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August 8, 2018

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MARPL 00156

Joseph Romano, Director of Code Enforcement
 Marple Township
 227 S. Sproul Road
 Broomall, PA 19008

RE: Preliminary Land Development Plan
 Sproul Road Development, LLC. – Residence at Marple Preserve

Dear Mr. Romano:

As requested, we have reviewed the following, prepared by Arna Engineering, Inc. unless otherwise noted, in connection with the referenced project:

- *“Residence at Marple Preserve – Preliminary Major Subdivision and Land Development,”* (43 sheets) dated June 12, 2018.
- *“ALTA/NSPS Land Title Survey – Sproul Road Partners, LLC,”* (18 sheets) prepared by Control Point Associates, Inc., dated January 23, 2018, last revised June 18, 2018.
- *“Post Construction Stormwater Management Report,”* dated June 12, 2018.
- *“Residence at Marple Preserve – Waiver Request Letter,”* dated June 12, 2018.
- *“Request for Confirmation, and in the alternative, Conditional Use Application,”* prepared by Donaghue & Labrum, LLP, dated June 20, 2018.

The applicant, Sproul Road Developers LLC, proposes to develop a portion of the 213.33-acre site bounded by Sproul Road, Reed Road, Interstate Route 476, and the Cardinal O'Hara property (folio no. 25-00-01275-00). The property is split by three zoning districts: INS – Institutional, RC – Residential, and RB - Residential. The proposed development is designed to comply with the Cluster Development Overlay District in the RB and RC Residential Districts. The Applicant is proposing forty-four (44) single family detached units and twelve (12) two-family units (twins) in the RB District and 108 single family detached units, sixty-eight (68) two-family units, and a clubhouse in the RC District. A total of 75.67 acres of permanent open space is reserved in both zoning districts. With the exception of the existing Don Guanella facility, the property is predominantly woodlands. Branches of Whetstone Run, a tributary to Darby Creek, traverse the property; a FEMA established floodplain is attributed to Whetstone Run along Reed Road. The existing Don Guanella buildings are served by public water and sewer and the applicant is anticipating public services for the proposed development.

The applicant has requested waivers for the following Subdivision Ordinance requirements:

- §265-26.B(1) to allow 50-foot road center-line radii in lieu of the required 150-foot center-line radii.
- §265-28.A to allow street intersections at 45° in lieu of the required minimum 60°.
- §257-17.D to allow matching of the existing peak runoff rates in lieu of the peak rate reductions required in the B-2 drainage district.
- §257-19.B to allow a stormwater basin freeboard of 0.5 feet in lieu of the required 1-foot freeboard.

The applicant has requested authorization for the following Conditional Uses:

- §300-62.E(5) to allow for the construction of accessory structures to a permitted use in areas of very steep slopes.
- §300-62.E(6) to allow for individual driveways accessory to single-family detached dwellings in areas of very steep slopes.
- §300-62.F(2) to allow the construction of single-family detached dwellings in areas of steep slopes.
- §300-62.F(4) to allow the construction of stormwater management facilities in areas of steep slopes.
- §300-62.F(5) to allow the construction of roads, driveways, and parking lots in areas of steep slopes.
- §300-62.F(7) to allow for accessory uses and structures in areas of steep slopes.

We offer the following comments:

ZONING

1. The subdivision of the tract into lots may occur only for financial purposes and not to permit individual lots to be treated as independent parcels for separate land development at a future time. (§300-8) The subject tract includes the land fronting Sproul Road that is zoned INS – Institutional. A subdivision is required to establish the parent tract for the proposed cluster residential development; and, a note added to the record plan restricting the parent tract from subdivision for future development.
2. The tract of land to be developed shall be in one ownership or shall be the subject of an application filed jointly by owners of the entire tract and it shall be agreed that the tract will be developed under single direction in accordance with an approved plan. (§300-32.B(5))
3. The Developable Acreage calculations of the tract should be revised as follows:
 - a. The required Reed Road 80-foot wide ultimate right-of-way is to be deducted from the developable acreage. (§300-14)
 - b. The steep and very steep slope areas used to calculate reductions of 25% for steep slopes and 50% for very steep slopes are inconsistent with the areas provided in the Natural Resource Disturbance Table on sheet NR-110. Please provide the total acreage of steep and very steep slopes in the RB and RC zoning district to confirm the provided calculations.
 - c. Include the areas of public rights-of-way and utility easements or rights-of-way. Include these items even if there is no area to be deducted from the gross area for both the RB and RC district calculations.
4. The proposed development shall be serviced by public sanitary sewers acceptable to the Board of Commissioners and subject to the approval of the Pennsylvania Department of Environmental

Protection. (§300-32.B(4)) The tract is located entirely within the Radnor-Haverford-Marple (RHM) Sewer Authority service area. The applicant proposes to split sewage flow from the proposed development between RHM and the Central Delaware County Authority (CDCA) using three (3) pump stations. The Township’s Act 537 Plan currently requires sewage flow from the property to be completely conveyed to RHM without the use of a pump station.

5. The Board of Commissioners is authorized to grant conditional uses for single-family detached dwellings, stormwater management facilities, roads, and sanitary sewer systems within steep slopes, subject to recommendations of the Planning Commission and Township Engineer. (§300-62.F) The following are located within steep slope areas:

DWELLING UNITS	STORMWATER MANAGEMENT	ROADS	SANITARY SEWER
TW26 *	SWF2	Road A	Pump Station 3
SFD1	SWF3	Road D	
SFD89	SWF4	Road F	
SFD90	SWF5		
SFD102	SWF7		
	SWF8		
	SWF9		
	SWF10		
	SWF12		
	SWF15		

* 2-family dwellings are not permitted in steep slope areas (§300-62.F)

6. The request for Conditional Use approval for the construction of improvements within areas of steep and very steep slopes is to be accompanied by the following in accordance with §300-62.I:
 - a. Plans depicting locations, dimensions and elevations of the property; existing and proposed uses and development; existing and proposed contours; location and boundaries of steep slopes and very steep slopes; cross-sections and elevations of the property and proposed structures; existing and proposed land cover characteristics of that portion of the property within the area of steep slope or very steep slope.
 - b. Photographs showing existing uses, vegetation, and topography of areas of steep slope or very steep slope.
 - c. Narrative report describing the slope, soil, and vegetation characteristics of that portion of the property within the area of steep slope or very steep slope. The report shall also describe the proposed types of structures and methods of construction, types of foundation systems to be employed and proposed landscaping, sewage disposal, and water supply; sediment and erosion control measures; and engineering and conservation techniques intended to alleviate adverse environmental effects that may be created by the proposed use.
7. The applicant should confirm that areas of steep and very steep slopes within the required riparian buffers that will be disturbed are counted toward the maximum permissible steep and very steep slope calculations.
8. The applicant has elected to develop the site using the Cluster Development Overlay District standards, requiring 60% open space in the underlying RB-Residential and 40% open space in the

underlying RC-Residential zoning districts (§300-32). The required open space area is to meet the following standards in accordance with §300-32.B(3):

- a. Each area of permanent open space shall contain at least 10,000 square feet of area. (§300-18.G(3)) The proposed open space adjacent to units SFD 137 and 138 does not meet the requirement for open space.
 - b. Permanent open space areas shall be designed as a continuous system of open space. (§300-18.G(4)) The proposed stormwater management basins are located in the proposed open space areas; however, Marple Township has not accepted dedication of stormwater management facilities for other similar developments. The stormwater management basins, including the required access easement from the roadway, are to be located outside the areas proposed as open space and cohesive open space areas provided.
 - c. Permanent open space shall be provided with safe and convenient access to the residentially developed area; capable of accommodating pedestrian, bicycle, and maintenance vehicle traffic. The permanent open space shall contain appropriate access improvements and shall be provided with adequate parking areas. (§300-18.G(5))
 - d. Permanent open space shall predominantly consist of natural environmental features and may contain walking, biking, equestrian trails, and active recreations facilities occupying up to 25% of the open space area. (§300-18.G(6)) The applicant should demonstrate that trails and recreation facilities can be provided within the proposed open space.
 - e. Permanent open space shall be configured to create areas of adequate size and shape to permit a variety of uses, active or passive, throughout the system. (§300-18.G(7)) The proposed open space areas consist of steep and very steep slopes, limiting the types of uses that can be accommodated.
 - f. An ownership and maintenance agreement for the permanent open space will need to be established in accordance with §300-18.I.
9. All floodplain areas are to be identified, including streams and its tributaries. (§300-60.D) If the floodplain is not identified from the FEMA maps, then the 100-year floodplain should be calculated with hydrologic and hydraulic engineering techniques. Hydrologic and hydraulic analyses shall be undertaken only by professional engineers or others of demonstrated qualifications, who shall certify that the technical methods used correctly reflect currently accepted technical concepts. Studies, analyses, computations, etc., shall be submitted in sufficient detail to allow a thorough technical review by the Township.
10. Grading or regrading of lands, and the construction of retaining walls (§300-60.I.(6)); culverts §300-60.I.(4); and, paved roads (§300-60.I.(5)), approved by the Pennsylvania Department of Environmental Protection within the floodplain may be granted as a Conditional Use by the Board of Commissioners. The Applicant is proposing two (2) roadways, two (2) culverts and associated grading that may be located within a floodplain that has yet to be shown on the plans, whether from FEMA maps or appropriate hydraulic calculations. If a conditional is required, it shall adhere to the requirements in §300-60.J.
11. No person or organization without first obtaining a required permit in accordance with §300-63 shall remove trees from the property with a trunk measuring more than 12 inches diameter. Any tree removed to construct proposed improvements shall be replaced with two (2) new trees with trunks not less than three (3) inches in diameter. (§300-63.F) A table of all trees to be removed or

relocated from the site is to be provided; and, demonstrate compliance with the procedures and conditions for removal or relocation of trees per §300-63.D.

12. The minimum building setback from a tract perimeter from other non-residential tracts shall be fifty (50) feet. Dwelling units TW 27 thru TW 60 and SFD 103 to SFD 108 are located within 50 feet of the tract perimeter that abuts the INS-Institutional zoning district. These dwelling units shall be relocated to be at least 50 feet from the zoning/tract line.
13. Buildings within the Cluster Development District are to be a minimum of 20 feet from local roads, 10 feet from property lines, and 10 feet from common parking areas. (§300-20.C) The proposed clubhouse at the corner of Roads A and B is located within the required building setbacks and 5 feet from the adjoining parking lot.
14. Parking calculations are to be provided for the proposed residential units and clubhouse in accordance with §300-84, and a loading/unloading area provided per §300-86 for the clubhouse.
15. Each required off-street parking space shall be measured 10 feet in width by 18 feet in length. Parking spaces for the physically handicapped shall be 12 feet wide. (§300-77) Dimensions are to be provided for the clubhouse off-street parking spaces and drive aisles.
16. The surface parking area for the clubhouse along a local street shall be fifteen (15) feet from the ultimate right-of-way. The location of the parking is approximately eleven (11) feet from the right-of-way. Please make the appropriate revisions accordingly.
17. The Applicant should indicate whether this project will be constructed in a single phase or in sections. (§300-32.B.(7)) A phasing plan is required if the development will be constructed in sections.
18. The permitted impervious coverage on the underlying RC zoning district portion of the tract is 25%. The proposed plan indicates 24.99% impervious coverage, allowing no future impervious coverage within the development.

SUBDIVISION AND LAND DEVELOPMENT

19. The following Preliminary Plan requirements are to be provided:
 - a. Existing topographic contours along Reed Road near the proposed retaining wall. (§265-9.B(7))
 - b. Existing natural features, including the FEMA floodplain located along the northern portion of the tract. (§265-9.B(9))
 - c. Existing easement descriptions and dimensions. (§265-9.B(12))
 - d. Proposed utility easements; including stormwater pipes and basins, sanitary sewer mains, and pump stations located outside of the rights-of-way. (§265-9.B(13))
 - e. Names of the abutting property owners. (§265-9.B(14))
20. The proposed sanitary sewer force main located along Reed Road, Sproul Road, and Crum Creek Road appears to be located outside of the rights-of-way. Easement agreements may be required with the affected property owners.
21. If the sanitary sewer pump stations will be offered for dedication, they should be located within a public right-of-way.

22. The plan indicates a road connection to future development between units TW 52 and 53 in accordance with §265-9.B(18); however, dead-end roads are not permitted. A cul-de-sac is to be provided at the end of the road or the applicant may consider establishing the right-of-way but not constructing the road at this time.
23. When a subdivision abuts an existing street with a right-of-way width less than the ultimate right-of-way width, the ultimate right-of-way width is to be offered for dedication. (§265-25.E) The ultimate right-of-way of Reed Road is 80 feet.
24. The applicant has requested a waiver from the requirement that minor roads have a minimum horizontal curve of 150 feet to allow a 50-foot curve. (§265-26.B(1)) The curve, located along the street frontage of proposed lot SFD 51 may not provide sufficient sight distance for vehicles traveling along Road D or exiting driveways located near the curve.
25. Street intersections shall be as nearly as possible at right angles, with no street intersecting another at an angle of less than 60°. (§265-28.A) The applicant has asked for a waiver to allow street intersections at 45°, specifically for the Road A intersections with Road G; however, the intersections require modifications and/or traffic controls for pedestrian and vehicular safety.
26. When feasible, intersections with major traffic streets shall be located not less than 800 feet apart, measured from center line to center line. (§265-28.D) The proposed intersection of Road A with Reed Road is located approximately 590 feet from the intersection of Reed Road and Red Hill Road. The intersection should be relocated to provide the required separation.
27. Clear-sight triangles of 75 feet measured along street centerlines from their point of junction shall be provided at all intersections, and no building or obstruction shall be permitted within such sight triangles. (§265-28.A) The clear sight triangles depicted on the plans do not correctly designate the clear sight triangle areas, measuring 37.5 feet from the centerline intersections and approximately 50 feet from the street that is perpendicular to the intersecting street. Please verify and make the appropriate revisions. Additionally, a clear-sight triangle is to be provided for the proposed intersection of Road A and Reed Road.
28. So far as practicable, blocks shall have a minimum length of 500 feet. Any block that is longer than 1,100 feet requires secondary access or accommodations for satisfactory fire protection. (§265-30.D)
29. Driveways shall be located not less than 40 feet from the intersection corner of corner lots. (§265-32.B) The driveway of proposed lot SFD 149 is located 33 feet from the intersection.
30. A 27-foot wide cartway is required for minor roads, whereas 30 feet is proposed. (§265-25.A(1)) Unless on-street parking is provided, the cartway width could be reduced to minimize impervious areas and the limit of disturbance, necessary for the development.
31. The proposed development includes 232 new residential housing units, adding nearly 2,200-weekday vehicle trips per day and a peak of approximately 230 vehicle trips per hour. A traffic study is required to be submitted for the proposed development. (§265-2)
32. The plan indicates access to the site via a new intersection with Reed Road; however, the proposed number of units and need to maintain emergency access requires a minimum of 2 entrances into the development. (§265-23.A)

STORMWATER MANAGEMENT

33. The stormwater management design does not comply with the peak rate reduction requirements for District B-2 of the Darby Creek watershed. The applicant has requested a waiver from this requirement. (§257-17)
34. The applicant has indicated that the proposed stormwater management basins are intended to function as infiltration basins. Additional information should be submitted, including infiltration test results and further plan details, to verify that groundwater recharge and water quality volume requirements have been satisfied. (§257-14, §257-14.C(2), §257-15)
35. Calculations indicating compliance with stream bank erosion requirements are required. (§257-16)
36. The stormwater narrative indicates that areas outside the limit of disturbance are safely conveyed and routed through the various stormwater facilities. The drainage area map should identify these areas.
37. Conveyance facilities to or discharging from stormwater management facilities shall be designed to convey the design flow for the maximum storm event. (§257-19.D) Calculations should be submitted verifying that the proposed storm sewers can convey the 100-year storm without bypass, particularly those immediately upstream of stormwater facilities (i.e. CB-9.8 and CB-9.9).
38. Stormwater drainage channel design, stability calculations, and details are required to be submitted. (§257-21.D(3))
39. Double inlets should be provided for inlets located in a sag along the proposed roadways and at the end of cul-de-sacs to limit clogging and improve pavement drainage.
40. A permit, issued by the Department of Environmental Protection, will be required for the two (2) proposed stream encroachments required for the construction of Road A.
41. The grading for the stormwater channel located behind proposed lots SFD 56 to 60 does not provide the uniform channel section required to convey runoff to the stormwater management basin.
42. The stormwater management details are to be updated in agreement with the design calculations.

GENERAL

43. The plans, including the layout of streets and location of fire hydrants, should be reviewed by the Fire Marshall.
44. An access plan is to be provided for the largest anticipated vehicles, such as a ladder truck, trash truck, etc., that will serve the development to ensure these vehicles can maneuver the roads and have access to all dwelling units without encroaching curbs or other structures.
45. The applicant should indicate if a Homeowners Association will be established for the proposed development and if any of the proposed improvements would be offered for dedication.
46. Information should be provided regarding the intended use of the proposed clubhouse including if it will be open to the public and if a restaurant or other food service will be provided.
47. The limit of disturbance includes wetland areas; therefore, the Applicant is required to obtain necessary permitting with PA DEP, which may include a jurisdictional determination.

48. This project is proposing to disturb more than one (1) acre; therefore, a NPDES permit will be required to be obtained prior to approval for recording of the plans. The permit and approved plans shall be provided to the Township for their files.
49. A stream crossing permit will be required for road crossings and utilities from PA DEP prior to construction and approval for recording of the plans.
50. There are details for a trash enclosure and a fence that are not shown on the plans. Please confirm the location of these improvements.
51. The Applicant shall obtain will-serve letters for sewer and water.

If you have any questions or concerns, please feel free to contact the undersigned.

Sincerely,



Joseph A. Mastronardo, PE
Senior Engineer
PENNONI ASSOCIATES INC.
Township Engineer

JAM/epj

cc: Anthony Hamaday, Township Manager
Adam Matlawski, Esq., Township Solicitor
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