining to proposed landscaping are included in this letter.

***The referenced landscaping comments have been addressed immediately following each respective review comment.***

10. The Applicant and the use and development of the Property shall comply with the representations and commitments made in the testimony and exhibits presented at the hearing to the Board.

CEG Comment: CEG defers to the Zoning Officer to confirm compliance.

**Noted.**

11. The Applicant and the use and development of the Property shall comply in all respects with all ordinances and regulations of Westtown Township and with all applicable provisions of any statute, ordinance or regulation of any municipal or governmental entity having jurisdiction over the Property or the uses thereon.

CEG Comment: The plans shall comply with this Review Letter and all correspondence provided by the Township and its consultants.

***Noted. Will comply.***

12. The athletic field light system may only be energized in conjunction with an event directly related to and under the control of the educational or sports program of Westtown School. No private organizations or other public entities may use the athletic field lights for lighted events of any reason.

CEG Comment: A note shall be provided, on the plan to be recorded, stating that the athletic field light system may only be energized in conjunction with an event directly related to and under the control of the educational or sports program of Westtown School. A statement that "No private organizations or other public entities may use the athletic field lights for lighted events of any reason." shall be added to the Record Plan.

***Plan notes to this effect has been added to Sheet 2. (See Notes E.1 and E.2)***

The following waivers have been requested by the Applicant:

- I. Section 144-301.T – to allow disturbance within 75 feet of the top of bank of a perennial waterway for installation of a stormwater management facility.

CEG does not recommend consideration of this request as the Riparian Buffer areas, as defined in Section 144-301.U of the Township's Stormwater Management Ordinance, are not currently shown on the PCSM Plan. If compliance with the applicable criteria in the referenced Ordinance section cannot be achieved, request for applicable relief will be reevaluated.

***The required riparian buffer area has been added to the plans and this waiver request is withdrawn.***

- II. Section 144-301.U.(1) – to reduce the minimum riparian buffer distance to 60 feet to allow for the installation of the berm of a stormwater management facility.

CEG does not recommend consideration of this request because the Riparian Buffer areas, as defined in Section 144-301.U of the Township's Stormwater Management Ordinance, are not currently shown on the PCSM Plan. If compliance with the applicable criteria in the referenced Ordinance section cannot be achieved, request for applicable relief will be reevaluated.

***The required riparian buffer area has been added to the plans and this waiver request is withdrawn.***

- III. Section 144-311.B.(3) – to allow for HDPE drain basins in select locations instead of precast concrete.

CEG offers no objection to consideration to allow HDPE drain basins in lieu of precast concrete inlets for the following inlets as shown on the plans in the vicinity of the fields: I-B6, I-B12A, I-B14, I-B13, I-B12, I-B11, I-B10, and I-B9.

***Noted.***

- IV. Section 144-311.B.(4) – to allow for 0” drop between invert in elevations to structures and the subsequent invert out elevations.

CEG offers no objection to consideration of relief from providing a minimum two-inch drop in inlets in the pipe run from I-B14 to EW-2.

**Noted.**

- V. Section 144-311.B.(8) – to reduce the minimum storm sewer size to 8 inches.

CEG offers no objection to consideration of relief from minimum pipe diameter of 15 inches to allow 12 inches, 10” inch, and 8-inch diameter pipes from A-A11 to I-A8, I-B14 to OCS-2, I-B6 to MH-B3, and I-B12A to I-B12.

**Noted.**

- VI. Section 144-311.B.(9) – to reduce the minimum cover for storm sewers in lawn areas from 24” to 12”.

CEG offers no objection to consideration of relief from providing 24 inches of cover over pipes for pipes located in lawn or field areas, provided that a minimum of 12 inches of cover is provided.

**Noted.**

- VII. Section 144-311.B.(11) – to reduce the minimum pipe velocity to less than 3 feet per second.

CEG offers no objection to consideration of relief to allow a minimum pipe velocity of less than 3 feet per second for storm pipes, applicable to pipes with a slope of less than 0.75% .

**Noted.**

- VIII. Section 144-311.C.(2) – to reduce the minimum top berm width of permanent stormwater structures to 5-8 feet to match the requirements of temporary sediment traps/basins.

CEG does not support consideration of relief from providing a minimum 10 foot wide top of berm. A 10-foot wide top of berm is required to adequately accommodate the embankment clay core and outlet pipe anti-seep collars.

**Noted. The basins have been modified to conform with this ordinance requirement and the waiver request is withdrawn.**

- IX. Section 144-311.C.(3) – to allow for a 0% basin bottom slope to promote infiltration.

CEG offers no objection to consideration of relief as it applies to BMP 1 to support infiltration in the BMP.

**Noted.**

CEG offers no object to consideration of relief as it applies to BMP 4 provided that the facility is redesigned to demonstrate compliance with the applicable criteria set forth in Sections 144-305 and 144-306 of the Stormwater Management Ordinance.

**The basin design has been revised as necessary and additional clarification/plan revisions have been provided to ensure compliance with these sections.**

- X. Section 144-311.C.(5) – to allow for SLCPP in lieu of concrete pipes for basin outlet barrels and to reduce the minimum anti-seep collar projection based on dimensions calculated following the PA DEP E&S Manual.

CEG has no objection to consideration of relief from using concrete pipes for basin outlet pipes provided that the anti-seep collars are designed in accordance with all applicable PADEP requirements.

**Noted.**

- XI. Section 149-700.A – to allow for submission of a preliminary/final plan instead of a preliminary then final plan.

CEG offers no objection to consideration of this request.

**Noted.**

- XII. Section 149-924.D.(12).(d) – to not provide the full amount of compensatory trees and instead receive credits from the (currently unapproved) Westtown School Solar project and to reduce the minimum caliper of trees provided from 3.5 inches to 2 inches.

CEG does not recommend consideration of this relief. The required compensatory tree planting shall be provided for each project exclusively and all compensatory trees shall have a minimum caliper of 3.5 inches.

**The plans have been revised such that compensatory trees are provided in full accordance with the applicable Ordinance sections and this waiver request is withdrawn.**

- XIII. Section 149-925.H.(1) – to reduce the minimum caliper of trees to be provided from 3.5 inches to 2 inches.

CEG does not recommend consideration of relief from this requirement. All compensatory trees shall have a minimum diameter of 3.5 inches.

**The Applicant will comply, and this waiver request is withdrawn.**

- XIV. Section 149-925.H.(3) – to provide shrubs less than the minimum 2-foot height with ones expected to be at least two feet in height within two years.

CEG does not recommend consideration of relief from this requirement. All shrubs, hedges, and yews required by the Ordinance shall be two feet in height.

**The Applicant will comply, and this waiver request is withdrawn.**

#### Chapter 80 – Erosion, Sediment Control and Grading

The following shall be addressed:

- An Erosion and Sediment Control Narrative and Report shall be submitted to the Township with future submissions and shall include supporting calculations for all proposed BMPs.

**The Erosion and Sediment Control Narrative/Report for the project has been submitted, as requested.**

- CFS #18-5 shall be relocated to not cross the construction entrance. As Construction Entrance #3 is labeled “optional”, permanent CFS shall be located on both sides with a CFS wholly within the roadway to be installed when RCE #3 is not present.

***CFS#18-5 has been revised accordingly.***

- The Construction Sequence shall clarify how the installation of stormwater inlets/storm sewer shall coincide with the installation of the rock construction entrance.

***General Sequencing of Construction Activities step #2 has been revised to indicate that the inlets may be installed at the time or RCE installation, at the contractor’s discretion.***

- Additional perimeter controls shall be provided between Sediment Trap #1 and CFS #24-6.

***CFS 24-6 has been extended to provide additional protection.***

- Additional perimeter controls shall be provided along Oak Lane at the northern most edge of the slope grading to prevent runoff entering the small existing swale.

***CFS 18-7 has been extended and the LOD line has been adjusted to more clearly show the filter sock.***

- The Erosion and Sedimentation Plan shall provide compost filter sock around the perimeter of the proposed topsoil stockpile.

***A compost filter sock has been added around the topsoil stockpile area.***

- The word “recommended” shall be removed from the topsoil stockpile label.

***The word “recommended” has been removed from the topsoil stockpile label.***

- General Erosion and Sediment Control Notes 1, 2, 27, and 33, Construction Staging Notes A and B, and General Sequencing of Construction Activities 3, 7, and 25 shall be revised to include “and Westtown Township” immediately following Chester County Conservation District.

***The notes have been revised accordingly.***

- General Erosion and Sediment Control Notes 12 and 13, Sheet 3, shall be revised to reference the installation of compost filter sock, or clarification shall be provided to indicate where the installation of silt fence is proposed.

***The notes have been revised accordingly.***

- Sediment Basin B-1 Detail (Sheet 36 of 48), Sediment Trap A Cross Section detail (Sheet 36 of 48), Sediment Trap #1 callout (Sheet 17 of 48) and Sediment Basin #4 callout (Sheet 18 of 48) shall be revised for consistency with designations provided on the Erosion & Sedimentation Control and PCSM Plans. Applicable references within the Construction Sequence (Sheet 4 of 48) shall be updated accordingly.

***The detail labels and construction sequence have been revised for consistency.***

- The location of the diversion berm referenced in Construction Sequence Step 14 (Sheet 4) shall be shown on the Erosion and Sedimentation Control Plan.

***The diversion berm has been labeled and the construction sequence has been revised to describe the location as the “southeastern fill slope.”***

- Steps shall be added to the Construction Sequence directing the conversion of sediment traps/basins to permanent stormwater BMPs.

***An additional step (#21) has been added to the construction sequence to direct conversion of the trap/basin.***

- Emergency spillways associated with Sediment Trap #1 and Sediment Basin #4, shall be clearly shown on the Erosion and Sedimentation Control Plans, Sheets 17 and 18.

***The emergency spillways are now shown on the E&S Plan sheets.***

- A step shall be added to the Construction Sequence referencing the installation of high visibility fencing around the areas for proposed BMPs, in accordance with Infiltration System Construction Notes 1 on Sheet 2 of 48.

***A step (#10) has been added to the sequence addressing high-visibility fencing. Fencing is not proposed for BMP's 1 and 4 given that they will be utilized for sediment removal. The Infiltration System Construction Notes on sheet 2 have been revised to state that fencing shall be installed where indicated on the plans.***

#### Chapter 144 – Stormwater Management

2. 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.

***Noted. An opinion of probable cost for public improvements will be submitted for review and approval.***

3. The Applicant has requested a waiver from this section of the Ordinance. CEG does not recommend consideration of this request because the Riparian Buffer areas, as defined in Section 144-301.U of the Township's Stormwater Management Ordinance, are not currently shown on the PCSM Plan. If compliance with the applicable criteria in the referenced Ordinance section cannot be achieved, request for applicable relief will be reevaluated.

***The required riparian buffer area has been added to the plans and this waiver request is withdrawn.***

4. The Applicant has requested a waiver from this section of the Ordinance. CEG does not recommend consideration of this request, as the Riparian Buffer areas, as defined in Section 144-301.U of the Township's Stormwater Management Ordinance, are not currently shown on the PCSM Plan. If compliance with the applicable criteria in the referenced Ordinance section cannot be achieved, the request for applicable relief will be reevaluated.

***The required riparian buffer area has been added to the plans and this waiver request is withdrawn.***

5. The following shall be addressed:

- Appendix D of the Stormwater Management Report, "Infiltration BMP 1 Calculations", reference infiltration rates associated with Test Pits TP-14A, TP-14B, TP-15A, TP-15B, TP-16A, and TP-16B, however the referenced test pits and corresponding limiting zone/infiltration rates are not provided in the Report, Appendix I, "Infiltration Reports", and the locations are not shown on the PCSM Plans (Sheets 19 and 20). This information shall be provided for review to demonstrate compliance with the referenced Ordinance section.

***The test pit locations are now shown on the plans.***

- Appendix D of the Stormwater Management Report, "Infiltration Basin BMP 4 Calculations", reference a Volume Infiltrated value of 18,850 cubic feet, however the "Typical Infiltration Basin/Rain Garden Cross Section Detail", Note Number 7, states that "Basin B-4 is not designed as an infiltration basin, but to function as a water quality BMP. The subgrade is to remain uncompacted and prepared for information, however geotechnical testing is not required. The underdrain valve for basin B-4 is to remain open." This discrepancy shall be addressed.

***Note 7 has been removed from the detail. This note referred to a previously proposed basin related to improvements that are no longer being proposed.***

- The "Storage Volume" cell on the provided DEP worksheet for BMP 1 shall be revised to 12,201 CF, consistent with the storage provided at the lowest outflow elevation (2" weir at 290.50).

***The storage volume value provided in the DEP worksheet for BMP 1 is now consistent with the storage provided at the lowest outflow elevation.***

- The Infiltration BMP 2 Outlet Structure Detail on Sheet 41 of 48 shall revise the riser pipe crest elevation from 1368.25 to 316.75, consistent with the Stormwater Management Report.

***The detail has been revised accordingly.***

- The Infiltration BMP 3 Outlet Structure Detail on Sheet 41 of 48 shall revise the riser pipe crest elevation from 1368.25 to 321.75 and shall label the 3" orifice elevation of 321.0, consistent with the Stormwater Management Report.

***The detail has been revised accordingly.***

6. The following shall be addressed:

- Test pit data, including but not limited to limiting zone elevation and infiltration rates, shall be provided in the Stormwater Management Report to demonstrate compliance associated with BMP1 with the above referenced criteria.

***The test pit information for Tp-4, TP-15 & TP-16 is provided in the Supplemental Infiltration Feasibility Report, included in Appendix I of the Report.***

- The above referenced test pit locations shall be shown on the PCSM Plan.

***The test pit locations are now shown on the plans.***



- Dewatering calculations shall be amended as applicable based upon the above referenced testing results.

***The dewatering calculations have been revised accordingly.***

- If BMP 4 is not to be utilized as an infiltration facility, all references to infiltration and dewatering associated with this facility shall be eliminated.

***BMP 4 is intended to be used for infiltration. The reference to Basin B-4 has been removed from the detail.***

- The plan dimensions of the infiltration beds to be located under the synthetic turf fields (BMP 2 and 3), shall be shown on the PCSM Plan and the Multipurpose Field/Infiltration Bed Cross Section Details, Sheet 41.

***The dimensions of the BMPs are shown on plan sheets 15 & 16. Additional dimensions have been added to these sheets as well as the cross-section details. The infiltration bed outside dimensions have also been added to the PCSM Plan sheets 19 & 20.***

7. Sumps, with a minimum depth of six (6) inches below the lowest pipe invert, shall be provided at structures located immediately upslope of proposed BMPs.

***Six-inch sumps have been added to I-A3 and MH-B3.***

8. The above referenced notes shall be added to the Multi-Purpose Field/Infiltration Bed Cross Sections details, Sheet 41.

***The required notes have been added to plan sheet 41. Please note that note (4), as listed on the comment letter, has been modified to omit the requirement that the bottom of the facilities be covered with fabric. In our experience non-woven fabric placed on the bottom of infiltration BMPs is prone to clogging and does not provide adequate permeability for infiltration whereas stone placed directly on the subgrade provides for a much more suitable interface between the storage volume and subsoils.***

9. The following shall be addressed:

- The Typical Infiltration Basin/Rain Garden Cross Section Detail indicates that the underdrain valve for BMP 4 is to remain open at all times. The Pond Report associated with BMP shall therefore include the underdrain as a basin outlet as part of the facility routing.

***The note in question was referring to a BMP that is no longer proposed. The note has been removed from the detail.***

- A detail shall be provided clearly showing underdrain/gate valve configuration as proposed.

***The outlet structure detail has been revised to include this information.***

10. The following shall be addressed:

- A tabulation shall be provided of existing ground cover to validate that 40% of all existing impervious area within the limits of disturbance is treated as meadow for volume and rate control calculations.

***The Pre-Development CN tabulation table has been revised to incorporate this requirement and a modified Worksheet 4 has been added to the volume section of the report. An additional volume summary has been added to the narrative summarize the calculations separately from the NPDES requirements.***

- The NRCS (SCS) TR-55 Watershed Weighted Curve Number Pre-Development Summaries shall be revised to remove Row Crops and Open Space and use Meadow for all on-site predevelopment conditions.

***The Pre-Development CN tabulation and routings have been revised accordingly.***

11. Appendix G of the Stormwater Management Report indicates that the emergency spillway associated with BMP has been designed to accommodate 0.5 feet of freeboard. The design of this spillway shall be revised in accordance with the above-referenced Ordinance section.

***The BMPs have been re-graded to provide the required freeboard.***

12. The Applicant has requested a waiver from the above referenced section of the Ordinance. CEG has no objection to granting a waiver from using precast concrete inlets for the following inlets as shown B12, I-B11, I-B10, and I-B9.

***Noted.***

13. The Applicant has requested a waiver from the above referenced section of the Ordinance. CEG offers no objection to consideration of relief from providing a minimum two-inch drop in inlets in the pipe run from I-B14 to EW-2.

***Noted.***

14. The Applicant has requested a waiver from the above referenced section of the Ordinance. CEG offers no objection to consideration of relief from minimum pipe diameter of 15 inches to allow 12-inch, 10-inch, and 8-inch diameter pipes from A-A11 to I-A8, I-B14 to OCS-2, I-B6 to MH-B3, and I-B12A to I-B12 as previously noted.

***Noted.***

15. The Applicant has requested a waiver from the above referenced section of the Ordinance. CEG offers no objection to consideration of a waiver from providing 24 inches of cover over pipes for pipes located in lawn or field areas, provided that a minimum of 12 inches of cover is provided as previously noted.

***Noted.***

16. The Applicant has requested a waiver from the above referenced section of the Ordinance. CEG offers no objection to consideration of relief from providing a minimum pipe velocity of 3 feet per second for storm sewer, provided that this is applicable to pipes with a slope of 0.75% or less.

***Noted.***

17. The Applicant has requested a waiver from the above referenced section of the Ordinance.

CEG does not support consideration of relief from providing a minimum 10-foot wide top of berm. A 10-foot wide top of berm is required to adequately accommodate the embankment clay core and outlet pipe anti-seep collars.

***The basins have been re-graded to provide the required berm width and the waiver request is withdrawn.***

18. The Applicant has requested a waiver from the above referenced section of the Ordinance. CEG offers the following:

- CEG offers no objection to consideration of relief as it applies to BMP 1 to support infiltration in the BMP.

***Noted.***

- CEG offers no objection to consideration of relief as it applies to BMP 4 provided that the facility is redesigned to demonstrate compliance with the applicable criteria set forth in Sections 144-305 and 144-306 of the Stormwater Management Ordinance.

***The basin design has been revised as necessary and additional clarification/plan revisions have been provided to ensure compliance with these sections.***

19. The Applicant has requested a waiver from the above referenced section of the Ordinance. CEG offers no objection to consideration of relief from using concrete pipes for basin outlet pipes provided that a detail and associated specifications for the anti-seep collars are provided on the plan and are deemed appropriate for the pipe proposed.

***Noted.***

20. A note shall be added to the PCSM Plan and the cover sheet of the report that reference one another by title and most recent revision date.

***A note referencing the report has been added to plan sheet 2 and a note referencing the plans has been added to the PCSM Report Cover.***

21. The Drainage Plan Acknowledgement on Sheet 1 of 48 shall be revised to include all language within the above referenced section of the Ordinance.

***The note has been revised as requested.***

22. The above referenced note shall be added to the Post Construction Stormwater Management (OCSM) Plan.

***This note has been added to the Cover Sheet.***

23. The following shall be addressed:

- The tract boundary bearings and distances shall be labeled on the Plan.

***A waiver of this requirement is being requested by the Applicant.***

- A statement of the total area of the property being developed shall be added to the Plan.

***This statement appears in the “Project Narrative” found on the Cover Sheet (Sheet 1 of 48).***

- Easement locations for proposed sanitary and stormwater conveyance and BMP facilities shall be shown on the PCSM Plan, in accordance with the applicable criteria set forth in Article VII of the Stormwater Management Ordinance.

***A blanket easement is being granted to the municipality and a statement to this effect can be found on the PCSM Plans (Sheets 19 and 20) as well as the Notes Sheet (2).***

- The stormwater easement referenced in Notes B Stormwater Management 5 on Sheet 2 of 48 shall be clearly shown on the Plans and include all bearings and distances needed to locate it.

***A blanket easement is being granted to the municipality and a statement to this effect can be found on the PCSM Plans (Sheets 19 and 20) as well as the General Plan Notes Sheet (2).***

24. The designated use of the receiving waters shall be clearly noted on the Plan.

***The receiving surface waters and designated uses are now provided on the PCSM Plan sheets 19 and 20 as well as on Sheet 2 (General Plan Notes)***

25. All areas classified as steep slopes, as set forth in Section 170-402 of the Zoning Ordinance, shall be shown on the PCSM Plan.

***The steep slopes as defined in the ordinance are now mapped on the PCSM Plan Sheets (19 and 20 of 48). As substantiated previously, all mapped steep slopes within the limit of disturbance are man-made, are maintained as lawn and are therefore not ecologically sensitive, are situated such that disturbance of the slopes will not threaten deposition upon nor damage to adjacent properties and public roadways, and therefore do not warrant the protections afforded in the Steep Slope Conservation District. We await the Zoning Officer’s determination on this matter.***

26. A tabulation shall be added to the Plan in accordance with the referenced Ordinance Section. This tabulation shall supplement the Area and Bulk Requirements Table on Sheet 1 and include only areas within the limits of disturbance.

***A table containing the required information has been added to Sheet 1 (Cover Sheet) within the Area and Bulk Requirements.***

27. The following shall be addressed:

- Notes B.8 shares a number with another Notes B.8 on Sheet 2 and all notes shall be renumbered accordingly.

***The notes have been re-numbered accordingly and note B.10 has been revised to include the expanded verbiage.***

- Note B.8 on Sheet 2 shall be expanded to include the following language: “The municipality is granted the right, but not the obligation, to enter the property for the purposes on inspections and maintenance activities regarding the BMPs shown on this Plan”.

***The notes have been re-numbered accordingly and note B.10 has been revised to include the expanded verbiage.***

28. A Stormwater Management Operation & Maintenance Agreement shall be executed and recorded for the proposed stormwater BMP's to be incorporated. The O&M Agreement will be provided by Westtown Township at the time that stamped and approved Plans are issued for the project. The applicable signatures must be signed by the property owner prior to Plan recording.

***The applicant will execute and record the agreement when provided.***

Chapter 149 – Subdivision and Land Development Ordinance

29. 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.

***Noted. An opinion of probable cost for public improvements will be submitted for review and approval.***

30. The following shall be addressed:

- The tract boundary bearings and distances shall be labeled on the Plan.

***A waiver of this requirement is being requested by the Applicant.***

- Existing monumentation along Westtown Road, adjacent to BMP1, shall be shown.

***No monumentation was found along the Westtown Road frontage adjacent to BMP 1, and therefore no monumentation appears on the plans in this vicinity.***

- A statement of the total area of the property being developed shall be added to the Plan.

***This statement appears in the "Project Narrative" found on the Cover Sheet (Sheet 1 of 48).***

31. Precautionary and prohibitive slope, in accordance with the criteria set forth in Section 170-402 of the Zoning Ordinance, shall be shown on the Plan.

***Precautionary and prohibitive slopes are shown on the Existing Conditions, Grading, and PCSM plans.***

32. The location (and ownership if not part of the public system) of all utilities shall be shown as required by the above referenced section of the Ordinance.

***The location and ownership of all charted utilities within the Limit of Disturbance has been noted on the Utility Plans.***

33. Easements associated with stormwater management BMPs and conveyance facilities shall be shown on the PCSM Plan. If a blanket easement is to be offered, this shall be clearly noted on the PCSM Plan.

***A blanket easement is being granted to the municipality and a statement to this effect can be found on the PCSM Plans (Sheets 19 and 20) as well as the General Plan Notes Sheet (2).***

34. A notice of capacity has been provided for sanitary service. This letter shall be subject to the review of the Township's Sewer Engineer.

***Noted.***

35. Riparian buffer areas shall be clearly shown on the Site and PCSM Plans.

***The required riparian buffer area has been added to the plan sheets, including the PCSM plans.***

36. The Requested Waivers/Modifications list shown on Sheet 1 of 48 (13 requests) shall be revised to include all waivers outlined in the received Waiver Request Letter (14 requests).

***The list of requested Waivers/Modifications on Sheet 1 has been amended to reflect the revised plans and the relief now being sought.***

37. The Applicant has requested a waiver from this section of the Ordinance to allow for submission of a combined Preliminary/Final Plan. CEG offers no objection to consideration of this request.

***Noted.***

38. A note shall be added to the Utility Plan (Sheet 21 and 22 of 48) referencing that all sanitary sewer improvements shall be in accordance with all standards and specifications of Westtown Township.

***A note to this effect has been added to the Utility Plans (Sheets 21 and 22 of 48).***

39. See Comment #1.

***See responses to Comment #1.***

40. The Operation and Maintenance Sheet (Sheet 5 of 48) shall be revised to remove all note references of "As specified in the O&M Plan" and like notation to a legitimate reference (example: Maintenance Requirements note iv to reference Infiltration Basin tables).

***The Operation and Maintenance Sheet has been accordingly revised.***

41. The stormwater easement referenced in Notes B Stormwater Management 5 on Sheet 2 of 48 shall be clearly shown on the Plans and include applicable bearings and distances.

***A blanket easement is being granted to the municipality and a statement to this effect can be found on the PCSM Plans (Sheets 19 and 20) as well as the General Plan Notes Sheet (2).***

42. The Applicant has requested a waiver from Section 144-311.B.(3) to allow HDPE drain basins. If the Applicant intends to request a waiver from the referenced Stormwater Management Ordinance section, a waiver shall be requested from 149-803.B.(3).(c) as well.

***A waiver is now being requested from both Ordinance Sections.***

43. The Applicant has requested a waiver from Section 144-311.B.(4) to allow omitting the two-inch drop from inlet to outlet. If the Applicant intends to request a waiver from the referenced Stormwater Management Ordinance section, a waiver shall be requested from 149-803.B.(3).(d) as well.

***A waiver is now being requested from both Ordinance Sections.***

44. The Applicant has requested a waiver from Section 144-311.B.(8) to allow for a minimum diameter of less than 15 inches. If the Applicant intends to request a waiver from the referenced Stormwater Management Ordinance section, a waiver shall be requested from 149-803.B.(3).(g) as well.

***A waiver is now being requested from both Ordinance Sections.***

45. The Applicant has requested a waiver from Section 144-311.B. (9) to allow for a minimum cover of 12 inches instead of 24 inches. If the Applicant intends to request a waiver from the referenced Stormwater Management Ordinance section, a waiver shall be requested from 149-803.B.(3).(h) as well.

***A waiver is now being requested from both Ordinance Sections.***

46. Typical Infiltration Basin/Rain Garden Cross Section Note 1 shall be amended to include specifying “Berm constructed of earth of a clay base with no topsoil and a cutoff trench key continuous along the berm base” as required by the above referenced Ordinance section.

***The above note has been added to the Basin/Rain Garden Cross section as requested.***

47. The Applicant has requested a waiver from Section 144-311.C.(2) to allow for a minimum berm width less than 10 feet. If the Applicant intends to request a waiver from the referenced Stormwater Management Ordinance section, a waiver shall be requested from 149-803.B.(4).(b) as well.

***The above waiver request has been withdrawn.***

48. The Applicant has requested a waiver from Section 144-311.C.(3) to allow for a basin bottom slope of 0%. If the Applicant intends to request a waiver from the referenced Stormwater Management Ordinance section, a waiver shall be requested from 149-803.B.(4).(c) as well.

***A waiver is now being requested from both Ordinance Sections.***

49. The Applicant has requested a waiver from Section 144-311.C.(5) to allow for a basin bottom slope of 0%. If the Applicant intends to request a waiver from the referenced Stormwater Management Ordinance section, a waiver shall be requested from 149-803.B.(4).(e) as well.

***A waiver is now being requested from both Ordinance Sections.***

50. The BMP emergency spillways shall be revised to be constructed of concrete/grass pavers as required by the above referenced section of the Ordinance.

***Flexamat, which is a grass paver specifically designed for stormwater management applications, is now being proposed as the emergency spillway liner for both BMP Basins.***

51. Sumps shall be provided at structures immediately upslope of proposed BMPs, as previously referenced.

***There are no inlets upstream/tributary to any of the underground facilities. Sumps have been added to the final structure prior to discharging to the above ground facilities.***

52. The following shall be addressed:

- The submitted traffic impact study (Transportation Operational Analysis) is subject to the review and approval of the Township Traffic Engineer.

**Noted.**

- The submitted traffic impact study narrative shall be revised in accordance with Conditional Use Approval condition 12. The first paragraph of "Project Background" shall be amended to remove the reference of the fields being used on a rental basis.

***The Applicant wishes to clarify that while the synthetic turf fields will indeed be used on a rental basis, the lights will not be in use during those times.***

53. The following shall be addressed:

- A water study shall be submitted to the Township for review and approval.

***A narrative addressing the nature of the proposed water usage for the project has been attached for the Township's review.***

- Conformance to applicable Westtown Township requirements is subject to the review and approval of the Township Authority.

**Noted.**

- Documentation shall be provided demonstrating acceptance of the system modifications and distribution from DEP, PUC, and CCHD as applicable.

***Noted. Documentation demonstrating acceptance of the system modifications and distribution will be provided once received from the Authorities having jurisdiction.***

54. Minimum clear sight triangles of 75 feet shall be provided on the Landscape Plan (Sheet 23 of 48) for the proposed parking entrance and exit.

***Because the intersection in question includes a driveway and not two streets, clear sight triangles are not required by the Ordinance. Instead, the Applicant has provided the available safe sight stopping distance, which is typically required by PennDOT for driveways connecting to State Highways.***

55. A roadway restoration detail shall be provided for repairing the area where the parking area accessway connections are proposed.

***A roadway restoration detail has been provided, as requested.***

56. The Applicant has included a Cobble Curb Detail on Sheet 29 of 48 however all other details that are ancillary to proposed curbs (pavement sections, underground beds) show standard concrete curbing. The following shall be addressed to provide clarity:

- The Layout Plans (Sheet 11 and 12 of 48) shall be revised to specify the locations of proposed curbing and curb type.

***A note has been added to the Layout Plan within the proposed parking area indicating that all curbing within the parking area is to be cobble curb unless otherwise noted.***



- If standard concrete curbing is proposed, a detail shall be provided on the Plan; otherwise, all details that show concrete curbing shall be revised to show cobble curbing.

***Standard concrete curbing is not proposed.***

- Both Multi-Purpose Field/Infiltration Bed details reference 12" curbing. Details consistent with the curb proposed shall be added to the Plan or the Cobble Curb detail amended accordingly.

***Detailed information regarding the level spreader curbing proposed at the outfall structures for BMP 1 and BMP 4 can be found in detail G, Sheet 39 of 48. Multi-purpose field curbing is detailed on Sheet 29 of 48.***

57. Profile views of the entrance and exit to the parking area shall be provided on the Plan that demonstrate compliance with the referenced Ordinance section.

***Spot elevations demonstrating compliance with this Ordinance Section have been added to the first 20 feet of each of the two parking area entrances/exits.***

58. The Concrete Sidewalk detail shall be amended to include a view adjacent to asphalt paving.

***The concrete sidewalk detail has been accordingly amended.***

59. The following shall be addressed:

- Enlarged views showing spot elevations, dimensions, and slopes shall be provided for all ADA ramps to confirm compliance with ADA regulations.

***Enlarged views showing spot elevations and slope have been provided on Sheets 14 and 32.***

- All ramps shall be labeled for clarity between the Plan views and the enlarged views.

***Ramps have been labeled for clarity, as requested.***

60. Grading in the vicinity of CFS#18-3 shall be relocated outside of the tree protection zone(s).

***Grading has been modified in the vicinity of CFS#18-3 such that it no longer encroaches into tree protection areas.***

61. The following shall be addressed:

- Specimen and non-specimen trees to be removed shall be clearly labeled on the Existing Features and Tree Protection Management Plans (Sheets 8, 9, 23, and 24 of 48).

***The Tree Protection Management Plan has been revised to clearly identify the specimen and non-specimen trees to be removed.***

- Compensatory trees shall be exclusive of trees required by other sections of the Ordinance. The Tree Protection Management and Landscape Plans shall clearly designate proposed trees to be used to meet compensatory requirements (Section 149-924) and those used to meet the requirements set forth in Section 149-925 of the Ordinance.

***The plans have been revised such that they comply with this Ordinance provision.***

- A table shall be provided on the Tree Protection Management Plan outlining the species and size of proposed trees to be used to meet compensatory tree requirements set forth in Section 149-924.

***A table meeting these requirements has been provided on Sheet 24A, and is included in the Tree Protection Management Plan by reference.***

- Tree protection shall be provided for the existing tree located adjacent to the existing/proposed trail.

***Tree protection has been provided in the noted location as requested.***

- Tree protection shall be provided for the tree mass downgradient of BMP 1.

***Tree protection has been provided in the noted location as requested.***

- Tree protection shall be provided for the trees upgradient of BMP 4 by TP-8.

***Tree protection has been provided in the noted location as requested.***

62. The Applicant has requested a waiver from this section of the Ordinance. CEG does not recommend consideration of relief from this requirement. All compensatory trees shall have a minimum diameter of 3.5 inches.

***The above waiver request has been withdrawn.***

63. The Applicant has requested a waiver from this section of the Ordinance. CEG does not recommend consideration of relief from this requirement. All shrubs, hedges, and yews required by the ordinance shall be two feet in height.

***The above waiver request has been withdrawn.***

64. The following shall be addressed:

- A tabulation shall be provided noting the number of required and proposed trees for the site. Plantings on the Landscape Plan (Sheet 23 and 24 of 48) shall clearly indicate what requirement proposed trees are to address.

***A tabulation has been provided on Sheet 24A.***

- Three proposed trees within BMP 4 do not have a designation and shall be labeled.

***We have verified that all trees within BMP 4 now have a designation/label.***

- All proposed BMP plantings shall be removed from the internal basin berm slopes and berm tops. This includes but is not limited to the following:
  - BMP 1
    - 1 of 3 BNH tree planting.
    - 9 CR shrub plantings.
    - 3 PO shrub plantings.
    - 5 MP shrub plantings.

- 5 SD shrub plantings
- BMP 4
  - The majority of plantings along the eastern berm.

***BMP plantings have been removed from internal basin berm slopes and berm tops.***

- Due to the limited cover currently provided for all storm pipes, all planting materials shall maintain a minimum horizontal separation of 10 feet for trees and 5 feet for shrubs.

***Noted. There are no trees or shrubs encroaching upon shallow storm piping.***

65. The following shall be addressed:

- The provided capacity verification letter is subject to review by the Westtown Township Sewer Engineer.

***Noted.***

- Conformance with Westtown Township requirements and regulations is subject to the review and approval of the Township Sewer Engineer.

***Noted.***

#### Chapter 170 – Zoning

66. The Steep Slope Conservation District shall be clearly shown on the Grading and PCSM Plans, in accordance with the criteria set forth in Section 170-402. Uses proposed within the Steep Slope Conservation District shall be subject to the review of the Westtown Township Zoning Officer.

***The steep slopes as defined in the ordinance are now mapped on the Grading and PCSM Plan Sheets (13, 14, 19, and 20 of 48). As substantiated previously, all mapped steep slopes within the limit of disturbance are man-made, are maintained as lawn and are therefore not ecologically sensitive, are situated such that disturbance of the slopes will not threaten deposition upon nor damage to adjacent properties and public roadways, and therefore do not warrant the protections afforded in the Steep Slope Conservation District. We await the Zoning Officer's determination on this matter.***

67. The location of the New Support Building shall be subject to the review and approval of the Westtown Township Zoning Officer.

***Noted. See our response to review comment No. 66.***

68. Upon the provision of the referenced area on the Plan, the Township Zoning Officer shall confirm compliance with the above referenced Ordinance section.

***Noted. See our response to review comment No. 66.***

69. Parking spaces in the proposed parking area in front of the lighted fields are only 9.0 feet wide. Compliance with the above referenced requirement shall be subject to review and approval by the Westtown Township Zoning Officer.

***This is correct. Parking has been provided in accordance with Section 170-1702.A(3), which governs parking for school uses. A note indicating the total number of spaces provided at 9.5' in width appears on Sheet 11.***

70. The Applicant shall place wheel stops along curb or demonstrate to the Board that there is sufficient sidewalk width to allow for the required two feet of overhang from parked vehicles.

***Additional dimensions have been added to Sheet 11 to demonstrate that the proposed sidewalks are sufficiently wide to accommodate two feet of overhang from parked vehicles while maintaining more than the minimum width clear for pedestrian usage.***

71. Additional comments may be forthcoming based upon the information to be resubmitted.

***Noted.***

Please let us know if you have any questions. Thank you.

Sincerely,  
**ELA GROUP, INC.**



Jason C. Best, RLA  
Senior Project Manager  
Corporate Office

Attachments

1091-001 Oak Lane Project\Project Files\Project Documents\Land Development\2023-09-27 resp ltr to CEG review.docx