



**EDWARD B. WALSH & ASSOCIATES, INC.**  
*Complete Civil Engineering Design / Consultation Services*  
Whiteland Business Park  
855 Springdale Drive, Suite 202  
Exton, PA 19341

September 8, 2022

Ms. Tiffany Loomis, Borough Manager  
Malvern Borough  
1 E. 1<sup>st</sup> Avenue - Suite 3  
Malvern, PA 19355

Re: Renehan – 551 Sugartown Road Subdivision  
Preliminary / Final Review #3  
EBWA Project #2780-142

Dear Ms. Loomis:

In accordance with Malvern Borough's request, I have reviewed the above referenced project for compliance with the Borough's Zoning, Subdivision & Land Development, and Stormwater Management Ordinances. The following information was submitted for review:

- Preliminary/Final Subdivision & Land Development Plan for 551 Sugartown Road, prepared for Renehan Building Group, LLC., prepared by JMR Engineering LLC., dated March 7, 2022, last revised August 29, 2022, eight (8) plan sheets.
- Post Construction Stormwater Management Narrative & Report for 551 Sugartown Road, prepared for Renehan Building Group, LLC., dated July 15, 2022, last revised August 29, 2022.
- Waiver Request Letter dated August 29, 2022.
- August 29, 2022 JMR response letter.

The applicant is proposing to consolidate and subdivide parcel 2-6-29 (owned by Paoli Memorial Grounds) and parcel 2-6-30 (owned by Renehan Building Group) into two lots and construct two single-family dwellings. In addition, the applicant has revised the plan set to adjust the lot line for parcel 2-6-31 (owned by P. Markowski) as part of this subdivision. The parcels are located at the corner of Sugartown Road and Monument Avenue. Access for Lot 1 is proposed to be off of Sugartown Road (PennDOT road) and access for Lot 2 is proposed to be off of Monument Avenue. No new improvements are proposed for Lot 3 (parcel 2-6-31). The following comments and recommendations from my August 12, 2022 letter require further consideration (new comments in **bold**):

**REGISTERED PROFESSIONAL ENGINEERS & LAND SURVEYORS**  
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### **Zoning Ordinance**

3. Article XXII – Natural Resource Protection Standards -
  - c. Section 2204 – Woodlands and specimen vegetation.
    - i. The plan indicates the location / diameter of free standing trees located onsite but there appears to be additional trees within the existing tree lines that have not been surveyed. The plan must be updated to indicate all trees onsite and the tree species must be noted.

*A detailed tree survey has been completed and is noted on the plans. The design engineer has noted that trees deemed dead or hazardous were not located in the tree survey. Clarification on the qualifications for the professional related to the hazardous tree evaluation must be provided.*

**Dead trees have been surveyed and noted on the plans. It is my understanding a member of the Shade Tree Commission has also met onsite and reviewed the condition of the trees. The final plan must be reviewed with the Shade Tree Commission for concurrence with the site visit.**

### **Subdivision and Land Development Ordinance**

2. Section 300.C – The project is classified as a Major Land Development application.
  - b. Applicant has submitted the plans under a preliminary / final application. A waiver to allow the project to be submitted as a preliminary / final application in lieu of separate applications has been requested by the applicant and must be reviewed by the Planning Commission.  
**The waiver approval is pending.**
  - c. Four-step design process documentation. This information must be submitted or a waiver must be requested.  
**A waiver has been requested and the approval is pending.**
3. Section 300.G – Any plan applications for tracts of land along the municipal boundary shall, at the same time as any plans or supplementary documentation are submitted to the Borough, include submission of one additional complete set of such plans and documentation, which shall be forwarded by the Borough to the adjacent municipality for its comments.

The Borough should submit a copy of the plan to Willistown Township. In addition, work is proposed in Willistown Township (cleaning clogged storm sewer). I believe the applicant has met with Willistown Township regarding this matter and if so, should provide documentation / summary of the discussions with Willistown Township.

***If not already completed, the plans should be issued to Willistown Township. Comments from Willistown Township should be considered by the Borough.***

**Comments from Willistown Township are pending.**

13. Section 402.B.4.f – An address for the proposed lot, as provided by the Malvern Post Office and the Borough staff, must be added to the plan.

**Addresses are pending. The applicant must coordinate the address issuance with the Borough staff.**

15. Section 503 – Street Standards. *Where a subdivision abuts or contains an existing street of inadequate right-of-way width, additional right-of-way width shall be dedicated to conform to the standards set by the Borough. Where a subdivision abuts or contains an existing street of inadequate cartway width, the applicant shall be required to widen and/or reconstruct the roadway to meet current Borough standards.* Monument Avenue is considered a Local Distributor, therefore the minimum standards are a 50-foot wide right-of-way and a 32-foot wide cartway. Sugartown Road is a major collector, therefore the minimum standards are a 60-foot wide right-of-way and a 34-foot wide cartway.

The applicant is requesting a waiver for relief of the requirement to widen Monument Avenue and Sugartown Road. The existing cartway widths should be clearly identified on the plans and the waiver requested reviewed with the Borough Planning Commission.

**A waiver has been requested and approval is pending.**

The applicant has noted the right-of-way of both Monument Avenue and Sugartown Road to be 50-foot wide (existing). The applicant is proposing to dedicate additional right-of-way along Sugartown Road to Malvern Borough. The proposed road dedication should be reviewed with the Borough staff and Planning Commission. Sugartown Road is an existing PennDOT road (not Borough owned). The Borough may wish not to accept dedication of right-of-way in this area.

***The additional right-of-way dedication along Sugartown Road has been removed from the plan. Either a waiver must be requested or the plan revised to show a continuing offer of dedication (Borough does not need to accept this right-of-way).***

**The applicant has requested a waiver for the dedicated right-of-way along the PennDOT owned roadway – Sugartown Road. EBWA has no issue with this waiver request.**

17. Section 506.H – *Sight distance requirements for all intersections shall be in accordance with the Pennsylvania Code, Title 67, Transportation, Chapter 441, "Access To and Occupancy of Highways by Driveways and Local Roads," latest revision. Plans shall indicate the clear sight distances.* Sugartown Road is a PennDOT State Highway, therefore a PennDOT permit is required for the Lot 1 driveway.

The sight distance analysis for the driveways must be evaluated to determine if the proposed profiles are measured from the driveway (12-ft from the edge of road) or if they are centerline profiles. The analysis must take into account the embankments and the existing vegetation.

***Confirmation from PennDOT regarding the need for a permit (Lot 1) is pending. The applicant is proposing to utility the existing driveway.***

**As discussed at the Planning Commission meeting, written confirmation is requested from PennDOT regarding the driveway permit (email sufficient). The PennDOT embankment grading permit is pending.**

18. Section 509.F – The plan must be revised to indicate all utility improvements in the public roads and the limits of the pavement restoration. Please note, Sugartown Road is PennDOT road and permits must be obtained for the utility improvements (and the driveway). Copies of the permits must be supplied to the Borough upon receipt.

**PennDOT approval is pending.**

19. Section 512 – Easements.

- b. The stormwater design for the development involves runoff from proposed Lot 1 to discharge to Lot 2 as a point discharge and the stormwater system on Lot 2 is designed to manage the runoff volume (2-year storm) for Lot 1. The applicant should review with the Borough Solicitor if some type of easement agreement is necessary between the two properties.

***The stormwater design has been modified so the systems operate independently but there is still a discharge of concentrated runoff from Lot 1 onto Lot 2. The applicant should review this with Borough Solicitor to determine if an easement is required.***

**The easement must be labeled (description) on the PCSM plan.**

21. Section 514.A – Curbs. Curbs shall be installed along both sides of all streets and shall be plain concrete curbs. The applicant has requested a waiver of this requirement.

**The waiver approval is pending.**

22. Section 515.A – Sidewalks and Trails. Sidewalks shall be provided on both sides of all existing streets where required by the Borough. The applicant has requested a waiver of this requirement. The applicant must review this waiver with the Planning Commission to determine if sidewalk improvements are desired for this property. If not, consideration should be given to requiring a fee-in-lieu of for the sidewalk.

**The applicant has requested a waiver for this requirement. I suggest that a fee-in-lieu of should be considered.**

23. Section 517 – Stormwater Management Ordinance – 2014-61, Adopted May 20, 2014.  
c. Section 305 - Water Quality and Runoff Volume Requirements and Section 306 – Infiltration Requirements.

1. The design engineer is proposing to have Lot 2 manage the necessary volume and infiltration requirements for both proposed dwellings. The stormwater report and recorded plans must be revised to clearly identify the intent of the design and standard Operation and Maintenance Agreement be revised to identify this intent. This should also be reviewed with the Solicitor to determine if any easement or agreement is required to ensure that this volume management is maintained in perpetuity.

*The design has been modified to provide volume control for 1 onsite. Soil testing must be completed prior to final approval (not permitted to defer to construction).*

**The soil test results must be submitted for approval. Testing was scheduled for August 2, 2022 per the design engineer.**

2. Clarification must be provided regarding the soil type / curve numbers utilized on the Volume Differential worksheet (page 38). B soils were used for the post developed area and C soils were used for the pre-developed grass areas.

*Additional clarification regarding the soil types and curve numbers / runoff coefficients must be provided. According to the soils map there are both B and C soils onsite but the calculations are not clear on what is being used.*

**The design engineer has noted that C soils were utilized since there is a negligible amount of B soils onsite.**

- **2-yr. Runoff Volume Differential appears to utilize B soils for both the pre and post developed calculations.**
- **Peak rate analysis appears to utilize C soils for the pre and post developed calculations.**
- **According to the provided soils mapping, there is 13% B soils onsite.**
- **The report should be revised to utilize the correct soil types for the analysis to ensure accurate results.**

- d. Section 310.F – Any facility located within a PennDOT right-of-way shall comply with PennDOT minimum design standards and permit submission and approval requirements. The applicant is proposing to discharge runoff into the PennDOT right-of-way. PennDOT approval is required for this discharge.

***The stormwater design has been revised to remove the outflow pipes. In accordance with Section 306.R of the ordinance, all infiltration practices shall have appropriate positive overflow controls. The design must be revised accordingly.***

**The plan has been revised to indicate positive outflow pipes. The construction detail should be revised to indicate the outflow pipe configurations as they are different for the two stormwater facilities.**

- g. Section 701 & 702 – Operation and Maintenance Responsibilities and Easements. An O&M Agreement must be prepared and submitted to the Borough for review and approval in accordance with Section 701 of the Ordinance. The O&M Plan shall be attached to, incorporated within, and recorded as a public record along with a fully executed O&M Agreement, all of which shall be recorded as a restrictive covenant that runs with the land and shall be binding upon the Landowner and any heirs, administrators, successors in interest or assigns of the Landowner.

**The applicant has agreed to address this in subsequent submittals.**

- h. Section 706 - Municipal Stormwater Control and BMP Operation and Maintenance Fund. Persons installing stormwater controls or BMPs shall be required to pay a specified amount to the Municipal Stormwater Control and BMP Operation and Maintenance Fund to help cover the costs of periodic inspections and maintenance expenses in accordance with Section 706 of the Ordinance.

**The applicant has agreed to this.**

- 24. Section 518 – Erosion and sedimentation control.
  - a. Additional silt controls must be installed along Sugartown Road and Monument Avenue along the property frontages to ensure sediment does not leave the property during construction.

***The silt controls are proposed to be located in the PennDOT right-of-way. Approval for all work in the PennDOT right-of-way must be obtained.***

**PennDOT approval for the work in the right-of-way is pending.**

- 25. Section 519 – Sewage disposal. The applicant is proposing to install individual grinder pumps and low pressure laterals for both dwellings and connect the laterals to the public sewer locate in Monument Avenue.
  - a. A full sewer design must be submitted for review and approval including the grinder pump design, lateral size and specifications, construction details, and rim / invert elevations. Calculations must be supplied to verify the flow and pump will generate a minimum of 2.0 ft / sec velocity.

***Specifications for the sewer lateral based upon the design must be noted on the plan. There is conflicting information between the utility notes and the design for the sewer forcemains.***

**Specifications for the sewer lateral (pipe material) do not appear to have been added to the plan.**

- b. Full topography of the lateral design location including the existing right-of-way limits, existing utilities and existing trees must be added to the plan and considered in the design. The neighboring sewer lateral for UPI 2-6-31 must be noted on the plan.

***Further evaluation is required for the tree impacts along Monument Avenue.***

**The design engineer has noted that the sewer lateral for UPI 2-6-31 was recently constructed without impacts to the existing trees. If my memory is correct, the existing sewer lateral was completed via direction drill construction (excavation not completed). Based upon EBWA review of the existing 48-inch oak tree, impacts to the root systems will occur with the excavation work. Further analysis should be completed to ensure the root system is not impacted.**

- c. Roadway restoration limits must be noted on the plan.

***Construction methods for the laterals must be detailed on the plan to determine if they can be constructed without impacting the roadway.***

**Upon further review, the sewer laterals are proposed to be at a minimum of 4-foot depth adjacent to the existing edge of roadway and is proposed to be installed crossing the existing sewer lateral. Trench details indicating spacing must be provided for review and approval. Horn Plumbing installed the existing sewer lateral and the design engineer should consider contacting them to discuss the construction.**

- d. Per Section 519.G.5, the maximum length of a lateral is 150-feet. The proposed lateral lengths exceed this distance. A waiver has been requested for relief of this requirement.

**A waiver has been requested for relief of this requirement. The length of the laterals are approximately 350' and 400'.**

- e. If permitted to run two parallel private laterals in Monument Avenue, the applicant will be required to enter into a written agreement with the Borough to detail the operation and maintenance of the grinder pump / forcemain laterals.

**The agreement is pending.**

- f. Sewer Planning for the subdivision is required to be approved by PA DEP.

**This sewer planning approval is pending.**

26. Section 520 – Water Supply. The applicant is proposing to connect the two dwelling to public water supply via Sugartown Road.
- a. A PennDOT permit will be required for the utility connection.

**The PennDOT permit is pending.**

30. Section 525 – Landscaping, Screening and Street Trees.
- a. The applicant must contact the Borough to coordinate a review of the landscape plan with the Shade Tree Commission to evaluate the proposed street trees.

**Shade Tree Commission approval is pending.**

- b. The design professional must evaluate the following for the proposed tree planting locations:
1. Conflicts with the existing overhead electric lines along both Sugartown Road and Monument Avenue.
  2. Conflicts with the existing trees that are to remain.
  3. Placement of the trees in relationship to the steep slope areas.

*The above noted conflicts should be reviewed with the Shade Tree Commission.*

**Shade Tree Commission approval is pending.**

- c. Section 525.D – Vegetation Disturbance and Replacement. Additional information must be provided regarding the existing trees and the proposed tree removal onsite. Replacement requirements must follow Section 525.D of the SALDO as applicable.

*The design professional has indicated 27 replacement trees to be planted. The locations of the replacement trees should be evaluated based upon the existing canopy of the trees to remain (planting locations may not be feasible).*

**The revised plan based upon the dead tree analysis indicates 24 replacement trees (instead of 27). The placement of the trees still appear to be in the canopy of the existing trees to remain, as reviewed at the Shade Tree Commission meeting. Further evaluation is required to address this concern.**

31. Section 526 – Grading.
- a. The design engineer must evaluate the proposed grading onsite. Due to the nature of a residential property, I recommend all slopes be a minimum of 3:1 for future



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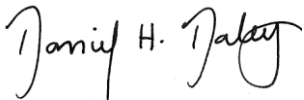
maintenance purposes. If not feasible, any slopes steep than 3:1 must be landscaped with plant material that prevents erosion and does not require regular mowing.

***The method of stabilization of the proposed 2:1 slopes must be clearly noted on the plans. Appropriate ground cover must be installed.***

**The applicant is proposing to install vinca pervinca (periwinkle / creeping myrtle) as a ground cover for the existing steep slopes that are to remain.**

If you should have any questions or require any additional information, please do not hesitate to contact me.

Very truly yours,  
EDWARD B. WALSH & ASSOCIATES, INC.  
Malvern Borough Engineers



Daniel H. Daley, P.E.

cc: Corinne Badman, Assistant Borough Manager  
Bill Wilfong, Malvern Borough  
JMR Engineering, LLC.  
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