



July 13, 2018

Project No. 23425.44

Board of Supervisors  
**EAST MARLBOROUGH TOWNSHIP**  
721 Unionville Road  
Kennett Square, PA 19348

Attn: Laurie Prysock, Township Manager

**RE: 223 East Street Road**  
**Preliminary/Final Subdivision Plan**

As requested, we have reviewed the Subdivision Plan submitted for the referenced project. The plan consists of (5) sheets, prepared by Commonwealth Engineers, Inc. (CEI), and is dated May 30, 2018. The plan was accompanied by the following:

- A Post Construction Stormwater Management Plan Narrative, dated May 30, 2018, prepared by CEI;
- A Floodplain Study Report dated December 7, 2017, prepared by CEI; and
- An Erosion and Sediment Control Plan Narrative dated May 30, 2018, prepared by CEI.

The plans and reports were received in our office on June 25, 2018.

The purpose of the plan is to subdivide the existing property into two (2) parcels. The existing dwelling and outbuildings will remain on Lot 2, and a new single family home will be constructed on Lot 1. Access to Lot 1 will require constructing a driveway across floodplain and wetlands. The applicant was granted a Special Exception for the construction in the floodplain on May 16, 2018.

We offer the following comments:

**Zoning Ordinance (ZO):**

1. Section 503.A – There are errors in the tabulation of existing wetlands and floodplain area. Please note that the errors do not impact the viability of the subdivision, but they should be corrected for the record. We have discussed the corrections with the applicant's engineer, who has indicated that they will be corrected on the next submission.
2. Section 1820 – The inner riparian buffer around the wetlands is not shown correctly. A significant portion of the proposed dwelling is within the inner buffer, which is not

permitted per 1820.C.2. The plans should be revised to show the inner riparian buffer 50' off the wetlands line. Note that there is no outer buffer for wetlands, per 1820.B.

3. Sections 2404.A and 2408 – The property on the other side of Route 926 (224 East Street Road) is identified as Historic resource #241 on the East Marlborough Township Historic Resources Map. The engineer should confirm whether the building is located within 100' of the property line. If so, the Historic Commission should determine whether that property is classified as a Class 1 or Class 2 Historic Resource, and if it is determined to be a Class 1 resource, additional buffering may be required.

**Subdivision and Land Development Ordinance (SLDO):**

4. Section 407 - The applicant is requesting a waiver from Section 407.A to allow submission of a Preliminary/Final Plan, rather than separate Preliminary and Final plan submission. We believe this project qualifies as a minor subdivision (as defined in Section 202) and no preliminary plan submission is therefore required. The waiver request should be removed from the plans, as it is unnecessary.
5. Section 502.C.9 – The boundary of the Groundwater Protection District should be shown on the plans.
6. Section 502.C.11 – The bearing and length of the northernmost proposed subdivision line should be added to the plans.
7. Section 502.C.13 – The applicant has requested a waiver from the requirement to provide a shadow analysis. We have no technical objection.
8. Section 502.C.15 – Details for the proposed laterals and grinder pumps, and connection to the existing Township forcemain along Rt. 926 should be added to the plans. The plans should be submitted for review by the Township's sewer consultant.
9. Sections 502.C.24 & 25 – The plans correctly note that permits from the Department of Environmental Protection and Department of Transportation are required. The applicant will need to acquire and submit copies of these permits to the Township as a condition of plan approval.
10. Sections 503.C.5 and 626.A – The plans should be revised to show proposed monuments at all currently un-monumented corners of the original lot, and monuments or pins at all proposed property corners.
11. Section 503.F - The engineer's certification on sheet 1 should be revised to indicate conformance with Zoning, building, and sanitation ordinances and regulations.

12. Sections 609.H and 614.G – The plans show that the PennDOT desirable sight distance (635' to the left, and 570' to the right) is provided. The applicant should confirm that the available sight distance shown on the plans represents the actual sight distance available, and is not just a re-statement of the PennDOT required distance. Additionally, the sightline to the east is restricted by existing vegetation, and it appears that a crest curve approximately 470' east of the site on Route 926 may impact sight distance. The applicant should add notes to the plans requiring removal of existing vegetation restricting sight lines, and add a sight line profile to the plans.
13. Section 620.A – General note 15 should be revised to clarify that both lots are to be connected to the Township sewer facilities.
14. Sections 620.B and 620.G – The applicant should provide verification of Sewage Planning Module approval, or a Planning Module waiver letter, from the Department of Environmental Protection.
15. Section 622 – The following note should be added to the plans; “All utilities will be installed underground, in strict accordance with the requirements of the utility provider.”

**Erosion and Sediment Control Ordinance:**

16. Section 53.5.C – The plans should be revised to address the comments from the Chester County Conservation District.
17. Section 53.5.G – The plans should be revised to provide silt fence around the downslope perimeter of the topsoil stockpile.
18. Sections 53.7.C and E - The plans should be revised to include a note stating that the owner of Lot 1 is responsible for keeping the six 24" and one 36" culvert pipes clear of debris and flowing freely at all times.

**Stormwater Management Ordinance:**

19. Sections 306.I & J – The stormwater management design relies on infiltration through a rain garden for volume control. Soil testing should be provided to demonstrate that there is a minimum of 24 inches between the bottom of the rain garden and the seasonal high water table, and that the underlying soils are capable of infiltrating the retained volume within 72 hours.
20. Section 306.M – The sequence of construction and erosion and sediment control plans should be revised to indicate:
  - a. How the raingarden area will be protected from compaction by construction traffic; and,

- b. How the infiltrative capacity of the underlying soils will be protected from sedimentation during construction.
21. Section 308.A – The submitted Stormwater Management Report does not include sufficient information to demonstrate compliance with peak rate controls. The report should be revised to include calculations demonstrating that the stormwater design achieves the rate reductions required by Section 308.A.
22. Sections 311.A.12, 402.B.18.C, and 701.E.2 – An easement allowing the Township access for maintenance and repair of the driveway culverts and raingarden is required. The applicant may either revise the plans to show the metes and bounds of a defined easement, or add a note to sheets 1 and 4 granting a blanket easement over the property. If the applicant elects the blanket easement option, we can provide language approved by the Township Solicitor.
23. Sections 402.B.8.f.ii and iii - The receiving watershed note on sheet 4 should be revised to include the impairments (siltation, habitat alterations, flow variability) and TMDLs (Red Clay PCB, Christina River Basin (Low Flow)) applicable to the stream.
24. Section 402.B.8.n.i – The existing well on Lot 2 should be shown on the plans.
25. Sections 402.B.10 & 11 – The Drainage Area Plan in the rear pocket of the Stormwater Management Report should be revised to show the boundaries of all land uses and soil types referenced in the Runoff Coefficient Spreadsheet on page 13 of the Stormwater Management Report.
26. Section 402.E – A Pond report sheet for the proposed rain garden should be included in the Stormwater Management Report. Also, the applicant should clarify the purpose of the submitted Pond Data sheet for the proposed culverts.
27. Section 501.D – Step 8 in the Sequence of Construction should be revised to include a requirement to contact the Township Engineer no less than 48 hours prior to construction of the rain garden, to schedule inspections.
28. Section 502.G – Sheet 1 should be revised to include a note stating that no Certificate of Use and Occupancy will be granted until As-Built plans of the driveway culverts and raingarden, signed and sealed by a qualified Licensed Professional, have been approved by the Township.
29. Section 703 – A Stormwater Management Operation and Maintenance (SWM O&M) Agreement will need to be executed and recorded with the Final Plan.

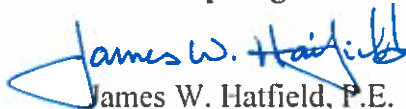
**General Comments:**

30. The plans should be revised to indicate that the existing septic system on Lot 2 will either be removed, or abandoned in place in accordance with the requirements of the Chester County Health Department.
31. On sheet 4, a note pointing to the level spreader appears to contain errors for the elevations (top, invert, and bottom). These should be checked and corrected.
32. The plans show the existing forcemain parallel to Route 926 to be within the paved area, while the existing manhole serving as a benchmark (which we believe is associated with the forcemain) is in the shoulder area. The applicant should determine the actual location of the forcemain. If it is in fact within the paving of Route 926, the work to make the forcemain connections will need to be included in the Highway Occupancy permit.

If you have any questions, please call.

Sincerely,

**VanDemark & Lynch, Inc.**  
**Township Engineers**

  
James W. Hatfield, P.E.

cc: Planning Commission  
Fronfield Crawford, Esq.  
Jorge Paredes  
Victor Kelly, Commonwealth Engineers, Inc.