



April 13, 2017

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

RE: Bryn Coed Subdivision – Natural Lands Trust
Bryn Coed Subdivision 4 – RESUBMISSION REQUIRED
West Vincent Township
File No. WVT-17-072

Dear Ms. Batdorf,

On behalf of West Vincent Township, we have completed a review of the Bryn Coed Farms Natural Lands Trust Subdivision 4. Natural Lands Trust (NLT) proposes to purchase lands know as Bryn Coed Farms (+/- 1500 acres) in West Vincent Township, West Pikeland Township, and East Pikeland Township, Chester County, Pennsylvania. This application is for the subdivision of tax parcels 25-4-141 and 25-4-171 into eleven (11) lots. The entirety of the proposed subdivision is located within West Vincent Township.

The following information was submitted by Nave Newell Inc., and was received by our office on March 28, 2017:

- A. One (1) full size set of plans consisting of 7 sheets titled “Bryn Coed Farms - Subdivision 4” prepared by Nave Newell, Inc., dated March 23, 2017. (Plan)
- B. One (1) copy of Lot Descriptions to Title Line of lots 4-1, 4-2, 4-3, 4-8, Preserve 4A, and Preserve 4C, dated March 23, 2017.
- C. One (1) copy of Lot Descriptions to Legal R/W Line of lots 4-4, 4-5, 4-6, 4-7, and Preserve 4B, dated March 23, 2017.
- D. One (1) copy of Right-of-Way Descriptions for the proposed lots, dated March 23, 2017.
- E. One (1) copy of Subdivision and/or Land Development Application dated March 23, 2017.
- F. One (1) copy of Ordinance Relief Report dated March 23, 2017.
- G. One (1) copy of Sewer and Water Feasibility Report dated February 16, 2017, and last revised March 23, 2017.
- H. One (1) copy of Hydrogeology and Groundwater Protection Study dated February 16, 2017.
- I. One (1) copy of Five-Step Design Process for Residential Subdivisions Narrative dated February 16, 2017, and last revised March 23, 2017.

We have reviewed the information for compliance with the West Vincent Township Subdivision and Land Development Ordinance (Ord. No. 170-2016) and offer the following comments for your consideration:

SECTION 403 PRELIMINARY PLAN

1. *Section 403.D. – Existing Resources and Site Analysis Plan*

An Existing Resources and Site Analysis Plan is required for this Application as four (4) of the proposed lots (Lots 4-5, 4-6, Preserve 4B and Preserve 4C) are less than ten (10) acres in size. A waiver has been requested from providing an Existing Resources and Site Analysis Plan. The Board of Supervisors will determine if an Existing Resources and Site Analysis Plan is required for this Application.

2. *Section 403.E. – Preliminary Impact Analysis and Resource Conservation Plan*

A Preliminary Impact Analysis and Resource Conservation Plan is required for this Application with the Existing Resources and Site Analysis Plan. If the Board grants a waiver from providing an Existing Resources and Site Analysis Plan, a Preliminary Impact Analysis and Resource Conservation Plan is not required. A waiver has been requested from providing a Preliminary Impact Analysis and Resource Conservation Plan. CEDARVILLE offers no objection to this requirement being waived for this Application.

3. *Section 403.F. – Five-Step Design Process for Residential Subdivisions*

Section 403.F.3 - Step 3: Alignment of Streets and Trails. Upon designating the house sites, a street plan shall be designed to provide vehicular access to each house, complying with the standards in Section 611 herein and bearing a logical relationship to topographic conditions. Impacts of the street plan on proposed Greenway lands shall be minimized, particularly with respect to crossing environmentally sensitive areas such as wetlands and traversing slopes exceeding 15%. Street connections shall generally be encouraged to minimize the number of new cul-de-sacs to be maintained by the Township and to facilitate access to and from homes in different parts of the tract (and adjoining parcels). Trails to provide pedestrian and equestrian access in accordance with Section 616 herein shall also be shown, connecting streets with greenway lands and trails on adjacent parcels.

Existing trails and the proposed general alignment on the parcels shall be shown on the Plan. As discussed at the March 16, 2017 Planning Commission Meeting, the general alignment of any existing trails and the proposed general trail alignment for the Preserve Lands will be shown on the Plan. This information must be added to Lots Preserve 4A, Preserve 4B and Preserve 4C.

4. *Section 403.G.2.I.(4) - In addition, the plan for a land development shall show, where applicable, proposed building locations, location and size of parking lots, provisions for access and traffic control, locations of loading docks, and provisions for landscaping and lighting of the site.*

It is unclear how access to Lot 4-8 will be provided. Access from Beaver Hill Road will be cross areas designated as “Highest Protection Areas”. As improvements are prohibited in these protection areas, driveway access must be shown within acceptable locations.

Acceptable Limits for Proposed Driveway Locations for Lots 4-4, 4-6, 4-7, 4-8, Preserve 4B and Preserve 4C have not been provided on the Plan. An acceptable access location for these lots must be indicated on the Plan.

5. *Section 403.G.2.o - Notes regarding ownership, maintenance responsibilities, and any use restrictions for all rights-of-way and easements within or adjacent to the subdivision or land development except those rights-of-way for pre-existing public streets.*

Notes listing the Natural Lands Trust Easement Area Descriptions have been shown on Plan C2.0. These notes must be expanded to describe the ownership and maintenance responsibilities for these areas.

6. *Section 403.H – Preliminary Improvements Construction Plan.*

An Improvements Construction Plan must be provided for review and approval unless this requirement is waived by the Board of Supervisors. A waiver has been requested from providing a Preliminary Improvements Construction Plan. CEDARVILLE offers no objection to this requirement being waived for this Application as no construction improvements are proposed.

7. *Section 403.H.10. – If land to be subdivided lies partly in another municipality, the applicant shall submit information concerning the location and conceptual design of streets, layout and size of lots and provisions of public improvements on land subject to his control within the adjoining municipalities. The design of public improvements shall provide for a smooth, practical transition where specifications vary between municipalities. Evidence of approval of this information by appropriate officials of the adjoining municipalities also shall be submitted.*

Portions of the Conceptual Overall Bryn Coed Subdivision lies within East Pikeland and West Pikeland Townships respectively. Evidence of Approvals of the subdivision(s) by East Pikeland and West Pikeland shall be submitted to the Township.

8. *Section 403.I.1 – Sewer and Water Feasibility Report*

- a) *Section 403.I.1.b – The report shall demonstrate the adherence of the plan to the Township Well Ordinance and Sections 607 and 608 of this Ordinance.*

- 1) *Section 607.C.2 - Soil percolation tests shall be performed for all subdivisions wherein building(s) at the time of construction will not be connected to a public or community sanitary sewage disposal system in operation. Soil percolation tests shall be made in accordance with the procedures required by the Pennsylvania Department of Environmental Protection and the Chester County Health Department, by either a registered sanitarian or the Pennsylvania Sewage Facilities Act sewage enforcement officer, at a rate of not less than one (1) per lot. For lots less than one (1) acre in size and/or in cases when soil percolation tests indicated suitability for an elevated sand mound system, two (2) sets of approved soil percolation tests shall be required per lot so as to identify both primary and replacement disposal areas. The metes and bounds for both areas shall be described on all plans and in the deed for each lot.*

Percolation tests, along with the proposed locations for on-site sanitary systems must be shown on the plans demonstrating that the systems are feasible within acceptable limits of the applicable protection areas. Metes and Bounds for the disposal areas shall be added to the Plan. The areas must be described in the Legal Descriptions for each proposed lot.

- 2) *Section 608.D.2 - The applicant shall be responsible either to install the on-site water supply system or to guarantee (by deed restriction or otherwise) as a condition of the sale of each lot*

or parcel within the subdivision that the system can be installed by the purchaser of such lot or parcel.

Installation of an on-site water supply system, Chester County Well Permit or proof of a guarantee that an on-site water supply system is feasible must be added to the plan. The locations of the existing and proposed wells must be shown on the Plan to demonstrate adequate separation from the septic disposal areas.

- b) *Section 403.1.1.e.(2) – An evaluation of costs and public interest factors in providing water disposal and water supply by three (3) different means:*
- a. Connection to an existing public sewer and/or water system.*
 - b. Reliance upon a private community sewer and/or water system.*
 - c. Reliance upon on-lot sewer and/or water system, complying with Sections 607 and 608.*

The above required information must be added to the Sewer and Water Feasibility Report unless waived by the Board of Supervisors. A waiver has been requested from providing the cost evaluations. CEDARVILLE offers no objection to this requirement being waived for this Application. Note – the waiver request on the Plan and in the Ordinance Relief Report incorrectly refers to Section 403.1.1.e.(3) and should be revised.

- c) *Section 403.1.1.e.(3) – The results of deep-hole percolation tests, as performed in accordance with the current standards of the Chester County Health Department and the Pennsylvania Department of Environmental Protection.*

Soil testing must be performed on the proposed parcels to determine feasibility of on-lot systems. The locations must be shown on the Plan.

9. *Section 403.1.4 – Stormwater Management Plan.*

A Stormwater Management Plan must be provided for review and approval unless this requirement is waived by the Board of Supervisors. A waiver has been requested from providing a Stormwater Management Plan. CEDARVILLE offers no objection to this requirement being waived for this Application as no construction improvements are proposed.

10. *Section 403.5.a.(1). – Traffic Impact Study - The Board shall require a traffic impact study as part of the application for subdivision and land development under any one (1) of the following conditions: The plan proposes a development of twenty-five (25) or more units.*

A Traffic Impact Study is required for this Application as the Overall Concept Plan proposes twenty-five (25) lots within West Vincent Township. The Study must be provided for review and approval unless this requirement is waived by the Board of Supervisors. A waiver has been requested from providing a Traffic Impact Study. CEDARVILLE offers no objection to this requirement being waived for this Application.

1.1. *Section 403.6. – Fiscal Impact Analysis*

A Fiscal Impact Analysis is required for this Application as the Overall Concept Plan proposes twenty-five (25) lots within West Vincent Township. The Analysis must be provided for review and approval unless this

requirement is waived by the Board of Supervisors. A waiver has been requested from providing a Fiscal Impact Analysis. CEDARVILLE offers no objection to this requirement being waived for this Application.

12. *Section 403.J.1 - Proposed ownership, use restrictions, improvement and building limitations.*

Proposed ownership of the greenway lands must be added to the Plan.

13. *Section 403.J.2 - Necessary regular and periodic operation and maintenance responsibilities for the various forms of greenway lands or open space (i.e. - lawns, playing fields, meadow, pasture, cropland, woodlands, etc.), including mowing schedules, control of invasive plants, etc.*

The above required information must be added to the Plan.

14. *Section 403.N – Preliminary Engineering Certification Prior to approval of the preliminary plan, the applicant shall submit to the Planning Commission a "Preliminary Engineering Certification" that the approximate layout of proposed streets, house lots, and greenway lands complies with the Township's Zoning and Subdivision and Land Development Ordinances, particularly those sections governing the design of subdivision streets and stormwater management facilities. This certification requirement is meant to provide the Township with assurance that the proposed plan is able to be accomplished within the current regulations of the Township. The certification shall also note any waivers needed to implement the plan as drawn.*

A Preliminary Engineering Certification noting any waivers needed to implement the Plan must be provided on the Plan.

SECTION 404 FINAL PLAN

15. *Section 404.B – Existing Resources and Site Analysis Plan*

An Existing Resources and Site Analysis Plan is required for this Application as four (4) of the proposed lots (Lots 4-5, 4-6, Preserve 4B and Preserve 4C) are less than ten (10) acres in size. A waiver has been requested from providing an Existing Resources and Site Analysis Plan. The Board of Supervisors will determine if an Existing Resources and Site Analysis Plan is required for this Application.

16. *Section 404.C – Final Impact Analysis and Resource Conservation Plan*

A Final Impact Analysis and Resource Conservation Plan is required for this Application with the Existing Resources and Site Analysis Plan. If the Board grants a waiver from providing an Existing Resources and Site Analysis Plan, a Final Impact Analysis and Resource Conservation Plan is not required. A wavier has been requested to not provide a Final Impact Analysis and Resource Conservation Plan. CEDARVILLE offers no objection to this requirement being waived for this Application.

17. *Section 404.D.3 - Sufficient data to determine readily the location, bearing and length of every lot and boundary line and to produce such lines upon the ground, including all dimensions, angles, and bearings of the lines. The gross tract acreage and adjusted tract area shall be shown. For each lot created, including areas to be dedicated to public use, the gross and net lot area shall be indicated to the nearest one-thousandth (0.001) of an acre. For lot sizes smaller than one (1) acre, the lot area shall be indicated by square feet.*

The described parcel sizes (acreage) on the Property Descriptions and the parcel sizes shown on the Plan are inconsistent for the following:

- a. Lot 4-1
- b. Lot 4-2
- c. Lot 4-3
- d. Lot 4-6
- e. Lot 4-8
- f. Preserve 4A
- g. Preserve 4C
- h. Right-of-way for Preserve 4C

The acreage must be verified and revised as necessary to show consistent values.

Additionally, preliminary calculations of some of the property lines have additive errors. This is not limited to but includes:

- i. The North East property line of Preserve 4C, the total distance labeled is 614.77 however the lines labeled on the plans $586.36 + \text{line L106 (8.5)} + \text{line L113 (8.5)} = 603.36$.
- j. The South West property line of Preserve 4C, the total distance labeled is 592.52 however the lines labeled on the plans $579.45 + 13.06 = 592.51$

The following inconsistencies have been noted in the submitted lot descriptions and information on the plans with respect to the specified parcels:

- k. ROW Lot 4-1
Line one of the description references a cord with a bearing of North $64^{\circ}09'49''$ East, while the plan show South $64^{\circ}09'49''$ East.
- l. ROW Lot 4-2
Sheet C3.1 does not list the input data for curves C8 or C9.
- m. ROW Lot 4-6_2
The callout for the point of beginning on sheet C3.4 points to the wrong Right-of-Way.
- n. ROW Preserve 4C
Sheet C3.4 lines 109 appears to be mislabeled and line L110 is not labeled on the Plan.

The following general comments were identified.

- o. Lot 4-6
The point of beginning is not labeled on the plans.
- p. Preserve 4A
The point of beginning is indicated in two different locations on the Plan.
- q. Preserve 4B
The point of beginning is not labeled on the plans.
- r. ROW Lot 4-6_2
The area label for ROW Lot 4-6_2 on sheet C3.4 is pointing to the Preserve 4B Right-of-Way.
- ROW Preserve 4B
The point of beginning is not labeled on the plans.
- ROW Preserve 4C
The size of the Right-of-Way (acreage) is not labeled on the plans.

Legal descriptions and closure reports for the proposed lots must be submitted for review.

18. *Section 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.*

Street Addresses for the proposed lots must be shown on the Plan.

19. *Section 404.D.5 – Permanent concrete control and reference monuments, as required by Section 603 of this Ordinance.*

Additionally, monuments or pins shall be added at all changes in directions of lines of the property. This occurs, but is not limited to the following locations:

- A monument shall be added to the property boundary of Lot 4-2 between T.M.P. 25-4-144 and T.M.P. 25-4-147.1 (located on Sheet C3.1).
- A monument shall be added to the property boundary of Lot 4-7 between T.M.P. 25-4-154 and T.M.P. 25-4-155 (located on Sheet C3.3).

Section 603.A.1. - Permanent stone or concrete monuments shall be accurately placed at the intersection of all lines forming angles and at changes in directions of lines in the boundary (perimeter) of the property being subdivided.

The perimeter boundary of the Bryn Coed Farms tract being subdivided within West Vincent Township must be monumented in accordance with the requirements of this section. Our review of the subdivision plan has identified the locations where the proposed pins shall be changed to a proposed monument. This occurs, but is not limited to the following locations:

- The proposed pins along the property boundary of Lot 4-1 and T.M.P. 25-4-142 (located on Sheet C3.1).
- The proposed pins along the property boundary of Lot 4-2 and T.M.P. 25-4-144 (located on Sheet C3.1).
- The proposed pins along the property boundary of Lot 4-2 and T.M.P. 25-4-147.2 (located on Sheet C3.1).
- The proposed pins along the property boundary of Lot 4-8 and T.M.P. 25-4-164 (located on Sheet C3.4).
- The proposed pins along the property boundary of Preserve 4B and T.M.P. 25-4-150 (located on Sheet C3.4).

Monuments and pins must be referenced in the legal descriptions for all parcels for clarity and completeness.

20. *Section 404.D.6. – The location of all percolation tests and test pits approved by the Chester County Health Dept. shall be indicated within lots or within undivided open space (with appropriate easements).*

The locations of the approved soil testing must be shown on the Plan.

21. *Section 404.E – Final Improvements Construction Plan*

A Final Improvements Construction Plan must be provided for review and approval unless this requirement is waived by the Board of Supervisors. A waiver has been requested from providing a Final Improvements

Construction Plan. CEDARVILLE offers no objection to this requirement being waived for this Application as no construction improvements are proposed.

22. *Section 404.F. – Final Stormwater Management and Erosion & Sedimentation Control Plan*

A Final Stormwater Management and Erosion & Sedimentation Control Plan must be provided for review and approval unless this requirement is waived by the Board of Supervisors. A waiver has been requested from providing a Final Stormwater Management and Erosion & Sedimentation Control Plan. CEDARVILLE offers no objection to this requirement being waived for this Application as no construction improvements are proposed.

23. *Section 404.G - Final Greenway Ownership and Management Plan. Using the Final Plan as a base map, the boundaries, acreage and proposed ownership of all proposed Greenway areas shall be shown. A narrative report shall also be prepared indicating how and by whom such Greenway areas will be managed, and demonstrating the Applicant's compliance with Article XIX of the West Vincent Township Zoning Ordinance.*

The proposed ownership of all proposed Greenway Areas must be added to the plan/report.

24. *Section 404.H. – Final Landscape Plan*

A Final Landscape Plan must be provided for review and approval unless this requirement is waived by the Board of Supervisors. A waiver has been requested from providing a Final Landscape Plan. CEDARVILLE offers no objection to this requirement being waived for this Application.

25. *Section 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.*

The format for the offer(s) of dedication for the Rights-of-Way to West Vincent Township must be coordinated with the Township Solicitor. Legal descriptions and closure reports for the Rights-of-Way to be dedicated must be submitted to the Township for review.

26. *Section 404.K.4. A copy of such deed restrictions, easements, covenants and declarations which are to be imposed upon the property to comply with the Final Plan as approved by the Board of Supervisors. All such documents shall be in such form as is satisfactory to the Board of Supervisors.*

The deed restrictions, easements, covenants and declarations which are to be imposed upon the individual lots shall be presented to the Township for review and approval by the Township Solicitor and Board of Supervisors.

Section 507.E. Conditions of Final Plan Approval

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

The Applicant, Natural Lands Trust, is advised that a Subdivision and Land Development Agreement may be required.

28. Section 507.E.4. - Receipt of all permits, final approvals or waivers required by Federal, State and County agencies for development in accord with the final plan including, but not limited to, the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the Pennsylvania Department of Environmental Protection, the Pennsylvania Department of Transportation, the Public Utility Commission, the Chester County Health Department, and the Chester County Conservation District.

Approval for the proposed subdivision from the Pennsylvania Department of Environmental Protection and Chester County Health Department must be provided to the Township prior to Final Plan Approval by the Board.

Please note, revised submissions may generate further review comments. Once we receive the revised information addressing the comments identified in this letter, CEDARVILLE will confirm that the Application is compliant with the West Vincent Township Subdivision and Land Development Ordinance.

Please do not hesitate to call with any questions.

Best Regards,
CEDARVILLE Engineering Group, LLC



Bryan D. Kulakowsky, P.E.
Township Engineer

cc: Tammy Swavely – West Vincent Township Secretary
West Vincent Township Board of Supervisors (Township to distribute)
West Vincent Township Planning Commission (Township to distribute)
Joseph J. McGrory, Jr., West Vincent Township Solicitor
Tom Wargo – West Vincent Township Code Official
Hamburg, Rubin, Mullin, Maxwell & Lupin, P.C. – John Walko (jwalko@hrmml.com)
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