

LOWM 254.48

June 25, 2018

Christopher Leswing, Director of Building and Planning  
Township of Lower Merion  
75 East Lancaster Avenue  
Ardmore, PA 19003

**Re: Philadelphia Country Club- 1601 Spring Mill Road**  
**Pool Area Improvements**  
**Waiver of Land Development Review**

Dear Mr. Leswing:

In accordance with your request for the above referenced submission, we have reviewed a set of Seven (7) plans dated 06-15-18, and associated stormwater management calculations dated 06-15-18, prepared by Momenee, Inc. We offer the following comments for your consideration:

**A. MAJOR ENGINEERING ISSUES**

- ❖ **Stormwater** – Several waivers of the Township stormwater code have been requested. We support the partial waiver of the requirement to provide during construction peak rate of runoff control for the low-frequency, high-intensity design storm events due to the relative short duration of the project and the nature of the construction activity. We also support the waiver of the code requirement to provide recharge for the twenty-five (25) year design storm provided sufficient documentation is provided qualifying the improved operation procedures for the stormwater reclamation activities for irrigation of the grounds. The procedures must be clearly outlined and submitted for approval prior to issuance of any permit. An official Maintenance and Operation Procedure Plan shall be established and recorded as a covenant for the property to ensure that the required controls will remain in place. We have also requested the addition of water quality structures at the outflow of the collected runoff from the development in order to provide passive improvement to water quality in addition to the active reclamation procedures currently proposed for use.

With the resolution of the above major engineering issue and the remaining comments in this letter incorporated, we recommend that the Waiver of Land Development be approved.

**B. ORDINANCE REQUIREMENTS**

1. Section 101-6A(1)—All woody vegetation to be retained within twenty-five (25') feet of a building site or disturbed area shall be protected from equipment damage by fencing placed at the driplines. Accurate location of the driplines has not been shown on the plan. All trees with driplines within twenty-five (25') feet of the project area have not been shown. This must be corrected on the plan. Since the tree protection fence has not been shown at the driplines of all trees to remain, the Township Arborist must approve the location of the tree protection fence shown on the plan.
2. Section 121-4A(1)—A waiver from the requirement to control the rate of runoff from the 10, 25, 50 and 100 year design storm for the during construction phase of the project has been requested. No request was made for the high-frequency, low-intensity storm events. During construction stormwater management controls for the high frequency storms must therefore be addressed and documented in the calculations. It must be clearly documented that the worst cover condition has been analyzed in the calculations. Phasing of the construction may be required depending upon the evaluation.
3. Section 121-4A(1b)1—The applicant has not requested a waiver from the peak rate control requirements of the code. Additional detail and dimensions of the existing stormwater facilities that intend to be documented to provide the code mandated controls may be required to be submitted. The limits and amount of information required will be dependent upon the details of the procedures that will be used in the water reclamation process and the preparations that are proposed to be made prior to impending storm events. These must be submitted and approved prior to issuance of any permit.
4. Section 121-4A(4)—The responsibility for the continued maintenance and operation of the stormwater management system and associated facilities shall be the obligation of the property owner. This note shall be clearly indicated on the plan.
5. Section 121-4A(23)—Since a perennial or intermittent stream passes through the site, a stream buffer must be maintained to a minimum of fifty (50') feet to either side of the top-of-bank of the channel. The buffer area shall provide appropriate native vegetation. Appendix H of the Pennsylvania Handbook of Best Management Practices for Developing Areas shall be used for the plant list. A Planting Plan must be submitted if required by Planning Staff and must be approved by the Planning Department and the Township Arborist.
6. Section 121-4B(2a)1—The code requires that at a minimum, the increased volume of stormwater generated by the proposed development for the twenty five (25) year storm must be recharged. A waiver of this code requirement has been requested. Calculations which provide the required volume of recharge shall be included in the calculations in order to properly document the magnitude of the waiver. We would support this waiver contingent upon acceptable procedures for the water irrigation are included in the Maintenance and Operating Procedure Plan that will be submitted.

7. Section 121-2C, 121-15—No additional or improved Water Quality provisions have been proposed for the increased impervious or the re-developed impervious areas of this application. In support of the partial waivers that are requested, we would ask that water quality structures be used in conjunction with the sump boxes now proposed at the outflow of the collected water from the developed area.
8. Section 121-4E(4)—A full and detailed description of how the permanent stormwater control facilities will be operated and maintained shall be submitted by the design engineer. The operation shall outline how the ponds will be drawn down additionally to account for the added runoff and rate generation from the proposed construction. It shall indicate how drawdown will occur in winter months when irrigation is diminished and in long wet weather periods. The frequency of inspection shall be listed on the plan. The contact information for the party responsible for the operation and maintenance of the facility shall be listed. The plan shall be presented in recordable form as a covenant running with the land and must be approved by the Township Solicitor and Township Engineer prior to recording.
9. Section 121-5A(6)—Newly graded slopes of over twenty-five (25%) percent must be stabilized with sod or jute netting and seed. This shall be noted on the Grading Plan and those areas meeting this criterion clearly delineated with shading on the plan.
10. Section 121-6H—The size and species of trees on the property within twenty-five (25') feet of disturbance shall be included on the plan. This has not been provided for all trees meeting this criterion.
11. Section 135-16B(13), 121-15—The soil type limits shall be clearly shown on the conservation inventory plan.
12. Section 135-17B(1)—All existing utility service locations shall be shown.
13. Section 135-19B(8) – We support the waiver for the traffic study provided there is no significant increase in membership or pool use due to the development.

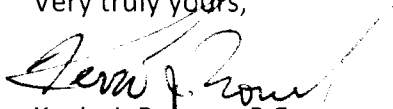
### **C. ENGINEERING COMMENTS**

1. Calculations shall be provided to qualify the erosion control measures provided on the plan.
2. A detail of the retaining walls shall be provided.
3. A fill material and topsoil stockpile location shall be provided. Notes shall be added regarding stabilization of the stockpiles.
4. A Lighting Plan must be submitted and approved by the Director of Building and Planning prior to recording the Final Plan.

5. A Planting Plan must be approved by the Planning Department and the Township Arborist prior to issuance of the permit/recording the Final Plan.
6. The construction entrance shall be shown to scale on the plan where it will be installed if washing the construction vehicle tires proves ineffective.
7. The pool will require a separate building permit. The pool, equipment, and enclosure must comply with 2009 IBC, Section 3109. The pool equipment, enclosure, and self-closing gate shall be clearly shown and be labeled on the plan.
8. A copy of the revised plan shall be submitted with any changes highlighted. A letter shall also be provided with the revised plan indicating how each requested revision has been addressed in the re-submission.

Please advise if we may be of further assistance in this matter.

Very truly yours,



Kevin J. Bowers, P.E.

**PENNONI ASSOCIATES**

Township Engineer

Cc: Robert E. Duncan, Assistant Township Manager  
Momenee, Inc.  
The Philadelphia Country Club