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June 4, 2010

RECEIVED
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BY: Denise Miller

East Fallowfield Township
Board of Supervisors
2264 Strasburg Road
East Fallowfield, PA 19320

Re: South Brandywine Middle School - 600 Doe Run Road
Proposed New Middle School Construction
Preliminary Land Development Plan Review #3

Dear Board Members:

The following revised preliminary plans and supporting documentation prepared by Kurowski & Wilson (K&W), LLC Harrisburg, PA and Gilbert Architects Inc., Lancaster, PA have been submitted for review:

Sheet No.	Description	Latest Date
SD-1 to SD-27	Preliminary Land Development Plans (27 sheets)	5/6/10
FC-1	Footcandle Plan	5/11/10
FC-2	Cuts Plan	11/2/09
FC-3	Details	5/11/10
ES-1 to ES-11	Erosion and Sedimentation Control Plans (11 sheets)	Rev.2

- Stormwater Management Narrative and Calculations, last revised 5/6/10.
- Response letter from K&W dated 5/14/10.
- Copy of review letter from Jim Reagan, Fire Marshal dated 3/26/10.
- Copy of cover letter from Chester County Conservation District dated 11/12/09 and NPDES Permit dated 10/29/09.
- Letter of Water Serviceability from PA American Water dated 5/12/10.
- Copies of email chain between K&W and East Fallowfield regarding Historical Commission comments.

The plan proposes the demolition of the existing middle school and the construction of a new middle school, parking lots, athletic fields, track and two new entrances. The site is located on the southwest corner of Strasburg Road and Doe Run Road. One of the two existing entrances on Doe Run Road will be retained and a new entrance is also proposed onto Strasburg Road.

The tract is located within the PF - Public Facilities zoning district. The existing facilities are currently served by on-site water and sewage disposal systems. The new plan proposes to utilize the existing on-site sewage system and shows a public water main extended from Strasburg Road.

The plans have been revised in accordance with Planning Commission comments and my last review letter of 12/17/09. The following comments are offered for your consideration:

Zoning Ordinance

1.1 Section 27-1402.3.B.(1) – The plan now notes that approximately 5,066 SF of Moderately Steep Slopes (15%-25% grades) and 3,976 SF of Very Steep Slopes (greater than 25% grades) will be disturbed as part of the construction. While these proposed disturbance figures exceed the amounts permitted for each of the two slope categories, it is the applicant's argument that these are manmade slopes and their disturbance is unavoidable. Although it is apparent that the slopes are indeed man-made as a result of the prior construction of the existing track, the requirements of this section specifically state that both natural and man-made slopes are regulated. The applicant's attorney has submitted a Request for Interpretation on this issue to the Zoning Officer. After reviewing the situation and given the fact that these are very small isolated areas of man-made slope which, in my opinion, do not represent environmentally sensitive areas I have no objection to the applicant's request however the Zoning Officer should make an official interpretation. A copy of this letter will be forwarded to the Zoning Officer for his review.

1.2 Section 27-1804.6 – The plan proposes to modify one of the two existing entrances onto Doe Run Road as well as constructing a new entrance onto Strasburg Road. The southernmost entrance on Doe Run Road will be eliminated. Approvals will be required from PennDOT for the proposed entrance work since both roads are PennDOT owned and maintained. The response letter states that application has been made to Penn DOT for approval of the entrances.

1.3 Section 27-1808 – A preliminary landscape plan is included with the plan set. The following initial comments were noted during this review:

a. The plan should be prepared by a landscape architect registered in Pennsylvania (27-1808.3.A). The plans are now only sealed by a Professional Engineer.

b. A required woodland replacement plantings tabulation has been added to sheet SD-15 however discrepancies were found. Woodland replacement is required when disturbance involves more than 20,000 square feet of woodland area or disturbance to more than 25% of the woodland area, whichever is less (22-630.3.A). In this case the calculation should be based on disturbance over 20,000 square feet. The planting schedule also does not appear to include the woodland replacement plantings. Furthermore, the column totals in the Landscape Standards & Calculations table do not appear correct.

c. The plan proposes to plant numerous trees on top of the stone infiltration areas. Since there will be only 36 inches of soil cover on these beds, in my opinion the type of trees proposed will not survive. The Township landscape consultant should determine if this is appropriate.

d. An extra copy of the landscape plans will be submitted to the township landscape consultant for review. Any comments will be provided when they are received.

1.4 Section 27-1809 – The lighting plans have been revised and details added. The following comments were noted:

a. The notes and specifications of section 27-1809.2.C.(2),(3)&(4) pertaining to light emission and glare control should also be added to the lighting plans and incorporated into the design.

b. General Note 21 pertaining to wall mounted light fixtures should also be added to the lighting plans (27-1809.2.D.(2)).

c. General Note 22 pertaining to hours of lighting should also be added to the lighting plans (27-1809.2.D.(4)).

d. The designer should verify that the footcandle plot is based on the proposed 25' mounting heights (27-1809.5.A.(2)&(3)(b)).

1.5 Section 2400 – A property listed as Strasburg Road Thematic District Resource #10 (SRTH 10) on the Historic Resources Map is located across Strasburg Road from the subject parcel. SRTH historic resources 8, 9 and 11 are also within close proximity to the site and therefore the requirements of this section would be applicable. The Historical Commission had initially reviewed the plan and had listed several concerns in their letter of June 29, 2009. The concerns of the Historical Commission should be addressed. The applicant has provided a letter from the PA Historical and Museum Commission that states that it is their opinion that there will be no effect on potential historic structures in the project area.

<u>Subdivision Ordinance</u>

2.1 Section 22-502.A – The applicant is requesting a waiver from this requirement that the plan be drawn at a scale of fifty (50) feet or one hundred (100) feet to the inch. Since the plan is drawn at a larger scale of forty (40) feet to the inch, which shows the required information more clearly, I have no objection to this waiver request.

2.2 Section 22-502.B.(21) – The design of any fire protection facilities should be approved by the Fire Marshal. The comments contained in the Fire Marshal's review letter of March 26, 2010 should be addressed.

2.3 Section 22-502.B.(24) – The applicant should obtain verification from the Chester County Health Department and/or PA DEP regarding the suitability of the existing sewage disposal system for the proposed new school. The July 23, 2009 letter from the Chester County Health Department recommends that additional information regarding the existing sewage flows be submitted. Furthermore, the December 3, 2009 letter from James MacCombie, P.E. also recommends that additional documentation be provided. The response letter states that they are working to resolve these issues.

2.4 Section 22-507 – Due to the scope of the proposed project the Board should consider requesting additional studies for the project to determine proposed impacts to facilities such as such as traffic, fire and emergency services, environmental, and recreation. Although the application states that there is no projected increase in student population, the new facility may have capacity for additional students in the future.

2.5 Section 22-620.2 – Planning Modules, or documentation that they are not required, should be provided from PA DEP and submitted. As noted above, the comments in the Chester County Health Department letter and Mr. MacCombie's letter should be addressed. The response letter states that they are working to resolve these issues.

2.6 Section 22-621.3 – The applicant is proposing to service the new school with public water. The plan shows a main being extended from the intersection of Strasburg Road and Doe Run Road. The nearest location of public water is a main that crosses Doe Run Road at Crossing Boulevard to service the Brook Crossing Development. As noted in the July 16, 2009 letter from the Township Solicitor, the property is located outside the PA American Water Company certified service area and will therefore require Township approval and a filing for an extension to the Pennsylvania PUC. The procedure outlined in the Solicitor's letter will need to be followed.

2.7 Section 22-622 – The general stormwater management concept has been reviewed and appears reasonable. The following comment pertaining to the preliminary review of the stormwater management design was noted however a more complete review of the design will be performed during the final plan stage.

a. Appendix 22-I, Section V.B.2 requires storm sewer piping to have a minimum diameter of 15 inches and be constructed of reinforced concrete (RCP). The applicant is proposing to use high-density polyethylene (HDPE) pipe throughout. Since the project involves all privately owned piping, I have no objection to this waiver request.

2.8 Section 22-630.2.C – Woodland replacement is required wherever permitted woodland disturbance involves more that 20,000 square feet of woodland area or disturbance to more than 25 percent of any woodland area, whichever is less. Since the proposed woodland disturbance will exceed 20,000 square feet, woodland replacement is required in accordance with this section. The required woodland replacement should be calculated based on the disturbed amount over the lesser of the disturbance thresholds, which in this

case the lesser would be 20,000 square feet. Therefore the replacement plantings should be based on the disturbed area over 20,000 square feet.

General Comments

3.1 A number of minor technical discrepancies were noted on the plans during this review. These will be conveyed directly to the designer.

3.2 Copies of all permits or approvals including but not limited to Penn DOT, Chester County Health Department, PA DEP, should be provided to the Township when received.

3.3 Additional comments may be expected with more detailed reviews after the above information is received.

The above comments should be addressed and revised plans submitted for review.

Please feel free to call if you have any questions concerning this review.

Very Truly Yours,

Christopher R. Della Penna, P.E.
Township Engineer

Cc: Planning Commission
Vince Pompo, Esq. (via fax)
K&W Engineers (via fax 717-735-9532)