



December 15, 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 #3)

Dear Ms. Carter:

On behalf of the Westtown School, we offer the following responses to CEG's review letter dated November 16, 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: This comment has been satisfactorily addressed.

Noted. No action required by the Applicant.

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: This comment has been satisfactorily addressed.

Noted. No action required by the Applicant.

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 has coordinated directly with the Township's Traffic Engineer to address the issues of visibility and sight distance at the Oak Lane - Westtown Road intersection and believes any related issues have been satisfactorily addressed.

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 and the Township's Traffic Engineer has acknowledged same.

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: The applicant has satisfactorily addressed comments pertaining to landscaping.

Noted. No action required by the Applicant.

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 objection to consideration of relief as it applies to BMP 4, The facility has been designed in accordance with applicable criteria set forth in Sections 144-305 and 144-306 of the Stormwater Management Ordinance as designed.

Noted.

- VII. Section 144-311.C.(5) – to allow for SL CPP 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 offers no objection to consideration of relief from using concrete pipes for the basin outlet.

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, based upon the landscaping shown on the Landscape Plan.

Noted. No action required by the Applicant.

Chapter 80 – Erosion, Sediment Control and Grading

1. Current Comment: The comments have been satisfactorily addressed.

Noted. No action required by the Applicant.

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.

October 13, 2023 Comment: The Applicant has responded that an Opinion of Probable Costs will be submitted for review and approval. The previous comment remains applicable.

Current Comment: The following shall be addressed:

- The sanitary and water line items shall be removed from the provided estimate. If required by Westtown Township Sewer and Water Authority(ies) a separate estimate shall be prepared.

Noted. The estimate has been accordingly revised.

- The unit cost for Earth Cut and Earth Fill shall be increased to \$5.50.

The estimate has been accordingly revised.

- The unit cost for Inlet Protection shall be increased to \$300.00.

The estimate has been accordingly revised.

- The unit cost 12" Compost Filter Sock shall be increased to \$8.00.

The estimate has been accordingly revised.

- The unit cost for Rock Construction Entrance shall be increased to \$3,000.00.

The estimate has been accordingly revised.

- The unit cost for Slope Matting shall be increased to \$6.00.

The estimate has been accordingly revised.

- The unit cost for the Sediment Trap shall be increased to \$15,000.00.

The estimate has been accordingly revised.

- The unit cost for the Sediment Basin shall be increased to \$20,000.00.

The estimate has been accordingly revised.

- The quantity and unit cost for Tree Protection Fencing shall be increased to 380 LF with a price of \$5.50.

The estimate has been accordingly revised.

- An additional line item shall be added for a Pumped Water Filter Bag with a quantity of 1 and a unit cost of \$400.00.

The estimate has been accordingly revised.

- An additional line item shall be added for Erosion Control Maintenance and Removal with a quantity of 1 and a unit cost of \$1,500.00.

The estimate has been accordingly revised.

- The quantity for the Pedestrian Path Paving shall be increased to 1550 square yards.

The quantity of bituminous paving (pedestrian paths) provided in the opinion of probable cost has been verified to be accurate. Therefore, the value for this line item remains as originally provided (1,382 SY).

- The line item for DWS shall be removed and replaced with ADA Ramps with a quantity of 8 and a unit cost of \$3,500.00.

The estimate has been accordingly revised.

- The unit cost of Cobblestone Curb shall be increased to \$55.00.

The unit cost suggested above is excessive based on current market prices. The unit cost provided by the Applicant in their opinion of probable cost (\$32.70/LF) was taken from RS Means (Q4 2023) for Granite Curb - installed using standard union labor. The Applicant asks that the Township justify the value provided, especially since it is unlikely that a granite curb would be installed if the construction project had to be undertaken by an entity other than Westtown School. Rather, it would be logical if a standard concrete curb were to be installed.

- The unit cost of Concrete Wheel Stops shall be increased to \$135.00.

The estimate has been accordingly revised.

- An additional line item shall be added for Roadway Restoration with a quantity of 23 square yards and a unit cost of \$55.00.

The estimate has been accordingly revised.

- The unit cost for 8" SLCPP shall be increased to \$40.00.

The estimate has been accordingly revised.

- The unit cost for 10" SLCPP shall be increased to \$44.00.

The estimate has been accordingly revised.

- The unit cost for 12" SLCPP shall be increased to \$48.00.

The estimate has been accordingly revised.

- The unit cost for 15" SLCPP shall be increased to \$53.00.

The estimate has been accordingly revised.

- The unit cost for Type M Inlet shall be increased to \$3,000.00.

The estimate has been accordingly revised.

- The unit cost for Type C Inlet shall be increased to \$3,500.00.

The estimate has been accordingly revised.

- The unit cost for Level Spreader shall be increased to \$80.00.

The estimate has been accordingly revised.

- The unit cost for Site Lighting shall be increased to \$3,500.00.

The estimate has been accordingly revised.

- The Unit Cost for BMP Shrubs and Parking Lot Shrubs shall be increased to \$75.00.

The estimate has been accordingly revised.

- The Engineering/Inspection Costs shall be increased to 10%.

The Applicant has maintained this line item at 5%, which has been acceptable for and is consistent with what was included in the financial security posted for each of their recent land development plans/projects.

Upon resolution of the above, CEG will provide and Construction Cost Escrow table for incorporation into the Financial Security Agreement. The posting of financial security and execution of the Financial Security Agreement shall be completed prior to plan recording.

Comments 3 through 11 have been satisfactorily addressed.

12. Current 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.

Noted. No action required by the Applicant.

13. 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 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.

14. 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 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. No action required by the Applicant.

15. Current 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.

Noted. No action required by the Applicant.

16. 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 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. No action required by the Applicant.

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

Noted. No action required by the Applicant.

18. 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.

Noted. No action required by the Applicant.

19. 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 using concrete pipes for basin outlet pipes.

Comment 20 has been satisfactorily addressed.

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. Current Comment: The Applicant has requested a waiver from Section 144-402.C.(7). CEG offers no objection to consideration of this waiver request.

Noted. No action required by the Applicant.

Comments 24 through 27 have been satisfactorily addressed.

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.

October 13, 2023 Comment: The Applicant has noted an Opinion of Probable Costs will be submitted for review and approval. The previous comment remains applicable.

Current Comment: See Comment #2 above.

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

Comments 30 through 33 have been satisfactorily addressed.

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.

Comments 35 and 36 have been satisfactorily addressed.

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.

Comments 38 through 41 have been satisfactorily addressed.

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.

Comments 46 and 47 have been satisfactorily addressed.

48. 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. 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.

Noted. No action required by the Applicant.

Comments 50 and 51 have been satisfactorily addressed.

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.

October 13, 2023 Comment: The above comment remains applicable.

Current Comment: The applicant's response notes that the field will be rented but remain until those times in accordance with the conditions of the Conditional Use Approval. This shall be subject to the Westtown Township Board of Supervisors.

Noted.

53. 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.

Comments 54 through 64 have been satisfactorily addressed.

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

The Township Zoning Officer issued a letter confirming compliance on December 15, 2023.

69. 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.

The Township Zoning Officer issued a letter confirming compliance on December 15, 2023.

Comment 70 has been satisfactorily addressed.

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\2023-12-15 resp ltr to CEG review.docx