



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

August 12, 2022

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

Re: Celli - 62 Highland Avenue Subdivision  
Preliminary / Final Review #1  
EBWA Project #2780-149

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 Subdivisions - Two Lot Residential Subdivision, 626 Highland Avenue, prepared for Rudolph L, Jr. & Anita M. Celli, prepared by Yohn Engineering, LLC. dated June 27, 2022, eight (8) plan sheets.
- Stormwater Management Calculations 626 Highland Avenue, prepared by Yohn Engineering, LLC. dated June 27, 2022.
- SALDO Application, Waiver Request Letter, and Neighbor Notifications
- Request of Sewage Planning Exemption

The applicant is proposing to subdivide parcel 2-6-26 into two lots and construct two single-family dwellings. The parcel is located at 626 Highland Avenue (west side near Sugartown Road). Access for the two lots is proposed to be off of Highland Avenue. The two dwellings are proposed to be served by public water and public sewer. The following comments and recommendations are offered for the Borough's consideration of the submitted plan:

**Zoning Ordinance**

1. Section 501 - The tract is located in the R-2 Zoning District. Single-Family Detached dwellings are uses permitted by right.
2. Section 502 – Area and Bulk Regulations. The proposed subdivision is noted to be in compliance with the applicable area and bulk regulations for the R-2 Zoning District.

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The plan must be revised to include a lot area (net) tabulation for each lot, including all easements, slopes, and rights-of-way, as applicable.

3. Article XXII – Natural Resource Protection Standards -
  - a. Section 2204 – Woodlands and specimen vegetation. Additional documentation must be provided regarding the determination of the health of the various trees noted as “dead” on the submitted plan.

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

1. Section 300.B – Based upon the noted criteria (greater than 1,500 sf of impervious coverage), the project is classified as a Major Subdivision application.
2. Section 300.C – The project is classified as a Major Land Development application.
  - a. 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.
  - b. A site visit with the Planning Commission should be scheduled by the applicant if requested by the Planning Commission.
  - c. Four-step design process documentation. This information must be submitted or a waiver must be requested.
  - d. A review by the Borough Fire Marshal must be completed for the project.
3. Section 402.B.2.k – The existing sanitary sewer mains / laterals must be labeled on the plan including the size and material.
4. Section 402.B.4.f – An address for the new lot, as provided by the Malvern Post Office and the Borough staff, must be added to the plan.
5. 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.* Highland Avenue is considered a Local street, therefore the minimum standards are a 50-foot wide right-of-way and a 28-foot wide cartway.

Highland Avenue is noted on the plan as having a 50-foot wide right-of-way and an average width of 14.5-feet +/- along the property frontage. The roadway must be widened or a waiver requested.

6. Section 509.F – The limits of the proposed roadway restoration for the new utility construction along with the construction details must be added to the plan. The restoration must follow the requirements of Chapter 179 – Article III Street Excavations of the Borough Code.

7. 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.
8. 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.
9. Section 517 – Stormwater Management Ordinance – 2014-61, Adopted May 20, 2014.
  - a. Section 105 – The applicant is proposing a regulated activity (construction of proposed impervious coverage in excess of 400 square feet and earth disturbance in excess of 5,000 square feet) therefore stormwater management controls are required as part of this project.
  - b. Section 301.C - No Regulated Activity shall commence until the Borough issues approval of a SWM Site Plan, which demonstrates compliance with the requirements of this Ordinance.
  - c. Section 305 - Water Quality and Runoff Volume Requirements and Section 306 – Infiltration Requirements.
    1. The Volume requirements calculations must be based upon the project limit of disturbance (29,000 sf).
    2. The 2-year SCS post developed captured hydrographs must be provided for review to ensure the drainage areas generate the required volume to meet the requirements of the ordinance.
    3. Section 306.M – Notes (including fence locations) must be added to the plan to address this requirement:  
*During site construction, all infiltration practice components shall be protected from compaction due to heavy equipment operation or storage of fill or construction material. Infiltration areas shall also be protected from sedimentation. Areas that are accidentally compacted or graded shall be remediated to restore soil composition and porosity. Adequate documentation to this effect shall be submitted to the Municipal Engineer for review. All areas designated for infiltration shall not receive runoff until the contributory drainage area has achieved final stabilization.*
  - d. Section 308 – Stormwater Peak Rate Control Requirements
    1. Based upon the current conditions, it appears the design should be revised to evaluate different points of interest. It appears the front of the property drains to Highland Avenue and the rear drains toward Monument Avenue. Upon evaluation of the analysis, the design engineer must either modify the design or provide justification for the current design.
    2. The drainage area plans must be modified to clearly indicate the controlled and uncontrolled areas and how the runoff will be managed (red dotted lines difficult to read). It appears a high point is located in the rear yard to direct runoff to the yard drains but this is not clear with the grading. It is recommended that the drainage area lines that discharge to the stormwater

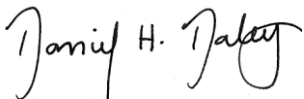
- facilities be added to the PCSM Plan to assist with the proper grading during construction.
3. Section 308.A – The post developed 10-year peak rate must be less than the 2-year predeveloped peak rate.
- e. Section 404.H - All or portions of the final approved SWM Site Plan shall be recorded at the County Recorder of Deeds.
  - f. 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.
  - g. 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.
10. Section 518 – Erosion and sedimentation control.
    - a. Silt sock calculations must be provided to ensure the sock is properly sized for the upslope drainage area.
    - b. The construction sequence must be revised to indicate a pre-construction meeting is required with the Borough.
  11. Section 519 – Sewage Disposal.
    - a. The applicant has submitted a Request for Sewage Planning Exemption for connections to the public sewer. The submitted paperwork is adequate. The applicant must submit and obtain signatures for on the PA DEP - Public Sewer System Available Capacity Determination worksheet from the applicable downstream municipalities including Aqua and VFSA.
    - b. The design of the sewer lateral must be provided. The plan must include all applicable notes regarding the construction from Section 519 of the SALDO and construction details / specifications for the lateral, connection method, backfill, interceptor trap / vent and other applicable information.
    - c. Sewer Planning for the subdivision is required to be approved by PA DEP.
    - d. The applicant will be required to pay one (1) additional tap in fee.
  12. Section 520 – Water Supply. The applicant is proposing to connect the two dwelling to public water supply.
    - a. Section 520.H – Documentation must be provided to ensure the minimum water supply requirements per Section 520.H have been met.

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13. Section 521 – Other Utilities. A noted must be added to the plan indicated that all utilities, including but not limited to electric, gas and telephone, shall be placed underground.
  
14. 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.
  - b. Section 525.D – Vegetation Disturbance and Replacement. Further evaluation / discussions related to the dead trees to be removed should be completed prior to evaluation of replacement tree requirements. Replacement requirements must follow Section 525.D of the SALDO as applicable.
  - c. The limits of disturbance and proposed fill within drip lines of the existing trees must be evaluated to determine if the health of the existing trees that are noted to remain might be impacted. The tree protection limits should be evaluated.
  
15. Section 701 – Upon approval of the final plan, the applicant must execute a Subdivision and Land Development Agreement and Financial Security Agreement. Included in the Financial Security agreement is a guarantee, in the form of a bond, deposit of funds or securities in escrow, sufficient to cover the cost of improvements.

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  
Yohn Engineering, LLC.  
R. Celli