



KNIGHT ENGINEERING, INC.

4998 Mechanicsville Road • PO Box 247 • Mechanicsville, PA 18934 • 215-794-5958 • Fax 215-794-8230

January 30, 2026

Ref: #6001

NEW HANOVER TOWNSHIP

2943 North Charlotte Street
Gilbertsville, PA 19525

Attention: Jamie L. Gwynn, Township Manager

Reference: **GREENS AT GILBERTSVILLE – TWP PLAN #812**
NEW HANOVER TOWNSHIP, MONTGOMERY COUNTY, PENNSYLVANIA
SWAMP CREEK PIKE, LUTHERAN ROAD, SWAMP PICNIC ROAD
AND REIFSNYDER ROAD – 176 B1-SINGLE FAMILY HOMES
PRELIMINARY MAJOR SUBDIVISION AND LAND DEVELOPMENT PLAN REVIEW NO. 5

Dear Jamie:

On August 27, 2025, Knight Engineering received a revised Preliminary Major Subdivision and Land Development Plan submission for the above referenced project site from New Hanover Township. The plan submission received by Knight Engineering included the following information:

- Waiver Request Letter dated August 27, 2025, and prepared by Artisan Land Company
- “Header” Spreadsheet of Knight Engineering, Inc. Review Comments (bearing no date and no preparer)
- Sewage Facilities Planning Module (NPDES Permit #0026531) prepared by Artisan Land Company
- Response Letter to Bowman August 5, 2025 Review Letter dated August 27, 2025, and prepared by Artisan Land Company
- Draft “173 Lot Plan – No Road/Utility Crossings Through Floodplain nor Hydric Soils, No Public Water on Lutheran Road” (Sheet 5 of 124) dated April 8, 2022, last revised August 27, 2025, and prepared by Stuart & Associates, LLC
- “Post Construction Stormwater Management System – Conceptual Site Plan (Sheets 1 to 8 of 8) dated June 20, 2025, last revised July 25, 2025, and prepared by AMI Consulting, LLC
- Response Letter to Knight Engineering August 4, 2025 Review Letter dated August 27, 2025, prepared by Artisan Land Company
- New Hanover Township Request for Review dated August 27, 2025, and prepared by Artisan Land Company
- “Greens at Gilbertsville – Preliminary/Major Subdivision and Land Development Plan” (Sheets 1 to 123 of 124) dated April 8, 2022, last revised August 27, 2025, and prepared by Edward B. Walsh & Associates, Inc.
- “Swamp Pike Left Turn Lane Sketch” dated August 26, 2025, and prepared by Traffic Planning and Design, Inc.
- Engineering Response Letter to Bowman August 5, 2025 Review Letter dated August 26, 2025, and prepared by Traffic Planning and Design, Inc.
- Cover Letter to Spreadsheet of Knight Engineering, Inc. Review Comments dated August 27, 2025, and prepared by Artisan Land Company
- Cover Letter to Draft “173 Lot Plan” dated August 27, 2025, and prepared by Artisan Land Company

- Stormwater Management Report and Narrative (915 Pages) dated April 28, 2022, last revised August 27, 2025, and prepared by Edward B. Walsh & Associates, Inc.

Additionally, on September 19, 2025, Knight Engineering received the following information to be supplemental to the above submission:

- “Greens at Gilbertsville – GTA SW Testing (8/29/25 – 9/8/25)” bearing no date or preparer
- Stormwater Management Report and Narrative (915 Pages) dated April 28, 2022, last revised September 19, 2025, and prepared by Edward B. Walsh & Associates, Inc.
- Response Letter titled “Dan Grey -KEI 9/16/2025 Questions For Walter Mugavin – AMI Consulting”
- “Preliminary Plan – Inlet Drainage Area Plan” (Sheets 1 to 3 of 3) dated April 8, 2022, last revised September 19, 2025, and prepared by Edward B. Walsh & Associates, Inc.
- FACW Wetland Meadow Mix – ERNMX-122 Seed Specification Sheet dated September 19, 2025, and prepared by ERNST Conservation Seeds
- “Greens at Gilbertsville – Post Construction Stormwater Management System” Plans (Sheets 1 to 9 of 9) dated June 20, 2025, last revised September 18, 2025, and prepared by AMI Consulting, LLC
- “Spray Irrigation Checklist – ET Only” dated June 2, 2016 (bearing no preparer)
- “Preliminary Plan – Off-Road Utility Profile Sheet” (Sheet 1 of 1) dated April 8, 2022, last revised September 19, 2025, and prepared by Edward B. Walsh & Associates, Inc.
- Preliminary Plan Sheets 39-50 and 118-120 of 124 dated April 8, 2022, last revised September 19, 2025, and prepared by Edward B. Walsh & Associates, Inc.

Furthermore, on September 23, 2025, Knight Engineering received the following information to be supplemental to the above submission:

- Plan Titled “Exploration Location Plan – Gilbertsville Golf Club” (Sheet 1 of 1) dated September 2025, and prepared by Geo-Technology Associates, Inc.
- “Gilbertsville Golf Club Stormwater Summary Table – Updated 9-22025”, and prepared by Geo-Technology Associates, Inc.
- “Gilbertsville Golf Club Stormwater Test Pit Logs – Updated 9-22025”, and prepared by Geo-Technology Associates, Inc.

The Preliminary/Major Subdivision and Land Development Plan submission for the Greens at Gilbertsville (Twp Plan #812) proposes the development of the Tax Map #47-043-001, #47-043-002, #47-043-012, #47-043-016, #47-043-051, #47-043-054, #47-043-056, #47-048-028, #47-048-040 into 176 new single family detached dwelling units (Zoning Use B1) The project site is located in the R-25 Residential District and is provided with frontage on Lutheran Road (Twp), Reifsnyder Road (Twp) and Swamp Picnic Road (Twp). The Total Site Area of the subject parcels is 166.564 Acres with a Base Site Area is 156.667 Acres after the existing utility easements and Ultimate Rights-of-Way are deducted from the site area. The site is significantly impacted by existing natural resources including a delineated FEMA Floodway, Flood Fringe Areas, Wetlands, Watercourses, Streams, Ponds, Steep Slopes, Mature Trees, and Woodlands. Access to the site is provided by two (2) proposed roadways that are proposed along Lutheran Road and Reifsnyder Road. An internal series of development roadways, parking areas, open space areas and stormwater management facilities have been provided to support the 176 new dwelling units. The plans also propose to connect to the Public Water System supplied by Aqua, and to connect to the existing New Hanover Township Sewer Authority’s sewer main that bisects the site.

In addition, it is noted that the Subdivision and Land Development Application has been amended to remove parcels #47-048-001 (existing brick house on Swamp Pike), #47-048-002 (Merkel Property at 2926 Lutheran Road), and #47-048-43 (located to the south of Minister Creek) from the application, and to eliminate the Swamp Pike development entrance.

Knight Engineering has reviewed the submission in conjunction with the requirements of the Township of New Hanover Code of Ordinances (incorporating amendments enacted to April 7, 2022). Based upon our review of the submitted documentation, the Preliminary/Major Subdivision and Land Development Plans do not appear to have been prepared in accordance with the Township of New Hanover Code of Ordinances. Due to the number of significant comments and the extent of missing documentation required to support this development, we do not recommend that the Preliminary/Major Subdivision and Land Development Plans be approved by the Township at this time and would recommend that the Plans be revised to address the following comments:

III. PRELIMINARY PLAN REVIEW - DEVELOPMENT CONCERNS

1.0 ZONING CONCERNS

1.1 The Plans fail to meet the Natural Resource Protection Standards specified in § 27-2101 of the Township
 1.1 of New Hanover Code of Ordinances (the “Code”). Specifically, the Applicant’s own “Land with
 1.1 Resources Tabulation” on Sheet 3 of 149 indicates that encroachments into the Floodway (0.33 acres
 1.1 proposed, 0.00 acres permitted), Floodplain (0.47 acres proposed, 0.00 acres permitted), Steep Slopes
 1.1 15% - 25% (0.192 acres proposed, 0.1869 acres permitted), and Wetlands (0.024 acres proposed, 0.00
 1.1 acres permitted) are proposed that exceed the Natural Resource Protection Standards. In addition, we find
 1.1 that the “Land with Resources Tabulations” significantly underestimates the proposed disturbance of the
 1.1 existing resources and note that there appears to be additional encroachments into the Floodway (1.82
 1.1 acres measured by KEI, 0.00 acres permitted), Floodplain (2.62 acres measured by KEI, 0.00 acres
 1.1 permitted), and Wetlands (0.38 acres measured by KEI, 0.00 acres permitted). Finally, we note that the
 1.1 “Land with Resources Tabulation” fails to identify the area of Floodplain Soils located on the site outside
 1.1 of the defined Floodplain boundary (approximately 10.738 acres), as well as the proposed Floodplain Soil
 1.1 encroachment of 8.738 acres (0.00 acres permitted).

The Plans have been revised to provide an updated Site Capacity Calculation - Land with Resource Tabulation chart on Sheet 3 of 119. The updated chart continues to fail to meet the Township’s Natural Resource Protection Standards specified in §27-2101 as follows (10/11/2023):

a. The Land with Resources chart indicates that 0.246 Acres of Floodplain will be disturbed in conjunction with this development. Floodplain areas are not to be altered, regraded, filled or built upon except in conformance with §27-2103. Section 27-2103.C permits the construction of new sanitary sewer facilities to be permitted within the Floodway and Flood Fringe subject to the requirements of §27-2103.3.K.(3), including the requirement that the sewer system is designed in strict compliance with all state and local regulations for sewerage systems. The Applicant shall confirm that the appropriate PaDEP Permits and NHT Authority approvals have been secured before disturbance of the Floodway and Flood Fringe shall be permitted. (10/11/2023)

The Land with Resources Table on Sheet 3 of 124 has been revised to provide updated areas of Floodway Protected Land (160.057 Acres) and Proposed Encroachments (0.132) which do not equate to 100% of the Floodway Area (160.057). In addition to correcting the mathematical inconsistency, the Existing Resource, Demolition & Site Analysis Map/PCSMMP shall be revised to show each proposed encroachment with hatching and an area to clarify each proposed encroachment and to verify that the disturbance, as noted by the asterisk, is limited to underground improvements associated with the sanitary sewer pipe installations. (8/4/2025)

While the area of Floodway Protected Land within Land with Resources Table (Sheet 3) has been revised based on the proposed encroachment areas, the Existing Resource, Demolition &

Site Analysis Map/PCSMP (Sheets 7-17) continue to fail to area to identify the area of each proposed encroachment via plan leader and clearly show each proposed encroachment via hatching to verify that the disturbance is limited to underground improvements associated with the sanitary sewer pipe installations. (1/30/2026)

- g. *The Plan fails to account for the proposed minor encroachment into the Watercourses and Stream Corridor, measured 50 feet from the defined banks of Minister Creek adjacent to Sanitary Sewer Manhole #54. Either the plan shall be revised to relocate the Limit of Disturbance outside of the Stream Corridor or the proposed encroachment shall be calculated and shown in the Land with Resources chart. (10/11/2023)*

The Site Capacity Calculations continue to indicate that zero (0) acres of proposed encroachment within Watercourses, Streams, and Ponds. However, the Plan continues to propose an encroachment of approximately 825 square-feet associated with the proposed removal of the existing asphalt parking lot off Lutheran Road, an encroachment of approximately 53 square-feet associated with the proposed connection to Sanitary Sewer Manhole #54, an encroachment of approximately 342 square-feet associated with the proposed connection to non-numbered Sanitary Sewer Manhole (Rim 241.00), and an encroachment of approximately 164 square-feet associated with the proposed widening of Reifsnnyder Road. The Plan shall be revised to either relocate the Limit of Disturbance outside of the Stream Corridor or the proposed encroachment shall be calculated and shown in the Site Capacity Calculations. (2/14/2025)

The Land with Resources Table on Sheet 3 of 124 has been revised to provide the proposed encroachment into the “Watercourses, Streams, and Ponds” shown on the plans. However, similar to the Floodway and Floodplain areas, reference shall be provided under the table to clarify that the proposed encroachments are associated with the construction items noted above and reference the section of the Township Code that permits the encroachments. Additionally, the plans shall be revised to clearly identify the proposed encroachments with hatching and area reference. (8/4/2025)

While the Resources Table (Sheet 3) has been revised to include an asterisk for the proposed watercourses, streams/corridor, and ponds encroachment areas, the Existing Resource, Demolition & Site Analysis Map/PCSMP (Sheets 7-17) continue to fail to area to identify the area of each proposed encroachment via plan leader and clearly show each proposed encroachment via hatching to verify that the disturbance is limited to underground improvements associated with the sanitary sewer pipe installations. (1/30/2026)

- 1.6 The Plans fail to comply with § 27-2101.1.B.1 which prohibits the alteration, regrading, filling, or building along streams, ponds, lakes and watercourses where the one-hundred-year floodplain has not been delineated and where floodplain soils exist, except in except in conformance with § 27-2103 – Floodplain Regulations. Roads may cross the floodplain soils where design ***approval is obtained from the Township or PaDEP, and where no other reasonable access is available (emphasis added)***. The Plan indicates that approximately 6.28 acres of Floodplain Soils will be encroached upon in conjunction with the construction of Lots 10 through 12, Lot 14, Lot 16, Lots 216 through 222, portions of Roads A, B and C, as well as Basin 4. The Applicant has failed to supplement the Plan submission with sufficient documentation that confirms that “no other reasonable access is available” in order for the Township to consider approving the proposed Road A, B, and C encroachments of the floodplain soils and no further studies have been provided to delineate the 100-year Floodway and Flood Fringe areas in place of areas designated as floodplain soils.

The submitted “Requested Waivers - Greens at Gilbertsville (Revised after 6/14 PC Meeting)” worksheet, the “Requested Waiver “ Table (which is different than the worksheet) contained on Sheet 2 of 167, and the Greens at Gilbertsville – 8/16/23 Artisan Responses – KEI 6/24/22 Review Letter” worksheet appear

to be requesting a relief from the above referenced of the Zoning Ordinance for the proposed Floodplain Soil disturbance. However, as noted above, the Floodplain Soil Resource Area, and the proposed disturbance (updated to be approximately 2.713 Acres) is not shown in Land with Resources chart provided on Sheet 3 of 167. Furthermore, the Township should determine if relief from Floodplain Soil disturbance, as regulated by §27-2101.1.B.1 and §27-2103, is appropriate for this project. Depending on the proposed improvements proposed to be located within the Floodplain Soil areas (which currently include approximately 200 feet of Road A, the proposed dwelling unit on Lot 175, the storm sewer improvements to the rear of Lots 174 and 175, and portions of SWM Basin #12), relief from the Zoning Hearing Board may be necessary to allow this plan to be approved by the Township. (10/11/2023)

The Plans have been revised and the current proposed improvements to be located within the Floodplain Soil areas include approximately 200 feet of Road A with associated sidewalk (both sides) and central median, approximately 390 LF of storm sewer conveyance system piping, three storm sewer conveyance system structures (M12, Inlet 110 and 111), and approximately 200 LF of watermain piping. While this is generally consistent with the encroachments presented to the Planning Commission, the Township should determine if relief from Floodplain Soil disturbance, as regulated by §27-2101.1.B.1 and §27-2103, is appropriate for this project to allow Road A to provide access from Lutheran Road to the main development area. (2/14/2025)

The Land with Resources Table on Sheet 3 of 124 has been revised to indicate 0.762 Acres of Floodplain Soil is proposed to be disturbed (Proposed Encroachments) as part of this project. As noted above, §27-2101.1.B.1 (1) indicates that areas of Floodplain Soils shall not be altered, regraded, filled or built upon except in conformance with the Floodplain Regulations. The Code continues to indicate that "Roads may cross the floodplain soils where design approval is obtained from the Township and PaDEP", and where no other reasonable access is available". The Applicant has previously requested that the Township accept this encroachment in lieu of other access options. However, the plans have been revised to include on Sheet 3 of 124 a note (Note 50) which provides:

50. AS PER THE MOST RECENT SUBDIVISION AND LAND DEVELOPMENT PLAN RECORDED 12/13/2000, PLANS DRAWN BY ASTON SURVEYORS/ENGINEERS INC., WITH A LAST REVISED DATE 6/9/2000, CONSISTING OF 15 PAGES, MONTGOMERY COUNTY PLANNING COMMISSION #99-335-1, THE MAJORITY OF THE DEVELOPMENT TRACT CONSISTING OF 221 GROSS ACRES HAS BEEN DISTURBED UPON NUMEROUS RECORDED APPROVALS. THE NRCS LISTED Bo/CrA SOILS HAVE BEEN DISTURBED AND/OR REMOVED OVER THE GOLF COURSES EXISTENCE. THEREFORE, THE APPLICANT IS NOT REQUESTING A WAIVER FOR DISTURBANCE OF SOILS IN THE AREA OF TWO ROAD CROSSINGS ON ROAD A & C. APPLICANT BELIEVES THIS ISSUE IS FOR THE TOWNSHIP AND APPLICANTS SOLICITORS TO MUTUALLY AGREE UPON LANGUAGE FOR THE APPROVAL OF GRADING AND DISTURBANCES PROPOSED AS THESE AREAS HAVE ALREADY RECEIVED APPROVAL FOR DISTURBANCE.

As this appears to be inconsistent with prior discussions with the Planning Commission, we would request that the Applicant clarify its position concerning the encroachment of the Floodplain Soils prior to the Planning Commission accepting the proposed encroachments. (8/24/2025)

The previously provided note has been removed from the Plan (Sheet 3) and the plans have been updated to indicate that 0.762 acres of Floodplain Soil disturbance is proposed to allow for the construction of Road A from Lutheran Road to Road B in the area of the existing cart path crossing adjacent to the existing pond. The Applicant has also a Draft Layout Plan that has been prepared to show an alternative roadway layout that does not proposed any road or utility crossings through the floodplain soil areas. This plan provides two (2) access roads to Reifsnyder Road and zero access roads to Lutheran Road in an attempt to prove to the Township that the two (2) Reifsnyder Road entrances is unreasonable and that the proposed plan showing the access to Lutheran Road provides a significant improvement to the plan when compared to the Draft Layout Plan. The Planning Commission should provide the Applicant and/or the Board of Supervisors with recommendations concerning the proposed layout. (1/30/2026)

- 1.8 The Plans fail to confirm that no more than 40% of the existing mature trees located on the site are proposed to be disturbed, as is required by § 27-2101.E. Mature trees are defined as those trees which

measure at least 10 inches diameter at breast height of 4-1/2 feet above the ground. The “Land with Resources” chart fails identify the existing trees (greater than 10” in diameter) located on the site or the proposed disturbances associated with the proposed improvements.

As noted above, the plans fail to accurately identify and tabulate the number of existing mature trees located on the site. (10/11/2023)

The overall ERSAM Plan (Sheet 7) continues to include the same tabulation for “Mature Tree Data (10” DBH or greater)”. The design engineer has indicated that the above review comment will be addressed at Final Plan Stage and that the Applicant has hired Rockwell Associates to perform a full field survey/inventory of the existing mature trees. (2/14/2025)

The revised plans have been accompanied by an Urban Forest Review and Investigation dated November 4, 2023 that attempts to document the condition of the existing mature trees located on the site. The Tree Inventory and the Existing Resource, Demolition & Site Analysis Map/PCSMP fails to comply with the requirements of the Township Code (§22-305.4.F, §22-921.1, §27-2101.1.E.(4) and §27-2101.1.J.). In conjunction with future submissions of the report, the following items shall be addressed:

- a. *The submitted inventory indicates that 1,774 mature trees (trees 10” and greater in caliper) are located on the site. However, the inventory further indicates that several trees are noted as “decline”, “lean”, “structure”, “bifurcated”, “seam” and other issues and therefore are not as being not included in the total number of mature trees located on the site that require protection. As the Zoning Ordinance defines a Mature Tree as those which measure at least 10 inches dbh, with the exception of trees that are “dead”, all mature trees regardless of condition shall be protected in accordance with the resource protection standards.*
- b. *The tree inventory shall be revised to separate the trees that are less than 10” DBH from the those that qualify as mature trees in order to verify that only the qualifying mature trees have been included in the resource protection calculations. Tree Inventory information regarding the trees between 6” and 10” shall remain in the report and those trees shall be noted on the plans to verify whether they qualify as Woodlands, as defined in the Zoning Ordinance.*
- c. *The inventory includes in the “Defects Observed” a category title “E.A.B – Dead/Decline”. It is presumed that E.A.B. refers to Edward B. Walsh and Associates, Inc. (the design engineer). The inventory shall clarify whether Rockwell fully concurs with E.A.B.’ assessment that the tree is dead, noting that a tree in decline is still considered a “Mature Tree”. It is recommended that the Rockwell inventory and assessment be completely independent of any other influences.*
- d. *The revised Existing Resource, Demolition & Site Analysis Map/PCSMP fails to provide consistent reference to the tree numbers provided in the Rockwell tree inventory. Additionally, the Existing Resource, Demolition & Site Analysis Map/PCSMP identifies several trees that do not provide a tag number. Finally, it appears that the Rockwell inventory has provided several trees of the same species and size with the same “Tag #” and has noted that there are trees covered by that tag (“Trees in tag”). However, there is no reference on the Existing Resource, Demolition & Site Analysis Map/PCSMP of this grouping. In this case, the tree numbers should be labeled as Tag # and each Tree in Tag reference (e.g., Tree 279.001, Tree 279.002, Tree 279.003, etc.).*
- e. *The Existing Resource, Demolition & Site Analysis Map/PCSMP shall identify all dead trees as “To be removed” to eliminate any safety concerns.*
- f. *The Tree Inventory shall be revised to identify which Mature Trees are “To Be Removed”, “To Be Disturbed, not Removed”, and “To Be Preserved”. Trees which are identified as “To Be Disturbed, not Removed” shall be those trees which are located outside of the proposed limit of disturbance, but where the limit disturbance line is proposed to be within the tree’s canopy or within 15 feet of the trunk of the tree, in accordance with the tree protection standards of §22-*

921.1 and §27-2101.1.J.

- g. *After the Inventory is updated to provide the information necessary to confirm whether the proposed woodland and mature tree disturbance meets the resource protection requirements, a site investigation shall be scheduled by the Applicant with Knight Engineering to review the condition of all “dead” trees that have been excluded from the resource tabulation calculations.*
- h. *In conjunction with the above update to the resource protection requirements, the Land with Resources table shall be revised to eliminate the reference to mature trees under the Woodlands section. Mature Trees and Woodlands are two different resources that have different resource protection ratios. Only areas that meet the definition of Woodlands may be included in the resource protection table. (§27-2101.1.D and §27-2101.1.E)*

The Applicant has indicated in their response “Will comply at Final Plan Stage.” The previously submitted Urban Forest Review and Investigation dated November 4, 2023 has not been revised nor resubmitted, and the Tree Inventory and the Existing Resource, Demolition & Site Analysis Map/PCSMP have not been revised based on our above comments. We do believe that this is an issue that should be deferred until Final Plan Stage and would request that the Applicant address the above issues to confirm compliance with the Township’s Zoning Ordinance. (1/30/2026)

2.0 STORMWATER MANAGEMENT CONCERNS

- 2.1 In accordance with § 23-401.3, the drainage plan must be designed to be consistent with the sequencing provisions of § 23-404 (Nonstructural Project Design – Sequencing to Minimize Stormwater Impacts) to ensure maintenance of the natural hydrologic regime, to promote groundwater recharge, and to protect groundwater and surface water quality and quantity. Based upon our initial review of the submitted Preliminary Plans, the Applicant has failed provide a drainage plan that is consistent with the sequencing provisions of § 23-404.2 as follows:

- c. The Preliminary Plan submission fails to include the required Draft Project Layout avoiding sensitive areas identified in § 23-404.2.A. (§ 23-404.2.C)

The Draft Project Layout, which is the revised Preliminary Plan layout, fails to avoid the Hydric Soil Areas (Bowmansville Knauers Silt Loams and Croton Silt Loams) that bisect the site, fails to avoid unnecessary wetland disturbances along Swamp Picnic Road, fails to preserve the potentially specimen trees (33” tree, 38” tree, 52” tree) along Swamp Picnic Road, and the potentially specimen trees (32” tree) near SWM Basin #5. (10/11/2023)

The submitted “Draft Project Layout”, which has been updated again to be the newly revised Preliminary Plan Layout, continues to show the encroachment in to the Hydric Soil Areas (Bowmansville Knauers Silt Loams and Croton Silt Loams) that bisect the site and continues to disturb several large caliper trees along Swamp Picnic Road. It is expected that the Draft Project Layout would avoid the Hydric Soils by providing two access points to Reifsnyder Road (as previously presented), and to adjust the limit of disturbance along Swamp Picnic Road to be set at the edge of the existing canopy line to preserve the required Tree Protection Zone in this area (rather than requiring the complete replacement of the existing vegetation with new buffer plantings). (2/14/2025)

The Applicant’s Engineer’s response indicates that the “Preliminary Plan as submitted is the proposed layout as the PC weighed in on this Alternate Layout in 2025, and it was not desired, as it did not provide enough access points to disperse traffic in different directions and to not point load Reifsnyder and Swamp Pike Intersection. Thus multiple access points on Reifsnyder Road are not part of the Proposal and consider this issued closed.” We do not agree with the Applicant’s response and note that a “Draft Project Layout” is necessary to provide both the Planning Commission and the Board of Supervisors with the necessary information to make a

informed decision on the proposed impacts to the Natural Resource Preservation and access configurations. As the plan has yet to receive Preliminary Plan approval, we further note that the issue is not “closed” as referenced in the response letter. The Exhibit Plan shall be prepared to avoid sensitive areas as required by the Township Code, unless a waiver is granted by the Township. (8/4/2025)

As noted above, a Draft Layout Plan has been included with this submission showing two (2) entrances to Reifsnnyder Road without any proposed road crossings of Floodplain or Hydric Soil Areas. (1/30/2026)

- f. *The Preliminary Plans and Stormwater Management Report fail to satisfy the groundwater recharge (infiltration) objective of § 23-405. The Applicant’s Stormwater Management Summary dated April 28, 2022, notes that the proposed improvements are intended to increase the volume of stormwater runoff created the site improvements during the two-year storm event from 728,924 CF to 1,004,677 CF, that 275,753 CF of Recharge (infiltration) is required and that only 71,009.7 CF of recharge is proposed (approximately 26% of the required volume), with the remaining volume to be controlled using the MRC Methods. However, the 71,009.7 CF of suggested recharge is not supported by any design calculation and the Post Construction Stormwater Management Details fail to provide construction details showing the installation of the amended soils noted . Furthermore, the supplied Stormwater Infiltration and Subsurface Evaluation documented 0.00 inch/hour infiltration rates in the majority of pits tested in the seven (7) detention basin locations. (§ 23-404.2.F)*

The Applicant has indicated in their response the existing irrigation system will continue to be utilized in an attempt to reduce the volume discharged to less than the pre-developed volume for the 2-year storm event. However, supporting calculations have not been provided to support the proposed recharge via the existing irrigation system and no information has been provided for the existing irrigation system (piping, sprinkler head locations, pump house, spray irrigation fields, etc.) to confirm the suitability of the existing system, as modified by the proposed improvements, to adequately manage the required recharge volume. We would also note that the Applicant’s Soil Consultant has provided several recommendations regarding using the site for spray irrigation, which have not been incorporated into the design plans. (10/11/2023)

For Point of Interest #1, basic volume calculations for the proposed Basin #10 irrigation design have been provided within the SWM Report (Page 520) that attempt to indicate that the majority of the stormwater recharge requirement (216,598 CF) will be addressed through the use of “capture and reuse” BMP consisting of the existing golf course irrigation system. However, insufficient documentation has been provided to verify compliance. In conjunction with future submissions of the revised Stormwater Management Report and Narrative, the report and PCSM Plans shall be revised to address, at a minimum, the following concerns:

- *The spray irrigation calculations indicate that the volume requirement will be addressed by spraying a minimum of 17 hours a day for 3 days. Typically, spray irrigation systems are designed to provide disposal of the stored runoff volume at a rate that will not exceed the maximum infiltration rate of the soils that area being irrigated. The report shall identify the maximum infiltration rate that has been used (based on site testing) to design the spray irrigation system.*

The Applicant’s design engineer has indicated in their response that the PCSM System has been designed to not exceed the hourly rate as per infiltration testing. The conceptual plan is based on not exceeding 0.25” per hour (until testing can be completed). The proposed system will run on existing fairways with sprinkler heads that will run 30 minutes each for 5-8 times per day with a 1.5 hour wait time until the next dose. The fairways will have an overall run time of 8.5-14.5 hours per day for 6 days.

However, in conjunction with discussions with the Applicant and their engineer at the July 30, 2025 Pre-Submission NPDES Permit Meeting, it is our understanding that the currently submitted Aqua Mist Irrigation (AMI) Plans dated June 20, 2025 are outdated and a new revision of Plans is being prepared that further expands the area that is being irrigated by the proposed irrigation system. The revised plans shall be submitted to the Township for review. (8/4/2025)

The Applicant has submitted revised Aqua Mist Irrigation (AMI) Plans titled “Post Construction Stormwater Management System” (Sheets 1 to 8 of 8) dated June 20, 2025, last revised September 18, 2025, and prepared by AMI. The AMI Plans must be fully integrated with the PCSM Plans and Detail Sheets to ensure that the proposed facilities can be constructed along side of the proposed residential development improvements. (1/30/2026)

- *Based upon the above soil infiltration rate, the Basin #10 Irrigation Design worksheet shall be revised to identify the minimum area necessary to support the irrigation of 216,598 CF of runoff volume. It is noted that the intent of this system appears to encourage the maximum volume of runoff as possible. However, appropriate controls shall be provided to ensure that the irrigation activities do not adversely affect the vegetated areas that are being irrigated. Irrigating at 16 gpm per sprinkler head for 17 hours a day for 3 days will cause damage to the existing vegetated areas and will likely overload the existing soils from recharging the runoff volume. Additional documentation, prepared by an engineer experienced in spray irrigation design, shall be provided to confirm the adequacy of the Basin #10 Irrigation design.*

The initially submitted AMI Plans indicate that more than 0.5” per day will be applied to the fairway areas at an assumed infiltration rate of 0.25 in/hour. In accordance with PaDEP standards, the total amount of irrigated water shall be less than 0.5” per day unless detailed hydraulic conductivity testing is provided to verify the assumed infiltration rate. It is our understanding that the AMI Plans and calculations have been revised to address this issue and will be submitted in the near future. We reserve our review of the AMI Plans and calculation worksheets until the revised design is provided. (8/4/2025)

The AMI Plans, specifically Charts #3 through #6 (Sheet 5 of 8), have been revised to identify an application rate of 0.499 inches per day in accordance with the Spray Irrigation Checklist – ET Only worksheet provided to the Applicant’s consultant by the MCCD. While the majority of the required items in the checklist have been provided, there remains several required items missing from this submission. Future submissions of the Spray Irrigation Design, as it is proposed on the PCSM Plan, shall be prepared to address each of the PaDEP checklist items. (1/30/2026)

- *The location of all pump station controls and distribution pipes shall be shown on the plan. For existing pipe systems, the approximate location of the piping can be provided so long as the designer can confirm which sprinkler heads are located in which irrigation zone.*

The Applicant’s design engineer has indicated in their response that all items noted will be shown on the final plan. As the general location of the existing pump station controls, which are proposed to remain within the Floodway on the E. B. Walsh Plans, is inconsistent with the AMI Plans, the proposed irrigation design features shall be clarified prior to Preliminary Plan approval. The Preliminary Plans shall provide sufficient design information to verify that the proposed Wet Well, Winter Valve, Winter Discharge Line and all other components of the irrigation system will not adversely impact the Basin

10 embankment and that suitable access is provided to the irrigation system components to allow for regular operation and maintenance. As currently proposed, a non-stabilized access path is proposed between Lots 143 and 144, along the top of the Basin #10 Berm, through the emergency spillway (with 3:1 embankment slopes) to the irrigation system facilities. Additionally, the E. B. Walsh plans fail to show the wet well location or the 5' x 5' concrete structure containing the self cleaning filter, or the energy dissipator that is shown to extend to elevation 240.75 (over 5 feet below the Floodway Elevation adjacent to Sanitary Sewer Manhole #24). (8/4/2025)

The E. B. Walsh Plans remain inconsistent with the AMI Plans. The Plans shall be revised to provide consistent information between the Plans to verify that all proposed components of the irrigation system can be adequately installed in conjunction with the Basin 10 embankment and that a suitable access can be provided to the irrigation system components. (1/30/2026)

- *The system design shall include a water budget to ensure that the required runoff volumes can be recharged into the ground during the appropriate irrigation seasons. Appropriate winter storage or basin routings shall be provided to ensure that release rates remain at acceptable rates during the winter months when the irrigation system is not in operation.*

The AMI Plans (Sheet 6 of 9) include a winterization procedure and winter discharge procedure that appears to be an attempt to indicate that the irrigation facilities will mechanically pump the basin down during the winter months. However, no documentation has been provided to clarify how these facilities will function during freezing temperatures. Furthermore, basin routings during the winter months have not been provided to document how the site will function without the irrigation facilities functioning. The design engineer noted during the MCCD NPDES Pre-Submission meeting that Basin No. 10 was to be configured as a wet pond to allow for the facility to function with various levels of water, however, appropriate design information has not been provided on the current plans to support this design intent. Additional design information is necessary to confirm that the basin and the site will function with the currently proposed (and recently amended) irrigation design prior to the approval of Preliminary Plans. (8/4/2025)

The Plans continue to fail to be supplemented with documentation to clarify how these facilities will function during freezing temperatures. The basin routings during the winter months have not been provided to document how the site will function without the irrigation facilities functioning. Additional design information is necessary to confirm that Basin #10 and the site will function with the currently proposed (and recently amended) irrigation design prior to the approval of Preliminary Plans. (1/30/2026)

- *Operation and Maintenance requirements shall be specified on both the PCSM Plans as well as the Stormwater Management Report and Narrative. Shop drawings for all existing irrigation parts shall be included in the O & M manual to allow for efficient replacement of any failed component. Detailed inspection and operation schedules shall be provided to ensure that the system is operated in accordance with the requirements of the PCSM and NPDES Permits. (8/4/2025)*

The Stormwater Management Report and Narrative continues to fail to include the Operation and Maintenance requirements for the Spray Irrigation System and the AIM PCSM Plans only provide the Operation and Maintenance Schedule for the Spray Irrigation System. The Preliminary Plan set shall contain a single PCSM Plan and single plan sheet that provides all O & M requirements for all proposed BMPs/SCMs.

(1/30/2026)

For Point of Interest #2, the report summary indicates that a Managed Release Concept (MRC) Basin (Basin #11) has been provided. However, based on the limited detail provided on the plans and the lack of the required MRC worksheets to document that the design has been provided that meets all of the requirements of the MRC White Paper, we find the proposed design fails to meet the requirements of the Stormwater Ordinance. Furthermore, with review of the limited design information, it is apparent that Basin #11 has not been designed to provide any storage volume or filtering devices that are a core component of the MRC Basin design requirements. (2/14/2025)

The Plans have been updated to identify Basin #13 as the only proposed basin to be designed as a Managed Release Concept (MRC). Based upon our review of the MRC basin design information, we note the following issues that shall be resolved prior to the Preliminary Plans being recommended for approval:

- *The Managed Release Concept (MRC) Design Summary indicates that the MRC is designed to be design in conjunction with Stormwater BMP Manual Section 6.4.2 (Infiltration Basin), however the design plans appear to be proposing a Bio-Retention/Rain Garden (BMP Section 6.4.5). The Design Summary shall be updated to clarify the design intent. (8/4/2025)*

The Plans have been revised and now propose two (2) MRC basins (#12 and #15). However, the proposed MRC design of Basin #12 and #15 are not acceptable at this time. For example, the MRC Basins side slopes are greater than 5:1, the top of berm width is less than 10 feet wide, the underdrain does not cover an adequate area to drain the entire amended soil area, a suitable access has not been provided, sediment forebays have not been provided at the main inflow discharge points, and the proposed grading of Basin #12 is within five (5) feet of the adjacent property line. (1/30/2026)

- *The MRC Design Summary indicates that the MRC will be vegetated and notes that a seed mix will be provided to meet the "Vegetation" requirement. Seed mixtures fail to become established and if this facility is intended to meet the guidelines for BMP 6.4.5 – Rain Garden/Bioretention, the basin landscaping shall be revised to meet the recommended planting requirement of 700 shrubs and 300 trees per acres noted in the BMP Manual. (8/4/2025)*

The Plans continue to fail to propose landscape material for each proposed BMP in accordance with the guidelines set for by the PADEP BMP Manual. The Landscape Plans fail to include proposed Basin #15. (1/30/2026)

- *The MRC Design Summary indicates that greater than 2 feet of separation from the groundwater elevation is provided. However, the soil testing report fails to provide sufficient documentation to verify the groundwater elevation, noting that bedrock was encountered in test pit "INF-24" (which is the closest infiltration test pit) at an elevation of 249.40, which is 9.4 feet above the bottom of the BMP (240.00). The groundwater elevation shall be determined before the MRC concept can be supported and therefore, we cannot recommend the approval of the Preliminary Plans at this time. (8/4/2025)*

The water table or bedrock elevations identified during the most recent on-site soil testing shall be identified in the MRC Basin Tabulation on Sheet 120 of 124. The tabulation shall confirm that the noted "> 2 ft" has been provided between the proposed bottom of the amended soils and the limiting zone. It is noted that our review of the supplied test results dated September 22, 2025 indicates that 0.84 feet has been provided between the top of the initial perched water table at Basin 12 and that bedrock was encountered 1.52 feet above the basin floor elevation. While we understand that

PaDEP does not currently require separation distance between the top of bedrock and the bottom of the MRC facility, in cases where bedrock is required to be excavated to achieve the necessary elevation to install the amended soils, the soil testing shall verify that groundwater does not exist within the bedrock at the minimum isolation distance noted in the current MRC requirements. This does not appear to have been provided. (1/30/2026)

- g. ***The Preliminary Plans and Stormwater Management Report fail to provide water quality protection in accordance with § 23-406 – Water Quality Requirements.*** Specifically, the Plans and Stormwater Calculations ***fail to provide for the replication of pre-construction infiltration and runoff conditions so that post-construction stormwater discharges do not degrade the physical, chemical, or biological characteristics of the receiving waters.*** The Applicant must provide water quality improvements through infiltration methods, water quality treatment methods and/or Stream Bank and Stream Bed Protection as outlined in § 23-406.1.C. While we have not yet been satisfied that infiltration methods are infeasible on this site, in the event that infiltration cannot be physically accomplished, the water quality volume shall be treated through the use of wet basins (e.g., Wet Ponds, Constructed Wetland Treatment Facilities, etc.) or detention basins that slowly release the water quality volume over a minimum of 24 hours. The Applicant has proposed seven (7) dry detention basins that fail to meet the PaDEP's BMP Manual's BMP 6.6.3: Dry Extended Detention Basin requirements. Of specific concern are the "water quality" low flow orifice sizes for the seven (7) basins (12", 6", 15", 24", 24", 18", and 15"). Although the required dewatering calculations (to document the slow release of the water quality volume over a minimum of 24-hours) have not been provided by the Applicant's engineer, it is apparent that the large diameter of the "water quality" orifices offer little to no detention during the first flush storm events. Furthermore, the lack of other required PaBMP Manual improvements (maximized flow paths, sediment forebays at primary inflow points, soil restoration of compacted basin flow soils, landscape improvements, etc.) render the proposed design entirely incapable of meeting the Township's Water Quality requirements. (§ 23-404.2.G)

The Applicant has indicated in their response that the water quality and volume requirements have been achieved via the retention of runoff without specifying the means and methods that the requirements will be met. The Stormwater Management Report and Narrative fail to provide sufficient documentation to verify that the Water Quality requirements have been met. We also note that the continued use of large 1st stage orifices in each of the proposed detention basin provide no water quality improvement and are not considered acceptable BMPs by the BMP Manual or the Township's Stormwater Management Requirements. The stormwater management design is unacceptable as submitted. (10/11/2023) (2/14/2025)

The Plans have been revised to propose forebays in an attempt to meet water quality requirements within Basins #1, #7, and #13. However, no supporting documentation has been provided to verify that the Water Quality Requirements have been met with the forebay design. The Applicant's design engineer has indicated that providing smaller orifices within the outlet structures will require additional basin storage volume that can be provided if the basin embankment slopes are modified to be less than 5:1 slope. The Plans continue to propose large (greater than 3") 1st stage orifices within the proposed detention basin (Basin #2, #4-9, and #11) outlet structures. (8/4/2025)

In addition, the Applicant has also proposed, during the NPDES Pre-Submission Meeting, that Contech "Filterra" was being offered for use to meet the Water Quality requirements, without providing any design calculations or sizing information for this project. Future submissions of the PCSM Plans and Calculations shall provide full design details to confirm that the proposed system meets the requirements of the Township Code. (8/4/2025)

The plans have been revised to provide forebays in Basin #1 and #15. However, no design information has been provided to verify that the forebays are adequately sized to remove the expected sediment/debris that is to be directed to the basin through the storm sewer system. It is generally accepted that sediment forebays shall be sized to retain a minimum of 0.25 inches of runoff per acre of contributing directly connected impervious area (DCIA), which includes any runoff that is directed to upstream basins that do not have forebays or other methods of addressing the water quality treatment requirements. Additionally, the plans fail to provide forebays for the proposed MRC basins. Finally, the plans fail to provide adequate pre-treatment of the runoff being directed to Basin #7, which is currently configured as an underground storage facility. Future submissions of the PCSM Plans and Calculations shall provide full design details to confirm that each basin that discharges runoff to a natural outfall meets the requirements of the Township Code. (1/30/2026)

- h. The Preliminary Plans and Stormwater Management Report fail to provide stream bank erosion protection in accordance with § 23-407 – Stream Bank Erosion Requirements. Specifically, the primary Stream Bank Erosion requirement is to design a BMP to detain the release rate from the 2-year Post Development storm event to the release rate of the 1-year Pre-Development storm event and to provide accommodations (such as adding a small orifice at the bottom of the outlet structure) so that the 1-year Post Development runoff volume takes a minimum of 24-hours to drain from the facility from a point where the maximum volume of water from the 1-year storm is captured (i.e., the maximum water surface elevation is achieved in the facility). *The submitted Stormwater Management Report fails to provide the required dewatering calculations to confirm the Applicant's compliance with this requirement and, as noted above, the proposed "water quality" orifice sizes for the seven (7) basins are undoubtedly unable to detain the 1-year Post Development runoff volume as required. (§ 22-404.2.H)*

The Applicant has indicated in their response that dewatering calculations have been added to the stormwater report and the rate of flow discharging from the site at each point of interest is less than the predeveloped rate to ensure erosion does not occur. However, dewatering calculations have not been included in the report. (§ 22-404.2.H) (10/11/2023)

Dewatering calculations for the proposed sediment traps have been included in the SWM Report (Page 689). However, it does not appear that dewatering calculations for the proposed post construction stormwater management facilities have been provided within the SWM Report that are required to provide confirmation that the Stream Bank Erosion requirements have been met. (2/14/2025)

Dewatering Calculations have been provided in an attempt to verify that this requirement has been met, noting that Basins No. 1 and No. 3 provide small orifices (3" and 1", respectively) that at this time provide the required detention of the 1-year Post Development runoff volume. Basin No. 7 (3" orifice) shall be revised to raise the 10' riser above the 1-year water surface elevation (244.82) to ensure that the runoff volume from the 1-year storm is slowly released. The dewatering calculations for Basin No. 10, the main storage basin for the irrigation system, shall be prepared to document the required dewatering time when the irrigation system is not functioning (during the winter) to verify that 1-year water quality volume is detained for a minimum of 24-hours. If zero runoff volume is release during all times, including during the winter months, this condition shall be supported by either a water budget or other accepted calculations that document the capacity of Basin No. 10 and the expected inflow volume. (8/4/2025)

The revised Dewatering Time Worksheets have been prepared to show the dewater times for the 2-year, the 10-year, the 50-year and the 100-year storm events. The worksheets do not provide information to confirm that the "1-year Post Development runoff volume takes a minimum of 24-hours to drain from the facility from a point where the maximum volume of

water from the 1-year storm is captured". As discussed with the design engineer, this evaluation shall be provided for each basin that discharges to a natural outfall. (1/30/2026)

- 2.2 In accordance with §22-808.2.B.7, provisions shall be made to accommodate effectively the increased runoff caused by changed soil and surface conditions during and after development within the site. Where necessary, the rate of surface water runoff shall be mechanically retarded. *The Stormwater Management Report & Narrative fails to evaluate the increased rate of runoff caused by changed soil and surface conditions during development within the site.* For purposes of calculating the impact of the changed soil and surface conditions during construction, peak discharges shall be calculated based upon the runoff coefficients for "Fallow Bare Soils" provided in Appendix 23-D for all disturbed areas and the maximum impervious surfaces during the maximum period and extent of disturbance. Controls shall be provided to ensure that the "During Construction" peak discharge rate does not exceed the "Pre Developed" peak discharge rates for each stormwater Point of Interest (POI). In instances where sediment basins or other temporary erosion control devices are in place during those periods of maximum earth disturbance and impervious surface installation, the Stormwater Management Report & Narrative may utilize the storage capacity of those temporary facilities to reduce the "During Construction" peak rates if the appropriate routing calculations support their use for all design storm events. The Stormwater Management Report & Narrative, as well as the proposed Sequence of Construction presented on the Erosion & Sediment Control Plan (Sheet 125 of 149), may be prepared to more efficiently develop the site to limit the impact that the changed soil and surface conditions have on the surrounding waterways by reducing the extent of the site that is disturbed at one time. (§23-302.2.C.1.c)

The Applicant has indicated in their response that the "Erosion control design will be provided in accordance with DEP regulations. Design will include sediment basins to manage rate of runoff." The detailed design shall be included in all future land development plan submissions for Township review. Furthermore, a copy of the Conservation District's review shall be supplied to the Township prior to any Plan Approval. (§§9-105.1 and 22-808.1.C) (10/11/2023)

The During Construction Routing Calculations and Summary spreadsheet referenced in the Design Engineer's Response Letter have not been included in the Stormwater Management Report and Narrative. Future submissions of the stormwater management calculations shall be revised to contain verification that provisions have been made to accommodate effectively the increased runoff caused by the changed soil and surface conditions during and after development of the site. (2/14/2025)

The During Construction Calculation shall be revised to account for the runoff bypassing the proposed sediment basins, in the same manner that the Pre-Development to Post-Development Release Rates are evaluated. Additional controls may be necessary to control the rate of runoff being discharged from the bypass areas during construction. Any accommodations provided to control the rate of runoff from the bypass areas shall be included in future submissions of During Construction Calculations. (8/4/2025)

Although the response letter indicates that this comment was addressed, we note that the During Construction Runoff calculations do not appear to have been revised with this submission. (1/30/2026)

- 2.3 *The Post Construction Stormwater Management Plans fail to identify the location of all sump pump discharge pipes from each lot that are expected to require the sump pumps to evacuate the elevated groundwater from the basement subgrade. The Post Construction Stormwater Management Plans fail to indicate that all pipe drain discharge shall be directed onto an absorbent surface such as grass, mulch, rip-rap or soil so that the discharge will be dissipated and not immediately drain into the Township right-of-way or adjacent properties. (§ 23-410.28.A.a)*

The Post Construction Stormwater Management Plans fail to identify the location of all sump pump discharge pipes from each lot. The Applicant has indicated in their response that it is "anticipated that sump pump discharge will be directed to the rear of properties where stormwater systems are located behind the lots." This is not acceptable. The plans shall identify the location of all sump pump and roof

drain discharge points to confirm the adequacy of the proposed storm sewer design and Stormwater Management Peak Rate and Recharge Volume calculations. Future submission shall be revised to meet the requirements noted above. (10/11/2023)

The Plans have been revised to identify the location of proposed sump pump discharge locations for every lot. However, many sump pump discharges connect directly to the proposed storm sewer conveyance system piping, discharge to the street, or discharge to the proposed Volume Control BMPs. In accordance with §23-410.28.A.(2)(a), sump pump or pipe drain discharge shall be directed onto an absorbent surface such as grass, mulch, rip-rap or soil so that the discharge will be dissipated and not immediately drain to the Township right-of-way or adjacent properties.” Furthermore, §23-803.1 and §23-803.2 indicate that “sump pump drains shall not be connected to streets, sanitary or storm sewers, or roadside ditches in order to promote overland flow and infiltration/percolation of stormwater where advantageous to do so. When it is more advantageous to connect directly to streets or storm sewers, connections of roof drains and sump pump drains to streets or roadside ditches may be permitted on a case by case basis as determined by New Hanover Township. The proposed sump pump connections to the proposed storm sewer systems shall be eliminated unless authorized by the Township. It is noted at this time, the proposed connection are not supported by the necessary storm sewer or stormwater routing calculations, and the means of the proposed connection (mid-pipe with no accessible structure) is completely unacceptable. (2/14/2025)

The Applicant’s design engineer has indicated in their response that the proposed dwelling elevations have been adjusted based on site subsurface testing to ensure the basements are above the water table and therefore do not need sump pumps. However, the required testing for each individual lot below-grade structure has not been provided. Furthermore, General Notes No. 13 and No. 51 provided on Sheet 3 of 124 provide conflicting statements concerning the status of required testing and basement floor elevations. The Applicant shall clarify the design intent. In order to expedite future reviews, it is requested that an excel spreadsheet be prepared that identifies the basement elevation of each lot and the tested groundwater elevation (with the appropriate test pit number). (8/4/2025)

The Plans continue to fail to be supplemented by a spreadsheet summarizing the testing for each individual lot below-grade structure. The Applicant has indicated in their response “Will Comply at Final Plan Stage” and the plans continue to contain General Notes that fail to meet the specific requirements of the Township Code (on-site testing completed prior to the Preliminary Plan submission). If the Applicant wishes to defer the required testing, the General Notes shall be revised to indicate “The proposed dwelling units identified on this plan are not proposed or approved to be provided with below grade areas (e.g., basements, crawl spaces, etc.). If in the future, the homebuilder wishes to install below grade areas, testing shall be provided in accordance with §22-806 – Below-Grade Structures and Streets to verify that all basements and below grade areas are designed to be set a minimum of six inches above the perched water table, groundwater elevation, or seasonally high groundwater elevation, whichever is closest to the surface of the land.” (1/30/2026)

3.0 FLOODPLAIN CONSERVATION DISTRICT CONCERNS – NO ADDITIONAL COMMENTS

4.0 RIPARIAN CORRIDOR CONSERVATION DISTRICT CONCERNS – NO ADDITIONAL COMMENTS

5.0 SUBDIVISION AND LAND DEVELOPMENT CONCERNS

- 5.1** *The Plan fails to comply with § 22-806.5, which prohibits the placement of streets within or on hydric soils or soils with hydric components. The plans indicate multiple sections of Road A, Road B, and Road J are within areas underlain by Bowmansville Soil, a Hydric Soil.*

A waiver of this requirement has been included with the Applicant’s Waiver Request worksheet and the notations presented on the Preliminary Plans. (10/11/2023)

- 5.2 The Plan fails to comply with 22-809.10, which requires that streets to be laid out to avoid hazardous areas such as floodplains, steep slopes and other hazardous natural features. The Plan proposes four road crossings that have not been laid out to avoid hazardous areas such as floodplains and wetlands.

The Plans continue to propose the crossing of approximately 200 LF of Floodplain Soils (28,000 SF) along Road A between Lutheran Road and Road B. (10/11/2023)

The Plans have been revised and the current proposed improvements to be located within the Floodplain Soil areas include approximately 200 feet of Road A with associated sidewalk (both sides) and central median, approximately 390 LF of storm sewer conveyance system piping, three storm sewer conveyance system structures (M12, Inlet 110 and 111), and approximately 200 LF of watermain piping. As noted above, the Township should determine if relief from Floodplain Soil disturbance, as regulated by §27-2101.1.B.1 and §27-2103, is appropriate for this project. (2/14/2025)

- 5.19 The Plan fails to provide streetlights for this community in conjunction with the requirements of § 22-907. The Township should discuss with the Applicant the desired location of streetlights (e.g., at all internal intersections, at the development entrances to Lutheran Road, Reifsnyder Road, and Swamp Pike, at “main” internal intersections, etc.).

The Plans have been revised to include a Lighting Plan (Sheet 99). We question if the proposed locations of streetlights are acceptable to the Township. (10/11/2023)

The Plans provide streetlights all intersections. The Township should advise if proposed streetlight locations are acceptable. (2/14/2025)

- 5.20 The Plan fails to provide an adequately designed Public Water system to provide the necessary capacity and distribution of hydrants for adequate fire protection. The plan does not provide fire hydrants or connections to existing Public Water mains to ensure that the system provides alternate directions of water flow to facility firefighting ability, as required by §§ 22-912.2 and 22-912.3. In accordance with § 22-922, fire hydrants shall be installed with a minimum of 800 feet separation distance between two hydrants.

The Applicant has indicated in their response that “Public Water System Design for hydrants, flow, and separation of hydrants to be provided at Final Plan Stage as Aqua will not provide a Will Service Letter until Preliminary Plan Approval is obtained for the Proposed Development. However, a preliminary water layout is depicted on the plans showing a connection at Reifsnyder and Swamp Pike connecting though the job, then out Lutheran Road to connect the existing main at Swamp Pike and Leidy Rd as discussed with Aqua Water and Township officials at 3/27/23 staff mtg.” (10/11/2023)

The Applicant has provided a Will Serve Letter from Aqua, Inc. dated December 11, 2024. The Utility Plan (Sheet 50) shows the proposed watermain partially along Lutheran Road (does not extend north along Lutheran Road for Lots 174-177 – Plan identifies temporary on-lot private wells until public water tie in provided) and abruptly ending within Lutheran Road (south) with a Plan notation along simply indicating “Extend to existing watermain”. Additionally, the Utility Plan (Sheet 57) shows the proposed watermain extending to the center of Reifsnyder Road without identifying a proposed connection to an existing watermain or a proposed valve tree. The Plans shall be revised to clearly identify the complete Public Water System design.

Furthermore, the Plan continues to fail to provide fire hydrants at a minimum separation distance of 800 feet throughout the entire land development. The Plans appear to propose one single fire hydrant, located at Lutheran Road entrance, throughout the entire land development. (2/14/2025)

The Applicant’s design engineer has indicated in their response that the Plans have been revised to propose fire hydrants at 800’ separation distance and have been revised to show the Aqua Water Main design. However, the Plans continue to fail to provide fire hydrant separation distances less than 800 feet. For example, along Road B between Lot 11 to 25, along Road B between Lot 150 to 157, along Road C between Lot 122 to 129, along Road E between Lot 80 to 87, and at Road A and Lutheran Road

intersection (Lot 174) and an internal site fire hydrant is greater than 800 feet. Furthermore, no hydrants are provided between the proposed development site and the two proposed connections to the existing water main. The Township's Fire Marshal shall review the proposed hydrant locations and provide the Applicant and Aqua with direction regarding acceptable hydrant spacing. (8/4/2025)

The Applicant has indicated in their response "Will Comply at Final Plan Stage." The Applicant shall address any concerns raised by the Fire Marshal prior to Plan Approval. (1/30/2026)

- 5.21 The Plan fails to provide natural gas, electric power and telephone facilities (including internet) in such a manner as to make adequate service available to each lot or dwelling unit in the subdivision. As all utilities shall be located within the street right-of-way or within easements of sufficient width for installation and maintenance, the plan shall identify the location of all service main locations along the perimeter of the site and identify on the proposed street cross-sections where the utilities are intended to be placed. (§ 22-917.1)

The Applicant has indicated in their response that the Final Plan will identify the location of all utilities to each Lot. (§ 22-917.1) (10/11/2023)

The Utility Plans (Sheets 50-58) have been revised to identify a single linetype for the proposed "separate underground electric/cable lines", which are generally located within the right-of-way between the curb and proposed sidewalk. However, the Typical Road Cross-Section (Sheet 117) continues to fail to identify the proposed location where the utilities are intended to be placed. The Typical Road Cross-Section shall be revised to identify the proposed location where utilities are intended to be placed.

Additionally, the Plans do not identify a connection to any existing Met Ed Utility Pole along Site perimeter. The Plan simply shows the proposed "separate underground electric/cable line" extending to the proposed Road C and Reifsnyder Road intersection with no connection to existing Utility Pole. The Plans shall be revised to identify a connection to an existing Utility Pole.

Lastly, the natural gas utility locations are still outstanding, with the design engineer stating they will be provided on the Final Plans. The preliminary location of the gas main, if proposed, shall be shown to ensure that adequate area is provided within the right-of-way to support the utility improvements. (2/14/2025)

While the Plans have been revised to show the proposed electric utility connection to an existing utility pole along Reifsnyder Road (rear of Lot 47), the Plan fails to identify the proposed location of underground utilities for Lots 174-177. It is noted that a Will Serve Letter from UGI Utilities has been included with this submission provided for proposed natural gas utility. However, the Utility Plans (Sheets 51-62) and Typical Road Cross Section (Sheet 122) fail to identify the location of the proposed gas main. (8/4/2025)

The Applicant has indicated in their response "Will Comply at Final Plan Stage." (1/30/2026)

IV. TECHNICAL CONCERNS

1.0 MISSING DOCUMENTS

- 1.2 The Application failed to be accompanied by reports and/or letters regarding availability of sewer and water facilities. (§22-305.5.E.6)

The Applicant has indicated in their response that a Sewer Capacity Confirmation Letter is forthcoming and that Aqua will not provide a will serve letter until Preliminary Plan Approval is obtained for the Proposed Development. (9/30/2023)

While a Will Serve Letter from Aqua, Inc. dated December 11, 2024, has been provided with this Application regarding the proposed public water availability, the Application continues to fail to be accompanied by reports and/or letters regarding availability of sewer facilities. A copy of the PADEP Sewage Facilities Planning Module Application Mailer has been included in this Application and the

design engineer has indicated in their response that the Applicant is hereby formally requesting the enclosed Sewage Facilities Mailer be processed with necessary reviews and signatures provided where necessary. (2/14/2025)

A copy of the PADEP Sewage Facilities Planning Module Application Mailer has been included in this Application and the design engineer has indicated in their response that the Applicant is hereby formally requesting the enclosed Sewage Facilities Mailer be processed with necessary reviews and signatures provided where necessary. Upon the Township receiving a supporting recommendation from the New Hanover Township Authority's or their engineer, we would recommend that the Township process the Sewage Facilities Mailer and transmit the necessary information to PaDEP for their review. (8/4/2025)

The Sewage Facilities Planning Module Application has been submitted by the Applicant, signed by the Township, and submitted to the PaDEP for review. Upon receipt of correspondence from PaDEP, the Applicant shall supply the necessary planning information to the Township and Township Authority to accomplish the proposed connection to the Township's Sewer System.

With regard to the Will Serve Letter from Aqua, Inc., an update to the December 11, 2024 conditional service letter shall be provided that confirms that the conditions noted in the December 11, 2024 Will Serve Letter have been addressed and that the Applicant/Aqua, Inc. has secured the necessary DRBC and PaDEP approvals for the proposed well on the Krummerer Parcel. If these conditions are not met and Aqua intends to service the development through the "additional well sources that Aqua is currently evaluating", the Applicant shall provide sufficient documentation that Aqua has set aside sufficient capacity to serve this development without exceeding the DRBC Groundwater Withdrawal Docket (No. D-2001-015-CP-6) amounts. (1/30/2026)

- 1.10 The Application failed to be accompanied by cut and fill calculations verifying that the project has been laid out to come as close as possible to balancing cut and fill operations on site. (§ 22-802)

The Application has been amended to include a single page cut and fill analysis that attempts to provide the Township with assurances that the site has been designed in order to prevent the necessity for excessive cut or fill, and that the project has been laid out to come as close as possible to balancing cut and fill operations on the site. Based upon our review of the single page cut and fill analysis (no plan provided), 154,268.6 CY of excavation and 297,468.6 CY of fill is proposed to grade the site, resulting in a net difference of 143,220 CY of fill material required to balance the site. Based on the limited information presented, it would appear that the project has not been laid out to come as close as possible to balancing cut and fill operations. Furthermore, no information regarding

A revised Cut/Fill Summary and Analysis Plan has been included in the revised Plan Set (Sheet 124), which indicates 1,689.88 CY of excess earthwork material will be created by this development. This revised balance is significantly closer to balancing the site. However, there remain several areas where significant cuts (Basin No. 1, Basin No. 13, Lot No. 41, and Lot 170) and significant fills (Lot Nos. 32-38, Lot No. 150, and Lot Nos. 158-163) are proposed. Of greatest concern is the significant cuts and fills associated with Basin No. 13 (cut) and Lots 32-38 (fills) located immediately adjacent to Swamp Picnic Road and in an area with shallow bedrock. The cuts and fills in this area will likely impact both the aesthetics of the site as viewed from the adjacent homes along Swamp Picnic and potentially the groundwater resources in the area due to the over 9.40 feet of cut into the bedrock associated with Basin No. 13. The Applicant shall look to alternatives in grading design, development density and landscaping to minimize the impacts of the cuts and fills in this area. (8/4/2025)

The Application continues to fail to be accompanied by cut and fill calculations verifying that the project has been laid out to come as close as possible to balancing cut and fill operations on site. (1/30/2026)

- 1.12 The Application failed to be accompanied by the Below Grade Soil testing for each lot proposed to be provided with basements or any type of structure below grade areas, as specified in § 23-806.1

The Applicant has not provided the required testing on each individual lot. In lieu of the required testing, the Applicant's Engineer has stated that the results of the infiltration testing has provided sufficient information to confirm that basements will be viable for this site and the Plans have been revised to contain Note #52 on Sheet 3 that indicates that the Applicant agrees to provide the require soil testing for each lot prior to the submission of the individual building permit plans. As this proposal does not meet the requirements of §23-806.1, the Applicant shall either provide the required testing prior to plan approval or request relief from this section of the ordinance. (10/11/2023)

The Plans continue to fail to be accompanied by the required Below Grade Soil testing for each lot proposed to be provided with basements or any type of structure with below grade areas. The Township Code requires this testing to be provided prior to the preliminary plan submission. We do not recommend that the Preliminary Plans be approved until this information is provided, as required. (2/14/2025)

Below grade testing has been completed by GTA and the results have been included with this submission. However, the completed testing has not been provided for each individual lot (177 lots). Additionally, as mentioned above, in order to expedite future reviews, it is requested that an excel spreadsheet be prepared that identifies the basement elevation of each lot and the tested groundwater elevation (with the appropriate test pit number). (8/4/2025)

The Plans fail to be supplemented by a spreadsheet summarizing the testing for each individual lot below-grade structure. The Applicant has indicated in their response "Will Comply at Final Plan Stage" and the plans continue to contain General Notes that fail to meet the specific requirements of the Township Code (on-site testing completed prior to the Preliminary Plan submission). If the Applicant wishes to defer the required testing, the General Notes shall be revised to indicate "The proposed dwelling units identified on this plan are not proposed or approved to be provided with below grade areas (e.g., basements, crawl spaces, etc.). If in the future, the homebuilder wishes to install below grade areas, testing shall be provided in accordance with §22-806 – Below-Grade Structures and Streets to verify that all basements and below grade areas are designed to be set a minimum of six inches above the perched water table, groundwater elevation, or seasonally high groundwater elevation, whichever is closest to the surface of the land." (1/30/2026)

- 1.13 The Applicant, in conjunction with the submission of the final plan shall offer for dedication a portion of the land being subdivided as public recreation area or a fee in lieu of land dedication. If land is proposed to be dedicated, the plan shall identify the area to be dedicated, fee simple, to the Township. (§ 16-201.1)

The Applicant has indicated in their response that the Applicant is offering the trail system for public use and that this area will be delineated at Final Plan stage to confirm compliance with § 16.201.1. The Township should determine if this is acceptable. (10/11/2023)

While the plans have been revised to provide some additional information regarding the existing trails to remain, the plans fail to provide a comprehensive trail system that includes defined beginning and end points, ownership and maintenance statements, complete trail systems (no dead-ends), restoration requirements due to construction activities, restoration due to deterioration, and other improvements that would create an acceptable recreation improvement. Additional effort shall be provided to ensure that the proposed dedication of the trail system will meet the recreational standards of the Township. (2/14/2025)

The Applicant's design engineer has indicated in their response that the proposed trail network is to terminate before leading into TMP 47-00-06984-00-7. The design engineer has also indicated that there is no open space requirement for this Development, thus no trail required in the open space, nor any dedication required nor proposed. The trail network, which is located entirely within proposed Lot #178 Common Area, is noted (General Note No. 58) on the Overall Subdivision/Record Plan (Sheet 3 of 124) to be "retained by Artisan Land Company". The plan shall be revised to clarify if the HOA will be permitted to use the trail to be owned by Artisan Land Company. (8/4/2025)

The Applicant shall also clarify why this particular Common Area is being retained by Artisan and not being conveyed to the Homeowner's Association. It would appear that by retaining the Common Area, not calling it "Open Space" like the other non-lot areas, and the physical location of the Common Area adjacent to other vacant lands, the Applicant may be retaining the rights to that area to develop those lands in the future. As there has been no prior indication of the development of this area, which contains mostly floodplain areas, we would recommend that the Applicant identify the possible uses of Lot 178 - Common Area, and if there is no proposed future development expected, that the area be restricted from future development. (8/4/2025)

The Applicant has indicated in their response that the intent for Lot 178 is to provide an area for Stormwater Management for the development, and to provide walking trails for the residents of the Development. We note that it appears that this area could be further developed when adjacent lands are developed in the future. (1/30/2026)

- 1.15 The Application failed to be accompanied by copies of letters and permit applications to all reviewing agencies, with the exception of the Montgomery County Planning Commission. (§ 22-305.5.E.7)

The Township should be assured that copies of letters and permit applications to all reviewing agencies have been obtained prior to plan approval. (2/14/2025) (1/30/2026)

2.0 STORMWATER MANAGEMENT

- 2.9 The Pre Developed Drainage Area Plan, the Post Developed Drainage Area Plan and the support hydrologic modeling calculations fail to comply with the definition of "Site Area" as presented in § 23-408.4. Specifically, the calculations fail to account for the runoff discharging uncontrolled to Minister Creek and the surrounding roadways. These areas must be included in the evaluated Site Area and the "bypass runoff" from those areas included in the Pre-Developed to Post Developed Drainage Release Rate comparison required by § 23-408.1.

While the SWMR&N include a hydrograph labeled as "Bypass", the submitted Pre Developed Drainage Area Plan and Post Developed Drainage Area Plan fail to identify with a label the "bypass" drainage area. It is also noted that the calculations fail to provide a consistent evaluation of the Pre-development and Post-Development conditions, noting that the total area analyzed in Pre-development is 122.74, whereas the Post Development drainage area only totals 117.57 acres, 5.17 acres less than the Pre-development conditions. The Pre- and Post-Development calculations shall be based on the same drainage area. (§ 23-408.4) (10/11/2023)

The Pre-Developed Drainage Area Plan and Post Developed Drainage Area Plan continue to fail to identify the "Bypass" drainage area (0.41 acres) used in the SWM Report. Similarly, the Pre-Developed Drainage Area Plan and Post Developed Drainage Area Plan fail to identify POI #3. Furthermore, the Hydrograph No. 62 and 63 shall be revised to provide a description that is consistent with the labels used within the Plans. (2/14/2025)

The Pre-Developed and Post-Developed Drainage Area Plan continue to fail to identify POI #3. (8/4/2025)

The Applicant has indicated in their response "Will Comply at Final Plan Stage." This is not acceptable and the plans shall be revised to clearly identify the discharge points. (1/30/2026)

- 2.13 The SWMR&N fails to account for the complete development of each proposed B1 Single Family lot within this development in accordance with the maximum building coverage percentage permitted by the Zoning Ordinance. Specifically, the Overall Subdivision/Record Plan indicates that only 13% of the permitted 20% is proposed at this time. The SWMR&N appears to assume that future homeowners will construct additional on-lot stormwater improvements if they exceed the 13% allotted for in the SWMR&N. As each lot provides very limited area for additional on-lot stormwater controls, the Plan shall be revised to provide stormwater management facilities for the full 20% building coverage permitted by the Zoning Ordinance or the Plans shall be revised to specify a maximum building (or total impervious surface) coverage deed restriction. Future submissions of the SWMR&N shall include a tabulation of the proposed impervious surface area per lot that has been accounted for in the Post Construction Stormwater Management analysis. (§ 23-409.5)

The Applicant has indicated in their response that "the Applicant is not stating that each lot is limited to 13%, as the Applicant has a right to go to 20% so long as the SWM System is designed accordingly. The R-25 Zoning District does not limit impervious coverage, and thus the only requirement is for SWM design proposal." This response is acceptable if the appropriate restrictions are put into place to ensure that future lot owners are aware that the Applicant has not provided for any additional impervious surface construction on the lots. If the stormwater system is not designed to provide any additional impervious surface area other than what is presented on the Preliminary Plans, it is our recommendation that each lot be deed restricted to the impervious surface area specified on the plans. (10/11/2023)

General Note No. 55 (Sheet 3) has been added to the Plans, which indicates that the SWM systems were designed to manage an additional 500 SF of impervious surface per lot. However, upon review of the submitted Stormwater Management Report and Narrative, it appears that the engineer has assumed that all of the additional impervious surface area has been directed to the proposed stormwater management facilities. This does not appear to be the case. The plans and calculations fail to account for the additional runoff created by the additional impervious surface area that would be installed to the rear of Lots 2-5, Lots 27-34, Lots 123-128, and Lots 144-149, and which would bypass the proposed stormwater management facilities. The individual drainage area calculations, including each bypass area, shall be provided in greater detail to verify that all impervious surface areas are adequately accounted for in the stormwater management design.

In addition, General Note #55, if the plans and calculations are ultimately revised to provide adequate stormwater management facilities to support the designed improvements, shall be revised to identify the maximum impervious surface area (or ratio) permitted per lot, as builder package options may be greater than what is currently shown on the plans. Furthermore, once the 500 SF of additional impervious surface area is installed by the homeowner, no further impervious surface area will be permitted as the lots do not contain sufficient area to install additional stormwater management facilities. It is therefore, our recommendation that a deed restriction be placed on all lots to limit the impervious surface area to the maximum design impervious surface area that is ultimately specified in on the plans and accounted for in the stormwater management report. (2/14/2025)

General Note #54 (Sheet 3) has been updated to indicate an allowance of 1,500SF of impervious surface. However, it is noted that the submitted SWM Report includes an impervious surface allowance of 1,800 SF. The design engineer shall verify the allowance amount and revise the Plans and SWM Report accordingly. (8/4/2025)

The Applicant has indicated in their response that the PCSM Plans and SWM Report have been revised to allow an impervious surface allowance of 4,800 SF for Lot sizes of 15,000 SF and 6,800 SF for Lot sizes of 25,000 SF. The Typical Lot Layouts (Sheet 18) and Impervious Area paragraph within the SWM Report (Page 2) shall be revised accordingly. (1/30/2026)

- 2.15 The GTA Stormwater Infiltration & Subsurface Evaluation Report, Page 2, references a Site Geology Map (Figure 2) which is intended to show the location of the mudstone, shales, and some inclusions of

sandstone on the site. The provided Site Geology Map, which contains a different reference to “reddish-brown mudstone, siltstone and shale” (Yellow Shading) and “medium- to coarse-grained diabase” (Light Brown Shading), provides no shading or any reference to the features noted in the Site Geology section of the report. The Site Geology Map shall be updated accordingly. (§ 23-405.1.B)

The Geology Map (Figure 3) has been revised within the Supplemental Stormwater Infiltration and Subsurface Evaluation Report prepared by GTA. The revised Geology Map now only contains one “Green Shading”, identifying the Triassic-Aged Brunswick Formation: reddish-brown mudstone, siltstone, and shale containing a few green and brown shale interbeds of the Brunswick Formation. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Site Geology Map shall be updated in accordance with the above comments. (1/30/2026)

- 2.16 The GTA Infiltration & Subsurface Evaluation Report fails to identify the impact of the elevated groundwater elevation or bedrock on the proposed detention basins, which have been recommended by GTA to be designed as Managed Release Concept BMPs (MRC Basins). For example, the infiltration testing for Basin 3 indicates that the limiting zone in INF-2 was identified as being set at 243.5 due to groundwater. However, the Post Construction Stormwater Management Plans indicate that the basin floor is proposed to be at 241.00. The Soil Consultant and the Design Engineer make no reference as to how the proposed MRC Basins will function when the proposed basin floor (set at least 2 feet above the excavated amended soil area) is inundated with groundwater. The use of an MRC Basin is not recommended with these site conditions. (§ 23-405.B)

The GTA Supplemental Stormwater Test Pit results were submitted after the Revised Plans were submitted for review. Future submissions of the design plans shall be revised to include a reference to the test pit results in all basin details to confirm that the required offset between the identified limiting zone and the bottom of the revised basins meet the requirements of the Township Code and/or the PaDEP MRC requirements. (1/30/2026)

- 2.17 The GTA Exploration Location Plan shall be revised to identify the soil type boundaries and Hydrologic Soil Group Classifications. (§ 23-405.1.B.1)

The Exploration Location Plan (Figure 4) within the revised Supplemental Stormwater Infiltration and Subsurface Evaluation Report continues to fail to identify the soil type boundaries and Hydrologic Soil Group Classifications. (8/4/2025)

The Exploration Location Plan (Figure 4) within the revised Supplemental Stormwater Infiltration and Subsurface Evaluation Report continues to fail to identify the soil type boundaries and Hydrologic Soil Group Classifications. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 2.18 In accordance with §23-304.4.B, we find that the Post Construction Stormwater Management Plan for this site is **INCONSISTENT AND NONCOMPLIANT** with the Swamp Creek Act 167 Stormwater Management Plan and the Stormwater Management requirements of the Township ordinances.

We find that the PCSMR&N for this site continues to be INCONSISTENT AND NONCOMPLIANT with the Swamp Creek Act 167 Stormwater Management Plan and the Stormwater Management requirements of the Township ordinances. (10/11/2023)

We find that the PCSMR&N for this site continues to be INCONSISTENT AND NONCOMPLIANT with the Swamp Creek Act 167 Stormwater Management Plan and the Stormwater Management requirements of the Township ordinances. (2/14/2025)

We find that the PCSMR&N for this site continues to be INCONSISTENT AND NONCOMPLIANT with the Swamp Creek Act 167 Stormwater Management Plan and the Stormwater Management requirements of the Township ordinances. (1/30/2026)

3.0 STORM SEWER CONVEYANCE CALCULATIONS

- 3.20 The Storm Sewer Conveyance Calculations fail to provide a storm sewer system that provides a minimum velocity of three feet per second when flowing full in accordance with § 23-410.14. The Storm Sewer Conveyance Calculations indicate that the proposed velocity in the pipes downstream of Inlets 6, 8, 10, 12, 27, 29, 31, 33, 38, 46, 50, 50A, 55, 56, 58, 62, 67, 69, 74C, 77, 79, 81, 86, 87, 89, 91, 93, 96C, 104, 110, 112, 119, 122, 124, 131, 133, 142, 146, 152, 154, 157, 158, 160, 164, 166, 168, 172, 174, 181, 182, 191, 192, 194, 196, 198, 200, 206, 210, 222, and 224 do not meet the requirements.

The Storm Sewer Conveyance Calculations continue to fail to provide a storm sewer system that provides a minimum velocity of three feet per second when flowing full in accordance with § 23-410.14. The Storm Sewer Conveyance Calculations indicate that the proposed velocity in the pipes downstream of Inlets 3, 9, 16, 34, 37, 40, 41, 46, 56, 67, 70, 74, 71, 52, 53, 58, 75, 77, 78, 81, 83, 85, 87, 88, 90, 91, 163, 164, 93, 96, 103, OS16, 111, 113, 115, 119, 162, 121, 123, 129, 131, 133, 137, 138, 143, 145, 148, 150, and 156 do not meet the requirements. (10/11/2023)

While the design engineer has provided some commentary in his response letter regarding the inadequacy of the storm sewer system calculations, additional calculations to support his assertions have not been provided. For all pipes that fail to show adequate flow velocities, supporting calculations shall be provided that document the full flow velocity is greater than 3.0 fps. (2/14/2025)

The Applicant's design engineer has indicated in their response that the Applicant will comply and this is why a waiver has not been requested and believes the final stormwater velocity calculations can be reviewed and approved once the NPDES Application and design criteria have been agreed to. At this time, the plan does not comply with the Township's requirements. (8/4/2025)

The SWM Report and Narrative fail to include Storm Sewer Conveyance Calculations to provide verification that the storm sewer system provides a minimum velocity of three feet per second when flowing full. The Applicant has indicated in their response "During the NPDES Approval process with MCCD and NHT, the SWM Report will be revised to provide final stormwater velocity calculations." (1/30/2026)

- 3.26 The Storm Sewer Conveyance Calculations fail to provide verification that the maximum encroachment of water on the roadway pavement along curb sections shall not exceed four inches in depth at the curbline as required by § 22-807.2.E. The Storm Sewer Conveyance Calculations indicate that the four-inch depth requirement is exceeded at Line 60, Line 76, Line 167, Line 182, and Line 190 of the "4830-Conveyance-7" calculations at Line 16 of the "4380-Rd-Widening" calculations.

The calculations continue to indicate that the depth of flow at the curbline at Inlets 49, 90, 91, 103, 115, 116, 132, and 161. Although it is noted that the Pipe Line No. and Inlet numbers for "4830 Conveyance West" do not appear to be consistent between the various computations. (10/11/2023)

The revised calculations indicate that the maximum encroachment of water on the roadway pavement is exceeded at Inlet 49, 76, and 77. (2/14/2025)

The Applicant's design engineer has indicated in their response that the Applicant will comply and this is why a waiver has not been requested and believes the final stormwater velocity calculations can be reviewed and approved once the NPDES Application and design criteria have been agreed to. At this time, the plan does not comply with the Township's requirements. (8/4/2025)

The SWM Report and Narrative fail to include Storm Sewer Conveyance Calculations to provide verification that the maximum encroachment of water on the roadway pavement along curb sections shall not exceed four inches in depth at the curbline. The Applicant has indicated in their response "During the NPDES Approval process with MCCD and NHT, the SWM Report will be revised to provide final stormwater velocity calculations." (1/30/2026)

- 3.27 The Storm Sewer Conveyance Calculations fail to provide inlet capacities that are based on a maximum

flow of five cubic feet per second as specified by § 22-807.2.F.3. The Storm Sewer Conveyance Calculations indicate that the five cubic feet per second limitation is exceeded at Line 38, Line 41, Line 60, Line 76, Line 79, Line 136, Line 170, and Line 190 of the “4830-Conveyance-7” calculations. The Storm Sewer Conveyance Calculations also indicate that the five cubic feet per second limitation is exceeded at Line 28, Line 40, Line 43, and at Line 47 of the “4830-Conveyance-Basin 7” calculations and at Line 16 of the “4380-Rd-Widening” calculations.

The calculations continue to indicate that more than 5 CFS is being directed to Inlets 39, 73, 92, 103, and 161. (10/11/2023)

The revised calculations indicate that more than 5 CFS is being directed to Inlet 49. (2/14/2025)

The Applicant’s design engineer has indicated in their response that the Applicant will comply and this is why a waiver has not been requested and believes the final stormwater velocity calculations can be reviewed and approved once the NPDES Application and design criteria have been agreed to. At this time, the plan does not comply with the Township’s requirements. (8/4/2025)

The SWM Report and Narrative fail to include Storm Sewer Conveyance Calculations to verify that inlet capacities are based on a maximum flow of five (5) cubic feet per second. The Applicant has indicated in their response “During the NPDES Approval process with MCCD and NHT, the SWM Report will be revised to provide final stormwater velocity calculations.” (1/30/2026)

4.0 WATER IMPACT STUDY

The Applicant’s Response Letter indicates that the Water Impact Study dated April 28, 2022, and prepared by Evans Mill Environmental, LLC has been supplied. However, this report was not included within the submitted documents. Furthermore, this report was the report in which the below comments were generated from. Therefore, the below comments remain applicable. (10/11/2023)

The Application continues to fail to be accompanied by the required Water Impact Study. The design engineer has indicated in their response that the Water Impact Study will be addressed at Final Plan stage. We do not recommend that the Township provide plan approval until the required Water Impact Study has been prepared in accordance with §27-2407. While our office has previously provided review comments of the previously submitted Water Impact Study dated April 28, 2022, and prepared by Evans Mill Environmental, LLC, additional comments may be generated upon receipt of an updated Water Impact Study and have kept the previously generated review comments below for the Applicants use in preparing the required Water Impact Study. (2/14/2025)

The Applicant’s design engineer continues to indicate that all Water Impact Study comments will be addressed with the next Plan iteration. (8/4/2025)

The Applicant has indicated in their response “Will Comply, as the Applicant will ask for guidance, during Final Plan stage, whether this is necessary, due to the proposed public water usage, and the off-site water main connections that are being designed and installed by the Applicant.” As noted above, regarding the Will Serve Letter from Aqua, Inc., an update to the December 11, 2024 conditional service letter shall be provided that confirms that the conditions noted in the December 11, 2024 Will Serve Letter have been addressed and that the Applicant/Aqua, Inc. has secured the necessary DRBC and PaDEP approvals for the proposed well on the Krummerer Parcel. If these conditions are not met and Aqua intends to service the development through the “additional well sources that Aqua is currently evaluating”, the Applicant shall provide sufficient documentation that Aqua has set aside sufficient capacity to serve this development without exceeding the DRBC Groundwater Withdrawal Docket (No. D-2001-015-CP-6) amounts. (1/30/2026)

- 4.1 The Water Impact Study fails to include a calculation of the projected water needs for the site as required by § 27-2407.2.A.1.

- 4.2 The Water Impact Study fails to provide a geologic map of the area with a radius of at least one mile from the site. (§ 27-2407.2.A.2)
- 4.3 The Water Impact Study fails to provide a map noting the location of all existing and proposed wells within 1,000 feet of the site, with a notation of the capacity of all high yield wells as required by § 27-2407.2.A.3. The Water Impact Study specifically notes the existence of three (3) on-site irrigation supply wells and at least one (1) on-site well the golf course's clubhouse potable water supply.
- 4.4 The Existing Features Plan fails to identify the location of the existing on-site wells referenced in the Water Impact Study. (§ 22-305.4.B.4)
- 4.5 The Water Impact Study fails to provide the location of all existing on-lot sewage disposal systems within 1,000 feet of the site, as required by § 27-2407.2.A.4., or a statement that no systems exist.
- 4.6 The Water Impact Study fails to provide the location of all streams within 1,000 feet of the site, and all known point sources of pollution, as required by § 27-2407.2.A.5.
- 4.7 The Water Impact Study fails to identify the location of all known faults and lineations within 1,000 feet of the site, as required by § 27-2407.2.A.6.
- 4.8 The Water Impact Study fails to determine the long-term safe yield based on the geologic formation underlying the site. (§ 27-2407.2.A.7)
- 4.9 The Water Impact Study fails to provide a determination of the effects of the proposed water supply system on the quantity and quality of water in nearby wells, streams and the ground water table. It is noted that the Water Impact Study make no reference to any water supply wells required by the proposed water utility supplier. (§ 27-2407.2.A.7)
- 4.10 The Water Impact Study fails to provide the one test well specified by § 27-2407.2.B.1 and the two monitoring wells per test well specified in § 27-2407.2.B.2.
- 4.11 The Water Impact Study fails to provide the test results of the test well 72-hour yield test as specified in § 27-2407.2.B.4.
- 4.12 The Water Impact Study fails to provide a description of the impact of servicing the proposed use on the water system's surplus capacity and water pressure throughout the system. The required analysis of maintenance needs and consumer service rates has not been provided by the Applicant. A full description of the manner in which water service will be provided to the proposed use, including descriptions of new, system wide improvements that will be required to service the use and the estimated cost of providing such services has not been included in the Water Impact Study. (§ 27-2407.3)
- 4.13 The Water Impact Study fails to provide documentation to support the assumption that the full twelve (12) million gallons per month for six month is extracted for irrigation purposes every year. (§27-2407.2.B.8)
- 4.14 The Existing Features/Demolition Plans for the project fail to indicate that the existing irrigation supply wells, as stated in the Water Impact Study, will be removed as part of this project.

5.0 LAND USE COMPATIBILITY STUDY – NO COMMENTS AT THIS TIME

6.0 TRANSPORTATION IMPACT ANALYSIS – SEE BOWMAN'S REVIEW LETTER

7.0 NATURAL RESOURCES IMPACT STUDY

The Application to fails to be accompanied by a revised Natural Resources Impact Study. The design engineer has indicated in their response that the Natural Resources Impact Study will be addressed at Final Plan stage. We do not recommend that the Township provide plan approval until the required Natural Resources Impact Study has been prepared in accordance with §27-2404. While our office has previously provided review comments of the previously submitted Natural Resources Impact Study dated April 25, 2022, and prepared by Edward B. Walsh and Assoc [sic], Inc., additional comments may be

generated upon receipt of an updated Natural Resources Impact Study and have kept the previously generated review comments below for the Applicants use in preparing the required Natural Resources Impact Study. (2/14/2025)

A revised Natural Resources Impact Study has been included with this submission. As noted above, additional clarifications and plan updates are required to address encroachments into the Natural Resources and to address the Mature Tree/Woodlands preservation. Upon completion of those plan changes, the Resource Protection Table and Tree Inventory shall be included/referenced in the Natural Resources Impact Study to show compliance with the Township Codes. (8/4/2025)

The Application fails to be accompanied by a revised Natural Resources Impact Study, which shall be updated once the updates to the Mature Tree/Woodlands reports are submitted and other natural resource protection plan items are resolved. (1/30/2026)

- 7.3 The Stormwater Management Study fails to provide hydrographs for the twelve-hour, six-hour and three-hour duration of storm events, as required by § 27-2404.2.

The Applicant's design engineer has indicated in their response that the SWM Report has been updated. However, the SWM Report continues to fail to provide hydrographs for the twelve-hour, six-hour and three-hour duration of storm events. (8/4/2025)

The SWM Report continues to fail to provide hydrographs for the twelve-hour, six-hour, and three-hour duration of storm events. The Applicant has indicated in their response "During the NPDES Approval process with MCCD and NHT, the SWM Report will be revised to provide hydrographs for the twelve-hour, six-hour, and three-hour duration of storm events." (1/30/2026)

8.0 SEWAGE FACILITIES PLANNING MODULE – NO COMMENTS AT THIS TIME

9.0 HOMEOWNER'S ASSOCIATION DOCUMENTATION – DRAFT COMMENTS

- 9.8 The Declaration identifies "Snow Storage Easements" in Section 12.12 and notes that they are shown on the Declaration Plat. These Snow Storage Easements shall be shown on the Preliminary Plans.

The Preliminary Plans have been revised identify "Snow Stockpile Areas". However, the proposed locations are in conflict with other proposed improvements (landscape, utilities, etc.). Our specific comments regarding the proposed "Snow Stockpile Areas" are found within the Individual Plan Sheet Comments below. (10/11/2023)

- 9.9 The Declaration shall be revised to include copies of all referenced exhibits. Until the exhibits are provided, many of the Township's requirements can not be reviewed.

The Declaration shall be revised to include all referenced exhibits prior to Final Approval. (10/11/2023)

In addition to the Declaration being revised to include the referenced Exhibits, the referenced Exhibits shall accurately identify the Open Space Management Plan (currently Sheet 85) sheet number within the final approved Land Development/Subdivision Plan. (2/14/2025)

A revised Declaration has not been included with this submission. The Applicant has indicated in their response "Will Comply at Final Plan Stage." (1/30/2026)

- 9.11 Article III, Section 3.01.z shall be revised to reference the Office of the Recorder of Deeds of the County of Montgomery, Pennsylvania. (2/14/2025)

The submitted Declaration continues to reference the Office of Recorder of Deeds of the County of Chester, Pennsylvania. (8/4/2025)

A revised Declaration has not been included with this submission. (1/30/2026) The Applicant has indicated in their response "Will Comply at Final Plan Stage."

- 9.12 Article III, Section 3.01.ee shall be revised to reference the New Hanover Township. (2/14/2025)

The submitted Declaration continues to reference Gilbertsville Township. (8/4/2025)

A revised Declaration has not been included with this submission. (1/30/2026) The Applicant has indicated in their response “Will Comply at Final Plan Stage.”

10.0 WAIVER REQUEST LETTER – EDWARD B. WALSH & ASSOCIATES, INC – AUGUST 27, 2025

Artisan Land Company, the Applicant, has submitted a Waiver Request letter dated August 27, 2025 for the Township’s consideration during the review of the Preliminary/Major Subdivision and Land Development Plans. We have reviewed the waiver requests and provide the following comments:

- 10.1 Section 22-806.5 of the Subdivision and Land Development Ordinance prohibits streets within or on
10.1 hydric soils or soils with hydric components. The Applicant’s stated Request simply indicates a partial
10.1 waiver to allow proposed Road A, from Station 0+00 to Station 8+00 be permitted on Bowmansville-
10.1 Knauers (Bo) soil and no that other roads are permitted on hydric soils. The Township should determine
10.1 if the crossing of hydric soils with new roadways in this location is acceptable.
- 10.2 Section 22-812.1.A of the Subdivision and Land Development Ordinance requires Minimum Cartway widths as follows: Rural Arterial - As required by the Pennsylvania Department of Transportation or Montgomery County; Major Collector - 36'; Minor Collector - 30', Local Roads - 28'; Marginal Access - 24'; Alley - 22'; Private Roads - As determined by the Township Supervisors with direction from the Township Engineer. The Applicant requests that no road widening be required for Swamp Picnic Road, Lutheran Road be permitted to be widened to same width as the blacktop on the recently reconstructed bridge on Lutheran Road (24-foot wide cartway width), and Reifsnyder Road be permitted to be widened to 24' from Swamp Picnic Road intersection to the existing bridge on Reifsnyder Road, with all widening to be along Applicant’s property (western side of road) and no disturbance to Mr. Woods property (eastern side of road).
- 10.3 Section 22-812.2 of the Subdivision and Land Development Ordinance requires curbs be provided in all zoning districts. The Applicant requests that no curbs be required along Lutheran Road, Swamp Picnic Road, and Reifsnyder Road.
- 10.4 Section 22-812.4 of the Subdivision and Land Development Ordinance requires where a subdivision or land development 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 of this chapter and where a subdivision or land development abuts or contains an existing street of inadequate cartway width, additional cartway width shall be dedicated to conform to the standards of this chapter. It appears that the Applicant is only requesting relief from the second part of this requirement, specifically regarding the requirement to provide additional cartway width along the existing exterior roadways.
- 10.5 The Applicant has grouped Section 22-813.2 through Section 22-813.5 of the Subdivision and Land Development Ordinance into one Waiver Request. We have separated each Section in an attempt to provide further clarity and provide our comments as follows:

Section 22-813.2 of the Subdivision and Land Development Ordinance requires a Street Hierarchy as follows:

- a. Residential major collector (highest order)
- b. Residential minor collector
- c. Residential local road (lowest order)

Section 22-813.3 of the Subdivision and Land Development Ordinance requires Street Classification. New residential streets will be classified according to the expected numbers of average daily trips generated. If proposed lots are large enough for further subdivision, the Board of Supervisors may require

that the street be constructed to the standards of a higher classification unless the lots are deed restricted against further subdivision or development. The number of trips per day is determined through use of the Institute of Transportation Engineers (ITE) Trip Generation Report (current edition or as amended).

Section 22-813.4 of the Subdivision and Land Development Ordinance requires that no new residential street may tie into an existing residential street if the expected average daily traffic (ADT) from the new development will exceed the allowable ADT level for the existing street classification.

Section 22-813.5 of the Subdivision and Land Development Ordinance requires specific Cartway provisions. The cartway width shall be increased by eight feet where on-street parking is provided along one side of the street and by 16 feet where on-street parking is provided along two sides of the street. In addition to the required off-street parking, on-street parking shall be provided along both sides of residential streets where any lot is less than 20,000 square feet in area or any lot width is less than 100 feet.

The Applicant requests that 5' wide sidewalks be permitted, where 4' wide sidewalks are required; requests that 5.5' wide verges be permitted, where 4' wide verges are required; requests that the design of Road Type A/B be permitted to contain two 11' wide Travel Lanes, two 8' wide Parking Lanes, two 5.5' wide Verges, and two 5' wide Sidewalks. Additionally, the Applicant requests that the design of Road Type C be permitted to contain two 15' wide Travel Lanes, two 5.5' wide Verges, and two 5' wide Sidewalks.

- 10.6 Section 22-818.3 of the Subdivision and Land Development Ordinance requires Intersection Spacing. Proposed streets which intersect opposite sides of another street (either existing or proposed) shall be laid out to intersect directly opposite each other, or at the discretion of the Board of Supervisors, with a minimum offset or spacing measured from center line to center line as specified below:

- a. Major Collector – 300 feet
- b. Minor Collector – 125 feet
- c. Local (Minor) Road – 125 feet

The Applicant requests that proposed Boulevard Entrance (Road C be permitted to contain a segment from Reifsnyder Road to its first intersection which is 267-feet, where 300-feet is required.

- 10.7 Section 22-822.1 of the Subdivision and Land Development Ordinance requires that sidewalks be provided along both sides of existing and new streets in the R-25, R-15, CB-1, CB-2 and LI zoning districts. The Applicant may request a waiver of this requirement for residential subdivisions where all lots are one acre or larger in areas or in those subdivisions and developments where a pedestrian path system or a bicycle path system is provided which serves the same purpose as a sidewalk system, subject to approval of the Board of Supervisors. The Applicant requests that no sidewalks be required along Reifsnyder Road, Lutheran Road, or Swamp Picnic Road. The Plans indicate that an eight-foot-wide paved path is provided along Lutheran Road between the northern development boundary and the Merkel property (UPI 47-48-2), sidewalks and paved trails are not provided along Swamp Picnic Road, and sidewalks and paved trails are not provided along Reifsnyder Road, where some trails were previously provided. The Plans propose sidewalks along both sides of the entire internal roadway system. The Township should determine whether the proposed sidewalk and paved path layout is acceptable.

With the recent revisions to the Reifsnyder Road widening design and the removal of a significant percentage of the existing vegetation between Lots 32 and 48, the Township may wish to consider requiring the installation of an 8' wide pedestrian path along Reifsnyder Road between Road C and Swamp Picnic Road, with a connection to the internal roadway system in the area of Lot 33 through Lot 38. (8/5/2025)

- 10.8 The Applicant has grouped Section 21-241.1 and Section 21-241.2 of the Subdivision and Land Development Ordinance into one Waiver Request. We have separated each Section in an attempt to provide further clarity and provide our comments as follows:

Section 21-241.1 of the Subdivision and Land Development Ordinance requires that all curbs and sidewalks as well as all driveways over sidewalks be constructed of monolithic concrete. Said concrete shall develop a compressive strength of 3,500 pounds per square inch (psi) in 28 days. Certification of the concrete mix shall be furnished if required by the Board of Supervisors of the Township of New Hanover. The Applicant is requesting permission to utilize Belgium block curb blocks in lieu of monolithic concrete.

Section 21-241.2 of the Subdivision and Land Development Ordinance requires curbs be made to the following specifications: The curbs shall have a depth of not less than 18 inches and shall be eight inches thick at the base and seven inches thick at the top. Curbs shall be constructed with an eight-inch reveal and shall rest on a compacted bed of AASHTO No. 57 (PADOT 2B) crushed stone of a depth of not less than four inches. At a minimum, the Plans being prepared to provide a suitable Belgium Block Curb Detail and that all Plans and detail sheets being revised to provide the appropriate curb indications.

The Waiver Request Letter shall be updated to reference accurate SALDO Sections. (1/30/2026)

- 10.9 Section 23-302.2.B.19 of the Subdivision and Land Development Ordinance requires a twenty-foot-wide access easement around all stormwater management facilities that would provide ingress to and egress from a public right-of way. The Applicant is offering a Blanket Easement to the Township which would provide access to all private stormwater management facilities, limited to Common Areas. All maintenance responsibilities are proposed to be the sole responsibility of a “professionally managed HOA”. If the Township is to consider this waiver request, we would recommend the following changes to the plans to ensure that the blanket easement sufficiently provides access to and protection of the stormwater management facilities:

- a. All basin improvements (basin berm to toe of slope, emergency spillways, 100-year water surface, etc.) shall be set at least 5 feet from individual lots to allow for maintenance activities to be performed without encroaching onto private lands.
- b. Revise the Record Plan Sheets to identify the 100-year water surface of all Stormwater Management Facilities.
- c. Revise the Record Plan and Grading Plans to identify the location of the proposed maintenance access path from the public right-of-way to all portions of the stormwater management facilities, including any required curb depression, driveway aprons, stabilized access paths, access gates, etc.
- d. Provide verification that all basins can be accessed without further encroachment into wetlands, floodplains, floodplain soils, woodlands, or other protected natural resources.

- 10.10 *Section 23-410.12 of the Subdivision and Land Development requires storm sewer pipes other than those used as roof drains, detention basin underdrains, and street subbase under-drains, to have a minimum diameter of 15 inches and be made of reinforced concrete pipe. Where installation conditions merit, structural calculations that address the actual design requirements will be required. The Applicant has requested a partial waiver to allow for the diameter of the proposed outlet pipe of Basin #1 to be 12” so that it can connect directly into an existing 12” pipe. It shall be noted that the submitted Requested Waivers table indicates Basin #10, while it appears that Basin #1 is proposed to contain a 12” outlet pipe. (8/4/2025)*

The Waiver Request Letter shall be updated to identify the correct Basin number and to clarify whether this request, as written, is still required. The revised plans now propose a 15” HDPE Pipe that is proposed for Detention Basin 1. (1/30/2026)

V. INDIVIDUAL PLAN SHEET COMMENTS

1.0 SHEET 1 OF 124 – TITLE SHEET

2.0 SHEET 2 OF 124 – OVERALL SUBDIVISION/RECORD PLAN

- 2.14 *The Requested Waivers table shall be revised to identify an accurate number of single family homes being proposed within the submitted Plans. Similarly, the table shall be revised to reflect the information identified within the submitted Waiver Request Letter. For example, the Waiver Request/Justification for Request #5 indicates that an 8' landscaped median is proposed for Road Type C. However, the revised Plans no longer propose an 8' landscaped median. (1/30/2026)*

3.0 SHEET 3 OF 124 – OVERALL SUBDIVISION/RECORD PLAN

- 3.7 The Plan fails to provide a consistent calculation of the required and proposed parking for the community. The Plans indicate under “Additional Performance Standard Development Data” that 110 On-Street Parking spaces are provided. However, the plans fail to provide any on-street parking and General Note #3 on this plan sheet indicates that on-street parking is prohibited. (§ 22-813.5)

General Note #3 has been revised to indicate that on-street parking is permitted except on Road ‘A’ and that the developer shall be responsible for installation of all signage deemed necessary by New Hanover Township. In order to confirm the proposed number of on-street parking spaces, the Plans shall be revised to identify (via line stripping for Plan reference only, not to be constructed) the on-street parking spaces along proposed Road’s ‘B’ and ‘C’. (§ 22-813.5) (10/11/2023)

While the total required parking spaces (399 spaces) have been provided (3 off-street parking spaces provided per unit – 177 units x 3 spaces = 531 total off-street parking spaces), the Plans must still be prepared to verify that total identified on-street parking spaces (615) have been provided. While we understand the design engineer’s methodology of calculating the total provided on-street parking spaces, we contend that a number of those spaces cannot be provided due to the expected firefighting apparatus/large truck turning movements, fire hydrants, sight distance issues, etc. Therefore, the Stripping, Signage, and Circulation Plans (Sheets 30-38) shall be revised to identify (not to be constructed) the on-street parking spaces along all proposed Roads and provide the required signage/stripping to prohibit on-street parking where necessary. (2/14/2025)

The Stripping, Signage, and Circulation Plans (Sheets 29-38) continue to fail to identify the proposed on-street parking spaces. (8/4/2025)

While we understand the design engineer’s methodology of calculating the total provided on-street parking spaces, we contend that a number of those spaces cannot be provided due to the expected firefighting apparatus/large truck turning movements, fire hydrants, sight distance issues, etc. Therefore, the Stripping, Signage, and Circulation Plans (Sheets 29-38) shall be revised to identify (not to be constructed) the on-street parking spaces along all proposed Roads and provide the required signage/stripping to prohibit on-street parking where necessary. (1/30/2026)

- 3.17 *The Overall Subdivision/Record Plan shall be revised to contain a table that is consistent with the impervious surface drainage area tables provided in the Stormwater Management Report (pages 5 through 21), noting the maximum impervious surface area that is permitted to be constructed on each lot. Additionally, General Note No. 4 and No. 54 shall be combined and simplified to indicate that each development lot has been designed to allow the impervious surface area identified in the aforementioned table. It is strongly recommended that no additional impervious surface area be permitted beyond those amounts noted in the requested table, as no additional area will be available on each lot for additional stormwater controls to be provided which meet the objectives of the Stormwater Ordinance. Small, inefficient, and maintenance-intensive on-lot systems should be prohibited. (8/4/2025)*

While General Note No. 4 has been combined with the previous note (No. 54), the note shall be revised based on the proposed maximum impervious surfaces for each Lot used within the SWM Report

(allowance of 4,800 SF for Lot sizes of 15,000 SF and 6,800 SF for Lot sizes of 25,000 SF). (1/30/2026)

4.0 SHEET 4 OF 124 PARCEL CONSOLIDATION PLAN – NO COMMENTS AT THIS TIME

5.0 SHEET 5 OF 124 – DRAFT LAYOUT – NO COMMENTS AT THIS TIME

6.0 SHEET 6 OF 124 – FEMA MAP – NO COMMENTS AT THIS TIME

7.0 SHEET 7 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

8.0 SHEET 8 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

8.12 The Plan fails to identify the Tree Protection Zone. (§22-825.1.J)

The Plan continues to fail to identify the Tree Protection Zone as required by § 22-825.1.J. (10/11/2023)

While the Plan identifies the Tree Protection Zone and drip line of existing vegetation, the Tree Protection Zone, on multiple occasions, encroaches within 15' of the trunks of trees designated to be retained and/or within the drip line. The Tree Protection Zone shall be revised to adhere to the requirements of §22-921.1. (2/14/2025)

The Limit of Disturbance/Tree Protection Fence/Tree Protection Zone continues to fail to adhere to the requirements of §22-921.1. The Limit of Disturbance shall be revised to include the proposed 15" RCP extension from proposed manhole M12 and the associated D-W Endwall and rip-rap apron. The Limit of Disturbance shall be revised to include the existing irrigation system components proposed to be removed. (1/30/2026)

8.13 The Plan fails to adequately identify the drip line of all trees to be saved. The Plan has been prepared using standard tree symbols that do not accurately represent the dripline and the resulting, required Tree Protection Area specified in § 22-921.1, which requires the tree protection area to 15 feet from the trunk of the tree to be retained or the distance from the trunk to the drip line, whichever is greater. (§22-921.2)

While the Plan identifies the Tree Protection Zone and drip line of existing vegetation, the Tree Protection Zone, on multiple occasions, encroaches within 15' of the trunks of trees designated to be retained and/or within the drip line. The Tree Protection Zone shall be revised to adhere to the requirements of §22-921.1. (02/14/2025)

The Plans (Sheets 8 through 17) have been revised to provide a note which indicates "All trees where the limit of disturbance encroaches in the driplines must be evaluated by a qualified specialist along with the Township Engineer to determine if the tree can be saved or needs to be removed". The Applicant's consultants shall prepare a plan and supplemental reports that verify the disposition of all existing mature trees for the Township's review. As noted in our review of the submitted Rockwell Tree Inventory, the inventory shall be revised to clearly indicate which mature trees are "To be Removed", "To be Disturbed, but not Removed", and "To be Preserved" in order to determine whether the site meets the Natural Resource Protection standards and whether the existing trees can be used to meet the buffer requirements along the perimeter of the site. If a tree is not fully protected per the Tree Protection Standards, it shall not be considered as "preserved" and shall not be used in accordance with §22-829.2.A.

Finally, in order to provide a plan set that is readable, the "Existing Resource, Demolition & Site Analysis Map/PCSMP Plans" shall be prepared to clearly indicate which mature trees are "To be Removed" and which are to be preserved (both disturbed but not removed and preserved). Once a tree is noted for removal from the "Existing Resource, Demolition & Site Analysis Map/PCSMP Plan" (and noted as such in the tree inventory and Mature Tree Data), the tree should not appear on other plan sheets in the plan set. Trees to be removed can be simply crossed out with a black "X". Trees that are "To be Disturbed, but not Removed" should be shaded to differentiate those trees from the "To be Preserved" trees. (8/4/2025)

The previously submitted Urban Forest Review and Investigation dated November 4, 2023 has not been revised nor resubmitted, and the Tree Inventory and the Plans have not been revised based on our

above comments. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

The above comment applies to all Existing Resource, Demolition, & Site Analysis Map/PCSMP Plans. (8/4/2025) (1/30/2026)

9.0 SHEET 9 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

9.1 *The design engineer shall verify the design intent of the existing headwall (HW) to the rear of proposed Lot 2. The Applicant has indicated in their response under a separate comment that the HW is to be removed. However, the Plans do not identify this structure as to be removed. (1/30/2026)*

10.0 SHEET 10 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

11.0 SHEET 11 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

12.0 SHEET 12 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

12.7 *The landscape consultant (Rockwell) shall verify that the existing trees located along the development boundary near Minister Creek, which are not located on the parcels being considered for development with this application, have not been included in the tree inventory or resource protection calculations. It is suggested that all off-site trees be hatched or provided with a different tree symbol to ensure that the plans are clearly prepared. (§22-305.3.U) (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The previously submitted Urban Forest Review and Investigation dated November 4, 2023 has not been revised nor resubmitted, and the Tree Inventory and the Existing Resource, Demolition & Site Analysis Map/PCSMP have not been revised based on our above comments. (1/30/2026)

13.0 SHEET 13 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

14.0 SHEET 14 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

15.0 SHEET 15 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

16.0 SHEET 16 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

17.0 SHEET 17 OF 124 – EXISTING RESOURCE, DEMOLITION, & SITE ANALYSIS MAP/PCSMP

18.0 SHEET 18 OF 124 – SUBDIVISION/RECORD PLAN (OVERALL)

18.5 *The Plan has been prepared to identify the proposed waivers requested by the Applicant. In conjunction with the Applicant’s request of §23-302.2.B.19 (Defined Easement vs. Blanket Easement) for Stormwater Management Facilities, the Applicant has also apparently included in the “Blanket Easement” concept the easements over proposed storm sewer, the proposed “Stream Easement”, the Riparian Buffer, clear sight triangle easement, and an easement over the Pedestrian Trails through the Open Space (which are offered for dedication to the Township per General Note 35). Future submissions of the Subdivision/Record Plan shall provide a listing of all uses of the common areas that are to be covered by the suggested blanket easement. The plan shall also include a listing of the required maintenance/prohibitions for each eased area and the entity that is responsible for that maintenance/enforcement of the prohibitions. (§22-804.3, §22-804.5, §22-804.10, and §23-302.2.B.(19). (8/4/2025)*

Future submissions of the Subdivision/Record Plan shall provide a listing of all uses of the common areas that are to be covered by the suggested blanket easement. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

19.0 SHEET 19 OF 124 – SUBDIVISION/RECORD PLAN

- 19.24 The Plan fails to provide the required Type C Buffer Yard along Tax Map 47-047-043, a Place of Worship Use. (§ 22-829.1.A.2)

While the Landscape Plans (Sheets 77-84) have been revised to provide the required Type C Buffer Yard along Tax Map 47-047-043, the Record Plan shall be revised to identify the Type C Buffer Yard area. (2/14/2025)

A 35-foot Type B buffer yard has been identified along TMP #47-047-043. However, when comparing the provided buffer plantings on Sheet 86 of 124, it does not appear that the proposed plantings are entirely contained within the identified buffer yard, mainly because of the placement of the proposed pedestrian path. Either the plan shall be revised to enlarge the protected buffer yard to contain all buffer plantings or the buffer planting design shall be revised to place all proposed plant material into the 35' wide buffer yard. (8/4/2025)

The Applicant has indicated in their response that this issue should be addressed at Final Plan Stage and that the definition of Buffer within the SALDO permits the buffer to be within the required setback and yard areas. If buffer plantings are provided on-lot, the Plans must identify those plantings as "Buffer Plantings" and put them in a buffer yard with the associated restrictions. (1/30/2026)

- 19.25 The Plan shall provide an indication of the proposed Stormwater Management Facility located within the Open Space shown on this plan. (2/14/2025)

While it does not impact the design of the Open Space or SWM Basin #1, the "Limit of the Stormwater Management Area" provided on this plan is not consistent with the Township requirements. The Stormwater Management Area shall include all stormwater improvements including the outlet pipe, the full extent of the emergency spillway lining, the entire basin embankment, and the required 20-foot access easement area around the exterior of the stormwater management facility required by §23-302.2.B.(19). The Limit of the Stormwater Management Area shall be adjusted accordingly. (8/4/2025)

The Plans continue to identify a "Limit of the Stormwater Management Area" that is not consistent with §23-302.2.B.(19). The Applicant has indicated in their response "Will Comply at Final Plan Stage." (1/30/2026)

20.0 SHEET 20 OF 124 – SUBDIVISION/RECORD PLAN

- 20.22 The Plan fails to provide the required Type C Buffer Yard along Tax Map 47-047-043, a Place of Worship Use. (§ 22-829.1.A.2)

While the Landscape Plans (Sheets 77-84) have been revised to provide the required Type C Buffer Yard along Tax Map 47-047-043, the Record Plan shall be revised to identify the Type C Buffer Yard area. (2/14/2025)

A 35-foot Type B buffer yard has been identified along TMP #47-047-043, whereas a Type C is required per the above noted requirement and as noted in the design engineer's response letter. In addition, when comparing the provided buffer plantings on Sheet 86 of 124, it does not appear that the proposed plantings are entirely contained within the identified Type B buffer yard, mainly because of the placement of the proposed pedestrian path. Either the plan shall be revised to enlarge the protected buffer yard to contain all buffer plantings or the buffer planting design shall be revised to place all proposed plant material into the required Type C buffer yard. (8/4/2025)

The Applicant has indicated in their response that this issue should be addressed at Final Plan Stage and that the definition of Buffer within the SALDO permits the buffer to be within the required setback and yard areas. If buffer plantings are provided on-lot, the Plans must identify those plantings as "Buffer Plantings" and put them in a buffer yard with the associated restrictions. (1/30/2026)

- 20.23 The Plan fails to provide the required Type B Buffer Yard (35 feet) along the perimeter of the site where adjoining property or the property across a street is zoned for or in residential use in accordance with § 22-829.1.D. All properties along the northern development boundary are in residential use.

Although the design engineer has indicated that a Type B Buffer Yard has been provided along the northern development boundary, the plans fail to identify the required buffer yard. (8/4/2025)

The Applicant has indicated in their response that this issue should be addressed at Final Plan Stage and that the definition of Buffer within the SALDO permits the buffer to be within the required setback and yard areas. If buffer plantings are provided on-lot, the Plans must identify those plantings as “Buffer Plantings” and put them in a buffer yard with the associated restrictions. (1/30/2026)

- 20.24 The Plan shall provide an indication of the proposed Stormwater Management Facility located within the Open Space shown on this plan. (2/14/2025)

While it does not impact the design of the Open Space or SWM Basin #1, the “Limit of the Stormwater Management Area” provided on this plan is not consistent with the Township requirements. The Stormwater Management Area shall include all stormwater improvements including the outlet pipe, the full extent of the emergency spillway lining, the entire basin embankment, and the required 20-foot access easement area around the exterior of the stormwater management facility required by §23-302.2.B.(19). The Limit of the Stormwater Management Area shall be adjusted accordingly. (8/4/2025)

The Plans continue to identify a “Limit of the Stormwater Management Area” that is not consistent with §23-302.2.B.(19). The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 20.27 The Plan fails to provide a drainage easement for the existing headwall (HW) located on Lot 2, adjacent to the Lot 1/Lot 2/ Open Space A property corner, which is not shown to be removed on the Existing Resource, Demotion & Site Analysis Map/PCSMF Plan (Sheet 9 of 124). The intent and necessity of this headwall shall be confirmed by the design engineer and the plans revised accordingly. (8/4/2025)

While the Applicant has indicated in their response that the existing headwall (HW) has been removed from the Open Space Area as it is not part of the SWM design, the Existing Resource, Demotion & Site Analysis Map/PCSMF Plan (Sheet 9 of 124) continues to fail to identify this HW is proposed to be removed. (1/30/2026)

21.0 SHEET 21 OF 124 – SUBDIVISION/RECORD PLAN

- 21.5 The Plan shall provide an indication of the proposed Stormwater Management Facility located within the Open Space shown on this plan. (2/14/2025)

While it does not impact the design of the Open Space or SWM Basin #10, the “Limit of the Stormwater Management Area” provided on this plan is not consistent with the Township requirements. The Stormwater Management Area shall include all stormwater improvements including the outlet pipe, the full extent of the emergency spillway lining, the spray irrigation pump facilities, the entire basin embankment, and the required 20-foot access easement area around the exterior of the stormwater management facility required by §23-302.2.B.(19). The Limit of the Stormwater Management Area shall be adjusted accordingly.

Furthermore, the Plan fails to identify the newly proposed irrigation zones provided on the Aqua Mist Irrigation Plans, as recently amended. While the plans do not need to provide the spray heads and the irrigation piping, the Subdivision Plan shall identify the extent of each of the spray zones to clarify location of the irrigation areas. (8/4/2025)

The Plans continue to identify a “Limit of the Stormwater Management Area” that is not consistent with §23-302.2.B.(19). Furthermore, the Plans continue to fail to identify the newly proposed irrigation zones provided on the Aqua Mist Irrigation Plans. The Applicant has indicated in their response “Will

Comply at Final Plan Stage.” (1/30/2026)

- 21.8 *The Plan shall be revised to clarify if SWM Basin #10 is intended to be a wet pond/storage lagoon for the proposed stormwater irrigation system or if it is intended to be a standard stormwater facility. If the facility is intended to retain stormwater for more than 72 hours, the basin shall be fenced off from the adjacent residential areas. Any proposed basin fencing shall be shown on the Subdivision/Record Plans. (8/4/2025)*

The Applicant has indicated in their response that SWM Basin #10 is proposed as a Wet Pond and that a fence has been proposed around the perimeter of the Basin. However, the Subdivision/Record Plan continues to fail to identify the required fence. It is noted that a gate along the required maintenance/spray irrigation components access will be required. (1/30/2026)

22.0 SHEET 22 OF 124 – SUBDIVISION/RECORD PLAN

- 22.7 *The Plan fails to provide the required Type B Buffer Yard (35 feet) along the perimeter of the site where adjoining property is zoned for or in residential use in accordance with § 22-829.1.D. All properties along the northern development boundary are in residential use.*

Although the design engineer has indicated that a Type B Buffer Yard has been provided along the northern development boundary, the plans fail to identify the required buffer yard. (8/4/2025)

While the Plan has been revised to identify the required Type B 35-foot Buffer Yard along the northern development boundary, the Applicant has indicated in their response that this issue should be addressed at Final Plan Stage and that the definition of Buffer within the SALDO permits the buffer to be within the required setback and yard areas. If buffer plantings are provided on-lot, the Plans must identify those plantings as “Buffer Plantings” and put them in a buffer yard with the associated restrictions. (1/30/2026)

- 22.11 *The Plan shall identify Open Space A to the rear of Lots 8 through 19, and Lot 174 – Common Area along Lot 129, Lot 141, and Lot 142 (8/4/2025)*

The Plan continues to fail to identify Open Space A to the rear of Lots 8 through 19, and Lot 174 – Common Area along Lot 129, Lot 141, and Lot 142. The Applicant has indicated in their response that when the Open Space Management Plan is designed and provided, all areas will be labeled appropriately with all responsibility clearly listed within that Plan. (1/30/2026)

- 22.15 *The Plan shall be revised to clarify if SWM Basin #10 is intended to be a wet pond/storage lagoon for the proposed stormwater irrigation system or if it is intended to be a standard stormwater facility. If the facility is intended to retain stormwater for more than 72 hours, the basin shall be fenced off from the adjacent residential areas. Any proposed basin fencing shall be shown on the Subdivision/Record Plans. (8/4/2025)*

The Applicant has indicated in their response that SWM Basin #10 is proposed as a Wet Pond and that a fence has been proposed around the perimeter of the Basin. However, the Subdivision/Record Plan continues to fail to identify the required fence. It is noted that a gate along the required maintenance/spray irrigation components access will be required. (1/30/2026)

23.0 SHEET 23 OF 124 – SUBDIVISION/RECORD PLAN

- 23.17 *The Plan shall provide an indication of the proposed Stormwater Management Facility located within the Open Space shown on this plan. (2/14/2025)*

While it does not impact the design of the Common Area, SWM Basin #7 or SWM Basin #10, the “Limit of the Stormwater Management Area” provided on this plan is not consistent with the Township requirements. The Stormwater Management Area shall include all stormwater improvements including

the outlet pipe, the full extent of the emergency spillway lining, the spray irrigation pump facilities, the entire basin embankment, and the required 20-foot access easement area around the exterior of the stormwater management facility required by §23-302.2.B.(19). The Limit of the Stormwater Management Area shall be adjusted accordingly.

Furthermore, the Plan fails to identify the newly proposed irrigation zones provided on the Aqua Mist Irrigation Plans, as recently amended. While the plans do not need to provide the spray heads and the irrigation piping, the Subdivision Plan shall identify the extent of each of the spray zones to clarify location of the irrigation areas. (8/4/2025)

The Plans continue to identify a “Limit of the Stormwater Management Area” that is not consistent with §23-302.2.B.(19). Furthermore, the Plans continue to fail to identify the newly proposed irrigation zones provided on the Aqua Mist Irrigation Plans. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 23.18 *The Plan fails to provide a concrete monument at each change of direction along the Lot 178 Common Area boundary with Lots 120 through 128. (§22-908.1) (8/4/2025)*

The Plan continues to fail to provide a concrete monument at the change of direction of the Lot 178 Common area between Lots 122 and 123. (1/30/2026)

24.0 SHEET 24 OF 124 – SUBDIVISION/RECORD PLAN

- 24.7 *The Plan shall be revised to identify the area between Lots 27 and 28. It appears that the area is considered as part of Open Space B. However, the inclusion of a bearing and distance (S77°39'45"W – 20.00'), it would appear that an easement (likely storm sewer) is proposed. This area shall be identified on the plans. (§22-911.2) (2/14/2025)*

The Plan has been revised to identify the proposed 20' Wide Trail Easement. However, the Plan fails to provide the associated bearings and distances. (8/4/2025)

While the Plan continues to fail to identify the bearing and distances for the 20' Wide Trail Easement, the Township should provide the Applicant with direction for the proposed trail connection to Swamp Picnic Road. The Applicant has indicated in their response that they are agreeable to provide a paved trail in this location. (1/30/2026)

- 24.8 *The Plan shall provide an indication of the proposed Stormwater Management Facility located within the Open Space shown on this plan. (2/14/2025)*

While it does not impact the design of the Open Space or SWM Basin #12, the “Limit of the Stormwater Management Area” provided on this plan is not consistent with the Township requirements. The Stormwater Management Area shall include all stormwater improvements including the outlet pipe, the full extent of the emergency spillway lining, the entire basin embankment, and the required 20-foot access easement area around the exterior of the stormwater management facility required by §23-302.2.B.(19). The Limit of the Stormwater Management Area shall be adjusted accordingly. (8/4/2025)

The Plans continue to identify a “Limit of the Stormwater Management Area” that is not consistent with §23-302.2.B.(19). The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 24.9 *The Plan fails to provide the required Type B Buffer Yard (35 feet) along the perimeter of the site where adjoining property is zoned for or in residential use in accordance with § 22-829.1.D. All properties along the northern development boundary are in residential use.*

Although the design engineer has indicated that a Type B Buffer Yard has been provided along the northern development boundary, the plans fail to identify the required buffer yard. (8/4/2025)

While the Plan has been revised to identify the required Type B 35-foot Buffer Yard along the northern development boundary, the Applicant has indicated in their response that this issue should be addressed at Final Plan Stage and that the definition of Buffer within the SALDO permits the buffer to be within the required setback and yard areas. If buffer plantings are provided on-lot, the Plans must identify those plantings as “Buffer Plantings” and put them in a buffer yard with the associated restrictions. (1/30/2026)

- 24.9 *The Plan fails to provide a concrete monument at each change of direction along the Open Space A boundary with Lot 23 through Lot 31. (§22-908.1) (8/4/2025)*

The Plan continues to fail to provide a concrete monument at each change of direction along the Open Space A boundary with Lot 26. (1/30/2026)

25.0 SHEET 25 OF 124 – SUBDIVISION/RECORD PLAN

- 25.14 *The Plan shall provide an indication of the proposed Stormwater Management Facility located within the Open Space shown on this plan. (2/14/2025)*

While it does not impact the design of the Open Space or SWM Basin #12, the “Limit of the Stormwater Management Area” provided on this plan is not consistent with the Township requirements. The Stormwater Management Area shall include all stormwater improvements including the outlet pipe, the full extent of the emergency spillway lining, the entire basin embankment, and the required 20-foot access easement area around the exterior of the stormwater management facility required by §23-302.2.B.(19). The Limit of the Stormwater Management Area shall be adjusted accordingly. (8/4/2025)

The Plans continue to identify a “Limit of the Stormwater Management Area” that is not consistent with §23-302.2.B.(19). The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 25.15 *The 20’ Wide Storm Sewer Easement between Lots 35 and 36 shall be expanded to include an access easement to SWM Basin #13. §23-302.2.B.(19) (8/5/2025)*

The Applicant has indicated in their response that the Engineer has verified the line. However, the Plans continue to propose only a 20’ Wide Storm Sewer and Basin Access Easement. (1/30/2026)

- 25.11 *The Plan fails to provide a concrete monument at each change of direction along the Open Space D boundary with Lot 56 through Lot 62. (§22-908.1) (8/4/2025)*

The Plan continues to fail to provide a concrete monument at each change of direction along the Open Space D boundary with Lot 60/61. (1/30/2026)

- 25.12 *The Plan fails to provide a lot line between Open Space D and Open Space F to the rear of Lot 58. The Plan shall also identify the area of Open Space F. (8/4/2025).*

The Plan continues to fail to provide a lot line to separate Open Space F from Open Space D. The design engineer shall verify the proposed extents of each Open Space and revise the Plan accordingly. (1/30/2026)

- 25.13 *The Plan fails to provide the required Type B Buffer Yard (35 feet) along the perimeter of the site where adjoining property or the property across a street is zoned for or in residential use in accordance with § 22-829.1.D. The provided Open Space along the rear of Lots 30 through 33 fail to provide sufficient width to allow for the installation of the required buffer plantings along Swamp Picnic Road. In fact, the Landscaping Plans indicate that the proposed buffer plantings on the rear of Lots 32, 33, and 34 are proposed to be placed on the rear of the aforementioned lots and not in the Open Space, where the buffer yard is required to be provided. (8/4/2025)*

- 25.16 ***While the Plan has been revised to identify the required Type B 35-foot Buffer Yard along the northern development boundary, the Applicant has indicated in their response that this issue should be addressed***
- 25.16

25.16 *at Final Plan Stage and that the definition of Buffer within the SALDO permits the buffer to be within*
25.16 *the required setback and yard areas. If buffer plantings are provided on-lot, the Plans must identify*
25.16 *those plantings as "Buffer Plantings" and put them in a buffer yard with the associated restrictions.*
25.16 *(1/30/2026)*

26.0 SHEET 26 OF 124 – SUBDIVISION/RECORD PLAN

26.10 *The Plan shall provide an indication of the proposed Stormwater Management Facility located within the Open Space shown on this plan. (2/14/2025)*

While it does not impact the design of the Lot 178 - Common Area, SWM Basin # 3 or SWM Basin #7, the "Limit of the Stormwater Management Area" provided on this plan is not consistent with the Township requirements. The Stormwater Management Area shall include all stormwater improvements including the outlet pipe, the full extent of the emergency spillway lining, the entire basin embankment, and the required 20-foot access easement area around the exterior of the stormwater management facility required by §23-302.2.B.(19). The Limit of the Stormwater Management Area shall be adjusted accordingly. (8/4/2025)

The Plans continue to identify a "Limit of the Stormwater Management Area" that is not consistent with §23-302.2.B.(19). The Applicant has indicated in their response "Will Comply at Final Plan Stage." (1/30/2026)

27.0 SHEET 27 OF 124 – SUBDIVISION/RECORD PLAN – NO COMMENTS AT THIS TIME

28.0 SHEET 28 OF 124 – SUBDIVISION/RECORD PLAN – NO COMMENTS AT THIS TIME

29.0 SHEET 29 OF 124 – OVERALL STRIPING, SIGNAGE & CIRCULATION PLAN

30.0 SHEET 30 OF 124 – STRIPING, SIGNAGE & CIRCULATION PLAN

30.5 *Additional advance warning signs shall be provided for the Raised Intersections proposed at the Road A and Road B intersection. (8/4/2025)*

The Applicant has indicated in their response that additional warning signs have been placed in the Road A & B intersection area. However, the Plans fail to identify the sign location or type. (1/30/2026)

31.0 SHEET 31 OF 124 – STRIPING, SIGNAGE & CIRCULATION PLAN – NO COMMENTS

32.0 SHEET 32 OF 124 – STRIPING, SIGNAGE & CIRCULATION PLAN – NO COMMENTS

33.0 SHEET 33 OF 124 – STRIPING, SIGNAGE & CIRCULATION PLAN – NO COMMENTS

34.0 SHEET 34 OF 124 – STRIPING, SIGNAGE & CIRCULATION PLAN

34.4 *Additional advance warning signs shall be provided for the Raised Intersections proposed at the Road A and Road B intersection. (8/4/2025)*

The Applicant has indicated in their response that additional warning signs have been placed in the Road A & B intersection area. However, the Plans fail to identify the sign location or type. (1/30/2026)

35.0 SHEET 35 OF 124 – STRIPING, SIGNAGE & CIRCULATION PLAN – NO COMMENTS

36.0 SHEET 36 OF 124 – STRIPING, SIGNAGE & CIRCULATION PLAN

36.5 *The Plan fails to provide replacement line striping at the intersection of Swamp Picnic Road and Reifsnnyder Road in the area of the proposed storm sewer improvements and the widening/wearing course overlay of Reifsnnyder Road. (§22-305.3.U) (8/4/2025)*

37.0 SHEET 37 OF 124 – STRIPING, SIGNAGE & CIRCULATION PLAN – NO COMMENTS

38.0 SHEET 38 OF 124 – STRIPING, SIGNAGE & CIRCULATION PLAN – NO COMMENTS

39.0 SHEET 39 OF 124 – OVERALL GRADING PLAN – NO COMMENTS AT THIS TIME

40.0 SHEET 40 OF 124 – GRADING PLAN

- 40.5 The Plan fails to provide spot elevations at appropriate locations along all residential driveways to confirm that all driveways have been designed as to provide a reasonable sight distance at intersections with stopping space, not to exceed a 4%, 20 feet behind the right-of-way line. (§ 22-817.1.C)

The Applicants response indicates that the Applicant will provide spot elevations at appropriate locations along all residential driveways to confirm that all driveways have been designed as to provide reasonable sight distance at intersections with stopping space not to exceed 4%, 20 feet behind right-of-way line at the time of final plan approval. (10/11/2023)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Applicant has also indicated in their response that they believe General Notes No. 60 and 61 (Sheet 3), which require the submission and approval of Plot Plans for each Lot prior to issuance of building permits, are a better way to handle the requirements of § 22-817.1.C. Generally, we would support this approach with the understanding that the General Notes shall be revised to indicate that the driveway slope must meet the design requirements listed above, that the plan details shall contain a detail showing a typical house meeting the slope requirements, and an acknowledgement from the developer that any areas that are clearly in violation of the ordinance will be addressed prior to final plan approval. (1/30/2026)

- 40.8 *With the proposed continued use of the existing 12” HDPE Pipe that discharges directly into the existing Minister Creek channel, the design engineer shall provide photographs of this discharge location and any appropriate improvements (without impacting the floodway) to ensure that erosion is not created by the proposed improvements (e.g., energy dissipator). The Plans shall be revised to provide specific notation that verifies that no impacts to the floodway are proposed and that all areas disturbed during the installation of the erosion control facility will be stabilized immediately and the access to the discharge location sealed from further disturbance. If the existing pipe discharge does not provide an appropriately sized energy dissipator, the plans shall be revised to provide a detailed grading plan that removes a section of the existing pipe and regrades the area to ensure that no impacts to the floodway are created by the installation of an energy dissipator. (§23-410.21) (2/14/2025)*

The Applicant’s design engineer has provided photographs of the existing 12” HDPE pipe discharge. However, the Plans have not been revised to provide any specific notation that verifies that no impacts to the floodway are proposed and that all areas disturbed during the installation of the erosion control facility will be stabilized immediately and the access to the discharge location sealed from further disturbance. If the existing pipe discharge does not provide an appropriately sized energy dissipator, the plans shall be revised to provide a detailed grading plan that removes a section of the existing pipe and regrades the area to ensure that no impacts to the floodway are created by the installation of an energy dissipator. (8/4/2025)

The Plans continue to fail to provide any specific notation that verifies that no impacts to the floodway are proposed and that all areas disturbed during the installation of the erosion control facility will be stabilized immediately and the access to the discharge location sealed from further disturbance. The Applicant has indicated in their response that the detail has been revised to include energy dissipater. However, Plans fail to include an identification number for the proposed D-W Endwall to correspond with endwall numbers within the Standard Construction Detail #9-1 (Sheet 106). (1/30/2026)

- 40.13 *The Plan shall be revised to identify the Open Space A lot. (8/4/2025)*

The Plan has been revised to provide a label for Open Space A. However, the identified area within the label is difficult to read and shall be revised to be clearly legible. (1/30/2026)

- 40.15 *The Plan shall verify that an adequate conveyance exists from EW17 to the natural outfall. If an adequate channel does not exist, a level spreader shall be provided to ensure that the concentrated discharge is returned to sheet flow before it is directed to Minister Creek. (§23-410.20)*

The Plan has been revised to propose a plunge pool/level spread downstream EW17. However, we are concerned with proximity of the proposed plunge pool/level spreader to the adjacent existing dwelling. A detail of the proposed plunge pool/level spreader shall be provided and referenced within the callout on this Plan Sheet. (1/30/2026)

- 40.16 *The proposed paved walkway around SWM Basin #1 shall terminate at the proposed Road A sidewalk and not at the edge of the road. (8/4/2025)*

The Plan has been revised to remove the portion of paved walkway between the sidewalk and Road A near the entrance to Lutheran Road. However, the Plan identifies proposed depressed curb in this area, when no crosswalk of curb ramp is proposed. The design engineer shall verify the proposed depressed curb in this area and revise the Plan accordingly. (1/30/2026)

- 40.17 *The Plan shall be revised to show the proposed Lutheran Road widening (both sides per detail), 2' shoulders and full width overlay. All proposed improvements shall be contained within the limit of disturbance line. (8/4/2025)*

The Plan continues to fail to show the required full width overlay of Lutheran Road. The Applicant has indicated in their response "Will Comply at Final Plan Stage." (1/30/2026)

- 40.18 *The design engineer shall verify if a double inlet is proposed for IN-110 within Road A. The Plan shall be revised accordingly. (1/30/2026)*

- 40.19 *The plan shall be revised to clearly identify the proposed sprinkler heads that are to be removed or abandoned. (1/30/2026)*

- 40.20 *Additional contour information is required to complete the grading around headwall proposed upstream of Inlet 111. (1/30/2026)*

- 40.21 *The Limit of disturbance line and fence from inlet M12 to the existing endwall (to be replaced) shall be shown around the proposed pipe. (1/30/2026)*

- 40.22 *The proposed headwall upstream of Inlet 111 and the existing endwall downstream of Manhole M12 shall be provided with a structure number. (1/30/2026)*

- 40.23 *The grading between the new endwall downstream of Manhole M12 and the existing stream shall be shown, including any proposed energy dissipator, swale liner, or other improvement to stabilize the transition between the storm sewer and the stream. (1/30/2026)*

41.0 SHEET 41 OF 124 – GRADING PLAN

- 41.14 *The Plan fails to provide spot elevations at appropriate locations along all residential driveways to confirm that all driveways have been designed as to provide a reasonable sight distance at intersections with stopping space, not to exceed a 4%, 20 feet behind the right-of-way line. (§ 22-817.1.C)*

The Applicant's design engineer has indicated in their response that spot elevations at appropriate locations along all residential driveways will be provided at the time of final plan approval. (8/4/2025)

Additional spot elevations shall be provided between EW10 and the limit of disturbance to verify that the endwall can be adequately installed without disturbing the adjacent floodplain soils. (§27-2101.1.B.(1))

The Plan continues to fail to provide additional spot elevations between EW10 and the limit of disturbance to verify that the endwall can be adequately installed without disturbing the adjacent floodplain soils. The Applicant's response does not appear to correspond with the above comment. (1/30/2026)

- 4.11 *The plans continue to fail to provide a spot elevation at the edge of the floodplain soils line where the discharge from the swale downstream of EW10 is intended to cross into the Open Space. The Endwall invert elevation 258.00 is the same elevation that exists at the floodplain boundary, which will create an unacceptable condition at the floodplain boundary line if additional grading is not performed within this protected area. At a minimum, a spot elevation identifying the existing elevation at the point the discharge swale is intended to terminate at the floodplain boundary shall be provided, noting that the swale between the endwall and this spot elevation shall be graded at a minimum of 2% to ensure that standing water is not created after construction is completed. It is also noted that a drainage swale shall be provided over any portion of the swale (up to the 100-year water surface) that extend onto Lots 3 or 4. (8/4/2025)*

The Plans continue to fail to provide additional spot elevations between EW10 and the limit of disturbance. Additionally, the design engineer shall verify the proposed cover over the Basin #2 outlet pipe upstream EW10. (1/30/2026)

- 41.13 Additional contour information (or a spot elevation and flow arrow) shall be provided to the rear of Lots 169 through 171 to clarify the drainage intent. It would appear that a significant amount of runoff is intended to be collected in the area to the rear of the above mentioned lots and conveyed through the small side yard swale between Lots 171 and 172, which is unacceptable. (§23-302.2.B.(9)) (2/14/2025)

The Plans continue to propose small swales within the side yards between Lots 168-172, which is unacceptable. The Applicant has indicated in their response "Will Comply at Final Plan Stage." (1/30/2026)

- 41.16 The design engineer shall verify that adequate cover is provided over the Basin #2 outlet pipe to the rear of Lot 5, where the proposed drainage swale crosses over the pipe. (§22-807.2.G.(6)) (8/4/2025)

While the proposed outlet pipe has been relocated out of the swale, we continue to question if adequate cover has been provided over the Basin #2 outlet pipe. (1/30/2026)

- 41.19 The proposed improvements at the existing Lutheran Road culvert crossing to the north of Lot 177 shall be provided with the pipe size, the invert elevation for the proposed Type D endwall, the missing energy dissipator dimensions, and the drainage swale from the culvert to the existing pond. (8/4/2025)

The Applicant has indicated that the required improvements will be shown during the NPDES Approval process. The Plans continue to fail to identify the proposed improvements at the existing Lutheran Road culvert crossing to the north of Lot 176. (1/30/2026)

42.0 **SHEET 42 OF 124 – GRADING PLAN**

- 42.14 The Plan fails to provide spot elevations at appropriate locations along all residential driveways to confirm that all driveways have been designed as to provide a reasonable sight distance at intersections with stopping space, not to exceed a 4%, 20 feet behind the right-of-way line. (§ 22-817.1.C)

The design engineer has indicated in their response that spot elevations at appropriate locations along all residential driveways will be provided at the time of final plan approval. (2/14/2025)

The Applicant has indicated in their response "Will Comply at Final Plan Stage." The Applicant has also indicated in their response that they believe General Notes No. 60 and 61 (Sheet 3), which require the submission and approval of Plot Plans for each Lot prior to issuance of building permits, are a better way to handle the requirements of § 22-817.1.C. Generally, we would support this approach with the understanding that the General Notes shall be revised to indicate that the driveway slope must meet the design requirements listed above, that the plan details shall contain a detail showing a typical house meeting the slope requirements, and an acknowledgement from the developer that any areas that are clearly in violation of the ordinance will be addressed prior to final plan approval. (1/30/2026)

- 42.6 *Additional contour information (or a spot elevation and flow arrow) shall be provided to the rear of Lots 143 and 144 to clarify the drainage intent, which is for this area to be conveyed into SWM Basin #10. (§23-302.2.B.(9)) (2/14/2025)*

The Applicant's design engineer has indicated in their response that additional spot elevations have been provided. However, the Plan continues to fail to provide additional contour information or spot elevations and flow arrows) to the rear of Lots 143 and 144 to clarify the drainage intent. (8/4/2025)

The Plan continues to fail to provide additional contour information or spot elevations and flow arrows to the rear of Lots 143 and 144 to clarify the drainage intent. If the intent is to convey runoff from the rear/side of Lot 143 to Basin #10, additional contour lines or spot elevations shall be added to show the drainage intent. (1/30/2026)

- 42.8 *The Plan shall be revised to provide a curb depression, driveway apron and stabilized access from Road B to the irrigation control facilities to allow for the routine inspection and maintenance of the irrigation pump facilities (at least twice a year). If an alternative access is preferred through Lot 178, the plans shall clearly show the location of the proposed access route to all stormwater improvements that require inspection and maintenance. (§23-302.2.B.(19)) (8/4/2025)*

The Plan continues to fail to provide a curb depression and driveway apron for the proposed irrigation control facilities along Road B. If an alternative access is preferred through Lot 128, the Plans shall clearly show the location of the proposed access route to all stormwater improvements that require inspection and maintenance. However, the proposed Inlet IN-75 shall be relocated out of the proposed curb depression along Road B for the Basin #10 maintenance access path. (1/30/2026)

- 43.9 *The grading design adjacent to Endwall EW7 shall be clarified. Additional contour information and hatching shall be provided to verify that the proposed grade does not exceed 5:1 and that the compacted basin embankment is at least 10 feet wide. (1/30/2026)*

- 43.10 *The proposed location of the path through Lot 178 shall be confirmed. E note that the path appears to simple end adjacent to the Basin 10 emergency spillway. (1/30/2026)*

- 43.11 *The limit of disturbance shall be revised to contain the improvements at EW14. (1/30/2026)*

- 43.12 *The location of the proposed irrigation controls, as they are proposed on the Aqua Mist plans, shall be added to the main plan set. (1/30/2026)*

- 43.13 *The design engineer shall clarify the design intent of the outlet pipe from Basin #7. It appears that a new pipe is proposed to encroach into the floodway and to be constructed to within a few feet of the existing stream. No pipe information, outfall structure, or energy dissipator is shown on the plans. These improvements are typically not permitted by the Township Code and the intent shall be clarified in future submission. (1/30/2026)*

43.0 SHEET 43 OF 124 – GRADING PLAN

- 43.14 *The Plan fails to provide spot elevations at appropriate locations along all residential driveways to confirm that all driveways have been designed as to provide a reasonable sight distance at intersections with stopping space, not to exceed a 4%, 20 feet behind the right-of-way line. (§ 22-817.1.C)*

The design engineer has indicated in their response that spot elevations at appropriate locations along all residential driveways will be provided at the time of final plan approval. (2/14/2025)

The Applicant has indicated in their response "Will Comply at Final Plan Stage." The Applicant has also indicated in their response that they believe General Notes No. 60 and 61 (Sheet 3), which require the submission and approval of Plot Plans for each Lot prior to issuance of building permits, are a better way to handle the requirements of § 22-817.1.C. Generally, we would support this approach with

the understanding that the General Notes shall be revised to indicate that the driveway slope must meet the design requirements listed above, that the plan details shall contain a detail showing a typical house meeting the slope requirements, and an acknowledgement from the developer that any areas that are clearly in violation of the ordinance will be addressed prior to final plan approval. (1/30/2026)

- 43.6 The Plan fails to identify the Tree Protection Zone. (§22-825.1.J) The proposed grading appears to encroach into the area of existing trees intended to meet the buffer requirements along the perimeter of the site.

The Plan continues to propose grading that encroaches into the area of existing trees intended to meet the buffer requirements along existing TMP#47-43-8 and TMP#47-43-11. (§22-825.1.J) (10/11/2023)

The Plan continues to propose grading that encroaches into the area of existing tree driplines intended to meet the buffer requirements along existing TMP #47-43-8 and TMP #47-43-11. The design engineer has indicated in their response that trees with canopies extending into the LOD will be evaluated prior to tree removal to determine whether they can be saved. This is not acceptable. The plans shall be revised to provide the required tree protection zones or the trees shall be considered disturbed/not protected and accounted for in the Natural Resources Calculations and on the Landscape Plans. (§22-825.1.J) (2/14/2025)

The Plans (Sheets 8 through 17) have been revised to provide a Note which indicates “All trees where the limit of disturbance encroaches in the driplines must be evaluated by a qualified specialist along with the Township Engineer to determine if the tree can be saved or needs to be removed”. As noted in our review of the submitted Rockwell Tree Inventory, the inventory shall be revised to clearly indicate which trees are “To be Removed”, “To be Disturbed, but not Removed”, and “To be Preserved” in order to determine whether the existing trees can be used to meet the buffer requirements. If a tree is not fully protected per the Tree Protection Standards, it shall not be considered as part of the required buffer yard planting. We should note that there are several locations where the Limit of Disturbance/Tree Protection Fencing has been unnecessarily placed well beyond the needed limit of disturbance, thus unnecessarily impacting trees that are not in the required work area. This is especially apparent in the area between Lot 7 and Lot 23 along the northern development boundary. (8/4/2025)

The proposed grading continues to encroach into the area of existing trees intended to meet the buffer requirements along the perimeter of the site. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 43.7 The Plan fails to provide driveways that are a minimum distance of forty (40) feet from any intersection (§22-817.1.A). The Plan indicates that the driveways to Lot 25, Lot 28 and Lot 32 fail to comply with this requirement.

Proposed Lots 10, 14, 17, and 131 continue to fail to provide driveways that are a minimum distance of forty (40) feet from any intersection. The design engineer has indicated in their response that a waiver will be discussed due to the inability to comply with this section due to the small lot sizes. However, a waiver request from §22-817.1.A has not been included in the provided Waiver Request Letter. (2/14/2025)

The Applicant’s design engineer has indicated in their response that a waiver from this requirement has been requested and added to the Sheet 3 (actually Sheet 2). However, the Requested Waivers table has not been revised to include a waiver request from §22-817.1.A. (8/4/2025)

The Applicant has indicated in their response that the waiver is no longer needed. However, the Plan has not been revised to relocate the driveway for Lots 10, 14, 17, and 131. The Plans shall be revised to provide driveways that are a minimum distance of forty (40) feet from any intersection, or a waiver shall be requested from §22-817.1.A. (1/30/2026)

- 43.8 *We question the location of the proposed Snow Stockpile Area adjacent to Lot 144. Specifically, we question a snowplow truck's ability to stockpile snow in the proposed location as no curb depression or driveway apron is proposed. The Applicant shall verify the ability of a snowplow truck to utilize the proposed Snow Stockpile Areas and revise the Plans accordingly. (§ 22-832.1.B.2) (10/11/2023)*

The Plans have been revised and now identify three (3) separate Snow Stockpile Areas totaling 4,909 SF. The Township should determine whether the proposed Snow Stockpile Areas are sufficient for the size of the proposed development. Similarly, the Snow Stockpile Areas appear to be provided with depressed curbs. However, the Plan does not provide clear indication that it is depressed curb. (2/14/2025)

The Township should determine whether the proposed Snow Stockpile Areas (totaling 4,913 SF) are sufficient for the size of the proposed development. (8/4/2025) (1/30/2026)

- 43.12 *The low point created to the rear of Lot 9 by the 274 contour line shall be eliminated. (§22-805.1) (8/4/2025)*

The Plans fail to provide an adequate grading design to the rear of Lot 9. Additionally, the Plans fail to identify the tie-in of proposed contour 274 to the existing contour line. (1/30/2026)

- 43.13 ***The proposed grading to the rear of Lot 17 shall be relocated outside of the existing dripline of the 36" tree (located off-site and required to be 100% protected). (1/30/2026)***

- 43.14 ***The Legend shall be revised to identify what the hatching shown within Plan View for Basin #10 represents. (§22-305.3.O) (1/30/2026)***

44.0 SHEET 44 OF 124 – GRADING PLAN

- 44.7 *The Plan shall be revised to provide a curb depression, driveway apron and defined access from Road C to the SWM Basin #4 for operation and maintenance activities. (§23-302.2.B.(19)) (8/4/2025)*

The Plan continues to fail to provide a curb depression, driveway apron and defined access from Road C to the SWM Basin #4. Proposed Inlets shall not be located within any curb depression for driveway aprons or curb ramps. (1/30/2026)

- 44.8 *The Plan shall be revised to provide a curb depression, driveway apron and defined access from Road C to the SWM Basin #9 for operation and maintenance activities. (§23-302.2.B.(19)) (8/4/2025)*

The Plan continues to fail to provide a curb depression, driveway apron and defined access from Road C to the SWM Basin #9. Proposed Inlets shall not be located within any curb depression for driveway aprons or curb ramps. (1/30/2026)

- 44.9 *The Plan shall be revised to identify the proposed contour elevation along the rear of Lots 122-125. (1/28/2026)*

- 44.10 *The Plan shall be revised to provide and identify the required drainage easement for the storm sewer piping to the rear of Lots 121-124. (§22-804.5 and §22-805.5.B) (1/30/2026)*

45.0 SHEET 45 OF 124 – GRADING PLAN

- 45.14 *The Plan fails to provide driveways that are a minimum distance of forty (40) feet from any intersection (§22-817.1.A). The Plan indicates that the driveway to Lot 132 fails to comply with this requirement.*

The Plan continues to fail to provide a driveway to Lot 25 that is a minimum distance of forty (40) feet from the intersection of Road B with Road E. (§22-817.1.A) (10/11/2023)

Proposed Lots 10, 14, 17, and 131 continue to fail to provide driveways that are a minimum distance of forty (40) feet from any intersection. The design engineer has indicated in their response that a waiver will be discussed due to the inability to comply with this section due to the small lot sizes. However, a waiver request from §22-817.1.A has not been included in the provided Waiver Request Letter.

(2/14/2025)

The Applicant's design engineer has indicated in their response that a waiver from this requirement has been requested and added to the Sheet 3 (actually Sheet 2). However, the Requested Waivers table has not been revised to include a waiver request from §22-817.1.A. (8/4/2025)

The Applicant has indicated in their response that the waiver is no longer needed. However, the Plan has not been revised to relocate the driveway for Lots 10, 14, 17, and 131. The Plans shall be revised to provide driveways that are a minimum distance of forty (40) feet from any intersection, or a waiver shall be requested from §22-817.1.A. (1/30/2026)

- 45.15 *We question the location of the proposed Snow Stockpile Area to the rear of Lot 94. Specifically, we question a snowplow truck's ability to stockpile snow in the proposed location as no curb depression or driveway apron is proposed. The Applicant shall verify the ability of a snowplow truck to utilize the proposed Snow Stockpile Areas and revise the Plans accordingly. (§ 22-832.1.B.2) (10/11/2023)*

The Plans have been revised and now identify three (3) separate Snow Stockpile Areas totaling 4,909 SF. The Township should determine whether the proposed Snow Stockpile Areas are sufficient for the size of the proposed development. Similarly, the Snow Stockpile Areas appear to be provided with depressed curbs. However, the Plan does not provide clear indication that it is depressed curb. (2/14/2025)

The Township should determine whether the proposed Snow Stockpile Areas (totaling 4,913 SF) are sufficient for the size of the proposed development. (8/4/2025)

- 45.9 *The Plan fails to provide grading that does not encroach within 5 feet of the development boundary. The plans indicate that the grading associated with SWM Basin #12 is proposed to be graded to within 1 foot of the development boundary. (§22-805.3 and §22-808.4.B) (8/4/2025)*

The Applicant has indicated in their response that this issue should be addressed at Final Plan once all other design issues are addressed. The proposed grading shall be revised in conjunction with the submission of future Preliminary Plans. (1/30/2026)

- 45.10 *The design engineer shall coordinate with the landscape architect to provide a suitable grading design that can accommodate the proposed landscaping. We note that the proposed drainage swale along the rear of Lots 18 through 24 is provided in the same location as several buffer plants intended to screen the development from the adjacent residential area. The placement of the trees within the drainage swale will create unsuitable growing conditions for the buffer plantings and will cause the plant material to quickly decline and die soon after planting. By placing landscaping (trees) within drainage swales, runoff will pond in the swales. (§22-805.1) (8/4/2025)*

The Applicant has indicated in their response that this issue should be addressed at Final Plan once all other design issues are addressed. The Applicant has also requested that the Township give input on the conflict between the ordinance and the Determination of Buffer Yard Table 22-8-1. (1/30/2026)

- 45.11 *In accordance with §22-829.2.D, no structure shall be permitted in the buffer area. The grading and landscape plans indicate that the proposed stormwater embankment is proposed to be located within the area of the required Class B Buffer required along the perimeter of this site. Furthermore, the landscape plan proposes the installation of several buffer trees within the compacted core of the basin berm, thereby jeopardizing the structural integrity of the basin berm and limiting access to the basin features. The grading plan shall be revised to relocate the basin embankment outside of the required buffer yard. (8/4/2025)*

The Applicant has indicated in their response that landscaping in close proximity to the proposed SWM Facilities can be adjusted after the SWM Facilities have been approved. We would recommend that this issue be resolved prior to the approval of the SWM Facilities, as changes to the basin berm location

will be difficult after the design is approved. (1/30/2026)

- 45.12 The Plan shall be revised to provide a curb depression, driveway apron and defined access from Road B to the SWM Basin #12 for operation and maintenance activities. (§23-302.2.B.(19)) (8/4/2025)

While the Plan has been revised to provide a curb depression, the Plans fail to provide a driveway apron and defined access from Road B to SWM Basin #12. Additionally, proposed Inlet 47 shall not be relocated out of the proposed curb depression. (1/30/2026)

- 45.13 The Plan shall be revised to provide a curb depression, driveway apron and defined access from Road B or F to the SWM Basin #11 for operation and maintenance activities. (§23-302.2.B.(19)) (8/4/2025)

The Plan continues to fail to provide a curb depression, driveway apron and defined access from Road B to SWM Basin #11. Proposed Inlets shall not be located within any curb depression for driveway aprons or curb ramps. (1/30/2026)

- 45.14 The Plan shall be revised to provide a curb depression, driveway apron and defined access from Road C to the SWM Basin #8 for operation and maintenance activities. It would appear that the snow stockpile area, with modifications to include the curb depression and driveway apron, would serve as acceptable maintenance access to SWM Basin #8. (§23-302.2.B.(19)) (8/4/2025)

While the Plan has been revised to provide a curb depression, the Plans fail to provide a driveway apron and defined access from Road B to SWM Basin #8. (1/30/2026)

- 45.15 The Plan fails to provide a storm sewer design that provides free discharge. We note that EW3 (Invert out elevation 251.50) is set within the side of the basin (254 contour line). (8/4/2025)

While it appears that the flared end section invert elevation within Basin 312 has been raised based on the proposed basin floor elevation, the Plan shall be revised to provide a label for each storm sewer structure, including endwalls/flared end sections within basins. (1/30/2026)

46.0 SHEET 46 OF 124 – GRADING PLAN

- 46.14 The Plan fails to provide spot elevations at appropriate locations along all residential driveways to confirm that all driveways have been designed as to provide a reasonable sight distance at intersections with stopping space, not to exceed a 4%, 20 feet behind the right-of-way line. (§ 22-817.1.C)

The design engineer has indicated in their response that spot elevations at appropriate locations along all residential driveways will be provided at the time of final plan approval. (2/14/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Applicant has also indicated in their response that they believe General Notes No. 60 and 61 (Sheet 3), which require the submission and approval of Plot Plans for each Lot prior to issuance of building permits, are a better way to handle the requirements of § 22-817.1.C. Generally, we would support this approach with the understanding that the General Notes shall be revised to indicate that the driveway slope must meet the design requirements listed above, that the plan details shall contain a detail showing a typical house meeting the slope requirements, and an acknowledgement from the developer that any areas that are clearly in violation of the ordinance will be addressed prior to final plan approval. (1/30/2026)

- 46.10 The Plan fails to provide driveways that are a minimum distance of forty (40) feet from any intersection (§22-817.1.A). The Plan indicates that the driveways to Lot 53 and Lot 54 fail to comply with this requirement.

The Plan continues to fail to provide a driveway to Lot 36 that is a minimum distance of forty (40) feet from the intersection of Road B with Road F. (§22-817.1.A) (10/11/2023)

Proposed Lots 10, 14, 17, and 131 continue to fail to provide driveways that are a minimum distance of forty (40) feet from any intersection. The design engineer has indicated in their response that a waiver

will be discussed due to the inability to comply with this section due to the small lot sizes. However, a waiver request from §22-817.1.A has not been included in the provided Waiver Request Letter. (2/14/2025)

The Applicant's design engineer has indicated in their response that a waiver from this requirement has been requested and added to the Sheet 3 (actually Sheet 2). However, the Requested Waivers table has not been revised to include a waiver request from §22-817.1.A. (8/4/2025)

The Applicant has indicated in their response that the waiver is no longer needed. However, the Plan has not been revised to relocate the driveway for Lots 10, 14, 17, and 131. The Plans shall be revised to provide driveways that are a minimum distance of forty (40) feet from any intersection, or a waiver shall be requested from §22-817.1.A. (1/30/2026)

- 46.11 *We question the location of the proposed Snow Stockpile Area adjacent to Lot 58 and Lot 73. Specifically, we question a snowplow truck's ability to stockpile snow in the proposed location as no curb depression or driveway apron is proposed. The Applicant shall verify the ability of a snowplow truck to utilize the proposed Snow Stockpile Areas and revise the Plans accordingly. (§ 22-832.1.B.2) (10/11/2023)*

The Plans have been revised and now identify three (3) separate Snow Stockpile Areas totaling 4,909 SF. The Township should determine whether the proposed Snow Stockpile Areas are sufficient for the size of the proposed development. Similarly, the Snow Stockpile Areas appear to be provided with depressed curbs. However, the Plan does not provide clear indication that it is depressed curb. (2/14/2025)

The Township should determine whether the proposed Snow Stockpile Areas (totaling 4,913 SF) are sufficient for the size of the proposed development. (8/4/2025)

- 46.15 *The design engineer shall verify that the proposed grading associated with SWM #13 adequately ties into the existing contours along Swamp Picnic Road. We note that the proposed grades appear to ignore the existing grades along between Lot 33 and the proposed emergency spillway. (8/4/2025)*

The Applicant has indicated in their response "Will Comply at Final Plan Stage." The design engineer shall verify that the proposed grading associated with SWM #13 adequately ties into the existing contours along Swamp Picnic Road prior to the stormwater design being accepted. (1/30/2026)

- 46.16 *The location of the existing 52" Sycamore Tree on Lot 33 that was previously noted by the Applicant as being protected shall be shown and tree protection fencing shall be provided at the existing dripline to preserve the tree root system. (8/4/2025)*

While the Plan has been revised to provide tree protection fencing, the Plans shall be revised to identify the surveyed dripline to confirm the location of the tree protection fencing is located as required. (1/30/2026)

- 46.17 *The Plan fails to provide sufficient drainage easement or right-of-way along Reifsnyder Road to the north of Swamp Picnic Road to contain the proposed construction, as identified by the proposed Limit of Disturbance line. Furthermore, it appears that a significant number of existing off-site trees along the proposed storm sewer run will be adversely impacted by the construction. No tree disturbance, as defined by the Tree Protection Standards, may occur without the authorization of the property owner who owns the existing trees. The plans shall be revised to clarify the design intent, to provide any necessary easements or rights-of-way to complete the work, to provide proper tree protection fencing during the construction of the improvements, and to ensure that the limit of disturbance is contained within the area that the Applicant has been approved to disturb. (8/4/2025)*

The Applicant has indicated in their response that no disturbance of existing offsite trees is proposed. However, proposed EW16 and associated rip-rap apron along the northbound lane appears to require disturbance to offsite trees. (1/30/2026)

- 46.18 *As no improvements are proposed along Swamp Picnic Road and the Reifsnyder Road improvements are not clearly defined in the plan set, the proposed roadway and driveway trenching associated with the storm sewer piping from Manhole M24 to Endwall 16 shall be clearly defined, with the appropriate roadway restoration provided in accordance with §21-107. The plans shall be revised to clearly identify the limit of wearing course overlay, including any required driveway restoration. (8/4/2025)*

The Plans continue to fail to identify the required limit of wearing course overlay and driveway restoration for the restoration of storm sewer trenching along Reifsnyder Road. (1/30/2026)

- 46.20 *The proposed grading design at EW9 shall be revised to provide the 0% slope from the pipe invert through the end of the energy dissipator. (8/4/2025)*

The Plans continue to propose a sloped energy dissipator downstream EW9 within Basin #13. The design engineer shall verify the allowable slope for rip-rap aprons and revise the grading accordingly. (1/30/2026)

47.0 SHEET 47 OF 124 – GRADING PLAN

- 47.3 *The Plan fails to provide spot elevations at appropriate locations along all residential driveways to confirm that all driveways have been designed as to provide a reasonable sight distance at intersections with stopping space, not to exceed a 4%, 20 feet behind the right-of-way line. (§ 22-817.1.C)*

The design engineer has indicated in their response that spot elevations at appropriate locations along all residential driveways will be provided at the time of final plan approval. This could impact the ability of the site to be compliant with the requirements of the SALDO. (2/14/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Applicant has also indicated in their response that they believe General Notes No. 60 and 61 (Sheet 3), which require the submission and approval of Plot Plans for each Lot prior to issuance of building permits, are a better way to handle the requirements of § 22-817.1.C. Generally, we would support this approach with the understanding that the General Notes shall be revised to indicate that the driveway slope must meet the design requirements listed above, that the plan details shall contain a detail showing a typical house meeting the slope requirements, and an acknowledgement from the developer that any areas that are clearly in violation of the ordinance will be addressed prior to final plan approval. (1/30/2026)

- 47.7 *We question the location of the proposed Snow Stockpile Area adjacent to Lot 151. Specifically, we question a snowplow truck’s ability to stockpile snow in the proposed location as no curb depression or driveway apron is proposed. The Applicant shall verify the ability of a snowplow truck to utilize the proposed Snow Stockpile Areas and revise the Plans accordingly. (§ 22-832.1.B.2) (10/11/2023)*

The Plans have been revised and now identify three (3) separate Snow Stockpile Areas totaling 4,909 SF. The Township should determine whether the proposed Snow Stockpile Areas are sufficient for the size of the proposed development. Similarly, the Snow Stockpile Areas appear to be provided with depressed curbs and driveway aprons. However, the Plan does not provide clear indication that it is depressed curb or driveway aprons. (2/14/2025)

The Township should determine whether the proposed Snow Stockpile Areas (totaling 4,913 SF) are sufficient for the size of the proposed development. (8/4/2025)

- 47.10 *Inlet #11 shall be relocated outside of the proposed handicap ramp along Road C. (8/4/2025)*

While the Plan has been revised to relocated Inlet #11 outside of the proposed handicap ramp, we question the design of the handicap ramp and depressed curb for the snow storage area between Basin #3 and Lot 115. The design engineer shall verify the design in this location and revise the Plans accordingly. (1/30/2026)

48.0 SHEET 48 OF 124 – GRADING PLAN – NO COMMENTS AT THIS TIME**49.0 SHEET 49 OF 124 – GRADING PLAN – NO COMMENTS AT THIS TIME****50.0 SHEET 50 OF 124 – GRADING PLAN – NO COMMENTS AT THIS TIME****51.0 SHEET 51 OF 124 – OVERALL UTILITY PLAN**

Knight Engineering has not provided comments regarding the detailed utility plans at this time as the Plan has not been accompanied by any design information for the proposed water provider, hydrant locations and any of the proposed service utilities (gas, electric, telecommunications). Upon submission of this information, review comments will be generated. (10/11/2023)

As previously noted, upon submission of the complete proposed water design, sewer design, hydrant locations, and all of the proposed service utilities (gas, electric, telecommunications), review comments will be generated. (2/14/2025)

The Plans (Sheet 49 to 50) have been revised to identify the complete proposed water main connection. The Applicant's design engineer has indicated in their response that the Plans will be submitted to Aqua once Preliminary Plan Approval has been granted. (8/4/2025) (1/30/2026)

52.0 SHEET 52 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME**53.0 SHEET 53 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME****54.0 SHEET 54 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME****55.0 SHEET 55 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME****56.0 SHEET 56 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME****57.0 SHEET 57 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME****58.0 SHEET 58 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME****59.0 SHEET 59 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME****60.0 SHEET 60 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME****61.0 SHEET 61 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME****62.0 SHEET 62 OF 124 – UTILITY PLAN – NO COMMENTS AT THIS TIME****63.0 SHEET 63 OF 124 – OFF-ROAD UTILITY PROFILE SHEET**

Due to the number of review comments regarding the adequacy of the proposed Stormwater Management, Storm Sewer Conveyance and perimeter roadway improvements, Knight Engineering has not provided a detail review of the Off-Road Utility Profile sheets at this time. Upon the submission of a plan that meets the general requirements of the Code, Knight Engineering will provide a review of the profile sheet contents. (10/11/2023)

Upon the submission of a Plan that meets the general requirements of the Code, Knight Engineering will provide a review of the profile sheet contents. (2/14/2025) (1/30/2026)

64.0 SHEET 64 OF 124 – OFF-ROAD UTILITY PROFILE SHEET – NO COMMENTS**65.0 SHEET 65 OF 124 – OFF-ROAD UTILITY PROFILE SHEET – NO COMMENTS****66.0 SHEET 66 OF 124 – OFF-ROAD UTILITY PROFILE SHEET – NO COMMENTS****67.0 SHEET 67 OF 124 – OFF-ROAD UTILITY PROFILE SHEET – NO COMMENTS**

68.0 SHEET 68 OF 124 – PLAN AND PROFILE SHEET

Due to the number of review comments regarding the adequacy of the proposed internal roadway network, lot design, Stormwater Management, Storm Sewer Conveyance and perimeter roadway improvements, Knight Engineering has not provided a detail review of the Plan and Profile sheets at this time. Upon the submission of a plan that meets the general requirements of the Code, Knight Engineering will provide a review of the Plan and Profile sheet contents. (10/11/2023)

Upon the submission of a plan that meets the general requirements of the Code, Knight Engineering will provide a review of the Plan and Profile sheet contents. (2/14/2025) (1/30/2026)

69.0 SHEET 69 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME**70.0 SHEET 70 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****71.0 SHEET 71 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****72.0 SHEET 72 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****73.0 SHEET 73 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****74.0 SHEET 74 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****75.0 SHEET 75 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****76.0 SHEET 76 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****77.0 SHEET 77 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****78.0 SHEET 78 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****79.0 SHEET 79 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****80.0 SHEET 80 OF 124 – PLAN AND PROFILE SHEET – NO COMMENTS AT THIS TIME****81.0 SHEET 81 OF 124 – TOWNSHIP OVERALL LANDSCAPE PLAN – NO COMMENTS****82.0 SHEET 82 OF 124 – TOWNSHIP LANDSCAPE DETAIL PLAN****82.3 The Plan fails to identify the Tree Protection Zone. (§22-825.1.J)**

The Plan has been revised to include a line type for the proposed tree protection fencing. However, the line type is extremely faint and barely legible. The tree protection fencing and limit of disturbance line type should be clearly legible and contrast the other features being shown on the Plan. (§ 22-921.3.J) (10/11/2023)

While the Plan identifies the Tree Protection Fence, the existing driplines within the Limit of Disturbance (LOD), particularly along the northern property line adjacent to TMP #47-43-42 are not identified. It would appear that the LOD, on multiple occasions, encroaches within 15' of the trunks of trees designated to be retained and/or the existing dripline. Additionally, proposed grading along the northern property line appears to encroach up to the 5' minimum buffer zone between the property boundary and LOD. We have concerns about the proximity to not only the existing trees along this border but also the property boundary. (§22-811.4.B and §22-921.1) (2/14/2025)

The Plans (Sheets 8 through 17) have been revised to provide a Note which indicates "All trees where the limit of disturbance encroaches in the driplines must be evaluated by a qualified specialist along with the Township Engineer to determine if the tree can be saved or needs to be removed". As noted in our review of the submitted Rockwell Tree Inventory, the inventory shall be revised to clearly indicate which trees are "To be Removed", "To be Disturbed, but not Removed", and "To be Preserved" in order to determine whether the existing trees can be used to meet the buffer requirements. If a tree is not fully protected per the Tree Protection Standards, it shall not be considered as part of the required buffer yard planting. We

should note that there are several locations where the Limit of Disturbance/Tree Protection Fencing has been unnecessarily placed well beyond the needed limit of disturbance, thus unnecessarily impacting trees that are not in the required work area. This is especially apparent in the area between Lot 7 and Lot 23 along the northern development boundary. (8/4/2025)

The revised submission fails to include a revised Rockwell Tree Inventory indicating which trees are To be Removed”, “To be Disturbed, but not Removed”, and “To be Preserved” in order to determine whether the existing trees can be used to meet the buffer requirements. (1/30/2026)

- 82.4 *The Plan have been revised to eliminate reference to several existing trees that are to remain. The plans appear to identify the tree numbers, but the tree symbols have been turned off. The plans shall be updated to include all trees to be preserved and all trees to be disturbed but not removed. (8/4/2025)*

The Plans appear to continue to fail to identify all trees to be preserved and all trees to be disturbed but not removed. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 82.5 *The Plans have been revised to provide several proposed trees in the same location as existing trees shown to remain. We specifically note that several proposed trees to the north of Lot 177 are shown to overlap existing trees. The landscape architect shall clarify the design intent. If the tree consultant (Rockwell) confirms that these trees are dead or are designed to be removed, the tree symbol shall not be shown on the Landscape Detail Plans. (8/4/2025)*

The Plans appear to continue to fail to consider the existing trees located where new trees are proposed. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 82.6 *The limit of disturbance shall be adjust to allow for the installation of the proposed 8’ wide pedestrian trail along Lutheran Road to the north of Lot 177. (8/4/2025)*

The Plans continue to fail to adjust the proposed LOD to contain the entire 8’ wide pedestrian trail. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 82.7 *The Landscape Detail Plan shall be revised to provide reference to the required Type B Buffer Yards (both buffer classification and buffer yard line delineating the buffer yard) along Lutheran Road and the residential properties that abut this development. (8/4/2025)*

The Plan continues to fail to provide reference to the required Type B Buffer Yards (both buffer classification and buffer yard line delineating the buffer yard) along Lutheran Road and the residential properties that abut this development. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 82.8 *The proposed green giant arborvitae located the northern development boundary with TMP 47-43-53 shall be relocated at least 10 feet from the existing storm sewer pipe in the area. (8/4/025)*

The Plan continues to fail to relocate all proposed plant material at least 10 feet from existing and proposed utilities. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 82.9 *The proposed landscaping along Lutheran Road shall be adjusted to allow for the conveyance of stormwater through the proposed pipe extension at the Lutheran Road culvert crossing north of Lot 177 (not shown on the Landscape Detail Plan). (8/4/2025)*

The Plan continues to fail to adjust the proposed landscaping along Lutheran Road to allow for the conveyance of stormwater through the proposed pipe extension at the Lutheran Road culvert crossing north of Lot 177. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 82.10 *The Landscape Detail Plan shall be revised to identify all clear sight triangles at each roadway*

intersection. (8/4/2025)

The Plan continues to fail to identify all clear sight triangles at each roadway intersection. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

- 82.11 *The Landscape Detail Plan contains several notations of “Meadow” and “Lawn” throughout the open space and common area. The Landscape Detail Plans shall provide a meadow and lawn seed specification or provide reference to a commercially available seed specification for those areas. For all meadow areas, the plans shall include sufficient detail to ensure the full establishment of the meadow. We note that properly established meadows take a minimum of two year (likely three) to become fully established. (8/4/2025)*

The Plan continues to fail to identify a meadow and lawn seed specification or provide reference to a commercially available seed specification for those areas. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” (1/30/2026)

83.0 SHEET 83 OF 124 – TOWNSHIP LANDSCAPE DETAIL PLAN

- 83.14 The Plan fails to provide the required Type B Buffer Yard and Plantings along the perimeter of the site
83.14 where adjoining property or the property across a street is zoned for or in residential use in accordance
83.14 with § 22-829.1.D. The Plan specifically fails to provide the Buffer Yard along Tax Map Parcel #47-043-
83.14 008 and #47-043-011, and fails to provide verification that the existing material located along the
83.14 development boundary meets the buffer requirements.

The Plan continues to fail to provide the provide the Type B Buffer Yard along TMP#47-043-008 and #47-043-011 and fails to provide verification that the existing material located along the development boundary meets the buffer requirements. (§ 22-829.1.D) (10/11/2023)

The design engineer has indicated in their response that according to Tabe 22-8-1, a buffer is not required where two B1 Residential properties adjoin one another. While §22-820.1.A and Table 22-8-1 do not require a buffer between the two B1 Uses, §22-820.1.D specifically states that “Except where a Class C buffer is required, a Class B buffer shall be provided along the side or rear property line where adjoining property or the property across a street is zoned for or in residential use.” As the properties noted above are in residential use, a Class B buffer shall be provided as required by the code. The Plans shall be revised to complete the Type B buffer along the development boundary where existing properties are in residential use, specifically along TMP #47-043-42. (2/14/2025)

The plans have been revised to provide additional landscaping along the development boundary. However, the Landscape Detail Plan continues to fail to identify the Buffer Classification (Type B), the minimum Buffer Yard width (35 feet), and to space the proposed plant material within the full width of the buffer yard to create the intended buffer screen. The plan also fails to utilize the existing vegetation or even account for the existing vegetation, noting that several proposed trees are located on top of the existing vegetation. Upon the plan being prepared to show the above information and to incorporate the recommendations regarding the existing vegetation, as noted in the Rockwell Inventory, we will provide a thorough review of the buffer yard planting design. (8/4/2025)

The Applicant has indicated in their response that this issue should be addressed at Final Plan approval. The Plan continues to fail to identify the Buffer Classification Types, the minimum Buffer Yard widths, and fails to space the proposed plant material within the full width of the buffer yard to create the intended buffer screen and to utilize the existing vegetation or even account for the existing vegetation. Additionally, the Applicant has requested that the Township give input on the conflict between the ordinance and the Determination of Buffer Yard Table 22-8-1. (1/30/2026)

- 83.15 *The Landscape Architect shall confer with the design engineer on the proposed type of stormwater control measure proposed for SWM Basin #10. Recent discussions with the design engineer during the NPDES Pre-Submission meeting, we were advised that SWM Basin #10 was to be configured as a wet*

pond/lagoon. Accordingly, the proposed landscape design (seed mix and minor surrounding plantings) would appear to be no longer be appropriate for this type of facility. (8/4/2025)

The Plan continues to propose a Wet Pond for Basin #10 and continues to only propose a seed mix with minor surrounding plantings. The Landscape Architect shall confer with the design engineer on the proposed type of stormwater control measure proposed for SWM Basin #10 and revise the landscape design in accordance with the recommendations from the PADEP BMP Manual for landscape material accordingly. (1/30/2026)

- 83.16 *In conjunction with the above, the Landscape Detail Plan shall identify the type of Stormwater Control Measure proposed for each basin (MRC Bioretention, Wet Pond, Extended Detention Basin, Wetland, Rain Garden, etc.). The Landscape Architect shall review the Pa BMP Manual and provide the recommended landscape design for each type of Stormwater Control Measure, noting the seed mixes are not recommended for MRC Bioretention Basin, Wetlands, or standard Rain Garden/Bio-retention Basins. (8/4/2025).*

The Plan continues to fail to identify the type of Stormwater Control Measure proposed for each basin. (1/30/2026)

84.0 SHEET 84 OF 124 – TOWNSHIP LANDSCAPE DETAIL PLAN

- 84.4 *The proposed street tree within Open Space D shall be relocated off of the proposed basin berm. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plan continues to fail to relocate the proposed street tree from the Basin #6 berm within Open Space D. (1/30/2026)

- 84.5 *The proposed street trees shall be relocated outside of the sight distance lines on Lot 106. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plan continues to fail to relocate the proposed street tree from the clear sight triangle on Lot 106. (1/30/2026)

- 84.6 *The plans shall be revised to remove any existing vegetation along Reifsnyder Road that is located within the sight distance line from Road C. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plan continues to fail to relocate the proposed street tree from the clear sight triangle on Lot 106. (1/30/2026)

85.0 SHEET 85 OF 124 – TOWNSHIP LANDSCAPE DETAIL PLAN

- 85.15 *The Plan shall be revised to relocate the proposed landscape material from the proposed Basin #13 emergency spillway near the proposed outlet structure. (§23-410.8.D) (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plan continues to fail to relocate the proposed landscape material from the proposed Basin #13 emergency spillway. (1/30/2026)

- 85.16 *The Plan shall be revised to relocate the proposed tree protection fence along Reifsnyder Road north of Swamp Picnic Road to be within the existing legal right-of-way, unless additional construction easements are acquired. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plan continues to fail to relocate the proposed tree protection fence along Reifsnyder Road or provide temporary construction easements. (1/30/2026)

- 85.17 *The location of the existing 52” Sycamore Tree on Lot 33 noted by the Applicant as to be preserved, shall be shown on the Landscape Detail Plan. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plan continues to fail to identify the existing 52” Sycamore Tree on Lot 32. (1/30/2026)

- 85.18 *The Landscape Architect shall verify that the proposed Redmond American Linden trees along Swamp Picnic Road in Open Space A are appropriate for the wetland conditions (standing water noted). (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to propose proposed Redmond American Linden trees along Swamp Picnic Road in Open Space A. (1/30/2026)

86.0 SHEET 86 OF 124 – TOWNSHIP LANDSCAPE DETAIL PLAN – NO COMMENTS

87.0 SHEET 87 OF 124 – TOWNSHIP LANDSCAPE DETAIL PLAN – NO COMMENTS

88.0 SHEET 88 OF 124 – TOWNSHIP LANDSCAPE DETAIL PLAN – NO COMMENTS

89.0 SHEET 89 OF 124 – OPEN SPACE MANAGEMENT PLAN

- 89.14 *The Plan fails to indicate that the Homeowners Association is responsible for the maintenance of the proposed sidewalks along the Open Space areas. (10/11/2023)*

The design engineer has indicated in their response that maintenance of the proposed sidewalks along Open Space Areas will be included in the HOA documents. (2/14/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue fail to indicate that the Homeowners Association is responsible for the maintenance of the proposed sidewalks along the Open Space areas. (1/30/2026)

- 89.15 *The Plan fails to provide a clear distinction between private lot areas and the proposed Open Space Areas. At a minimum, the required monumentation specified in §22-908 shall be placed along the boundary between private lots and proposed Open Space Areas. It is recommended, however, that fencing be provided between the private and public spaces to prohibit lot creep from occurring into the common open space areas. (10/11/2023)*

The Plan has been revised and now proposes fiberglass boundary markers to distinguish between private lots and designated Open Space Areas. We do not believe that this type of marker is suitable and continue to recommend that a three-rail fencing or something similar be provided to differentiate the open space areas from the private lot areas. (2/14/2025)

The Plan continues to propose fiberglass boundary markers to distinguish between private lots and designated Open Space Areas. The Applicant’s design engineer has indicated in their response letter that Lot 178 is a Common Area and not Open Space and therefore no requirement for open space dedication. It is recommended that the Applicant provide a physical example of the proposed marker for the Township’s consideration at a upcoming Township meeting. (8/4/2025) (1/30/2026)

- 89.16 *The Open Space Management Notes shall be revised to provide different maintenance requirements for the proposed “Lawn” areas and the “Meadow” areas shown on the Landscape plans. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plan continues to fail to identify the maintenance requirements for the proposed “Lawn” areas and the “Meadow” areas shown on the Landscape plans. (1/30/2026)

- 89.17 *The Stormwater Management Basin Maintenance Notes shall be expanded based on the proposed type of Stormwater Control Measure proposed by the design engineer. The provided maintenance note (“The vegetation within the basins shall be maintained”) is woefully inadequate. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plan continues to fail to expand the Stormwater Management Basin Maintenance Note based on the proposed type of Stormwater Control Measure proposed. (1/30/2026)

90.0 SHEET 90 OF 124 – TOWNSHIP LANDSCAPE SCHEDULE + NOTES

- 90.9 The Plans fail to provide appropriate protection for the existing vegetation proposed to satisfy the buffer requirements. In accordance with § 22-829.2.A, all existing noninvasive deciduous and coniferous trees larger than two inches in caliper and/or six feet in height may be considered to contribute to the definition of an existing buffer on the property. If the amount of existing plant material that size or greater equals any of the above planting requirements for reducing buffer yard sizes, the equivalent reduction may be taken without additional plant material being required. As noted above, the plans fail to properly inventory the existing vegetation to remain. Until such time as that information is provided, the extent of additional buffer planting in the areas where existing material exists remains unresolved.

The design engineer has indicated in their response that a formal report of the existing plant material has been submitted to the Township for review. However, our office has not received a copy of the referenced report to date. (2/14/2025)

An “Urban Forest Report” prepared by Rockwell Associates has been included with this submission and shall be revised as noted above. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The previously submitted “Urban Forest Report” prepared by Rockwell Associates shall be revised as noted above. (1/30/2026)

- 90.10 The New Hanover Township Landscaping Requirements Table shall be revised to provide additional clarification regarding the area of Woodlands located on the site verse the Mature Tree preservation requirements listed in §27-2101. Mature Tree preservation is a different requirement than woodlands. The table shall provide verification that both sections of the Township Code have been met. (§27-2101.1.D and §27-2101.E) (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The New Hanover Township Landscaping Requirements Table continues to fail to provide additional clarification regarding the area of Woodlands located on the site verse the Mature Tree preservation requirements. (1/30/2026)

- 90.11 The description of §22-829 – Buffer Yards shall be revised to reflect the actual requirement, noting that the requirement specified in §22-829.1.D is “Except where a Class C Buffer is required, a Class B buffer shall be provided along the side or rear property line where adjoining property or the property across a street is zoned for or in residential use.” The reference to being “within the residential use district” is not provided in the Township Code. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plan continues to fail to accurately identify the §22-829 – Buffer Yards requirement. (1/30/2026)

- 90.12 The General Planting Notes shall be revised to identify the dates that the proposed plant material may be installed.

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The General Planting Notes continue to fail to identify the dates that the proposed plant material may be installed. (1/30/2026)

- 90.13 The General Planting Notes shall be revised to reference the requirements of §22-829.E. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The General Planting Notes continue to fail to reference the requirements of §22-829.E. (1/30/2026)

- 90.14 The General Planting Notes shall be revised to reference the requirements of §22-829.H. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The General Planting Notes continue to fail to reference the requirements of §22-829.H.

- 90.15 *The Shrubs listed under Buffer Yards in the Planting Schedule shall be revised to specify a minimum plant height of 4 feet minimum in accordance with the Table 27-3 and Table 22-8-3 provided in the code. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Shrubs listed under Buffer Yards in the Planting Schedule continue to fail to specify a minimum plant height of 4 feet. (1/30/2026)

91.0 **SHEET 91 OF 124 – TOWNSHIP LANDSCAPE DETAILS – NO COMMENTS AT THIS TIME**

92.0 **SHEET 92 OF 124 – LIGHTING PLAN – NO COMMENTS AT THIS TIME**

93.0 **SHEET 93 OF 124 – LIGHTING PLAN – NO COMMENTS AT THIS TIME**

94.0 **SHEET 94 OF 124 – OVERALL EROSION & SEDIMENTATION CONTROL PLAN**

95.0 **SHEET 95 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN**

- 95.14 *The Applicant has indicated in their response that a detailed design of the Erosion and Sedimentation (E&S) Control Plans will be completed for submission to the Conservation District. The detailed design shall be included in all future land development plan submissions for review. Furthermore, a copy of the Conservation District’s review shall be supplied to the Township prior to Final Plan Approval. (§§9-105.1 and 22-808.1.C) (10/11/2023)*

The Applicant’s design engineer has indicated in their response that a submission to the Conservation District occurred on July 30th during the Pre-Application Meeting. A copy of the Conservation District’s review shall be supplied to the Township prior to Final Plan Approval. (8/4/2025) (1/30/2026)

- 95.9 *Inadequate erosion control devices have been provided for the Lutheran Road widening and paved trail construction. (2/14/2025)*

The Plans have been revised to include a note indicating “Install filter sock at end of road widening”. A copy of the Conservation District’s review shall be supplied to the Township prior to Final Plan Approval. (8/4/2025) (1/30/2026)

96.0 **SHEET 96 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN – NO COMMENTS**

97.0 **SHEET 97 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN – NO COMMENTS**

98.0 **SHEET 98 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN – NO COMMENTS**

99.0 **SHEET 99 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN – NO COMMENTS**

100.0 **SHEET 100 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN – NO COMMENTS**

101.0 **SHEET 101 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN – NO COMMENTS**

102.0 **SHEET 102 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN**

- 102.10 *The compost sock on Lot 116 shall be relocated to be downslope of the pipe run between M13 and I180. (2/14/2025)*

The Applicant’s design engineer has indicated in their response that this comment will be addressed as part of the NPDES Permit Applications process. (8/4/2025) (1/30/2026)

103.0 **SHEET 103 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN – NO COMMENTS**

104.0 **SHEET 104 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN – NO COMMENTS**

105.0 **SHEET 105 OF 124 – EROSION & SEDIMENTATION CONTROL PLAN – NO COMMENTS**

106.0 **SHEET 106 OF 124 – EROSION & SEDIMENTATION CONTROL DETAILS**

107.0 **SHEET 107 OF 124 – EROSION & SEDIMENTATION CONTROL DETAILS**

108.0 SHEET 108 OF 124 – OVERALL POST CONSTRUCTION STORMWATER MANAGEMENT**109.0 SHEET 109 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT PLAN**

109.10 *The note referencing the SWM and E&S Calculations shall be revised to reflect the current submission and ultimately final approved SWM Report revision date. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify the most current revision dates of the supporting documents. (1/30/2026)

109.11 *The Sediment Forebay design shall be provided with a stabilized overflow device to ensure that the median berms are not washed out by the inflow runoff. The sediment forebay designs shall be prepared in accordance with the guidelines listed in the PaBMP Manual for each type of BMP proposed. (8/4/2025)*

The Applicant has indicated in their response that the sediment forebay design will be revised with a stabilized overflow device during the NPDES Approval process. (1/30/2026)

109.12 *The PCSM Plan shall be revised to identify the type of BMP (e.g., Bioretention, Extended Detention, etc.) proposed for SWM #1. (8/4/2025)*

The Plan continues to fail to identify the type of BMP for each proposed SWM Basin. (1/30/2026)

109.13 *The proposed Sediment Forebay shall be designed to permit the full release of runoff contained in the forebay within 72 hours of the end of the design storm event to ensure that runoff is not retained within the inflow storm sewer pipe. Alternatively, a stilling well may be proposed, provided that the invert elevation does not create standing water in the inflow piping system. (8/4/2025)*

109.14 *The PCSM Plan shall identify the Point of Interest along Minister Creek. (8/4/2025) (1/30/2026)*

109.15 *The PCSM Plan shall provide all required BMP Landscaping and Seed Mixes, noting that basin seed mixes are discouraged for bio-retention, wet ponds, and wetland facilities. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify all required BMP Landscaping and Seed Mixes. (1/30/2026)

110.0 SHEET 110 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT PLAN

110.10 *The note referencing the SWM and E&S Calculations shall be revised to reflect the current submitted and ultimately final approved SWM Report revision date. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify the most current revision dates of the supporting documents. (1/30/2026)

110.11 *The PCSM Plan shall be revised to identify the type of BMP (e.g., Bioretention, Extended Detention, etc.) proposed for SWM #2. (8/4/2025)*

The Plan continues to fail to identify the type of BMP for each proposed SWM Basin. (1/30/2026)

110.12 *The grading shall be revised to provide a stable slope from the drainage swale to the rear of Lots 6-9 into the basin. The current inflow 5:1 slope without any permanent erosion control measure is concerning. (8/4/2025)*

The Applicant’s response indicates that individual grading issues like the one noted above can be resolved on a “per lot basis” during individual building permit approval. We do not concur with the Applicant’s belief and note that the above issue could significantly impact the design of the overall basin/SWM facility. The grading shall be revised to provide a stable slope from the drainage swale to

the rear of Lots 6-9 into Basin #2. (1/30/2026)

110.13 The PCSM Plan shall provide all required BMP Landscaping and Seed Mixes, noting that basin seed mixes are discouraged for bio-retention, wet ponds, and wetland facilities. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to identify all required BMP Landscaping and Seed Mixes. (1/30/2026)

111.0 SHEET 111 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT PLAN

111.8 The note referencing the SWM and E&S Calculations shall be revised to reflect the current submitted and ultimately final approved SWM Report revision date. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify the most current revision dates of the supporting documents. (1/30/2026)

111.10 The PCSM Plan shall identify the location of the required stabilized access path for the irrigation improvements. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify the location of the required stabilized access path for the irrigation improvements. (1/30/2026)

111.11 The PCSM Plan shall be revised to provide sufficient design information to construction the irrigation improvements shown on the AMI Irrigation Plans. (8/4/2025)

The PCSM Plans included in the Land Development Plan Set shall be revised based on the improvements shown on the revised AMI Irrigation Plans, and vice versa. (1/30/2026)

111.14 The PCSM Plan shall identify the Point of Interest along Minister Creek. (8/4/2025) (1/30/2026)

111.15 The PCSM Plan shall provide all required BMP Landscaping and Seed Mixes, noting that basin seed mixes are discouraged for bio-retention, wet ponds, and wetland facilities. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to identify all required BMP Landscaping and Seed Mixes. (1/30/2026)

112.0 SHEET 112 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT PLAN

112.7 The note referencing the SWM and E&S Calculations shall be revised to reflect the current submitted and ultimately final approved SWM Report revision date. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify the most current revision dates of the supporting documents. (1/30/2026)

112.8 The PCSM Plan shall provide all required BMP Landscaping and Seed Mixes, noting that basin seed mixes are discouraged for bio-retention, wet ponds, and wetland facilities. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to identify all required BMP Landscaping and Seed Mixes. (1/30/2026)

113.0 SHEET 113 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT PLAN

113.8 The note referencing the SWM and E&S Calculations shall be revised to reflect the current submitted and ultimately final approved SWM Report revision date. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify the most current revision dates of the supporting documents. (1/30/2026)

113.9 *The PCSM Plan shall be revised to identify the type of BMP (e.g., Bioretention, Extended Detention, etc.) proposed for SWM #4 and SWM #7. (8/4/2025)*

The Plan continues to fail to identify the type of BMP for each proposed SWM Basin. (1/30/2026)

113.10 *The PCSM Plan shall provide all required BMP Landscaping and Seed Mixes, noting that basin seed mixes are discouraged for bio-retention, wet ponds, and wetland facilities. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to identify all required BMP Landscaping and Seed Mixes. (1/30/2026)

114.0 SHEET 114 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT PLAN

114.11 *The note referencing the SWM and E&S Calculations shall be revised to reflect the current submitted and ultimately final approved SWM Report revision date. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify the most current revision dates of the supporting documents. (1/30/2026)

114.12 *The PCSM Plan shall be revised to identify the type of BMP (e.g., Bioretention, Extended Detention, etc.) proposed for SWM #8, SWM #11 and SWM #12. (8/4/2025)*

The Plan continues to fail to identify the type of BMP for each proposed SWM Basin. (1/30/2026)

114.13 *The PCSM Plan shall identify the Points of Interests along Swamp Picnic Road. (8/4/2025) (1/30/2026)*

114.14 *The PCSM Plan shall provide all required BMP Landscaping and Seed Mixes, noting that basin seed mixes are discouraged for bio-retention, wet ponds, and wetland facilities. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to identify all required BMP Landscaping and Seed Mixes. (1/30/2026)

115.0 SHEET 115 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT PLAN

115.8 *The note referencing the SWM and E&S Calculations shall be revised to reflect the current submitted and ultimately final approved SWM Report revision date. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify the most current revision dates of the supporting documents. (1/30/2026)

115.9 *The PCSM Plan shall provide all required BMP Landscaping and Seed Mixes, noting that basin seed mixes are discouraged for bio-retention, wet ponds, and wetland facilities. (8/4/2025)*

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to identify all required BMP Landscaping and Seed Mixes. (1/30/2026)

114.11 *The PCSM Plan shall be revised to identify the type of BMP (e.g., Bioretention, Extended Detention, etc.) proposed for SWM #5, SWM #11 and SWM #13. (8/4/2025)*

The Plan continues to fail to identify the type of BMP for each proposed SWM Basin. (1/30/2026)

116.0 SHEET 116 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT PLAN

116.14 *The Plan shall be revised to identify the proposed Rock Energy Dissipator directly downstream EW2 within Basin #3. (2/14/2025)*

The Plans continue to fail to identify the proposed Rock Energy Dissipator directly downstream EW2 within Basin #3. (8/4/2025) (1/30/2026)

116.9 *The note referencing the SWM and E&S Calculations shall be revised to reflect the current submitted and*

ultimately final approved SWM Report revision date. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify the most current revision dates of the supporting documents. (1/30/2026)

116.10 The PCSM Plan shall provide all required BMP Landscaping and Seed Mixes, noting that basin seed mixes are discouraged for bio-retention, wet ponds, and wetland facilities. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to identify all required BMP Landscaping and Seed Mixes. (1/30/2026)

116.12 The PCSM Plan shall be revised to identify the type of BMP (e.g., Bioretention, Extended Detention, etc.) proposed for SWM #3, SWM #6, and SWM #7. (8/4/2025)

The Plan continues to fail to identify the type of BMP for each proposed SWM Basin. (1/30/2026)

117.0 SHEET 117 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT PLAN

117.1 The note referencing the SWM and E&S Calculations shall be revised to reflect the current submitted and ultimately final approved SWM Report revision date. (8/4/2025)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to identify the most current revision dates of the supporting documents. (1/30/2026)

117.2 The Post Construction Long Term Operation and Maintenance of Stormwater Facilities shall be expanded to provide operation and maintenance activities for each type of BMP proposed for this site. This shall include the MRC Basins, the Wet Pond, the Spray Irrigation System, the Extended Dry Detention Basin (if proposed), Drainage Swales, Level Spreaders, Stormwater Landscaping, etc. (§23-702.2.B) (8/4/2024)

The Applicant has indicated in their response “Will Comply at Final Plan Stage.” The Plans continue to fail to expand the Post Construction Long Term operation and Maintenance of Stormwater Facilities to provide operation and maintenance activities for each type of BMP proposed for this site. (1/30/2026)

118.0 SHEET 118 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT DETAILS

118.1 Additional design details shall be provided for the StormBrixx System, including the backfill requirements, loading capacity, surface restoration detail, access ports, inlet connections, geotextile requirements, and construction sequencing. The single detail is inadequate to ensure the proper construction of this type of storm storage system. (1/30/2026)

118.2 The design engineer shall provide documentation from StormBrixx that confirms that a berm can be constructed over the systems. (1/30/2026)

118.3 Cross-sections through the StormBrixx system shall be provided to verify that the portion of the system that extends beyond the proposed berm is set below the existing grade and to ensure that no encroachment into the floodplain is required. (1/30/2026)

118.4 Additional contour information shall be provided for Basin 7, specifically the 246 and 248 contour lines along the toe of the basin slope. (1/30/2026)

118.5 The StormBrixx system shall be relocated outside of the proposed sewer easement. (1/30/2026)

118.6 The plan shall be revised to provide additional access ports to the subsurface system to allow for proper inspection. Additional documentation shall be provided from ALCO to provide information regarding basin inspections, as the space between the support structures appears to limit visibility through the system and prohibits any access to the subsurface area to perform any maintenance. The large surface

area of the basin creates a concern with being unable to visually inspect large portions of the system and limits the ability to access areas for maintenance. (1/30/2026)

118.7 *The design engineer shall provide information and design details on the required sediment filtering devices required prior to the basin inflow pipes to eliminate the accumulation of sediment in the underground system. (1/30/2026)*

118.8 *The design of Bed 14 and the downstream outlet pipes/single row system shall be clarified. We question the ability of the single row systems to convey the discharge from Bed #14 and the upstream tributary drainage areas. Additional details shall also be provided for the proposed outlet structure(s) and a profile shall be provided to verify that the design elevations can be provided throughout the system. (1/30/2026)*

118.9 *An outlet structure detail shall be provided for Basin #7. (1/30/2026)*

118.10 *An emergency spillway design and detail shall be provided for Basin #7. (1/30/2026)*

118.11 *The size of the Basin #7 outlet pipe shall be verified. The SWM Report indicates an 18" pipe size, whereas the design plans indicate a 12" outlet pipe. As noted above, the new pipe appears to be conveyed through the floodplain, which is generally not acceptable. Additional design information shall be provided to verify that the proposed design meets the requirements of the Township Code. (1/30/2026)*

119.0 **SHEET 119 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT DETAILS**

119.1 *Upon the submission of PCSM Plans that identify the type of BMP proposed, additional comments regarding the adequacy of each facility to meet the Township Code requirements will be provided. This information shall be supplied prior to the approval of Preliminary Plans. (8/4/2025) (1/30/2026)*

119.2 *If the proposed basins are intended to be used as a sediment basin during construction, the plan shall be revised to show the amendment of the basin floor soils in accordance with the requirements of the BMP Manual to restore the soil porosity from compaction. (1/30/2026)*

119.3 *The basin construction sequences shall be revised to clarify when they will be constructed. If any of the basins are intended to be constructed to their final configuration prior to 80% stabilization of the inflow drainage area, the plans shall be revised to provide additional erosion control devices in the basins to ensure that the soil media and other water quality devices are not overrun by sediment during construction. (1/30/2026)*

119.4 *The width of the top of berm for Basin 1 shall be verified. We question whether the top contour line is intended to represent the 253 contour line or a 253.25 user contour line. Either way, the plan shall clearly be prepared to show a 10 foot berm width at 253.25. (1/30/2026)*

119.5 *The design intent of the "Dry Extended Detention Basin with Bioretention Vegetation" shall be verified. If the basins are intended to be dry basins, a low flow channel, not concrete, shall be provided to fully drain the detention basin. If the basins are intended to act as bioretention facilities, the plans and details shall be revised to provide underdrains and amended soil media to allow for the basins to function as a bioretention basin and allow stormwater to infiltrate into the basin floor area. Otherwise, the plant material will simply die due to extended duration of standing water. (1/30/2026)*

119.6 *A location for the access to Basin 2 shall be shown on the plans and detail sheets. (1/30/2026)*

- 119.7** *All plan details shall identify the top of berm contour line elevation. The plans appear to show an intermediate contour line that does not consistently provide a minimum top of berm width of 10 feet at the minimum top of berm elevation. (1/30/2026)*
- 119.8** *All basin details shall be revised to show the proposed emergency spillway liner extending up to the top of berm elevation, to the toe of slope on the outside of the basin and to an elevation 2 vertical feet on the inside of the basin, in order to adequately protect the basin from failure during a emergency event. (1/30/2026)*
- 119.9** *The design engineer shall verify that Basin 4, Basin 5, Basin 8 and Basin 9 are adequately graded to allow for the entire basin to drain. We note that in each basin, the lowest basin invert out elevation is lower than the closest contour line. For example, the Basin 4 outlet structure is provided with a 246.0 invert elevation, however, the 246 contour line does not extend to the outlet structure. Each basin outlet orifice shall daylight and allow for the entire basin to drain within 72 hours after the end of the storm event. (1/30/2026)*
- 119.10** *The cover over the Basin 8 outlet pipe does not appear to meet the design required 18" of cover over the bell of the pipe. This condition appears to occur in other basins. Each basin outlet pipe should be provided with a scaled profile verifying that all pipe slope, pipe size, structure drop, and pipe cover requirements have been met. (1/30/2026)*

120.0 **SHEET 120 OF 124 – POST CONSTRUCTION STORMWATER MANAGEMENT DETAILS**

- 120.4** The Typical Basin Embankment Cross Section provided on the Post Construction Stormwater Management Detail Sheet fails to provide a Permanent Erosion Control *Liner* for the proposed Emergency Spillway for all seven (7) basins. The Cross Section indicates the installation of North American Green – C125, a long-term (but temporary) Erosion Control *Blanket* that is expected to last up to 36 months. In addition to replacing the temporary blanket with a permanent liner, for Basins 3, 4, 5, and 6, the engineer shall consider a more stable (rip-rap, river stone, concrete checkerblocs) spillway liner, as the proposed routing calculations indicate that "Emergency" spillway is intended to be one of the primary outlet control devices (stormwater is designed to discharge during at least the 100-year storm event) in the identified basins. (§ 23-410.8.D)

The Typical Basin Embankment Cross Section continues to indicate the installation of North American Green – C125 Erosion Control Blanket. The Applicants response indicates that the basin detail has been revised to include an erosion control system for the emergency spillways. However, the Typical Basin Embankment Cross Section continues to fail to provide a Permanent Erosion Control Liner for each of the 17 proposed Emergency Spillways. (10/11/2023)

The Typical Basin Embankment Cross Section has been revised to indicate the use of North American Green S200 Erosion Control Blanket or Approved Equal to extend to undisturbed ground on exterior embankment. However, proposed Basins #4, #6, and #9 all have sidewalk proposed directly downstream/outside of spillway. It shall also be noted that Basin #9 is proposed with an emergency spillway elevation at the 100-year water surface elevation (253.00). The Plans shall be revised to provide emergency spillways that will not create a downstream hazard. (2/14/2025)

The Plans continue to propose sidewalk directly downstream the emergency spillway of Basins #4, #6, and #9. (8/4/2025)

The Applicant has indicated in their response "Will Comply at Final Plan Stage." The Plans continue to fail to provide emergency spillways that will not create a downstream hazard. (1/30/2026)

- 120.7** The Typical Basin Embankment Cross Section fails to provide outlet pipe sizes in compliance with § 23-410.12, which requires storm sewer pipes other than those used as roof drains, detention basin

underdrains, and street subbase underdrains, to have a minimum diameter of 15 inches. The plan indicates that a 12" pipe is proposed for Basin 1, and a 6" pipe is proposed for Basin 2.

The Applicants response indicates that "many of the stormwater systems are very small systems where a 15" pipe is not warranted. A smaller pipe size will be discussed". However, the submitted waiver requests do not include § 23-410.12. We note that nine (9) of the 17 proposed SWM Basins propose an outlet pipe diameter less than 15". (10/11/2023)

The Plan has been revised and now proposes 15" diameter outlet pipes, with the exception of Basin #10, which proposes a 12" pipe. The Plan shall be revised to provide a minimum 15" pipe, or a waiver of §23-410.12 shall be requested. (2/14/2025)

A partial waiver has been requested for proposed Basin #1 to utilize a 12" outlet pipe to tie into an existing 12" HDPE pipe. (8/4/2025)

- 120.8 *The Typical Basin Embankment Cross Section shall be revised to provide trash racks over all proposed outlet orifices. (§23-407.2)*

The Applicant has indicated in their response "Will Comply at Final Plan Stage." The Typical Basin Embankment Cross Section continues to fail to provide trash racks over all proposed outlet orifices. (1/30/2026)

- 120.9 *The Note provided with the Typical Basin Embankment Cross Section regarding the top of berm being located at least 5 feet from the property line is not consistent with §805.3, which requires the top or bottom edge of slopes shall be a minimum of 5 feet from the property line. (8/4/2025)*

The Typical Basin Embankment Cross Section continues to fail to be consistent with §805.3. (1/30/2026) The Applicant has indicated in their response "Will Comply at Final Plan Stage." We do not support this request.

- 120.10 *The design engineer shall verify the design intent of the basin outlet structure in the typical basin embankment cross-section. We note that a trash rack and anti vortex device, features typically installed during construction, are shown on what appears to be a detail showing the permanent basin features. (1/30/2026)*

- 120.11 *The design engineer shall clarify the "Filteria Bioscape Vault" concept shown on the outlet structure. Additional details and design calculations shall be provided for each basin in which the vault is proposed. (1/30/2026)*

- 120.12 *The outlet pipe from Basin 1 shall be revised to be O-ring RCP Pipe from the outlet structure to 1st downstream structure. (1/30/2026)*

- 120.13 *The Type of System Basin Table shall be revised to indicate that Basin 7 is a "BMP 6.6.3 – Subsurface Extended Detention Basin" to be consistent with PaDEP BMP Manual requirements and to ensure that the required water quality features are being provided per the manual. (1/30/2026)*

- 120.14 *The Wet Pond Profile shall be revised to identify the proposed Aqua Mist design information, including the irrigation system components which appear to be located several feet below the identified bedrock elevation and will likely require blasting to install.*

- 120.15 *The Wet Pond Outlet Structure Detail shall be drawn to scale. We note that the outlet pipe invert (245.80 is set above the 4' wide weir (244.50) and can not be constructed as shown. The detail shall be drawn to scale to ensure that it can be constructed. (1/30/2026)*

- 120.16 *The Type of System Basin Table shall be revised to indicate that Basin 10 is to be a "Wet Pond and BMP 6.5.2 – Runoff Capture and Reuse Storage Basin". (1/30/2026)*

120.17 *The design engineer shall verify that the proposed safety and aquatic benches shown in the Wet Pond Profile are adequately designed on the grading plan. (1/30/2026)*

120.18 *The MRC Basin Tabulation and the Detention Basin Tabulation shall be revised to include the identified limiting zone from the on-site testing. (1/30/2026)*

121.0 **SHEET 121 OF 124 – CONSTRUCTION DETAIL**

122.0 **SHEET 122 OF 124 – CONSTRUCTION DETAIL**

122.6 The Typical Road Cross Section fails to provide the typical location of sewers and utilities, street trees, streetlights, and roadway underdrains. (§ 22-305.5.D.3.g)

The Applicant has indicated in their response that the Typical Road Cross Section will be provided with the typical locations of sewers & utilities, street trees, streetlights and roadway underdrains at Final Plan stage once utility layout has been confirmed. (10/11/2023)

A Typical Road Cross Section has been included with this submission (Sheet 122). The Typical Road Cross Section fails to identify the location of the proposed gas utilities. (8/4/2025) (1/30/2026)

122.7 *The Reifsnyder Road Widening/Swale detail shall be revised to provide reference to the proposed storm sewer from Manhole M24 to Endwall E16. A separate cross-section may be warranted for this off-site improvement as the roadway right-of-way may not be consistent with the existing detail. (8/4/2025)*

The Reifsnyder Road Widening/Swale detail continues to fail to provide reference to the proposed storm sewer from Manhole M24 to Endwall E16. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” We do not support this request. (1/30/2026)

122.8 *The Reifsnyder Road Widening/Swale detail shall be revised to provide a roadside swale grade of 6:1 for a minimum depth of 18”. The proposed 3:1 slope is unsafe and shall not be provided. (8/4/2025)*

The Reifsnyder Road Widening/Swale detail continues to fail to provide a roadside swale grade of 6:1 for a minimum depth of 18”. The Applicant has indicated in their response “Will Comply at Final Plan Stage.” We do not support this request. (1/30/2026)

122.9 *The Stormwater Management Calculations shall be revised to provide calculations that verify that all roadside swales meet the requirements of §22-807.2.D.(1)) (1/30/2026)*

123.0 **SHEET 123 OF 124 – CONSTRUCTION DETAIL – NO COMMENTS AT THIS TIME**

124.0 **SHEET 124 OF 124 – CUT AND FILL ANALYSIS PLAN – SEE COMMENTS ABOVE**

125.0 **SHEET 1 OF 1 – OFF-ROAD UTILITY PROFILE SHEET**

125.1 *This plan sheet shall be incorporated into the full plan set. (1/30/2026)*

125.2 *Additional detail shall be provided for the proposed storm sewer discharge location on the south side of Reifsnyder Road. Additional survey data shall be provided to verify that the pipe can be installed without impacting the existing culvert or roadway area. (1/30/2026)*

125.3 *The design engineer shall verify the location of the proposed edge of road and the existing (to be replaced?) guiderail adjacent to the culvert crossing. (1/30/2026)*

125.4 *The limit of clearing of the trees located along Reifsnyder Road shall be clarified. It appears that several large caliper trees are required to be cleared in order to install the proposed storm pipe. (1/30/2026)*

125.5 *The design engineer shall identify the location of the existing floodplain and determine the impacts of the proposed storm sewer on the floodplain requirements. Additionally, the storm sewer calculations shall take into account the tailwater conditions associated with the floodplain to ensure that the*

*upstream stormwater management systems are not adversely impacted by flooded storm sewer pipes.
(1/30/2026)*

125.6 *The plan shall show all proposed contours through the proposed widening of Reifsnyder Road.
(1/30/2026)*

Based upon our review of the plans, we note that there are several comments that require significant changes to the Preliminary/Major Subdivision and Land Development Plans. Accordingly, we do not recommend that the plans be approved at this time. The plans shall be revised in accordance with the above comments, as well as the comments from the other Township Consultants, and resubmitted for further review.

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

Very truly yours,
KNIGHT ENGINEERING, INC.



Daniel E. Gray, P.E.

DG

ecc: Jamie L. Gwynn – Township Manager
Mark Donovan – Planning and Zoning Director
Michael G. Crotty, Esq. – Township Solicitor
Matt Lubitz – Montgomery County Planning Commission
Sandy Kozza – McMahon – Township Traffic Consultant
Jacqueline Erixson – Artisan Land Company
Joan E. London – Kozloff Stoudt