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RECEIVED
MAY 14 2010
BY: Denise McCee

May 14, 2010

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

Re: Coatesville Area School District – South Brandywine Middle School
Proposed New Middle School Construction
Preliminary Land Development Plan Review #2
K&W Project No. 2041.004

Dear Supervisors:

We are in receipt of the Christopher Della Penna, P.E. review letter dated December 17, 2009 for the above-referenced project. Accordingly, we have made the necessary revisions to address the comments contained therein and, on behalf of the Coatesville Area School District (CASD), offer responses to said comments below (original comments are in bold).

Zoning Ordinance

1.1 Section 1402.3 – The Plan now notes that approximately 5,066SF 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.
Response: No response required – awaiting Zoning Officer's interpretation.

1.2 Section 1402.9.A – Since the applicant is requesting approval to extend public water to service the site a Water Survey consistent including the requirements of Section 506 would be required.

Response: A letter is attached from Pennsylvania American Water acknowledging the status of water service and their ability to serve the Middle School.

1.3 Section 1729.A.5&8 – Sheets SD-7 through SD-10 show both a "Building Setback Line (Typical)" and a "Proposed Building Setback". This should be clarified. The setback line should also be measured from the proposed right-of-way line.
Response: The building setbacks have been clarified as "existing" and "proposed." Additionally, the "Proposed Building Setback" has been measured from the proposed right-of-way line.

1.4 Section 1804.F – 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.
Response: HOP plans have been submitted to PennDOT for their approval. Copies of the approvals will be forwarded to the Township upon receipt.

1.5 Section 1805.A.1 – The legend contains "No Parking" (D) signs and "Stop Ahead" (J) signs however none were found on the plans. "No Parking" signs should be added around the fire lane and speed limit signs should be added to the plan.
Response: No Parking signs have been added near the entrances to the fire lane. There is only one "Stop Ahead" sign indicated on the plan, it is located near the entrance to the school from Doe Run Road. Please refer to sheets SD-8 through SD-10.

1.6 Section 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 (1808.C.1).**
   Response: The plan has been prepared under the guidance of a PA registered Landscape Architect and his seal has been provided on Sheets SD15-18.

b. **View analyses are required by section (1808.C.3). The plan depicts view perspectives with descriptions however it is unclear if photographs were intended to accompany the analysis. If so, copies of the photographs should be provided.**
   Response: No photographs were intended to follow the descriptions. The written descriptions adequately depict the views as required by ordinance.

c. **The required woodland replacement plantings tabulation should also be added to sheet SD-15 along with the other planting requirements calculations.**
   Response: The "Woodland Replacement Calculations" table has been added to sheet SD-15 along with the "Landscape Standards and Calculations – Overall Site" Table.

d. **The plan proposes to plant numerous trees and shrubs on top of the stone infiltration areas. Since there will be only 18 inches of soil cover on these beds, the plants will not survive. The designer should reconsider the type of plants, if any, that are proposed to be planted over these beds.**
Response: A bioretention detail has been provided on sheet SD-25 that provides for a 36" deep planting area for the trees.

e. **As noted in the previous review an extra copy of the landscape plans should be submitted so the township landscape consultant can review the plan.**
Response: Plans will be submitted to the Township's landscape consultant.

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

a. **The plans should contain the appropriate notes and specifications of section 1809.3.b,c&d pertaining to light emission and glare control.**
Response: The requested notes have been added as General Notes 18-20 on Sheet SD-1.

b. **Due to the close proximity of the proposed school to the residential properties to the southwest, the designer should verify that the lighting will not create a nuisance to these property owners (1809.B.4.a).**
Response: Sheet FC-1 clearly shows there will not be any light from the southwest "bleeding over" to the nearby residential properties.

c. **The proposed SF1 wall mounted light fixtures should include provisions to prevent them from projecting light output directly skyward (1809.B.4.b).**
Response: This note has been added as General Note 21 on Sheet SD-1.

d. **With the exception of necessary security lighting, to be approved by the Township, all lighting shall be turned off or reduced by 75% after business hours or 11pm, whichever is earlier (1809.B.4.d).**
e. *Response: This note has been added as General Note 22 on Sheet SD-1.*

f. **If any flagpoles with lighting are proposed, the design must meet the requirements of section 1809.B.4.i.**
Response: No flagpoles with lighting are proposed.

g. **Actual isofootcandle plots should be provided for each light fixture on the plan. The plan should also include pole details and fixture mounting heights (1809.E.1.b&c).**
Response: The updated electrical drawings are included with the re-submission, pole details and fixture heights are identified – See Sheets FC-1 through FC-3.

h. **The main parking lot islands propose numerous Red Maple trees between the proposed lighting fixtures. The trees may impact the proposed parking lot lighting after several years of growth. The lighting design should consider the impact of any such trees, which will reach a large size at maturity.**

Response: The trees have been moved within the parking areas as to not conflict with the lighting as they mature.

1.8 Section 2400 – A property listed as Strasburg Road Thematic District Resource #10 (SRTH 10) on the historic Recourses 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 initial reviewed the plan and had listed several concerns in their letter of June 29, 2009. The comments of this letter must 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 affect on potential historic structures in the project area.

Response: We tried to review the Historical Commission's comments with them last year but received no response other than we needed to discuss the issue with the Planning Commission, We discussed the issues with the Planning Commission and believe the new landscaping along Strasburg Road will provide a visual buffer to the Towerville Historic District. I have also attached correspondence of our request to be on the August 2009 HC meeting and subsequent denial.

<u>Subdivision Ordinance</u>

2 .1 Section 501.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.

Response: Noted

2.2 Section 501.B.12 – The 100 foot strip of land connecting Wilmington Road is still labeled as R-S Residential and should be labeled as R-2 Residential.

Response: This label has been updated to show the R-2 Residential district; see sheet SD-2.

2.3 Section 501.B.20 – The plan should contain a statement indicating whether or not the project is consistent with the Township's current Act 537 Plan.

Response: This note has been added as General Note 23 on Sheet SD-1.

2.4 Section 501.B.21 – The design of any fire protection facilities should be approved by the Fire Marshal. The location of any proposed fire hydrants should be shown.

Response: The hydrants have been added to the plan – see sheets SD-12, 13, and 14. The plans have been submitted to the Fire Marshall for their review.

2.5 Section 501.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.
Response: We are continuing our correspondence with the Chester County Health Department/PADEP to resolve this issue.

2.6 Section 501.B.29 – The applicant should provide written verification from the water company indicating their ability and willingness to service this project.
Response: Letter is attached.

2.7 Section 504.B – A copy of the NPDES Permit for Stormwater Discharges from Construction Activities should be provided to the Township when received.
Response: A copy of the NPDES permit has been included in the resubmission.

2.8 Section 504.B.3.b – A legend or description of the geologic formations underlying the tract should be added to the plan.
Response: The geologic legend has been added to the existing features plan, sheet SD-2.

2.9 Section 506 – 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 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.
Response: No response required.

2.10 Section 615.B – The plan now shows a walkway from the school to the intersection of Strasburg and Doe Run Roads with the intersection crosswalks as previously discussed. The pathway should be labeled and a construction detail provided.
Response: Labels have been added to the walkway see sheet SD-10. A walkway detail has been provided on SD-24.

2.11 Section 619.B – 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.
Response: We are continuing our correspondence with the Chester County Health Department/PADEP to resolve this issue.

2.12 Section 620.C.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. A 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. As requested by the Planning Commission at their December meeting, the applicant should supply additional documentation to support their request.
Response: The servicing of the school with public water has been discussed with the Planning Commission and Board of Supervisors. During the April 27 Supervisors meeting the Board approved a recommendation from the Planning Commission to allow for the new middle school to be serviced with public water. The actual details are anticipated to be worked out in the upcoming months.

2.13 Section 621 – The general stormwater management concept has been reviewed and appears reasonable. The following comments pertaining to the review of the stormwater management design were noted however a more complete review of the design will be performed during the final stage.

a. **Appendix 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.**
Response: Noted.

b. **The proposed Basin B will be discharging to the intersection of Strasburg Road and Doe Run Road. This intersection has a history of poor drainage and the existing pipes under the road are in poor condition. It is recommended that the drainage under this intersection be improved as part of this project.**
Response: The18-inch cast iron pipes underneath the intersection that lead from the project site will be replaced as a part of the project. Additionally, the headwall will be replaced since PENNDOT is requesting the paved radius at the intersection be increased.

c. **Additional distribution piping should be installed in Infiltration Area B as well. It is also recommended that a minimum 15" diameter pipe be used for the perforated distribution pipes in the beds. In some instances, such as for Bed C, there is an 18" pipe entering into the bed manhole with only 8" pipes for distribution. In addition, with the small pipes and limited amount of distribution pipes, the water entering into the beds could "short-circuit" through the system before it has a chance to fill and even back up out of the inlets upstream.**
Response: Additional distribution piping has been provided in Infiltration Area B – see sheet SD-26. The pipe size for the perforated distribution pipes has been increased to at least 15" diameter.

d. **No details were provided for the Planted Bioretention Areas and no E&S plans were submitted.**
Response: A detail for the planted bioretention area has been provided on sheet SD-25 and E&S plans have been included in the resubmission.

e. **The design of each of the infiltration areas is based on only one or two percolation test holes some of which had very slow infiltration rates. The plan therefore should note that additional testing is to be performed prior to construction to verify the design and if necessary, the beds will be redesigned based on those test results.**
Response: Additional infiltration testing has been performed at the infiltration areas. This has been provided in the Stormwater Management Report, Appendix D. The rates shown have been found to comply with PADEP BMP manual standards for infiltration with rates between 0.50 in/hr to 2.63 in/hr.

2.14 Section 629.B.3 – 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 lesser of the disturbance over 20,000 square feet or 25% of the total woodland area. In this case the lesser would be 20,000 square feet so the replacement amount should be based on the disturbed area over 20,000 square feet. Woodland replacement planting should be shown.
Response: Woodland replacement planting has been added with a calculation table on sheet SD-15.

General Comments

3.1 A note should be added to the construction sequence stating that the limits of disturbance in wooded areas shall be verified by a Township representative prior to clearing to determine if any additional specimen trees can be saved. The response letter states that this was added to sheet ES-1 however this sheet was not provided.
Response: A copy of the E&S plans has been provided in this resubmission.

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

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

If you should have any questions or require any additional information regarding this submission, please do not hesitate to contact me. We look forward to discussing these plans with you in further detail. Thank you.

Sincerely,

Kurowski & Wilson, LLC

FOR

Brian S. Bingeman, RLA
Director of Landscape Architecture

Enclosures

cc: Mr. William Androwick – CASD, with enclosures
Mr. Kenneth R. Johnson – Gilbert Architects, with enclosures