



October 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 #2)

Dear Ms. Carter:

On behalf of the Westtown School, we offer the following responses to CEG's review letter dated October 13, 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 lighting has been shown on the Plan. This condition has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

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. Based on the October 13, 2023 letter from Systems Design Engineering, Inc., we believe the parking lot lighting has been demonstrated to be compliant with the applicable Ordinances and regulations.***

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. No action required by the Applicant.***

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. Based on the October 13, 2023 letter from Albert Federico Consulting, LLC, we believe we have satisfactorily demonstrated that emergency vehicles may safely access the proposed parking lot.***

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. The Applicant understands that the Township's Lighting Consultant has reviewed the plans and has deemed them to be adequate. According to the October 13, 2023 letter from Systems Design Engineering, Inc., the scoreboard luminance will be evaluated for compliance following installation.***

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. The Applicant is coordinating directly with the Township's Traffic Engineer to address the issues of visibility and sight distance at the Oak Lane - Westtown Road intersection.***

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. The Applicant has indicated on the plans that the existing flashing signal along Oak Lane is to be removed as part of this project.***

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.

CEG Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

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. The Applicant awaits the Zoning Officer's determination of compliance.***

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: Notes stating the above condition have been added to the Plan. This condition may be considered satisfactorily addressed.

***Noted. No action required by the Applicant.***

The following waivers have been requested by the Applicant:

- I. 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. No action required by the Applicant.***

- II. 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. No action required by the Applicant.***

- III. 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. No action required by the Applicant.***

- IV. 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. No action required by the Applicant.***

- V. 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. No action required by the Applicant.***

- VI. 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. No action required by the Applicant.***

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.

***Noted.***

- VII. 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. No action required by the Applicant.***

- VIII. 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. No action required by the Applicant.***

- IX. Section 149-702.B.(7) – to not provide a full boundary of the parcel with bearing and distances on the Plan.

CEG offers no objection to consideration of this request due to the extents of the property with respect to the size and location of the Project.

***Noted. No action required by the Applicant.***

- X. Section 149-925.G.(1) – to provide perimeter plantings consistent with what had been negotiated during the Conditional Use Hearing for the Athletic Field.

CEG offers no objection to consideration of this request, conditioned upon the following resolution of comment # 61, below:

- The Athletic Field and Solar Farm Plans show consistent buffering/planting.
- The perimeter yard planting requirement for the referenced area is consistent with Section 149-925.G.(1).
- All “glare” concerns are eliminated via plantings to be included in this application.

***Noted. As of the date of this letter, the Applicant has discussed the matter with the Planning Commission, which has recommended approval of the requested waiver.***

#### 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.
- 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.
- The Construction Sequence shall clarify how the installation of stormwater inlets/storm sewer shall coincide with the installation of the rock construction entrance.
- Additional perimeter controls shall be provided between Sediment Trap #1 and CFS #24-6.
- 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.
- The Erosion and Sedimentation Plan shall provide compost filter sock around the perimeter of the proposed topsoil stockpile.
- The word “recommended” shall be 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.
- 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.
- 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 location of the diversion berm referenced in Construction Sequence Step 14 (Sheet 4) shall be shown on the Erosion and Sedimentation Control Plan.
- Steps shall be added to the Construction Sequence directing the conversion of sediment traps/basins to permanent stormwater BMPs.
- 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.
- 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.

Current Comment: The following shall be addressed:

- The provided supporting calculations shall be revised for consistency between the Plans, Details, and Calculations as follows:
  - The riser elevation for the permanent structure shall be increased to above 290.75. Currently this structure has a crest elevation of 290.5 shown on the Sediment Trap 1 Cross Section Detail on Sheet 37 and a value of 291 on Page 22 of the Calculations. This configuration will result in discharge from the basin prior to the design values in the supporting calculations.

***The sediment trap detail on Sheet 36 has been revised to differentiate between the temporary riser and permanent riser and the permanent riser elevation has been revised to 291.00.***

- The supporting calculations on Page 22 of the Report shall revise "Sediment Trap A" to "Sediment Trap 1".

***The Worksheet #17 label on pg. 22 has been revised accordingly.***

- The bottom elevation shown on the Sediment Trap 1 Cross Section detail (288.5) and the bottom elevation on page 23 of the report (288.8) shall be revised to coincide with one another.

***The sediment trap bottom elevation on pg. 23 has been revised accordingly.***

- The emergency spillway for Sediment Basin 4 elevation shall be included with the Sediment Basin 4 Detail on Sheet 37.

***The spillway elevation is now provided on the sediment basin detail on Sheet 36.***

- The outlet pipe invert elevation for Sediment Basin 4 shown on the Detail on Sheet 37 (307.25) shall coincide with the invert elevation on Page 28 of the Report (307.0).

***The calculations on page 28 of the report accurately indicate an elevation of 307.25.***

- The emergency spillway side slopes on Page 22 (8:1) and Page 35 (5:1) shall coincide with one another.

***Worksheet #17 on page 22 has been revised accordingly.***

- The emergency spillway side slopes on Page 26 and 28 (8:1) and Page 36 (6:1) shall coincide with one another.

***Worksheets #13 and #17 on pages 26 and 28 have been revised accordingly.***

- The provided routings in the Report (Pages 30-32) shall include routings for Sediment Basin 4 and a Pond Report for Sediment Trap 1 to validate the outflows noted on Report Page 37.

***The routings provided on pages 30-32 are to validate the 25-yr elevation (elevation 5 on worksheet 13, pg 26). Routings are not provided for Sediment Trap #1 and as such there is no pond report. The values provided on page 37 are the 100-year inflows found in the PCSM Report/Module 2. A note has been added to page 37 indicating such.***

- Riprap aprons and supporting calculations shall be provided for both Sediment Trap 1 and Sediment Basin 4. The details shall be revised accordingly to provide design information to facilitate installation. Noting “N/A” as shown on the Sediment Trap A detail is not acceptable.

***Rip-rap aprons are provided for the sediment trap and basin as shown on the E&S Plan Sheets 17 and 18, as well as the detail provided on plan Sheet 39. Labels have been added to the E&S Plan sheets for clarity. The ‘Outlet Basin’ columns provided on the Sediment Trap 1 Cross Section detail refer to an ‘Outlet Basin’, which is not proposed and is a separate E&S BMP. As such, ‘N/A’ is the appropriate value for these columns. The sediment trap cross section shows a rip-rap apron and refers to the rip-rap detail. The sediment basin detail has been revised to reference the rip-rap detail. The provided trap/basin details are based on the E&S Manual Standard details, which do not provide rip-rap information. It is bad practice to provide the same information in multiple locations as this can lead to conflicting information if there is a design change. At this time, we have no intent to provide rip-rap detail information on the cross-section details when there is a detail provided specifically for the rip-rap aprons.***

***The rip-rap apron calculations are provided in Appendix G of the report and are based on the post construction 100-year outflows, which exceeds the design outflows for E&S BMP’s. As such, separate calculations for sediment trap/basin rip-rap in addition to PCSM rip-rap calculations is not necessary.***

- Construction Sequence Step 2 shall be revised to include sealing/protecting the inlet locations at the construction entrances to prevent clogging of the conveyances.

***The sequence has been revised to direct the installation of inlet protection. The E&S plans have been revised to show the protection and the associated detail has been added to the drawings (See Sheet 34).***

- Grading associated with the Diversion Berm, conveying flow to Sediment Trap #4 shall be shown.

***The diversion berm grading is now shown on the E&S Plans (see Sheet 17).***

#### Chapter 144 – Stormwater Management

2. September 1, 2023 Comment: Financial security in an amount acceptable to the Township shall be provided prior to Plan recording. A Construction Cost Estimate shall be submitted for review and approval, with the required financial security incorporated into a Developer’s Agreement to be executed prior to Plan recording.

Current Comment: The Applicant has responded that an Opinion of Probable Costs will be submitted for review and approval. The previous comment remains applicable.

***Noted. An opinion of probable cost for public improvements is being provided with this plan resubmission for the Township’s review and approval.***

3. September 1, 2023 Comment: 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.

Current Comment: The Applicant has withdrawn the previously requested waiver. This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

4. September 1, 2023 Comment: 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.

Current Comment: The Applicant has withdrawn the previously requested waiver. This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

5. September 1, 2023 Comment: The following shall be addressed:
  - 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.
  - 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 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 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

6. September 1, 2023 Comment: 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 above referenced test pit locations shall be shown on the PCSM Plan.
  - Dewatering calculations shall be amended as applicable based upon the above referenced testing results.
  - 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.
  - 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.

Current Comment: This comment has been satisfactorily addressed.



***Noted. No action required by the Applicant.***

7. September 1, 2023 Comment: 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.

Current Comment: MH-B3 (sheet 26 profile) shall be revised to provide a six-inch sump as referenced in the provided response letter.

***Manhole MH-B3 has been accordingly revised.***

8. September 1, 2023 Comment: The above referenced notes shall be added to the Multi-Purpose Field/Infiltration Bed Cross Sections details, Sheet 41.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

9. September 1, 2023 Comment: 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.
- A detail shall be provided clearly showing underdrain/gate valve configuration as proposed.

Current Comment: The following shall be addressed:

- The Pond Reports for Basin 1 (114) and Basin 4 (163) shall be revised to have consistent weir structure crest lengths. Basin 1 currently notes 8.5 ft and Basin 4 shows 10.5 ft however both structures are 2x4 outlet boxes.

***The crest lengths as provided are correct. The length of the outlet structure crest is approximately 10.5'. BMP 1, however, also features a 2' wide weir. The hydraflow program calculates the 2' weir flow for all elevations above the weir elevation and as such must be subtracted from the riser crest length. Otherwise, the calculations would be factoring a total weir length of 12.5' at and above the crest of the riser.***

10. September 1, 2023 Comment: 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 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

11. September 1, 2023 Comment: 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.

Current Comment: Appendix G of the Stormwater Management Report is inconsistent with the Plans and shall be revised accordingly:

- The spillway calculations indicate that the emergency spillway associated with BMP 4 has a top of berm of 315.0 while the detail on Sheet 40 notes 314.5.

***The detail on sheet 40 has been revised.***

- The spillway calculations and detail for BMP 1 notes a spillway elevation of 291.25 while the plan grading shows a spillway elevation of 291.0 on Sheet 19.

***The Grading and PCSM Plan sheets have been revised accordingly.***

12. September 1, 2023 Comment: 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.

Current Comment: Reference above comment.

***Noted. No action required by the Applicant.***

13. September 1, 2023 Comment: 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.

Current Comment: Reference above comment.

***Noted. No action required by the Applicant.***

14. September 1, 2023 Comment: 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.

Current Comment: Reference above comment.

***Noted. No action required by the Applicant.***

15. September 1, 2023 Comment: 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.

Current Comment: Reference above comment.

***Noted. No action required by the Applicant.***

16. September 1, 2023 Comment: 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.

Current Comment: Reference above comment.

***Noted. No action required by the Applicant.***

17. September 1, 2023 Comment: 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.

Current Comment: The Applicant has withdrawn the waiver request. This comment is no longer applicable.

***Noted. No action required by the Applicant.***

18. September 1, 2023 Comment: 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.
- 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.

Current Comment: The Applicant has requested a waiver from the above referenced section of the Ordinance. CEG offers no objection to consideration of relief from this requirement, subject to resolution of applicable comments applicable to BMP design.

***Noted.***

19. September 1, 2023 Comment: 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.

Current Comment: Reference above comment.

***Noted. No action required by the Applicant.***

20. September 1, 2023 Comment: 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.

Current Comment: The Applicant has noted that the required notes has been added to the Plan and Report, however Sheets 19 and 20 do not contain the required note. The previously referenced note shall be added to Sheet 19 or 20 of the Plans as previously required.

***The note provided on Sheet 2 has been copied to Sheets 19-20 and appears as Note 3 on both sheets.***

21. September 1, 2023 Comment: The Drainage Plan Acknowledgement on Sheet 1 of 48 shall be revised to include all language within the above referenced section of the Ordinance.

Current Comment: The referenced certification shall be signed prior to Plan approval.

***Noted. Will comply.***

22. September 1, 2023 Comment: The above referenced note shall be added to the Post Construction Stormwater Management (OCSM) Plan.

Current Comment: The referenced certification shall be signed prior to Plan approval.

***Noted. Will comply.***

23. September 1, 2023 Comment: The following shall be addressed:

- The tract boundary bearings and distances shall be labeled on the Plan.
- A statement of the total area of the property being developed shall be added to the Plan.
- 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.
- 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.

Current Comment: The following shall be noted:

- The Applicant has noted that they have requested a waiver from Section 144-402.C.(7). CEG offers no objection to consideration of this waiver request, however Section 144-402.C.(7) has not been included on the Waiver Request Letter and shall be formally requested in writing.

***The Applicant formally requested a waiver of Section 144-402.C(7) in a letter dated October 18, 2023.***

24. September 1, 2023 Comment: The designated use of the receiving waters shall be clearly noted on the Plan.

Current Comment: The Applicant has responded that the designated use is noted on the PCSM Plans and in the General Notes on Sheet 2; clarification shall be provided specifying the note location on the Plan. The previous comment remains applicable.

***The receiving surface waters and their designated uses are listed on Sheet 2, bottom right, above the Stormwater BMP Information Chart 5.B under the heading "Surface Waters". This information is also provided on plan Sheets 19 and 20 under the heading "Surface Waters" beneath the legend and above the Soils chart.***

25. September 1, 2023 Comment: All areas classified as steep slopes, as set forth in Section 170-402 of the Zoning Ordinance, shall be shown on the PCSM Plan.

Current Comment: Zoning Officer determination letter is pending.

***The Zoning Officer issued a determination on October 13, 2023 indicating no objection to the proposed modifications given the information pertaining to the nature of the existing steep slopes presented by the Applicant.***

26. September 1, 2023 Comment: 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

27. September 1, 2023 Comment: 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.
- 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".

Current Comment: The following shall be addressed:

- Notes B.9 shares a number with another Notes B.9 on Sheet 2 and all notes shall be renumbered accordingly.

***The numbering of the plan notes on Sheet 2 have been checked and revised to ensure that no duplicates exist.***

28. September 1, 2023 Comment: 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.

Current Comment: This comment is for informational purposes only.

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

#### Chapter 149 – Subdivision and Land Development Ordinance

29. September 1, 2023 Comment: Financial security in an amount acceptable to the Township shall be provided prior to Plan recording. A Construction Cost Estimate shall be submitted for review and approval, with the required financial security incorporated into a Developer's Agreement to be executed prior to Plan recording.

Current Comment: The Applicant has noted an Opinion of Probable Costs will be submitted for review and approval. The previous comment remains applicable.

***Noted. An opinion of probable cost for public improvements is being provided with this plan resubmission for the Township's review and approval.***

30. September 1, 2023 Comment: The following shall be addressed:

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

- Existing monumentation along Westtown Road, adjacent to BMP1, shall be shown.
- A statement of the total area of the property being developed shall be added to the Plan.

Current Comment: The Applicant has noted that a waiver has been requested from this section of the Ordinance. CEG offers no objection to consideration of this request, however this waiver shall be formally requested in writing.

***This waiver was formally requested in both the October 1, 2023 and October 18, 2023 letters requesting waivers/modifications.***

31. September 1, 2023 Comment: 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

32. September 1, 2023 Comment: 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

33. September 1, 2023 Comment: 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

34. September 1, 2023 Comment: A notice of capacity has been provided for sanitary service. This letter shall be subject to the review of the Township's Sewer Engineer.

Current Comment: CEG defers comments regarding availability and verification of capacity for sanitary service to the Township's Sewer Engineer.

***Noted.***

35. September 1, 2023 Comment: Riparian buffer areas shall be clearly shown on the Site and PCSM Plans.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

36. September 1, 2023 Comment: 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).

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

37. September 1, 2023 Comment: 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.

Current Comment: This comment is for informational purposes only.

***Noted. No action required by the Applicant.***

38. September 1, 2023 Comment: 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

39. September 1, 2023 Comment: See Comment #1.

Current Comment: See Comment #1.

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

40. September 1, 2023 Comment: 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).

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

41. September 1, 2023 Comment: 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

42. September 1, 2023 Comment: 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.

Current Comment: The Applicant has requested a waiver from this section of the Ordinance. 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-B4, I-B6, I-B9, I-B10, I-B11, I-B12, I-B12A, I-B13, and I-B14.

***Noted. No action required by the Applicant.***

43. September 1, 2023 Comment: 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.

Current Comment: The Applicant has requested a waiver from this 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. No action required by the Applicant.***

44. September 1, 2023 Comment: 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.

Current Comment: The Applicant has requested a waiver this section of the Ordinance. 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. No action required by the Applicant.***

45. September 1, 2023 Comment: 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.

Current Comment: The Applicant has requested a waiver from this section of the Ordinance. 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. No action required by the Applicant.***

46. September 1, 2023 Comment: 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

47. September 1, 2023 Comment: 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.

Current Comment: The Applicant has withdrawn the waiver request from Section 144-311.C.(2). This comment is no longer applicable.

***Noted. No action required by the Applicant.***

48. September 1, 2023 Comment: 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.

Current Comment: The Applicant has requested a waiver from this section of the Ordinance. CEG offers no objection to consideration of this request.



***Noted. No action required by the Applicant.***

49. September 1, 2023 Comment: 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.

Current Comment: The Applicant has requested a waiver from this section of the Ordinance. 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. The basin anti-seep collars have been designed in accordance with PADEP guidelines. The calculations are provided on pages 202-203 or the PCSM Report and are provided on plan Sheet 35.***

50. September 1, 2023 Comment: The BMP emergency spillways shall be revised to be constructed of concrete/grass pavers as required by the above referenced section of the Ordinance.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

51. September 1, 2023 Comment: Sumps shall be provided at structures immediately upslope of proposed BMPs, as previously referenced.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

52. September 1, 2023 Comment: 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.
- 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.

Current Comment: The above comment remains applicable.

***The Applicant wishes to reiterate that while the synthetic turf fields will indeed be used on a rental basis, the lights will not be in use during those times in accordance with the conditions of the Conditional Use Approval.***

53. September 1, 2023 Comment: The following shall be addressed:

- A water study shall be submitted to the Township for review and approval.
- Conformance to applicable Westtown Township requirements is subject to the review and approval of the Township Authority.
- Documentation shall be provided demonstrating acceptance of the system modifications and distribution from DEP, PUC, and CCHD as applicable.

Current Comment: The following shall be addressed:

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

***Noted.***

- The Applicant has noted that Documentation shall be provided demonstrating acceptance of the system modifications and distribution from DEP, PUC, and CCHD, as applicable, upon receipt.

***Noted. Will comply.***

54. September 1, 2023 Comment: 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

55. September 1, 2023 Comment: A roadway restoration detail shall be provided for repairing the area where the parking area accessway connections are proposed.

Current Comment: The following shall be addressed:

- The restoration detail or bituminous paving section/schedule detail shall be revised in accordance with the above referenced Ordinance section.

***As discussed with CEG on 10/24/2023, the restoration detail has been updated to reference the use of proposed Pavement Section 'A' or matching the existing pavement section, whichever is greater.***

56. September 1, 2023 Comment: 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.
- 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.
- 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

57. September 1, 2023 Comment: 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

58. September 1, 2023 Comment: The Concrete Sidewalk detail shall be amended to include a view adjacent to asphalt paving.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

59. September 1, 2023 Comment: 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.
- All ramps shall be labeled for clarity between the Plan views and the enlarged views.

Current Comment: The following shall be addressed:

- The DWS for Curb Ramp #1 shall be revised to the full length of the ramp face adjacent to the pavement.

***The DWS for Curb Ramp No. 1 has been revised to occupy the full length of the interface with the adjacent roadway paving.***

- Curb Ramp #2 shall be revised to provide a maximum slope of 2% along the triangular landing area created between the DWS and the pavement crossing.

***Curb Ramp No. 2 has been accordingly revised.***

- Curb Ramp #3 shall be redesigned to include all applicable ramp features, flares, landing areas, and longitudinal transitions.

***Per ICC A117.1, flares are not warranted in this location since there is no cross traffic on the landing. The landing area and longitudinal transitions are compliant with ICC A117.1.***

- Curb Ramp #8 shall extend the DWS to run the full width of the landing as nothing prevents travel at the curb edge.

***The DWS in this location was reduced to what is currently shown from the full width recommended by CEG in response to a request by the Township's Traffic Engineer.***

60. September 1, 2023 Comment: Grading in the vicinity of CFS#18-3 shall be relocated outside of the tree protection zone(s).

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

61. September 1, 2023 Comment: 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).
- 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.

- 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.
- Tree protection shall be provided for the existing tree located adjacent to the existing/proposed trail.
- Tree protection shall be provided for the tree mass downgradient of BMP 1.
- Tree protection shall be provided for the trees upgradient of BMP 4 by TP-8.

Current Comment: The following shall be addressed:

- The Applicant shall demonstrate consistency between the proposed plan landscaping and landscaping outlined in the tabulation and verify all labels and planting quantities shown on Sheets 24 and 25 compared to the tabulations provided on Sheet 24A. This includes the following:
  - Compensatory Plantings:
    - ASB (3 on Plans, 5 on Tabulation)  
  
***All five trees are shown in both the plan view and in the Compensatory Planting Table. It appears that two ASB trees proposed adjacent to the riparian buffer area were overlooked by the reviewer.***
    - CL (4 on Plans, 5 on Tabulation)  
  
***The number shown in the Compensatory Planting Table has been confirmed to be correct. The plans have been revised to depict 5 proposed CL plantings.***
  - BMP 1 Plantings:
    - IG (12 on Plans, 14 on Tabulation)  
  
***The number shown in the BMP 1 Planting Table has been confirmed to be correct. The plans have been revised to depict 14 proposed IG plantings within BMP 1.***
  - BMP 4 Plantings:
    - AM (0 on Plans, 7 on Tabulation)  
  
***The number shown in the BMP 4 Planting Table has been confirmed to be correct. The plans have been revised to depict 7 proposed AM plantings within BMP 4.***
    - CA (19 on Plans, 28 on Tabulation)  
  
***The number shown in the BMP 4 Planting Table has been confirmed to be correct. The plans have been revised to depict 28 proposed CA plantings within BMP 4.***
    - CS (5 on Plans, 12 on Tabulation)  
  
***The number shown in the BMP 4 Planting Table has been confirmed to be correct. The plans have been revised to depict 12 proposed CS plantings within BMP 4.***

- IV (28 on Plans, 36 on Tabulation)  
  
*The number shown in the BMP 4 Planting Table has been confirmed to be correct. The plans have been revised to depict 36 proposed IV plantings within BMP 4.*
- SD (0 on Plans, 5 on Tabulation)  
  
*The number shown in the BMP 4 Planting Table has been confirmed to be correct. The plans have been revised to depict 5 proposed SD plantings within BMP 4.*
- SN (0 on Plans, 7 on Tabulation)  
  
*The number shown in the BMP 4 Planting Table has been confirmed to be correct. The plans have been revised to depict 7 proposed SN plantings within BMP 4.*
- VD (17 on Plans, 25 on Tabulation)  
  
*The number shown in the BMP 4 Planting Table has been confirmed to be correct. The plans have been revised to depict 25 proposed VD plantings within BMP 4.*
- 34 unlabeled shrubs are shown on Plans.  
  
*All unlabeled shrubs have been labeled on the plans.*
- Perimeter Landscaping
  - ABC (5 on Plans, 11 on Tabulation)  
  
*The number of ABC plants shown in the Perimeter Landscaping planting table have been adjusted to exclude the perimeter plantings proposed as part of the Solar Farm project and have been confirmed to be accurate for the Perimeter plantings proposed between the Solar Farm Plantings and the northeast property corner.*
  - ARO (6 on Plans, 14 on Tabulation)  
  
*The number of ARO plants shown in the Perimeter Landscaping planting table have been adjusted to exclude the perimeter plantings proposed as part of the Solar Farm project and have been confirmed to be accurate for the Perimeter plantings proposed between the Solar Farm Plantings and the northeast property corner.*
  - ASB (2 on Plans, 4 on Tabulation)  
  
*The number of ASB plants shown in the Perimeter Landscaping planting table have been adjusted to exclude the perimeter plantings proposed as part of the Solar Farm project and have been confirmed to be accurate for the Perimeter plantings proposed between the Solar Farm Plantings and the northeast property corner.*
  - AGB (6 on Plans, 13 on Tabulation)  
  
*The number of AGB plants shown in the Perimeter Landscaping planting table have been adjusted to exclude the perimeter plantings proposed as part of the Solar Farm*

**project and have been confirmed to be accurate for the Perimeter plantings proposed between the Solar Farm Plantings and the northeast property corner.**

- CL (2 on Plans, 4 on Tabulation)

**The number of CL plants shown in the Perimeter Landscaping planting table have been adjusted to exclude the perimeter plantings proposed as part of the Solar Farm project and have been confirmed to be accurate for the Perimeter plantings proposed between the Solar Farm Plantings and the northeast property corner.**

- CF (4 on Plans, 8 on Tabulation)

**The number of CF plants shown in the Perimeter Landscaping planting table have been adjusted to exclude the perimeter plantings proposed as part of the Solar Farm project and have been confirmed to be accurate for the Perimeter plantings proposed between the Solar Farm Plantings and the northeast property corner.**

- PS (7 on Plans, 14 on Tabulation)

**The number of PS plants shown in the Perimeter Landscaping planting table have been adjusted to exclude the perimeter plantings proposed as part of the Solar Farm project and have been confirmed to be accurate for the Perimeter plantings proposed between the Solar Farm Plantings and the northeast property corner.**

- QA (5 on Plans, 10 on Tabulation)

**The number of QA plants shown in the Perimeter Landscaping planting table have been adjusted to exclude the perimeter plantings proposed as part of the Solar Farm project and have been confirmed to be accurate for the Perimeter plantings proposed between the Solar Farm Plantings and the northeast property corner.**

- 50 shrubs labeled RG are not included as part of the Tabulation.

**The fifty shrubs named above have been shown in a separate planting table.**

- 2 trees labeled AG are not included as part of the Tabulation.

**The two trees named above have been shown in a separate planting table.**

- The Tabulation of Required Landscaping is short 2 shrubs for Basin 1 and 17 shrubs for Basin 4 (92 provided shrubs and 233 provided shrubs respectively based on the planting tables).

**The tabulation has been confirmed to show the correct number of trees and shrubs for each Basin area.**

62. September 1, 2023 Comment: 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.

Current Comment: The Applicant has rescinded this waiver request. This comment is no longer applicable.

**Noted. No action required by the Applicant.**

63. September 1, 2023 Comment: 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.

Current Comment: The Applicant has rescinded this waiver request. This comment is no longer applicable.

***Noted. No action required by the Applicant.***

64. September 1, 2023 Comment: 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.
- Three proposed trees within BMP 4 do not have a designation and shall be labeled.
- 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.
- 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.

Current Comment: The Applicant has requested a waiver from this section of the Ordinance to allow for providing perimeter plantings only along Shady Grove Way, consistent with the negotiated screenings for the Oak Lane project. As this project is separate from the Oak Lane project, CEG does not recommend consideration of this waiver. The following shall be addressed:

- The perimeter lengths noted in the Tabulation of Required Landscaping shall be revised to the perimeter lengths associated with this project (along Oak Lane and Shady Grove Way) and clearly labeled.

***The Tabulation of Required Landscaping has been revised such that it accurately reflects the perimeter lengths the Planning Commission has indicated must be included, as part of their recommendation for the approval of the Applicant's waiver request.***

- The Perimeter Landscaping and Tabulation of Required Landscaping tables shall be revised to be consistent with one another and the plantings shown on Sheet 24.

***The Tabulation of Required Landscaping and Perimeter Landscaping tables have been revised. We would note that a plan note has been added to Sheet 24A that clarifies the tabulation. This note points out that 2 evergreen trees are equal to 1 canopy tree, which might otherwise confuse matters.***

- The plantings along Shady Grove Way shall be consistent with those shown on the Oak Lane Solar Farm project. This includes placement and quantities of plantings for the whole length of both project boundaries.

***The proposed perimeter plantings accurately reflect what has been proposed as part of the Solar Farm project. With that, a note has been added to Sheet 24 indicating that the plantings associated with the Solar Farm are shown for contextual purposes only and may differ from what is shown on these plans.***

65. September 1, 2023 Comment: The following shall be addressed:

- The provided capacity verification letter is subject to review by the Westtown Township Sewer Engineer.
- Conformance with Westtown Township requirements and regulations is subject to the review and approval of the Township Sewer Engineer.

Current Comment: 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. September 1, 2023 Comment: 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.

Current Comment: The Applicant has noted they are awaiting a determination by the Township Zoning Officer regarding the applicable requirements of the Steep Slope District. CEG defers to the Township Zoning Officer regarding this requirement.

***The Zoning Officer issued a determination on October 13, 2023 indicating no objection to the proposed modifications given the information pertaining to the nature of the existing steep slopes presented by the Applicant.***

67. September 1, 2023 Comment: The location of the New Support Building shall be subject to the review and approval of the Westtown Township Zoning Officer.

Current Comment: The Applicant has noted they are awaiting a determination by the Township Zoning Officer regarding the applicable requirements of the Steep Slope District. CEG defers to the Township Zoning Officer regarding this requirement.

***The Zoning Officer issued a determination on October 13, 2023 indicating no objection to the proposed modifications given the information pertaining to the nature of the existing steep slopes presented by the Applicant.***

68. September 1, 2023 Comment: Upon the provision of the referenced area on the Plan, the Township Zoning Officer shall confirm compliance with the above referenced Ordinance section.



Current Comment: The previous comment remains applicable.

***Noted. The Applicant awaits the Zoning Officer's determination of compliance.***

69. September 1, 2023 Comment: 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.

Current Comment: Final confirmation regarding compliance with the above referenced section of the Ordinance is subject to the review and approval of the Township Zoning Officer.

***Noted. The Applicant awaits the Zoning Officer's determination of compliance.***

70. September 1, 2023 Comment: 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.

Current Comment: This comment has been satisfactorily addressed.

***Noted. No action required by the Applicant.***

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\2023-10-27 resp ltr to CEG review.docx