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VIA ELECTRONIC MAIL

January 9, 2020

Erica L. Batdorf, Township Manager
West Vincent Township
729 Saint Matthews Road
Chester Springs, PA 19425

RE: 352 Black Horse Road
Minor Subdivision Plan Review – **RESUBMISSION REQUIRED**
West Vincent Township
File No: 11084.51

Dear Ms. Batdorf:

As requested, we have completed a review of the Final Minor Subdivision application for 352 Black Horse Road – Parcel 25-6-83. The site (UPI No. 25-6-83) containing 8.653 acres, is located on the south side of Black Horse Road within the R-2 Residential Zoning District. The owner is proposing to create three lots, one of which (Lot #2) will contain the existing dwelling, barn, and other outbuildings; the surrounding two lots created by the subdivision (Lots #1 & 3), are proposed for development of single-family dwellings.

The following information was received by ARRO:

- A plan set, consisting of seven (7) sheets – Plan for Land Development of Parcel 25-6-83 dated January 15, 2019, last revised December 3, 2019, and prepared by E. B. Walsh & Associates, Inc. (Plan).
- Post Construction Stormwater Management Report dated July 11, 2019, last revised December 10, 2019, and prepared by E. B. Walsh & Associates, Inc. (PCSM Report).
- Legal Descriptions and Closure Reports of Parcel 25-6-83 prepared by E. B. Walsh & Associates, Inc.
 - Proposed Lot 1, dated December 5, 2019
 - Proposed Lot 2, dated December 5, 2019
 - Proposed Lot 3, dated December 5, 2019
 - Proposed Right-of-Way Widening Along Proposed Lot 1, dated December 5, 2019
 - Proposed Right-of-Way Widening Along Proposed Lot 3, dated December 5, 2019

352 Black Horse Road
Minor Subdivision Plan Review
January 9, 2020
Page 2

- Ordinance Relief Report, dated December 10, 2019 and prepared by E. B. Walsh & Associates, Inc.

We have reviewed the information for compliance with the following Ordinances:

- West Vincent Township Subdivision and Land Development Ordinance of 1998 (As amended by Ordinance No. 170-2016)
- West Vincent Township Stormwater Management Ordinance (Ordinance No. 160 of 2014).

Relief Granted:

1. On November 18, 2019, the Board of Supervisors granted a waiver to not require a Historic Resource Impact Study.

Relief Requested:

The applicant is requesting waivers from the requirements of the following sections of the SALDO.

1. §403.F. – Five-Step Design Process for Residential Subdivisions

The applicant is requesting a waiver from the requirement for a five-step design process. ARRO offers no objection to this requirement being waived for this Application.

2. §403.I - : Studies and Reports

The applicant is requesting a waiver from the required submission of reports for sewer, water, hydrogeology and groundwater. ARRO offers no objection to this requirement being waived for this Application due to this being a minor subdivision and the Plan, PCSM Report, and Sewage Facilities Planning Module will provide the required information.

We offer the following comments for your consideration:

Subdivision and Land Development Comments:

3. §403.D. – Existing Resources and Site Analysis Plan

For all subdivisions (except those in which all proposed lots are to be ten or more acres in area), an Existing Resources and Site Analysis Plan shall be prepared to provide the developer and the Township with a comprehensive analysis of existing conditions, both on the proposed development site and within 500 feet of the site. Conditions beyond the parcel boundaries may be described on the basis of existing published data available from governmental agencies, and from aerial photographs.

The Township shall review the Plan to assess its accuracy and thoroughness. Unless otherwise specified by the Planning Commission, such plans shall generally be prepared at the scale of 1"= 100' or 1"= 200', whichever would fit best on a single standard size sheet (24" x 36"). The following information shall be included in this Plan:

The aforementioned Analysis and Sheet 1 of the Plan, Natural Features Plan, were provided, which include some but not all of the required information, see below:

§403.D.4 - Vegetative cover conditions on the property according to general cover type including cultivated land, permanent grass land, old field, hedgerow, woodland and wetland, specimen trees, the actual canopy line of existing trees and woodlands. Vegetative types shall be described by plant community, relative age and condition.

Individual trees (size), woods, and brush areas are shown on Plan and the Analysis indicates species found on the property, but other than the fallow area being maintained and mowed once or twice a year, there is no mention of type of ground cover – grass land, old field, hedgerow, etc.

§403.D.11 - Locations of all historic districts and resources on the tract and on any abutting tract as defined and identified by Article XXIV of the Zoning Ordinance.

The house and outbuildings are shown and described as a Class II Historic Site/Structure on the Plan and Analysis. Another Class II Historic Site/Structure is indicated 440' East. Additionally, the subject property shares a corner (diagonal across Black Horse Road) with a Class III Historic Resource, which is not shown on the Plan or mentioned in the Analysis.

4. §403.E. – Preliminary Impact Analysis and Resource Conservation Plan

An Impact Analysis and Resource Conservation Plan must be provided for review. While the Plan and Analysis submitted does indicate whether or not impacts occur, there is no delineation of primary or secondary impact areas as well as designated protected areas as required by this Section.

5. §403.K - Proof of Adjacent Property Owner Notification

Verification that all property owners within five hundred (500) feet of the tract boundaries of the proposed subdivision or land development have been notified of the proposed plans via certified mail, returned receipt required.

Proof of notification to all property owners within five hundred (500) feet shall be provided to the Township prior to Final Plan approval.

6. §404.D.4 – For residential subdivisions, proposed driveway locations and the names of all streets, as approved in writing by the U.S. Postal Service, County Emergency Services

Department and local fire companies, and house numbers as assigned by the Township shall be shown.

House numbers as assigned by the Township shall be added to the Plan prior to recordation.

7. *§404.E.4 -- Notification from PennDOT or the Township shall be provided confirming that a Highway Occupancy Permit will be issued after preliminary approval.*

Highway occupancy permit(s) must be obtained for the proposed driveway(s). Notations must be added to the Plan.

8. *§404.K.3 -- All offers of dedication of realty or structures and all declarations, easements and covenants governing the reservation and maintenance of undedicated open space, for the Final Plan shall be in such form as shall be satisfactory to the Board of Supervisors.*

An offer of dedication for the dedication of rights-of-way along the property frontage of Black Horse Road must be provided for review and approval. The deed of dedication for the right of way for Black Horse Road will be prepared by the Township Solicitor for execution by the Applicant prior to Final Plan execution and recordation.

9. *§507.E.1 - The landowner shall execute a Subdivision and Land Development Agreement in accordance with Section 509.*

A Subdivision and Land Development Agreement in a format approved by the Township Solicitor must be prepared and recorded with the Final Plan.

10. *§606.H -- For the length of twenty (20) feet as measured along the centerline of the driveway from the edge of cartway, the driveway shall have a maximum grade of four (4) percent. Any remaining portion of the driveway shall have a maximum grade of fifteen (15) percent.*

The existing roadway grades shall be shown on the Plan to demonstrate the required driveway transition grades and/or a driveway profile shall be provided.

Stormwater Management Comments:

11. *§305.A: The Post-construction total runoff volume shall not exceed the Predevelopment total runoff volume for all storms equal to or less than the two (2)-year, twenty-four (24) hour duration precipitation (design storm). The water quality and runoff volume to be managed shall consist of any runoff volume generated by the proposed Regulated Activity over and above the Predevelopment total runoff volume and shall be captured and*

permanently retained or infiltrated on the Site. Permanent retention options may include, but are not limited, reuse, evaporation, transpiration, and infiltration.

§306.B: For Regulated Activities involving New Development, the volume of a minimum of one (1)-inch of runoff from all Proposed Impervious Surfaces shall be infiltrated.

Per the report, managed release concept BMPs are to be utilized to control rate and the volume of runoff leaving each lot. Since it is apparent that the requirements referenced above will not be met due to site limitations, waivers for relief from these sections should be requested.

12. *§402.A.2 - A listing of all regulatory approvals required for the proposed project and the status of the review and approval process for each. Final approval or adequacy letters must be submitted to the Municipality prior to (or as a condition of) the Municipality's issuing final approval of the SWM Site Plan. Proof of application or documentation of required permit(s) or approvals for the programs listed below shall be part of the SWM Site Plan, if applicable:*

The NPDES permit status, PennDOT HOP status and any other applicable permits must be listed on the plan.

13. *§402.B.12 - The total extent of the upstream area draining through the Site. §402.B.18.b - Delineation of the land area, structures, Impervious Surfaces, and Conveyances draining to and from the BMP or Conveyance.*

§309.E - Areas located outside of the Site (i.e., areas outside of the Regulated Activity) that drain through a proposed Site are not subject to peak flow rate control requirements. Drainage facilities located on the Site shall be designed to safely convey flows from outside of the Site through the Site.

The drainage areas to Lot 1 and Lot 3 appear to be inconsistent with site topography. The drainage areas should include all upstream (undisturbed areas) that will drain into the BMPs. All upstream flow must be safely conveyed through the BMP's. The Plans and Report should be revised accordingly.

14. *§502.A. - For Regulated Activities involving one (1) acre or more of Earth Disturbance, the Applicant shall provide to the Municipality final As-Built Plans (signed and sealed by a qualified Licensed Professional) of all BMPs, Conveyances, other stormwater facilities, and related improvements shown in the final approved SWM Site Plan.*

Notations for providing As-Built Plans per SWMO Section 502.A must be added to the Plans.

15. §702.B.4 - *"The Landowner acknowledges that, per the provisions of the Municipality's Stormwater Management Ordinance, it is unlawful to modify, remove, fill, landscape, alter or impair the effectiveness of or place any structure, other vegetation, yard waste, brush cuttings, or other waste or debris into any permanent stormwater management BMP or Conveyance described in this O&M Plan or to allow the BMP or Conveyance to exist in a condition which does not conform to this O&M Plan, without written approval from the Municipality."*

The required statement must be included on the Plan.

16. §702.C - *A statement that no BMP or man-made Conveyance may be used by the owner or others for any purpose other than its intended stormwater control function, or, if approved by the Municipal Engineer, a statement of specific allowable uses of the BMP (i.e., recreational benefits that maybe associated with certain BMPs owned by a homeowners association, or allowable uses by an individual residential Landowner).*

The required statement must be included on the Plan.

17. §703: *Operation and Maintenance Agreements*

An O&M Agreement for each lot will be provided for execution upon approval of the Plan. These agreements shall be executed by the Applicant and provided to the Township for the Township's execution prior to final approval and recording of the Plan.

The Site Plan and Stormwater Plan must be recorded with the Operations & Maintenance Agreement due to required stormwater information being located only on the Site Plan.

Sewage Facility Planning Module Comments:

18. An On-lot Sewage Management Agreement shall be completed prior to municipal action by West Vincent Township.

General Comments:

19. On pages 74 & 79 of the Report, the first paragraph references to see design calculations on specific pages but those page numbers are not called out. The referenced information must be provided and referenced correctly.

352 Black Horse Road
Minor Subdivision Plan Review
January 9, 2020
Page 7

20. The distances shown on the Plan between the existing iron pins and new monuments in the Northeast and Northwest corners of the property are inconsistent.
21. Sizing of the level spreader(s) shall be included in the Report.
22. On sheet 2 of the Plan, the distance is inconsistent on the boundary measurement between Lot 1 and UPI 25-7-15.
23. On sheet 2 of the Plan, the signature block for the Licensed Professional contains an incorrect date. It references the year 2018.
24. General Note 7 shall be updated with the revision dates for the PCSM Report and E&S Report.

Please note, a revised submission may generate further review comments. Once we receive the revised information addressing the comments in this letter, ARRO will confirm that the application is compliant with the West Vincent Township Ordinances.

Please do not hesitate to contact me via email at bryan.kulakowsky@arroconsulting.com or by phone at our West Chester office with any questions.

Sincerely,



Bryan D. Kulakowsky, P.E.
ARRO Consulting, Inc. – Township Engineer

BDK:ted

CC: Kathy Shillenn – West Vincent Township Secretary
Tracey Franey – West Vincent Township Zoning Officer
Robert Johnson – Applicant (Applicant's Engineer to distribute)
E. B. Walsh & Associates, Inc. – Applicant's Engineer (andy@ebwalshinc.com)
John Mott, P.E. – ARRO
Lowell B. Leaman, P.E. - ARRO

