#### WORCESTER TOWNSHIP PLANNING COMMISSION MEETING REMOTE MEETING THURSDAY, DECEMBER 10, 2020, 7:30 PM

#### **CALL TO ORDER** by Chair Sherr at 7:30 PM

#### ATTENDANCE

PRESENT:	TONY SHERR	[X]
	BOB ANDORN	[X]
	MICHELLE GREENAWALT	[X]
	MICHAEL HOLSONBACK	[X]
	LEE KOCH	[X]

- 1. <u>November 12 Meeting Minutes Ms. Greenawalt motioned to approve the November 12, 2020 meeting minutes.</u> There was no public comment. Mr. Koch seconded the motion. By unanimous vote the motion was approved.
- 2. <u>3425 Stumphall (LD 2020-05)</u> Tim Woodrow, Engineer for the applicant, provided an overview of the proposed subdivision.

Chair Sherr commented on the proposed subdivision, perc testing, and the requested waivers.

Joe Nolan, Township Engineer, commented on the proposed plans and his review letter.

- Ms. Greenawalt commented on the requested waivers
- Mr. Andorn commented on the on-lot septic.

Mr. Andorn motioned to recommend preliminary/final plan approval to the Board of Supervisors, conditioned upon the applicant complying with the items addressed in the review letters, second by Ms. Greenawalt. By unanimous vote the motion was approved.

3. <u>Environmental Ordinance Review</u> – Andrew Raquet, Codes Director, provided an overview of the MCPC memo.

Chair Sherr commented on methods for reviewing the ordinances.

Joe Nolan commented on his review letter and preparing an additional review letter.

4. <u>January 28, Planning Commission Meeting Agenda</u> – At its January 28 meeting the Planning Commission may review existing township ordinances and subdivision applications LD 20-04 & LD 20-06

Andrew Raquet provided an overview of the agenda for the January 28 planning commission meeting.

#### **PUBLIC COMMENT**

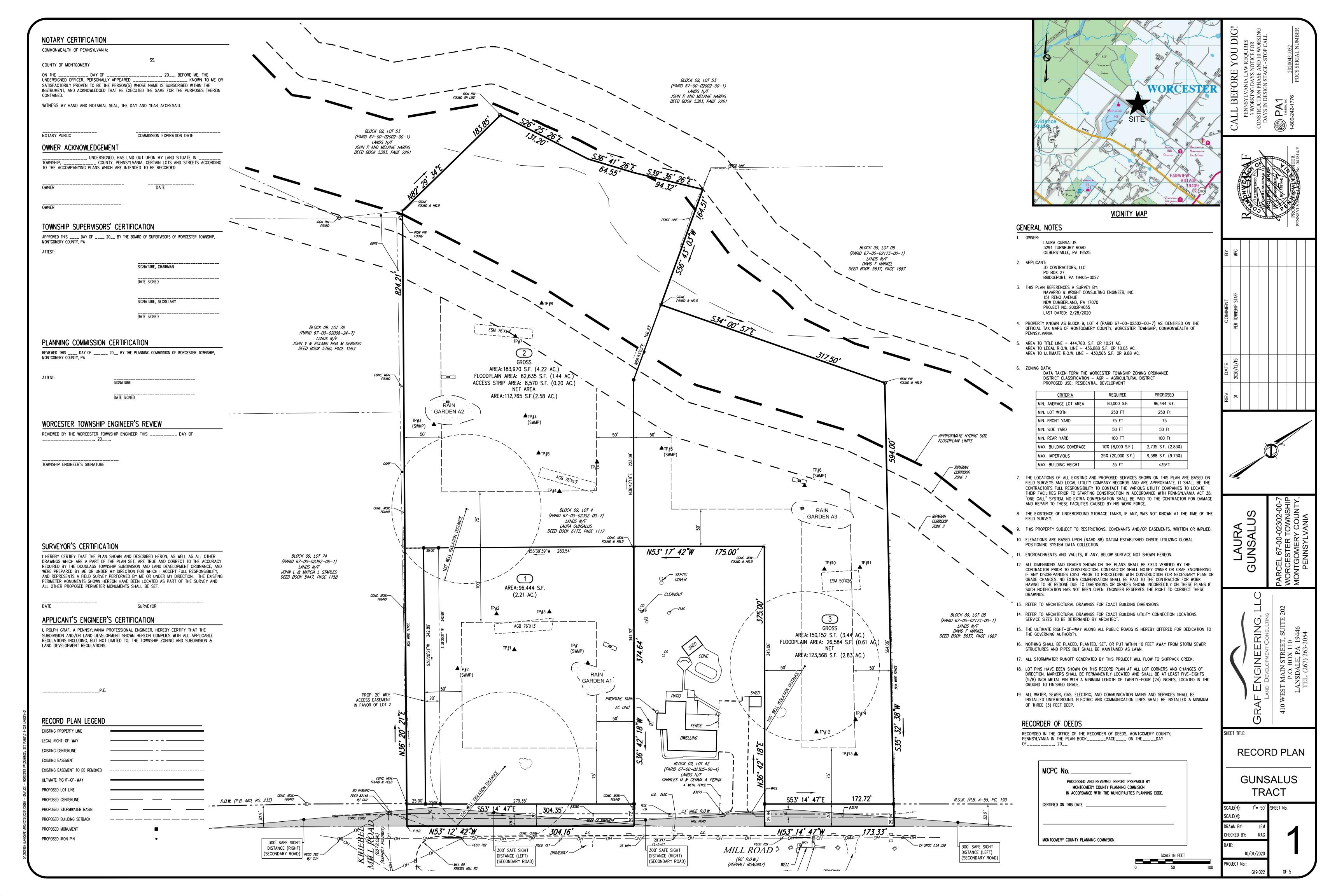
• There was no public comment.

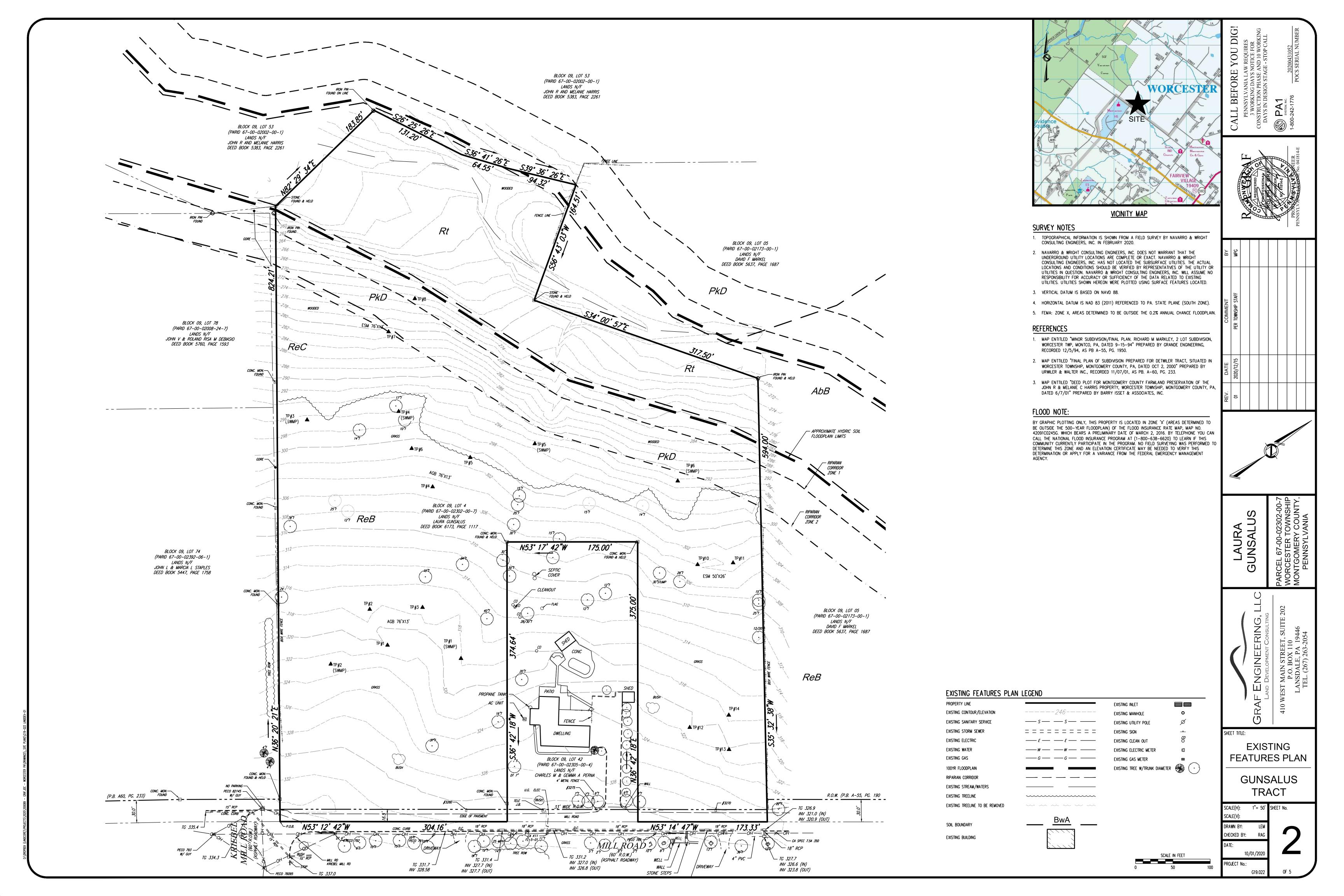
#### **ADJOURNMENT**

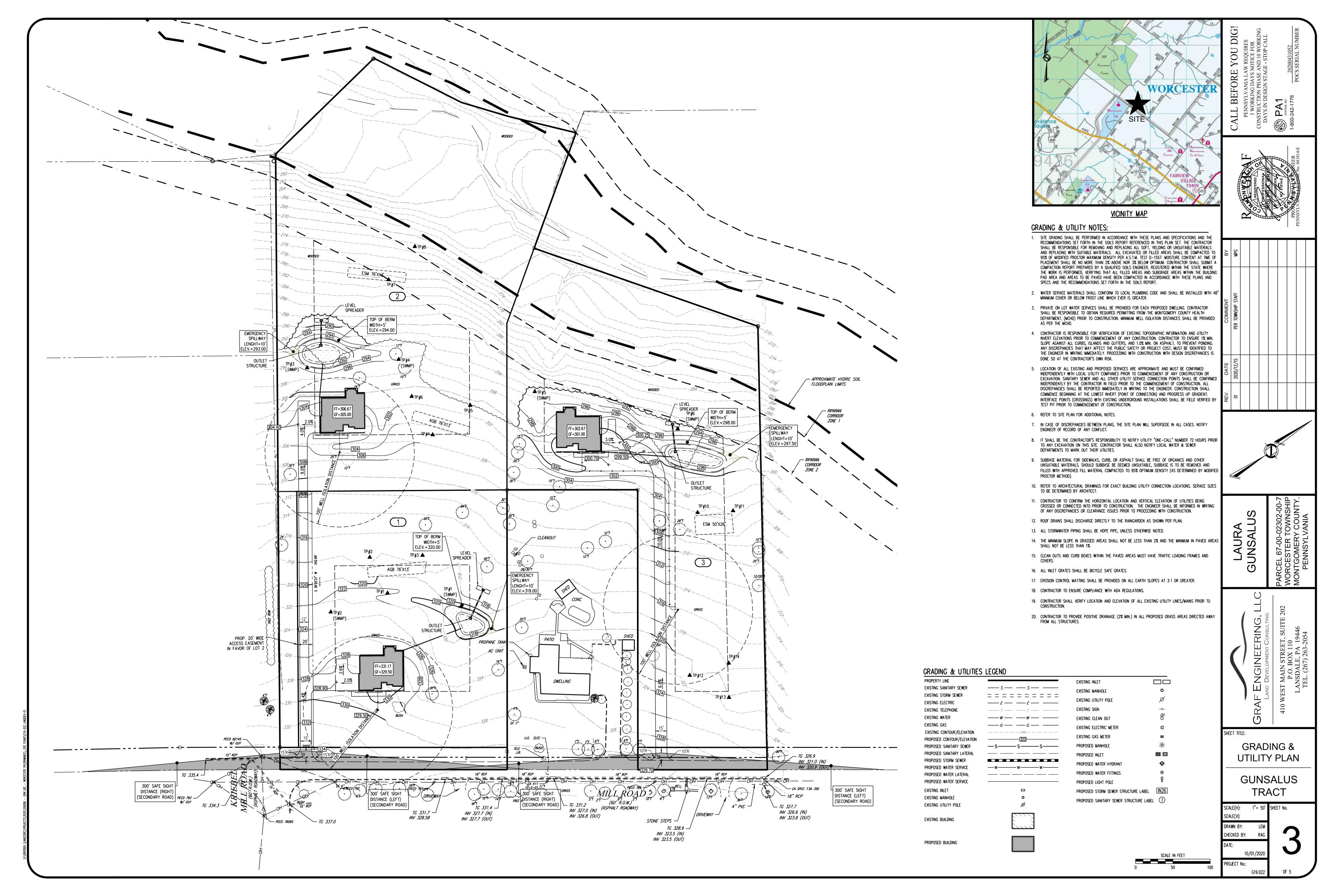
There being no further business before the Planning Commission, Chair Sherr adjourned the meeting at 8:02 PM.

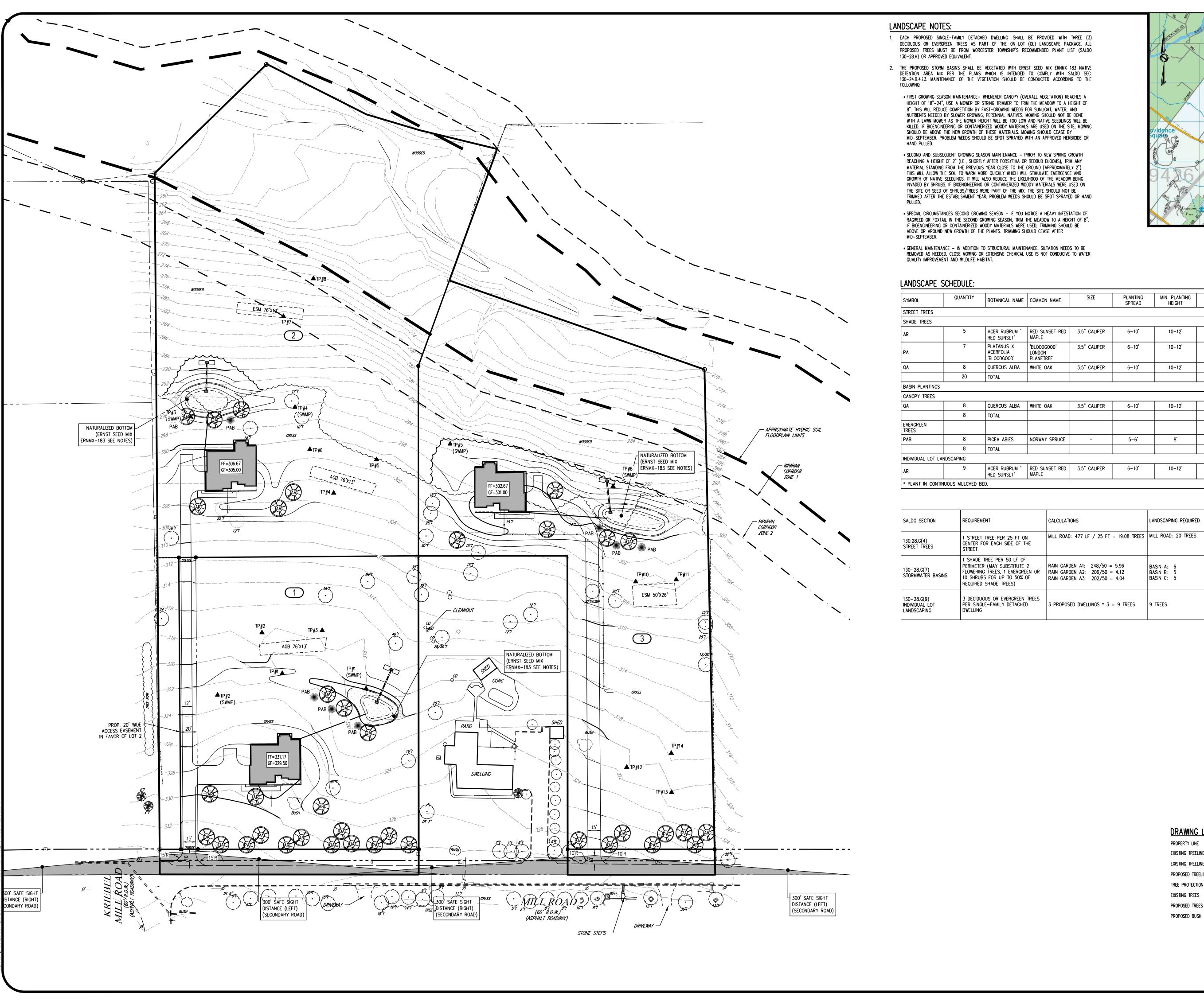
Respectfully Submitted:

Andrew R. Raquet Codes Director









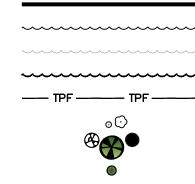
VICINITY MAP

SYMBOL	QUANTITY	BOTANICAL NAME	COMMON NAME	SIZE	PLANTING SPREAD	MIN. PLANTING HEIGHT	REMARKS
STREET TREES	•	•					
SHADE TREES							
AR	5	ACER RUBRUM ' RED SUNSET'	RED SUNSET RED MAPLE	3.5" CALIPER	6-10*	10-12'	B&B
PA	7 PLATANUS X ACERFOLIA 'BLOODGOOD'		'BLOODGOOD' LONDON PLANETREE	3.5" CALIPER	6-10'	10-12'	B&B
QA	8	QUERCUS ALBA	WHITE OAK	3.5" CALIPER	6-10'	10-12'	B&B
	20	TOTAL					
BASIN PLANTINGS							
CANOPY TREES							
QA	8	QUERCUS ALBA	WHITE OAK	3.5" CALIPER	6-10'	10-12'	B&B
	8	TOTAL					
EVERGREEN TREES							
PAB	8	PICEA ABIES	NORWAY SPRUCE	-	5-6'	8'	B&B
	8	TOTAL					
INDIVIDUAL LOT L	ANDSCAPING	•					
AR	9	ACER RUBRUM '	RED SUNSET RED MAPLE	3.5" CALIPER	6-10'	10-12'	B&B

SALDO SECTION	REQUIREMENT	CALCULATIONS	LANDSCAPING REQUIRED	LANDSCAPING PROVIDED
130.28.G(4) STREET TREES	1 STREET TREE PER 25 FT ON CENTER FOR EACH SIDE OF THE STREET	MILL ROAD: 477 LF / 25 FT = 19.08 TREES	MILL ROAD: 20 TREES	MILL ROAD: 20 TREES
130-28.G(7) STORMWATER BASINS	1 SHADE TREE PER 50 LF OF PERIMETER (MAY SUBSTITUTE 2 FLOWERING TREES, 1 EVERGREEN OR 10 SHRUBS FOR UP TO 50% OF REQUIRED SHADE TREES)	RAIN GARDEN A1: 248/50 = 5.96 RAIN GARDEN A2: 206/50 = 4.12 RAIN GARDEN A3: 202/50 = 4.04	BASIN A: 6 BASIN B: 5 BASIN C: 5	BASIN A: 3 SHADE, 3 EVERGREEN BASIN B: 2 SHADE, 3 EVERGREEN BASIN C: 3 SHADE, 2 EVERGREEN
130-28.G(9) INDIVIDUAL LOT LANDSCAPING	3 DECIDUOUS OR EVERGREEN TREES PER SINGLE-FAMILY DETACHED DWELLING	3 PROPOSED DWELLINGS * 3 = 9 TREES	9 TREES	9 *TO BE PROVIDED WITH ON-LOT LANDSCAPING PACKAGE



PROPERTY LINE EXISTING TREELINE EXISTING TREELINE TO BE REMOVED PROPOSED TREELINE TREE PROTECTION FENCE EXISTING TREES PROPOSED TREES





10/01/2020

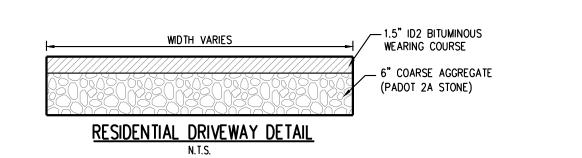
GRAF ENGINEERING,

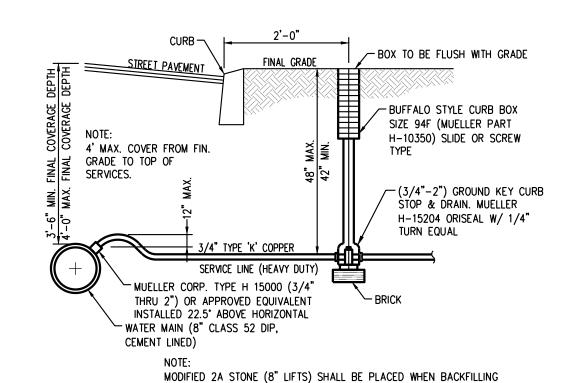
LANDSCAPE PLAN

**GUNSALUS** 

TRACT

DRAWN BY: CHECKED BY:

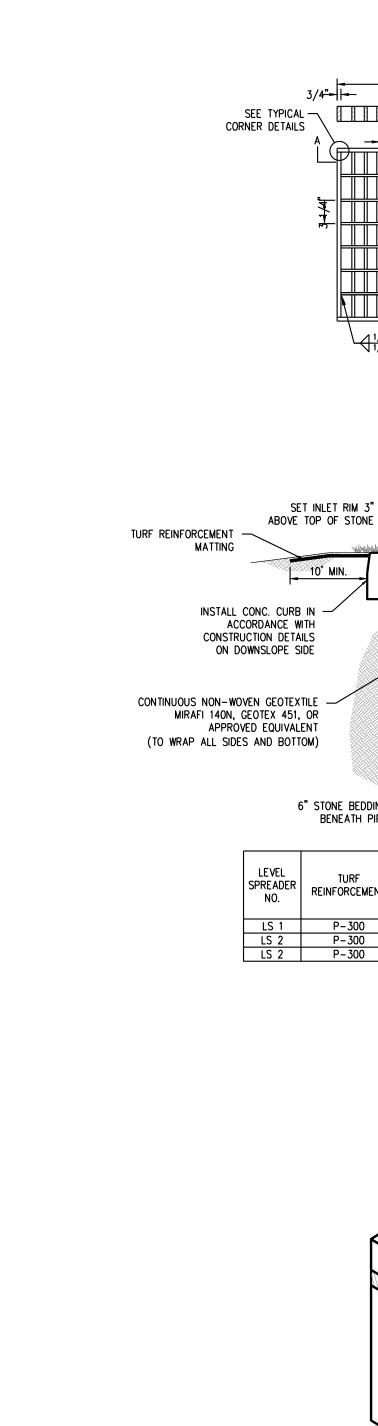




WATER SERVICE CONNECTION FROM MAIN TO BEHIND CURB.

WATER SERVICE CONNECTION DETAIL

N.T.S.



3/4"-

SET INLET RIM 3" -

6" STONE BEDDING

BENEATH PIPE

REINFORCEMENT

└─ 6 TRANSVERSE

RODS AT 3 5/8"

C TO C (TYP)

3/8" X 46 1/4"

STRUCTURAL STEEL GRATE

(BICYCLE SAFE)

TYPE 'M' INLET

DISCHARGE PIPE FROM UPSTREAM BMPS

-UNCOMPACTED SUBGRADE

WIDTH DEPTH LENGTH BOTTOM

ELEV. | ELEV. | (FT) | (FT) | (FT)

LEVEL SPREADER DETAIL

<del>\_\_| |\_1</del>\_1/4" (TYP)

SECTION A-A

В—

─ 26 BEARING BARS

1 3/4" C TO C

1/2" X 2 1/24" X

TURN DOWN GEOTEXTILE MIN 6". BURY

WITH 4" TOPSOIL AND SECURE WITH STAPLES IN ACCORDANCE WITH

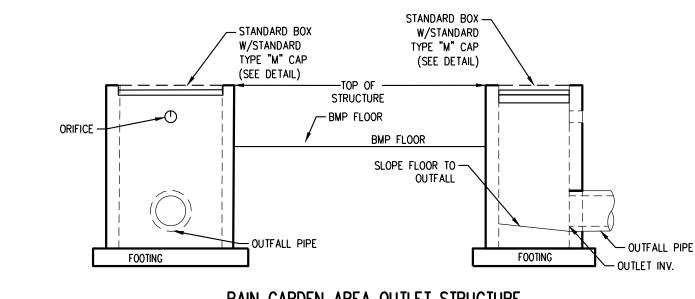
MANUFACTURER SPECIFICATIONS

-CLEAN UNIFORMLY GRADED COARSE

AGGREGATE (PADOT 2B STONE)

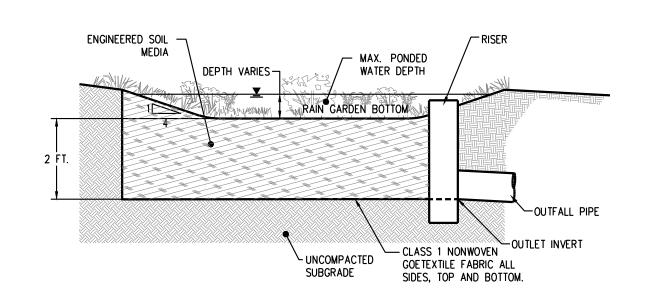
CONTINUOUSLY PERFORATED 24" HDPE (SET LEVEL WITHIN TRENCH)

25" BAR



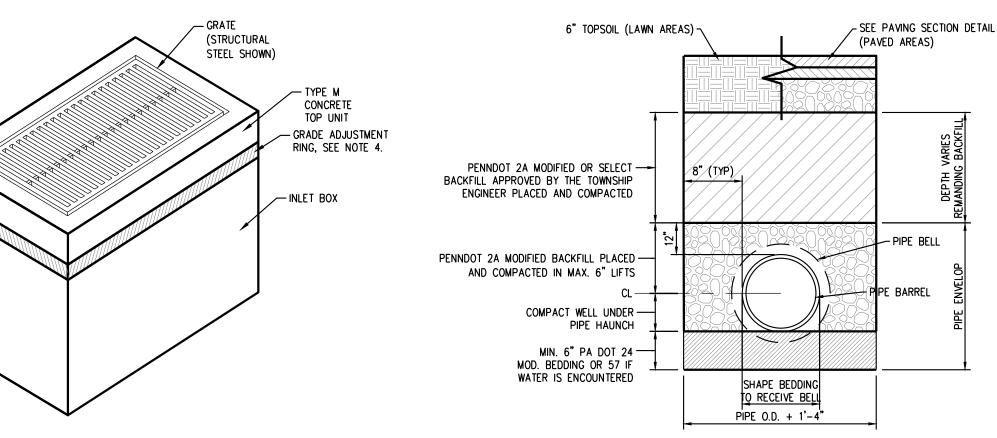
RAIN GARDEN AREA OUTLET STRUCTURE
N.T.S.

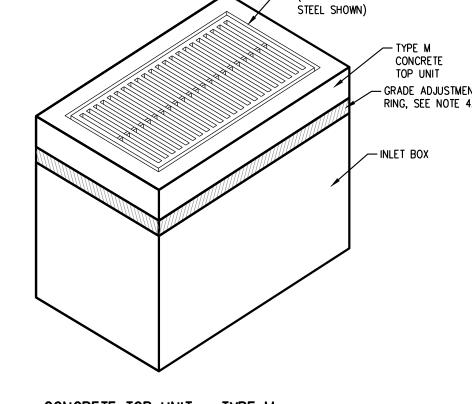
	RAIN GARDEN AREA		ELEVATIONS							DESIGN
		воттом	TOP OF BASIN/BERM	OCS ORIFICE	OCS ORIFICE DIAM.	OUTLET INV.	TOP OF OUTLET STRUCTURE	OUTLET STRUCTURE TYPE	OUTLET PIPE	INFILTRATION RATE (IN/HR)
	1A	317.00	320.00	317.50	3 IN.	316.00	318.50	STANDARD BOX	12" HDPE	-
	1B	291.00	294.00	291.50	6 IN.	290.00	292.50	STANDARD BOX	12" HDPE	-
	1C	295.00	298.00	295.50	6 IN.	294.00	296.50	STANDARD BOX	12" HDPE	_

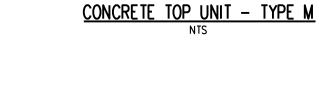


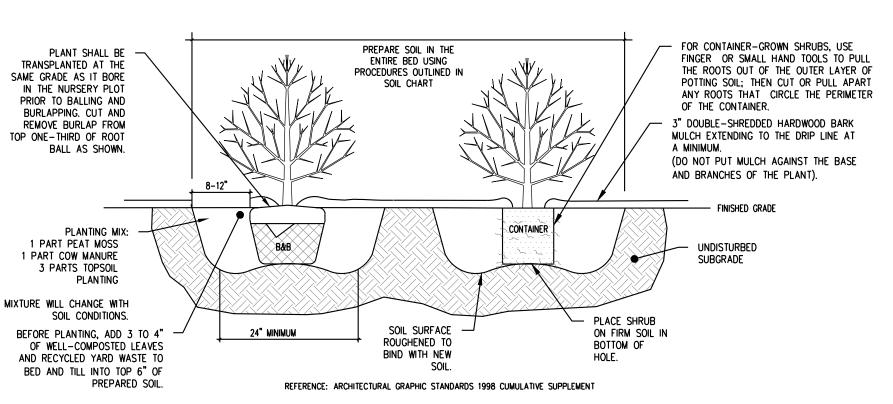
RAIN GARDEN AREA CROSS SECTION

STORM SEWER BEDDING/TRENCH DETAIL

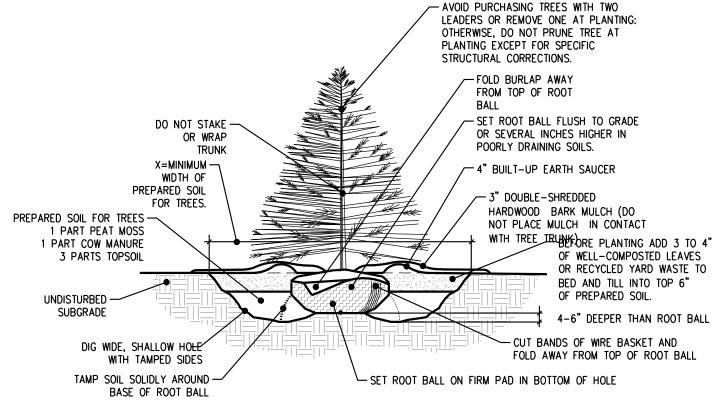








DECIDUOUS AND EVERGREEN SHRUB PLANTING DETAIL NOT TO SCALE



REFERENCE: ARCHITECTURAL GRAPHIC STANDARDS 1998 CUMULATIVE SUPPLEMENT.

NOTES:

1. NO SOIL OR MULCH SHALL BE PLACED AGAINST ROOT COLLAR OF PLANT.

TOD OF BOOT BALL FOLD BURLAP BA REMOVE ALL ROPE FROM TRUNK & TOP OF ROOT BALL. FOLD BURLAP BACK 1/3 FROM ROOT BALL

PLANTING DEPTH SHALL BE THE SAME AS GROWN IN NURSERY. THOROUGHLY SOAK THE TREE ROOT BALL AND ADJACENT PREPARED SOIL SEVERAL TIMES DURING THE FIRST MONTH AFTER PLANTING AND REGULARLY THROUGHOUT THE FOLLOWING TWO SUMMERS.

5. THE BOTTOM OF PLANTING PIT EXCAVATIONS SHOULD BE ROUGH TO AVOID MATTING OF SOIL LAYERS AS NEW SOIL IS ADDED. IT IS PREFERABLE TO TILL THE FIRST LIFT (2 TO 3 IN.) OF PLANTING SOIL INTO THE SUBSOIL.

> EVERGREEN TREE PLANTING DETAIL N.T.S.

X=MINIMUM WIDTH OF PREPARED SOIL FOR TREES 24" MIN. BEFORE PLANTING ADD 3 TO 4" OF WELL-COMPOSTED LEAVES OR RECYCLED YARD Waste to bed and till into top 6" of PREPARED SOIL. UNDISTURBED 4-6" DEEPER THAN ROOT BALL DIG WIDE, SHALLOW HOLE -CUT BANDS OF WIRE BASKET AND WITH TAMPED SIDES FOLD AWAY FROM TOP OF ROOT BALL PREPARED SOIL FOR TREES -1 PART PEAT MOSS PAD IN BOTTOM OF HOLE 1 PART COW MANURE - TAMP SOIL SOLIDLY AROUND 3 PARTS TOPSOIL BASE OF ROOT BALL REFERENCE: ARCHITECTURAL GRAPHIC STANDARDS 1998 CUMULATIVE SUPPLEMENT DECIDUOUS TREE PLANTING DETAIL

NOTES:

1. NO SOIL OR MULCH SHALL BE PLACED AGAINST ROOT COLLAR OF PLANT.

2. REMOVE ALL ROPE FROM TRUNK & TOP OF ROOT BALL. FOLD BURLAP BACK 1/3 FROM ROOT BALL
3. PLANTING DEPTH SHALL BE THE SAME AS GROWN IN NURSERY.
4. THOROUGHLY SOAK THE TREE ROOT BALL AND ADJACENT PREPARED SOIL SEVERAL TIMES DURING THE FIRST MONTH AFTER PLANTING AND REGULARLY THROUGHOUT THE FOLLOWING TWO SUMMERS.
5. THE BOTTOM OF PLANTING PIT EXCAVATIONS SHOULD BE ROUGH TO AVOID MATTING OF SOIL LAYERS AS NEW SOIL IS

- AVOID PURCHASING TREES WITH TWO LEADERS OR REMOVE

ONE AT PLANTING. PRUNE DEAD OR DAMAGED BRANCHES IN

ACCORDANCE WITH RECOGNIZED HORTICULTURAL PRACTICES.

OTHERWISE, DO NOT PRUNE TREE AT PLANTING EXCEPT FOR

/— 3" DOUBLE-SHREDDED HARDWOOD BARK MULCH

//+ (DO NOT PLACE MULCH IN CONTACT WITH TREE TRUNK)

SPECIFIC STRUCTURAL CORRECTIONS.

OF ROOT BALL

FOLD BURLAP AWAY FROM TOP

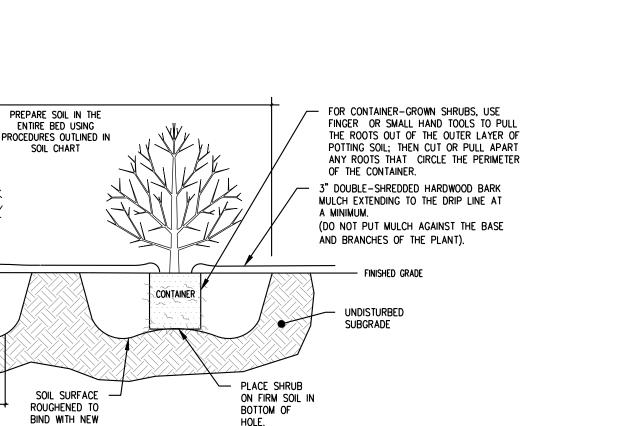
✓ SET ROOT BALL 2"-3" ABOVE

GRADE WITH TRUNK FLARE

─ 4" BUILT-UP EARTH SAUCER

ADDED. IT IS PREFERABLE TO TILL THE FIRST LIFT (2 TO 3 IN.) OF PLANTING SOIL INTO THE SUBSOIL.

6. BACKFILL MATERIAL TO BE FREE OF STONES, LUMPS OF CLAY GREATER THAN 2", ALL ROOTS, AND EXTRANEOUS

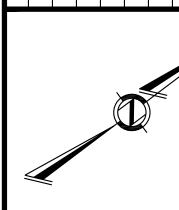


**TRACT** 1"= 50' SHEET No.

10/01/2020

YOU DIG!

CALL BEFORE



LAURA GUNSALUS

NGINEERING RAF

SHEET TITLE: CONSTRUCTION DETAILS

**GUNSALUS** 

SCALE(H): SCALE(V): DRAWN BY: CHECKED BY: PROJECT No.:



January 5, 2021 Ref: #7543

Township of Worcester 1721 Valley Forge Road PO Box 767 Worcester, PA 19490-0767

Attention:

Tommy Ryan, Township Manager

Reference: Gunsalus Tract – Revised Subdivision Plans

Dear Mr. Ryan:

I am in receipt of revised subdivision plans for the Gunsalus Tract in Worcester Township. These plans consist of five (5) sheets, are dated October 1, 2020 with a latest revision date of December 15, 2020. The plans have been prepared by Graf Engineering, LLC for the property owner, Laura Gunsalus. The plans propose the subdivision of an existing parcel of 10.21 acres into three (3) new building lots. The property is located in AGR-Agricultural District, and the subdivision plans have been prepared in conformance with Section 150-110.2 and Section 150-110.2.A(2) which allows for the subdivision of three (3) lots of less in the conservation subdivision district by utilizing the criteria established for the AGR district. CKS Engineers, Inc. previously reviewed subdivision plans for this parcel and submitted comments in our initial review letter dated October 21, 2020. This latest plan submission was also accompanied by a letter from Graf Engineering, LLC dated December 30, 2021 responding point by point to our original review letter, and also to the McMahon Associates review letter dated November 2, 2020. I have reviewed this latest plan submission and have the following comments:

- 1... All of the technical comments in my October 21, 2020 letter have been adequately addressed with the plan revisions.
- 2. The applicant will require numerous waivers in conjunction with this subdivision plan. The applicant should submit a separate letter to the Township requesting the required waivers, and also include the waivers on the record plan. The following waivers will be required.
  - Α. Section 130-17B(2) which requires driveways to be at least 40' from a roadway intersection.
  - B. Section 130-33C(2) requiring an aerial photograph of all physical features withing 500' feet of the property.
  - C: Section 130-16 requiring road frontage improvements (widening) along Mill Road.

January 6, 2021 Ref: # 7543 Page 2

- D. Section 130-18.A, requiring installation of sidewalks along the property frontage.
- E. Section 130-18.B requiring the installation of curbing along the property frontage.

Road improvements along Mill Road maybe difficult at this time, since there is an intermediate parcel between lots 1 and 3. It is suggested that the Township consider deferring the requirements for road frontage improvements, the installation of sidewalks, and the installation of curbing. These improvements can be deferred to a later date when it makes better sense to provide improvements along the entire frontage including the intermediate lot. The granting of either the waivers or deferrals should be considered.

- The applicant is reminded that a construction escrow will be required in conjunction with this project. Items to be included in the construction escrow included the three 93) rain gardens, all landscaping, and all monuments and pins. This escrow will be included in a development agreement which must be executed by the Township and the Applicant.
- 4. An Erosion and Sedimentation Control Plan must be prepared for this project. The limits of disturbance for each of the three (3) lots should be identified and indicated on the erosion and sedimentation control plan. This plan should be provided as part of the final plan set when submitted to the Township. If the total limit of disturbance exceeds one (1) acre, the applicant will be required to obtain a NPDES permit for this project.
- 5. Sheet No. 5 includes construction details for this project. This sheet includes a "water service connection detail" which should now be removed since public water is not being provided for this project.

It should be noted that the Township's traffic consultant, McMahon and Associates did submit an initial review letter, and the applicants engineer response letter did address the comments set forth in the McMahon letter. The Townships traffic consultant should review these plans and the revisions to make certain that all issues in their initial review letter are adequately addressed.

The above represents all comments on this latest plan submission. The applicants engineer should follow through with final revisions and preparation of the E & S plan and resubmit for further review and approval consideration.

Please contact me if you have any questions or need any additional assistance on this project.

Very truly yours,

CKS ENGINEERS, INC.

Township Engineers

Joseph J. Nolan, P.E.

JJN/paf

cc: Robert Brant, Esq., Township Solicitor Andrew Raquet, Worcester Township Rolph Graph, Graf Engineering, LLC

JD Contractors, LLC

File

#### TRANSPORTATION ENGINEERS & PLANNERS



McMahon Associates, Inc. 425 Commerce Drive, Suite 200 Fort Washington, PA 19034 P. 215.283.9444 mcmahonassociates.com

January 13, 2021

Mr. Tommy Ryan Township Manager Worcester Township 1721 Valley Forge Road P.O. Box 767 Worcester, PA 19490

RE: Traffic Review #2 – Land Development Plans

Gunsalus Tract (LD 2020-04) Worcester Township, Montgomery County, PA McMahon Project No. 820847.11

#### Dear Tommy:

In response to your request, McMahon Associates, Inc. (McMahon) has completed our second (2<sup>nd</sup>) traffic engineering review of the proposed Gunsalus Tract subdivision, to be located along the northern side of Mill Road to the east of Kriebel Mill Road in Worcester Township, Montgomery County, PA. It is our understanding that the proposed subdivision involves subdividing Parcel 67-00-02302-00-7 into three lots (Lots 1, 2, and 3) with a single-family home proposed to be constructed on each lot. Access to Lots 1 and 2 is proposed to be provided via a shared driveway connection to Mill Road while access to Lot 3 is proposed to be provided via individual driveway connection to Mill Road.

The following documents were reviewed and/or referenced in preparation of our traffic review:

- <u>Land Development Plans for Gunsalus Tract</u>, prepared by Graf Engineering, LLC, last revised December 15, 2020.
- <u>Response to Comments Letter for Gunsalus Tract</u>, prepared by Graf Engineering, LLC, dated December 30, 2020.

Based on our review of the submitted documents noted above, McMahon offers the following comments for consideration by the Township and action by the applicant:

- All waivers/deferrals requested by the applicant must be included on the plans. Also, a waiver/deferral
  request letter must be included in subsequent submissions providing justification for the waiver/deferral
  requests.
- 2. According to **Section 130-16.C(1)** of the **Subdivision and Land Development Ordinance**, Mill Road should have a minimum cartway width of 38 feet along the site frontage. The plans currently show an approximate 25-foot cartway width along the site frontage of Mill Road, thereby not satisfying the ordinance requirement. Since roadway widening along the entire site frontage is not feasible at this time since the widening improvements would not be contiguous along the proposed lots unless also

required along the 175 feet of the parcel owned by the Perna's (Block 09, Lot 42) that the proposed subdivision surrounds, we recommend to the Board of Supervisors to consider deferring this obligation that is required of the applicant until such a time as may be required by the Township for these subdivided properties, whether under present or future land ownership, and at no cost to Worcester Township. We understand that the Planning Commission was in general support of a waiver to this requirement.

- 3. According to **Section 130-18.A** of the **Subdivision and Land Development Ordinance**, sidewalk should be provided along the site frontage of Mill Road. The plans do not show any sidewalk along the site frontage of Mill Road, thereby not satisfying the ordinance requirement. The applicant has requested a waiver from providing sidewalk along the site frontage of Mill Road. We understand that the Planning Commission was in general support of a waiver to this requirement. However, we recommend to the Board of Supervisors to consider deferring this obligation that is required of the applicant until such a time as may be required by the Township for these subdivided properties, whether under present or future land ownership, and at no cost to Worcester Township.
- 4. According to Section 130-18.B of the Subdivision and Land Development Ordinance, curbing should be provided along the site frontage of Mill Road. The plans do not show any curbing along the site frontage of Mill Road, thereby not satisfying the ordinance requirement. The applicant has requested a waiver from providing curbing along the site frontage of Mill Road. We understand that the Planning Commission was in general support of a waiver to this requirement. However, we recommend to the Board of Supervisors to consider deferring this obligation required of the applicant based on the subdivision size and that the curbing would not be contiguous along the proposed lots unless also required along the 175 feet of the parcel owned by the Perna's (Block 09, Lot 42) that the proposed subdivision surrounds. If curbing is deferred, it should be until such a time as may be required by the Township for these subdivided properties, whether under present or future land ownership, and at no cost to Worcester Township.
- 5. According to Section 130-17.B(2) of the Subdivision and Land Development Ordinance, driveways shall be located not less than 40 feet from street intersections. Since the driveway to Lots 1 and 2 is located less than 40 feet from the intersection of Mill Road and Kriebel Mill Road, a waiver must be requested from this ordinance requirement. It should be noted that driveway volumes for Lot 1 and 2 are expected to be minimal, therefore, we would not be opposed to the granting of this waiver.
- 6. According to the Township's Roadway Sufficiency Analysis, the proposed development is located in Transportation Service Area South, which has a corresponding impact fee of \$3,125 per "new" weekday afternoon peak hour trip and the applicant will be required to pay a Transportation Impact Fee in accordance with the Township's Transportation Impact Fee Ordinance. Based on Land Use Code 210 (Single-Family Detached Housing) in the Institute of Transportation Engineers publication, *Trip Generation*, 10<sup>th</sup> Edition, a single-family home on Lots 1, 2, and 3 would generate three "new" trips during the weekday afternoon peak hour resulting in a transportation impact fee of \$9,375.
- 7. Based on our review, the applicant should address the aforementioned comments, and provide revised plans to the Township and our office for further review and approval recommendations. The applicant's engineer must provide a response letter that describes how each specific review comment has been

#### addressed, where each can be found in the plan set or materials, as opposed to general responses.

This will aid in the detailed review and subsequent review timeframes.

We trust that this review letter responds to your request. If you or the Township have any questions, or require clarification, please contact me.

Sincerely,

Casey A. Moore, P.E

Executive Vice President – Corporate Operations

BMJ/MEE/CAM

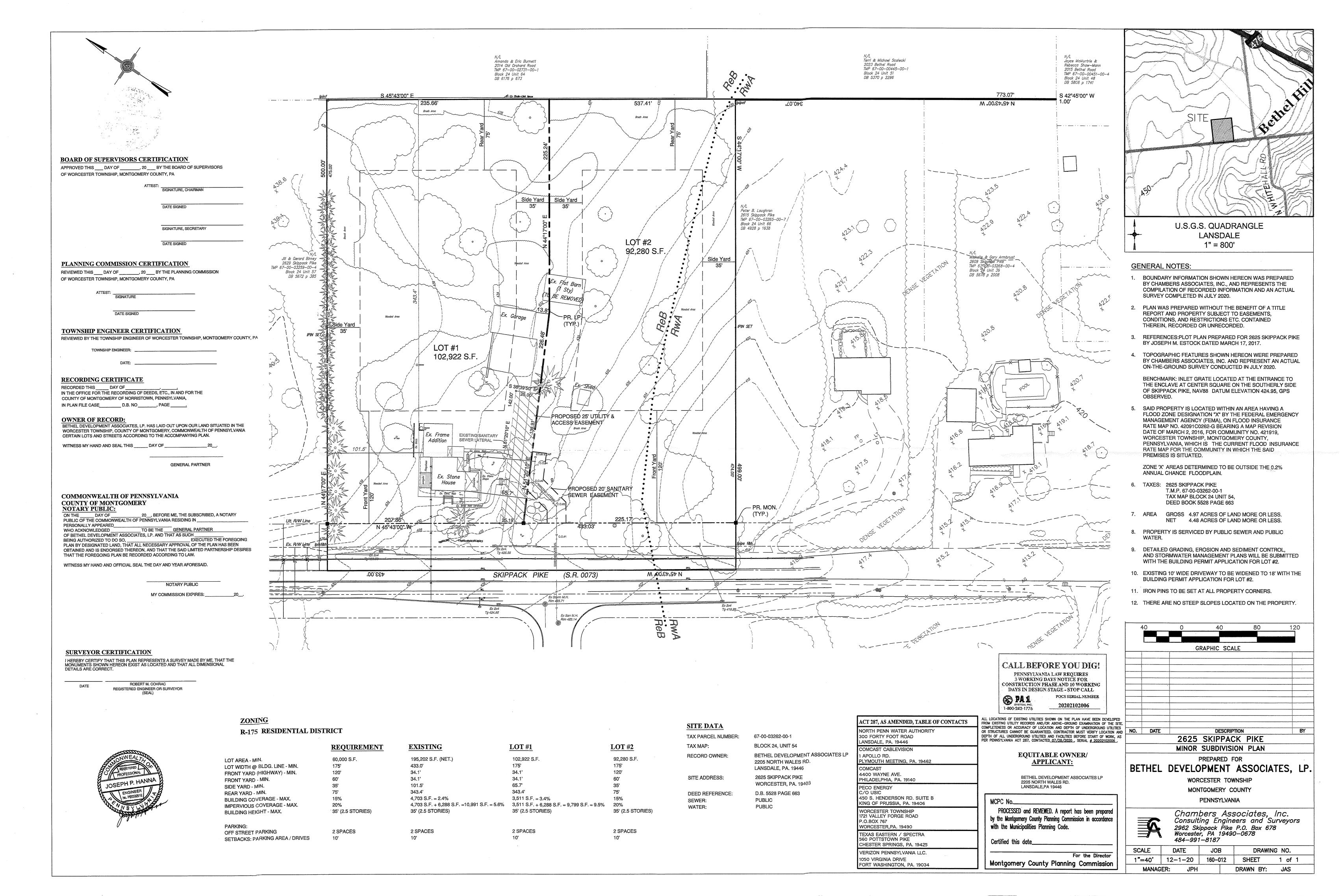
cc: Andrew R. Raquet, Worcester Township Codes Director & Assistant Zoning Officer

Joseph Nolan, P.E., CKS Engineers (Township Engineer)

Robert Brant, Esq. (Township Solicitor)

Rolph Graf, P.E., Graf Engineering, LLC (Applicant's Engineer)

I:\eng\WORCETO1\820847 - Gunsalus Tract\Correspondence\Out\2021-01-13 Gunsalas Tract Subdivision Review #2 (finalized).docx





December 14, 2020 Ref: # 7545

Township of Worcester PO Box 767 1721 Valley Forge Road Worcester, PA 19490-0767

Attention:

Tommy Ryan, Township Manager

Reference:

2625 Skippack Pike - Minor Subdivision

Dear Mr. Ryan:

I am in receipt of the Township's memorandum dated December 4, 2020 requesting my review of the proposed preliminary/final plan subdivision for 2625 Skippack Pike. This plan has been submitted as a minor subdivision plan in conformance with Section 130-35.1, "Minor Plan Submission" of the Township Subdivision and Land Development Ordinance. The plan consists of one (1) sheet, has been prepared by Chambers Associates, Inc., and is dated December 1, 2020. The plan has been prepared for the Bethel Development Associates LP, of Worcester Township.

The plan proposes the subdivision of an existing parcel containing 195,202 square feet (net) into two (2) lots. Lot 1 will contain the existing dwelling on the property. Lot 2 is proposed to be a future building lot. This property is in the R-175 Residential Zoning District as set forth in Worcester Township Code. I have reviewed this plan for conformance with the code requirements and offer the following comments:

- 1. The proposed lot line to subdivide the existing property has created a zoning violation for the existing garage. Section 150-177A(2) states that either attached or detached garages in the zoning district shall be located within the building envelope. The existing garage is only 13.8' from the proposed subdivision line. Based on the zoning ordinance, this distance must be at least 35'. The applicant should determine how it wishes to address this violation.
- 2. Lot 1 contains a "proposed 25' utility and access easement". It is assumed that the access easement is being provided for a shared driveway with proposed Lot 2. If that is the case, then there will need to be an agreement between Lots 1 and 2 in conjunction with maintaining the common drive area.

December 14, 2020 Ref: # 7545 Page 2

- The applicant should consider relocating the common drive to line up with the existing exit road from the reserve at Worcester project directly across the street. This would eliminate the offset in the existing driveway and improve traffic flow.
- 4. The applicant should also add the required site distance triangle on the plans. There appears to be landscaping at the front of the property that could inhibit site distance onto Skippack Pike.
- 5. The plans show an existing sewer lateral that was constructed as part of the Reserve at Worcester project. This lateral is shown crossing through proposed Lot 2 with a proposed sanitary sewer easement, and connecting to the existing stone house. The plans also show a stub and cap for future connection of the sewer lateral for Lot 2. Since two (2) lots will be utilizing the same lateral, there should be a written agreement to address the joint maintenance responsibilities of the lateral.
- 6. This project will be provided with both public water and public sewer. Public sewer shall be from Worcester Township, and public water shall be from the North Penn Water Authority.

  The applicant will need to obtain a letter indicating willingness to serve from the North Penn Water Authority.
- The plan as proposed shows no improvements on Lot 2. It is anticipated that this would be used for construction of a future house. In conjunction with that building permit, a full-plot plan of Lot 2 should be prepared to show the proposed location of the house, the grading of the lot, and all associated facilities including utilities, and the access driveway. Also, the applicant should address stormwater in conjunction with the stormwater management ordinance.
- 8. The plans are showing no public improvements. The applicant will need to request waivers from the Township in conjunction with required improvements for a subdivision. These waivers include road frontage improvements (130-16), sidewalks along all road frontages (130-18.A), curbing along all streets or road frontages (130-18.B), and landscaping requirements (130-28). The Township may want certain Landscaping included as part of this subdivision.

The applicant should request waivers for these improvements and also add the waivers to the subdivision plan.

The plans show the proposed placement of concrete monuments at several locations along the property frontage. The monuments must be set prior to plan recording, or an escrow will be required to cover the placement cost. Any landscaping that might be required would also need to be part of that escrow.

December 14, 2020 Ref: # 7545 Page 3

The above represents all initial comments on this plan submission. The applicant's engineer should address the comments and resubmit for further review and consideration. Please contact me if you have any questions or need any additional assistance with this subdivision.

Very truly yours,

CKS ENGINEERS, INC

Township Engineers

Joseph J. Nolan, P.E.

JJN/paf

CC:

Robert Brant, Esq., Township Solicitor Joseph Hannah, P.E., Chambers Engineers, Inc.

Bethel Development Associates, LP

File

#### TRANSPORTATION ENGINEERS & PLANNERS



McMahon Associates, Inc. 425 Commerce Drive, Suite 200 Fort Washington, PA 19034 P. 215.283.9444 mcmahonassociates.com

December 14, 2020

Mr. Tommy Ryan Township Manager Worcester Township 1721 Valley Forge Road P.O. Box 767 Worcester, PA 19490

RE: Traffic Review #1 – Residential Subdivision Plans

2625 Skippack Pike (LD 2020-06) Worcester Township, Montgomery County, PA McMahon Project No. 820978.11

#### Dear Tommy:

In response to the Township's request, McMahon Associates, Inc. (McMahon) has completed our initial traffic engineering review of the proposed subdivision, to be located at 2625 Skippack Pike (S.R. 0073) in Worcester Township, Montgomery County, PA. It is our understanding that the proposed subdivision involves subdividing Parcel 67-00-03262-00-1 into two lots (Lots 1 and 2). Based on a phone call from the applicant's site engineer, we understand that the existing single-family home will remain on Lot 1 and there is no plan or development currently proposed for Lot 2. Access to Lot 1, and the future development on Lot 2, is proposed to be provided via the existing driveway to Lot 1 along Skippack Pike (S.R. 0073) which will be widened from 10 feet to 18 feet in width.

The following document was reviewed and/or referenced in preparation of our traffic review:

• Subdivision Plan for 2625 Skippack Pike, prepared by Chambers Associates, Inc., dated December 1, 2020.

Based on our review of the submitted document noted above, McMahon offers the following comments for consideration by the Township and action by the applicant:

- 1. As part of the Reserve at Center Square residential development (directly across Skippack Pike from this parcel), a new access road across from the subject parcel was recently constructed. Additionally, Skippack Pike (S.R. 0073) has been widened to provide a separate right-turn lane into the Reserve access and a two-way-center-left-turn lane along Skippack Pike (S.R. 0073) from Berks Road to east of the Reserve at Center Square site. Consideration should be given to providing better access management along Skippack Pike (S.R. 0073) in the vicinity of the site, therefore, it is recommended that the existing driveway along Skippack Pike (S.R. 0073) should provide joint access to both Lots 1 and 2 and be shifted further to the east from its existing location, if at all feasible, in order to provide safer turning movements in this area and align directly opposite the eastern local road access of the Reserve at Center Square residential development.
- 2. Sight distance lines and measurements must be provided on the plan for the existing driveway to 2625 Skippack Pike (S.R. 0073) as required by **Section 130-16.E(5)** of the **Subdivision and Land Development Ordinance**, and to satisfy PennDOT Highway Occupancy Permits. Specifically, vehicular egress sight distances looking in both directions (sight distance to the left and sight distance to the right) must be shown on the plans. If the existing

driveway is ultimately realigned to be more directly opposite the eastern local road access to the Reserve at Center Square, as recommended in Comment #1, sight distance measurements must be provided for the realigned driveway location.

- 3. According to **Section 130-18.A** of the **Subdivision and Land Development Ordinance**, sidewalk should be provided along the site frontage of Skippack Pike (S.R. 0073). The plan does not show any sidewalk along the site frontage of Skippack Pike (S.R. 0073), thereby not satisfying the ordinance requirement. Due to this being a minor subdivision, the lack of presence of sidewalk along either side of Skippack Pike (S.R. 0073) in the surrounding vicinity of the site, and lack of pedestrian destinations in the surrounding vicinity, the Board of Supervisors may wish to consider deferring this obligation until such a time as may be required by the Township for these subdivided properties, whether under present or future land ownership, and at no cost to Worcester Township. The applicant should ensure that the site frontage is free and clear of any physical obstructions and graded in such a manner so as to not prohibit the installation of sidewalk in the future.
- 4. According to Section 130-18.B of the Subdivision and Land Development Ordinance, curbing should be provided along the site frontage of Skippack Pike (S.R. 0073). The plan does not show any curbing along the site frontage of Skippack Pike (S.R. 0073), thereby not satisfying the ordinance requirement. We note for the Board, that there is curbing along the north side of Skippack Pike (S.R. 0073) to the east of the site, near the intersection with Bethel Road, and curbing is also present along the site frontage of the Reserve at Center Square along Skippack Pike, opposite the site. However, it should also be noted that a field view of the site confirms that grading along the subject parcel flows away from the roadway and drains down into an existing swale along the frontage and appears to collect into a stormwater system that drains to the east along Skippack Pike. Given this drainage pattern and given this is a minor subdivision, the Board of Supervisors may consider deferring this required obligation of the applicant and that the curbing would not be contiguous along the site side of Skippack Pike (S.R. 0073) to the east unless curbing is also required along the site frontage of the parcel owned by Peter Loughran (Block 24, Unit 66). If curbing is deferred, it should be until such a time as may be required by the Township for these subdivided properties, whether under present or future land ownership, and at no cost to Worcester Township.
- 5. Add the existing driveway width to the plans. In addition, if the existing driveway will be modified under this application, or if a new or modified access will be provided under a separate application at such time that physical improvements are constructed for Lot 2, the modified or new access must be in accordance with Section 130-17.B (3) of the Subdivision and Land Development Ordinance with respect to grades, widths, and radii at the intersection with Skippack Pike (S.R. 0073), as well as satisfy PennDOT minimum use driveway requirements for permitting.
- 6. Since Skippack Pike (S.R. 0073) is a State Roadway, a minimum use driveway Highway Occupancy Permit (HOP) will be required for any modifications to the existing driveway to Lot 1 and/or for any future modifications within the PennDOT Right-of-Way associated with future construction of Lot 2. Since we are recommending that the future driveway to both Lot 1 and Lot 2 be used as a shared driveway, the owners of both properties will need to apply for a joint driveway HOP permit and there should be notes on the plan indicating there is an access easement to Lot 1 for use of the shared driveway accessing Skippack Pike. The Township and our office must also be copied on all plan submissions and correspondence between the applicant and PennDOT, and invited to any and all meetings among any of these parties.
- 7. According to the Township's Roadway Sufficiency Analysis, the proposed development is located in Transportation Service Area North, which has a corresponding impact fee of \$3,977 per "new" weekday

afternoon peak hour trip and the applicant will be required to pay a Transportation Impact Fee in accordance with the Township's Transportation Impact Fee Ordinance. Based on Land Use Code 210 (Single-Family Detached Housing) in the Institute of Transportation Engineers publication, *Trip Generation*, 10<sup>th</sup> Edition, a single-family home on Lot 2 would generate **one "new" trip** during the weekday afternoon peak hour resulting in a **transportation impact fee of \$3,977**. However, should the Board of Supervisors consider this use and its peak hour trip generation to be a deminimus traffic-generating application, the transportation impact fee may be waived. To qualify for the exemption, the applicant must place a waiver request on their final plan and submit information to support the request for review and approval by the Board.

- 8. A more detailed review of the site and all transportation-related engineering elements on the plan can be conducted, as the Township deems necessary, if/when new residential development is proposed on either Lot 1 or Lot 2 and a land development plan is submitted to the Township. Additional comments may follow at that phase of the parcel development.
- 9. Based on our review, the applicant should address the aforementioned comments, and provide revised plans to the Township and our office for further review and approval recommendations. The applicant's engineer must provide a response letter that describes how each specific review comment has been addressed, where each can be found in the plan set or materials, as opposed to general responses. This will aid in the detailed review and subsequent review timeframes.

We trust that this review letter responds to your request. If you or the Township have any questions, or require clarification, please do not hesitate to contact me.

Sincerely,

Casey A. Moore, P.E.

Executive Vice President – Corporate Operations

BMJ/CAM

cc: Andrew R. Raquet, Codes Director & Asst. Zoning Officer

Joseph Nolan, P.E., CKS Engineers (Township Engineer)

Robert Brant, Esq. (Township Solicitor)

Francis J. Hanney, PennDOT District 6-0 Susan LaPenta, PennDOT District 6-0

Brian Olszak, Montgomery County Planning Commission

Joseph Hanna, P.E., Chambers Associates, Inc. (Applicant's Engineer)

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## MONTGOMERY COUNTY PLANNING COMMISSION

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SCOTT FRANCE, AICP EXECUTIVE DIRECTOR

December 23, 2020

Mr. Tommy Ryan, Manager Worcester Township 1721 Valley Forge Road—Box 767 Worcester, Pennsylvania 19490

Re: MCPC #20-0239-001 Plan Name: 2625 Skippack Pike (1 lot comprising approx. 4.97 acres) Situate: Skippack Pike and Bethel Road

Worcester Township

Dear Mr. Ryan:

We have reviewed the above-referenced subdivision plan in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on December 7, 2020. We forward this letter as a report of our review.

#### **BACKGROUND**

The Applicant, Bethel Development Associates, LP, is proposing to subdivide an existing 4.97-acre residential lot into two single-family detached residential lots in the R-175 Residential District. The existing dwelling and certain out-buildings will remain on 'Lot 1', while it is anticipated another dwelling will be constructed on 'Lot 2'; both lots will share an access driveway from Skippack Pike. Apart from indicating a building envelope, no improvements appear to be proposed at this time. It appears that the development will be served by public water and sewer.

#### RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the Applicant's proposal; however, in the course of our review we have identified issues which the Township may wish to consider prior to final approval. Our comments are as follows:

#### **REVIEW COMMENTS**

#### **ZONING AND SALDO**

- 1. <u>Setbacks</u>. As per §150-77.A.2 of the Zoning ordinance, private garages must adhere to the required setbacks of all principal buildings in the R-175 Residential District. At present, the existing garage on Lot 1, which is proposed to remain, will be within 13.8 feet from the side lot line of Lot 2, less than the 35-foot setback required of the zoning district for principal structures. While the existing dwelling on Lot 1 is a legal nonconformity as it pertains to front yard setback and is permitted to remain, rendering a previously-conforming garage nonconforming through a subdivision is not permitted. The Applicant should alter the proposed lot lines, or otherwise rectify the situation to the satisfaction of the Township.
- 2. <u>SALDO Waivers.</u> There are several waivers to SALDO requirements which will likely be requested by the Applicant; however, a list of which has not been provided for our review, so it is unclear what waivers are being requested and what requirements have simply not been met. Significant issues such as stormwater management, vegetation removal, and planting cannot be adequately assessed without the Applicant providing them at the time of subdivision approval. The Township should require the Applicant to provide these details or otherwise provide the refined list of requested waivers.

#### CONCLUSION

We wish to reiterate that MCPC generally supports the Applicant's proposal, but we believe that our suggested revisions will better achieve the Township's planning objectives for residential development.

Please note that the review comments and recommendations contained in this report are advisory to the municipality and final disposition for the approval of any proposal will be made by the municipality.

Should the governing body approve a final plat of this proposal, the Applicant must present the plan to our office for seal and signature prior to recording with the Recorder of Deeds office. A paper copy bearing the municipal seal and signature of approval must be supplied for our files.

Sincerely,

Brian J. Olszak, Senior Planner

bolszak@montcopa.org - 610-278-3737

c: Bethel Development Associates, LP, Applicant Chamber Associates, Inc, Applicant's Representative Andrew R. Raquet, Asst. Township Zoning Officer

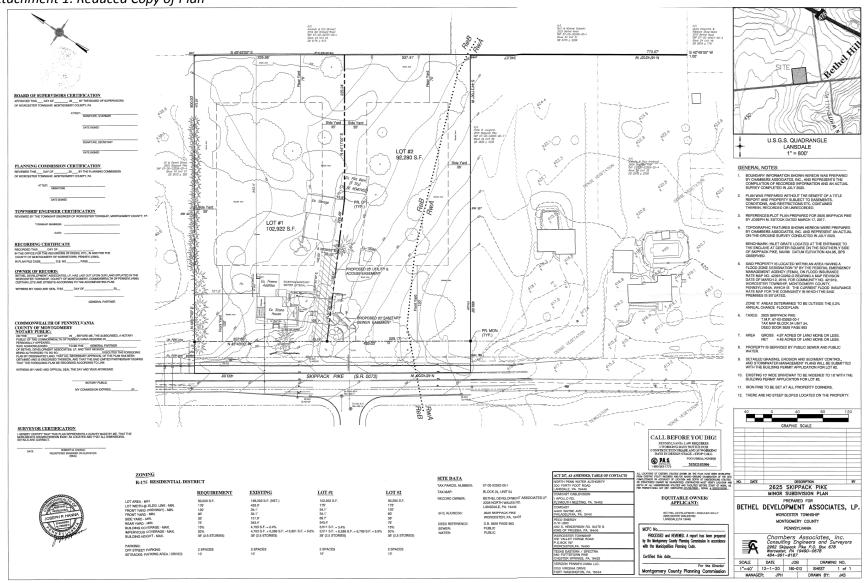
Attachments: 1. Reduced copy of plan

2. Aerial Map

Tommy Ryan, Mgr. - 3 - December 23, 2020

#### **APPENDIX**

#### Attachment 1: Reduced Copy of Plan



Attachment 2: Aerial Map



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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

SUBJECT: Review of Worcester "Green" Conservation Ordinances

TO: Worcester Township Planning Commission

CC: Tommy Ryan, Township Manager Stacey Crandall, Asst. Township Manager

Andrew R. Raquet, Asst. Zoning Officer; Codes Clerk

FROM: Brian J. Olszak, Senior Planner, MCPC

DATE: December 3, 2020

#### INTRODUCTION

At the direction of the Township Planning Commission, I have performed an analysis of Worcester's Zoning Ordinance and Subdivision and Land Development Ordinance (SALDO) regarding "green" ordinance provisions related to natural resource protection and landscaping. As directed, I've analyzed these various ordinances with an eye to comparing Worcester's standards with prevailing ordinance trends in the county and region, as well as identifying opportunities to strengthen existing protection standards. The topics I've reviewed included the following:

- Floodplains
- Steep slopes
- Riparian corridors
- Recommended plant species
- Street trees
- Buffers between zoning districts
- Parking lot landscaping
- Other miscellaneous conservation sections

Under each topic area, I give a brief overview of the existing regulatory framework and indicate notable code sections which the Township might consider revising.

#### **FLOODPLAIN CONSERVATION**

The Township regulates floodplain protections in the Floodplain Conservation Overlay. Almost all Montgomery County municipalities were required to update their floodplain ordinances once FEMA finalized the new floodplain maps, which went into effect in 2016. The state Department of Community and Economic Development created a model ordinance, modified by MCPC, for municipalities to use to ensure compliance with federal FEMA regulations. The Township's ordinance is based upon this

model and, because participation in the National Flood Insurance Program (NFIP) is conditioned upon having a compliant ordinance, we generally do not recommend changes which are too substantial in nature. That being said, municipalities were permitted to make changes which were more restrictive than the model suggested. Since most of the lots in floodplain in Worcester tend to be large lots, impacts to the floodplain have largely been avoided when developed out and, in that light, Worcester may not see any appreciable gain by making significant revisions to this section. In the interest of exhausting all possible options to strengthen the ordinance, I offer the following options for the Township's consideration:

- §150-136.B. The regulatory flood elevation, the minimum height above the base flood elevation which new structures must be constructed in the floodplain, is 1.5 feet, higher than the 1 foot that many municipalities have. Worcester may increase this height if desired, but I'll defer to the Township Engineer whether such a change is justified.
- §150-138.D.2 Worcester, and many other communities, permit expansions and enlargements of existing structures in the floodplain (but not the floodway), which are conditioned upon specific criteria, one of which is that all cumulative improvements on the property must not "increase the one-hundred-year-flood elevation more than one foot at any point." While the FEMA model ordinance framework considers this modest rise acceptable, some communities in particularly flood-prone areas, such as Cheltenham Township, have stricken these clauses from the ordinance and have replaced them with the phrase "[must not] increase the base flood elevation at any point." However, since Worcester has seen few, if any, applications for development within the restricted floodplain area, making this change may not be necessary.
- §150-139.B.3 The same instance of permitting the modest increase in the base flood elevation also appears in the conditions for granting a variance. While the variance conditions of subsections B.5, B.6 and B.7 attempt to protect properties upstream and downstream from an unacceptable rise in the flood elevation on one particular variance application, there is still the possibility that permitting small, incremental changes from several properties may accumulate, which the current variance process cannot protect against. Again, since Worcester has seen few, if any, applications for development within the restricted floodplain area, making this change may not be necessary.

#### **STEEP SLOPES CONSERVATION**

Regulation of steep slope disturbance is performed for two general reasons: to prevent the uncontrolled disturbance of slopes in a manner which will cause excessive erosion and unstable soils, and to protect the natural geology and ecology which steep slopes afford. Requiring any disturbance and regrading of steep slopes to be performed only through an engineered plan and the approval of the Township Engineer is considered customary across the region, which Worcester's Steep Slopes Conservation Overlay requires as well. Worcester defines steep slopes at 15% and above, with 25% and above considered especially steep, upon which most development is prohibited (§150-146.4). This is largely in line with how the many other county municipalities define steep slopes. A few revisions which the Township might consider include the following:

 Overall, the existing Steeps Slopes Conservation Overlay focuses largely on the avoidance of steep slopes during the land development process, particular in the "layout of developments." However, disturbance of steep slopes can and does occur outside the land development process, such as when a single residential lot is under construction. One significant addition to address this issue could include a prohibition on vegetation removal in steep slope areas, with or without grading.

- Currently there is no limitation to how much regrading of slopes under 25% can occur on a property. While slopes below 25% may not be as environmentally sensitive as slopes greater than 25%, such slopes still provide ecological functions and potential erosion hazards worthy of protection. A potential revision in this regard could include an overall limitation on the disturbance of slopes between 15% and 25%: many municipalities limit disturbance of these types of slopes to 25% of all eligible slopes on the property by area.
- \$130-32.1. There appears to be a discrepancy between what the Zoning and the SALDO consider steep slopes: the SALDO defines steep slopes as 10% and 18%, while the Zoning defined steep and very steep slopes as 15% and 25%. This discrepancy should be corrected.
- **\$150-9**. Worcester ensures, through the "lot area calculation" standard required for all residential zoning districts, that the presence of steep slopes must be accounted for when determining the minimum lot size necessary for residential properties. This essentially requires a *greater* lot area to ensure there is usable lot area outside of steep slope areas and other sensitive land, which ultimately incentives their continued protection. However, it appears no such requirement is included for calculated *nonresidential* lot area. The Township may want to consider adding similar language to the creation of nonresidential lots as well, to ensure consistent conservation practices across the Township.

#### RIPARIAN CORRIDOR CONSERVATION

Stream corridors, as well as lakes and ponds, all maintain unique aquatic-based habitats and plant communities. Not only do these resources provide habitat, but the land-based resources abutting these water bodies provide a number of ecological benefits, including the attenuation of stormwater, streambank conservation and erosion prevention, as well as the regulation of pollutants and oxygen levels in waterways. Worcester regulates activities on the land abutting these waterways, called riparian corridors, primarily through the Riparian Corridor Conservation Overlay District (RCCD) in the Zoning ordinance. This ordinance, along with those of many municipalities in the county, uses MCPC's Model Riparian Corridor Conservation District ordinance.

Worcester's ordinance is, in fact, better than many other ordinances I have come across, namely because it includes a substantial section which is left out of the Model and other existing ordinances: corridor management and replenishment. However, there are certain sections of Worcester's ordinances on this topic which might be strengthened in the following ways:

• \$150-146.6.A.2. The Township might desire to strengthen the measured width of the corridor to be included within the district. Many municipalities, as well as the Model ordinance, provide for a Zone 1 width of 25 feet and a Zone 2 width of 50 feet, adding up to a total width of 75 feet from bankfull flow. However, since the Model was written, guidance has evolved to recommend at least a 100-foot buffer from the streambank, which could be expressed as an additional 25 feet added to the Zone 2 width. However, increasing the total buffer from 75 feet

to 100 feet may prove more onerous for affected property owners, in that additional setbacks may reduce the amount of usable land on certain properties.

#### RECOMMENDED PLANT SPECIES LIST

The list of recommend plant species contained within **§130-28.H** of the SALDO appears to be a good mix of native and adapted species, and otherwise appears more or less in line with the average municipality. However, there are some sections which could be improved, following current best practices, in the following ways:

- **Remove. Invasive Species.** I'd recommend the removal of the following species, which are known to be invasive in Pennsylvania and nearby states:
  - Acer ginnala
  - o Koelrueteria paniculata
  - Phellodendron amurense
- Remove: Pest or Disease-Prone Species. I'd recommend the removal or clarification of the following species:
  - Fraxinus americana and Fraxinus pennsylvanica var. lanceolata (white and green ashes, respectively). The Township should remove these species due to the persistent threat of the emerald ash borer in the state.
  - Elm species. The Township should specify that any elms to be planted should be of a Dutch Elm Disease—resistant variety, such as Ulmus americana 'New Harmony.'
- Add to Prohibited Species List. In addition to those species already listed in §130-28.H.6
  which are prohibited, the Township may want to adopt by reference other lists established by
  governmental agencies, including any other plants listed in the official Federal and State
  Noxious Weed Laws, as well as those species listed in the Department of Conservation and
  Natural Resources' <a href="Invasive Species List">Invasive Species List</a>. This last list contains the most comprehensive list
  of any organization relevant to Pennsylvania, is more-frequently updated, and is based on
  DCNR's current management practices of state lands.
- Add to Overall Recommended Plant List. While the list of §130-28.H contains many good species, there is significant potential to include additional beneficial species, as well as to provide expanded guidance on recommended species for other plant categories mentioned in the SALDO but not referenced in the existing list, such as for drainage areas and detention basins. Additionally, recommended species for shrubs in §130-28.H.4 is not currently included in the existing list. Attached to this memo is a comprehensive List of Recommended Plants I recently put together for another Montgomery County municipality, which was reviewed by several landscape architects and conservation professionals, which represents our most comprehensive guidance—the Township can adopt any part, or the entirety, of this list according to its preference. A particular strength of this list is that it also provides specific cultivars, or cultivated varieties, of tree species which have been cultivated for positive attributes, and which can make them suited for special environments, like a parking lot or a street tree.

#### STREET TREES

Street trees provide a number of benefits to the community, including beautification, increasing the shading of paved areas like sidewalks and streets, and providing a visual buffer between the street and buildings. Street trees are required along shared driveways, streets, and sidewalks in the Township. It appears that much of this section, §130-28.G.4, may have been inspired by MCPC's Model Subdivision and Land Development Ordinance, which has been used in multiple municipalities across the county. However, since its publishing in 2012, our guidance has evolved, which has been complemented by a renewed interest among municipalities in encouraging street tree plantings, and the Township may wish to consider these revisions:

- \$130-28.G.2. The wording of this section is a bit confusing: "Plantings should be selected and located where they will not create or contribute to conditions hazardous to the public's safety. Such locations include but shall not be limited to public street rights-of-way; sidewalks; underground and above ground utilities; and sight triangle areas required for unobstructed view at street intersections, as discussed in \$130-16E(5)". The second sentence appears to suggest places where trees are not recommended, instead of recommended. The Township should consider rewriting this section to state something to the effect of: "Street trees shall not be located within X feet of street rights-of-way, sidewalks, underground and above ground utilities and sight triangles." Five or ten feet are common distances used which may be reasonable to use here. That being said, there are trees which are appropriate for and adapted to confined spaces, such as near sidewalk or street pavement, and areas with overhead utility wires, which the Township may wish to insist a developer use in those circumstances, instead of having no landscaping at all in those areas. Such tree species and cultivars are included in the attached List of Recommended Plants referenced above.
- **\$130-28.G.4.b.** The first sentence of this section appears to set one standard for the *number* of trees required, but then suggests a different *spacing* requirement for primary streets "where they may be up to 50 feet on center spacing." It is not clear from a reading of this sentence whether the actual number of street trees required on primary streets is different, or if just the spacing is permitted to be flexible. The actual number of street trees required should be consistent and unambiguous, but the Township can continue to permit flexibility in the spacing of those trees. Using one tree for every 25 feet of street frontage is a common requirement. In addition, this section should explicitly clarify that the required street tree is calculated based on the frontage of both streets *and* "new sidewalks or passageways," as is referenced in Subsection 4.a.
- \$130-28.G.4.c. As it stands, there is a minimum five-foot setback required from rights-of-ways, but no maximum. Measuring a street tree setback from the ultimate right-of-way, which can often extend several yards from the edge of the street pavement into a property, can be tricky—if a street tree is too far away from the street, it arguably may no longer be a street tree, and the benefits of shading sidewalks and streets are lost. While there are legitimate concerns about street trees heaving sidewalks or complicating road widening projects, many of these concerns can be allayed by instead installing or requiring the appropriate tree species for the space (such appropriate tree species and cultivars are included in the attached List of Recommended Plants referenced above). Some municipalities instead use a

"distance from the curb or cartway edge" measurement and a *maximum* setback to achieve better results, which the Township could also consider doing.

#### **BUFFERS BETWEEN DISTRICTS**

Requirements for landscape buffers are located within **§130-28.G.5** of the Township's SALDO; however, most individual zoning districts in the Township also contain their own specific buffer requirement, which are generally limited to the specified width, or otherwise state that "a buffer is required." The Township may wish to consider the following revisions:

- Buffers throughout Zoning. Buffer requirements for individual zoning districts vary widely, and can sometimes be under-prescriptive (e.g. the SC Shopping Center District does not specify a required width for the buffer) or over-prescriptive, leading to small conflicts with the buffer requirements of the SALDO. Since by law the regulations of both the SALDO and Zoning are meant to apply simultaneously, conflicts tend to be resolved, since the more restrictive regulation would tend to apply. In theory, the zoning district should stipulate the required widths of the buffer, and the SALDO should stipulate the method in which buffers across all zoning districts will be planted. While the provisions for buffers do vary slightly from district to district, the total impact of the Zoning and SALDO requirements—in particular the relative buffer widths and intensity of plantings required—do not radically differ from the average municipality in Montgomery County. In the future, the Township may wish to investigate the slight differences in application of buffering requirements to ensure that the same terms and conditions apply consistently throughout the zoning districts.
- §130-28.G.5.b.1: This section states that "Existing vegetation of appropriate species and
  quantities on the property can be considered in the fulfillment of these requirements." The
  Township may want to consider conditioning a developer's inclusion of existing vegetation
  into the required buffer plantings by requiring the removal of dead, dying, diseased and
  invasive trees in the existing tree masses.
- \$130-28.G.10: This section stipulates several buffer requirements for the "RPD Rural Preservation District." However, it appears that this district may no longer exist in the Zoning Ordinance, or may intend to apply to a newer district that may have superseded the RPD district. If this is no longer an active zoning district, then it should be repealed, applied to the successor zoning district, or applied to Conservation Subdivisions.
- Buffering of other site elements, such as refuse areas and other related elements appear satisfactory.

#### PARKING LOT LANDSCAPING

Landscaping in a parking lot serves several uses, not the least of which is beatification. However, trees and other vegetation also reduce the "urban heat island effect" of large parking lots, break up large patches of impervious surface, and ultimately improve air quality. Worcester requires the provision of landscaping within parking lots in §130-28.G.6 of the SALDO, which also appears to have been inspired by MCPC's Model Subdivision and Land Development Ordinance. The traditional way that landscaping is usually integrated within and around parking lots through land development regulations is either through an "x parking islands per y parking spaces" scheme or "x trees per y parking spaces" metric, which is how Worcester generally does it. It has been our experience at

MCPC and the experience of several municipalities, however, that this method of parking lot landscaping tends to not worked out as well as planned. What often results is the creation of several parking islands with little to no vegetation in them at all (which instead are primarily composed of shredded hardwood mulch), and what trees do survive after the initial guaranty period are otherwise stunted and in poor health due to poor soil conditions and constricted growing conditions. Upon review of the Township's provisions for parking lot landscaping, the Township may want to consider the following revisions:

- Overall we highly recommend applying provisions from MCPC's Sustainable Green Parking
   Lots Guidebook, which has taken a comprehensive approach to updating our guidance on
   parking lot landscaping and design. One need only look at the parking lot landscaping of Peter
   Went Farmstead to see the impressive benefits of such landscaping, which can even be used
   for stormwater management purposes. In particular, we recommend adding enhanced
   interior landscaping standards. I've created the first full implementation of this guidance in
   Montgomery County into another community's recently-adopted SALDO, which can be found
   here: https://ecode360.com/36416171
- \$130-28.G.6.a. Perimeter buffers for parking are required along property lines, rights-of-way, as well as between buildings and parking lots. These planting schemes satisfactorily add beneficial landscaping to these areas. However, we'd recommend offering additional street-buffering options for more constrained sites, such as a reduced reliance on landscaping and greater allowance for ornamental fences and walls, as well as shrubs.
- \$130-28.G.6.c. This section provides the fundamental planting requirement for parking lot interiors. However, several terms within this section could be further defined: for instance, it is not clear how "a minimum of 10% of the [parking] area shall be devoted to landscaping" is measured, whether it is by surface area of planting islands or by number of plants. Although there is "one tree per 15 parking spaces" required, offering "lawn" as a potential landscaping option tends to be rare among municipalities, and could be reconsidered. In the *Guidebook* referenced above, and my own implementation of it linked above, the landscaping required is benchmarked at increasing percentages depending upon the size of the parking lot, and uses a "canopy and ground coverage" measurement of vegetation to ensure high-quality, beneficial landscaping is provided with adequate growing conditions, which the Township may consider using as well.
- The selection of appropriate plantings for the challenging environment of parking lots could be further encouraged by the inclusion of the relevant plant species from the attached **List of Recommended Plants** indicated for adaptability to parking lots.

#### OTHER CONNSERVATION SECTIONS

The Township stipulates, through the Conservation Subdivision standards within the SALDO, that certain natural resources be protected and included with the required open space of certain land developments (§130-15.2). The natural resources referenced in §130-15.2 extend beyond the scope of the typical riparian, steep slope and floodplain areas for which Worcester already has established protections, and are generally not well defined. Some of these referenced natural resources include "groundwater recharge" areas, "hedgerows," "groups of trees," "swales," and "springs," among other resources. These and other resources are currently required to be incorporated into required

open spaces "to the fullest extent practicable," according to the satisfaction of the Township. If desired, the Township could specify more clearly which of these and other resources should be protected and to what extent.

### **Appendix A: List of Recommended Plants**

**Note**: Any species or cultivar listed below may be used for another purpose other than the Category under which it is listed, provided it receives the recommendation of the Township.

#### Street Trees:

#### **Shade or Canopy Trees Suitable Under or Near Power Lines**

Maximum height shall not exceed 25.' Trees shall be spaced at least 18' apart.

Amelanchier arborea Robin Hill' 'Robin Hill' Juneberry

Amelanchier canadensis Serviceberry

Carpinus caroliniana 'Native Flame' 'Native Flame' American Hornbeam

Cercis canadensis Eastern Redbud

Cornus alternifoliaAlternate-Leaf DogwoodCornus floridaFlowering DogwoodMagnolia virginianaSweetbay MagnoliaPrunus serrulata "Shirotae"Mt. Fuji Cherry

Prunus subhirtella "Autumnalis"

Syringa reticulata "Ivory Silk"

Japanese tree lilac

Syringa reticulata "Summer Snow"

Zelkova serrata 'City Sprite'

Zelkova serrata 'Schmidtlow'

Vireless Zelkova

Note: No other cultivars of Zelkova serrata shall be permitted under these conditions.

#### Street Trees:

## Shade or Canopy Trees Suitable Near Paving and Parking Lot Greening (Planting Islands and Planting Strips):

Trees shall be spaced at least 20' apart.

Trees indicated with an asterisk (\*) shall be spaces at least 30-40' apart.

Acer saccharum Goldspire' Goldspire' Sugar Maple

Betula nigra River Birch

Carpinus betulus Columnaris 'Columnar European Hornbeam

Carpinus caroliniana American Hornbeam
Cercis canadensis Eastern Redbud

Ginkgo biloba 'Princeton Sentry' Princeton Sentry Ginkgo Ginkgo biloba 'Magyar'\* Magyar Upright Ginkgo\*

**Note**: No female cultivars of Ginko biloba shall be permitted.

Gleditisia triacanthos 'inermis'\*

Thornless Honey Locust\*

Ilex opacaAmerican HollyNyssa sylvaticaBlack Gum

Platanus x acerfolia 'bloodgood "\* Bloodgood London Plantree\*

Quercus alba\*White Oak\*Quercus coccinea\*Scarlet Oak\*Quercus imbricaria\*Shingle Oak\*Quercus palustrisPin OakQuercus rubra\*Red Oak\*

Tilia cordata
Littleleaf linden
Taxodium distichum
Bald Cypress
Zelkova serrata
Zelkova

#### **Shade or Canopy Trees Suitable for Buffers, Screens, and Natural Areas**

Minimum mature height: 45' or more. Trees shall be spaced at least 30' apart, and shall be planted in minimum eight foot (8') planting strip.

Acer saccharum Sugar Maple

Acer rubrum October Glory' October Glory Red Maple

Betula nigra River Birch

Carya ovata Shagbark Hickory
Celtis occidentalis Common Hackberry

Cercidiphyllum japonicum Katsura

Cladrastis kentukea American Yellowwood Fagus grandifolia American Beech

Ginkgo biloba (male clones only)

Gleditisia triacanthos var. inermis

Ginkgo (Male Clones Only)

Thornless Common Honeylocust

Liquidambar styracifluaSweetgumLiriodendron tulipiferaTulip TreeMetasequoia glyptostroboidesDawn Redwood

l*Ostrya virginiana* American Hophornbeam

Platanus occidentalis Sycamore

Platanus x acerifolia "bloodgood" Bloodgood London Planetree

Quercus alba White Oak

Quercus bicolor Swamp White Oak

Quercus imbricariaShingle OakQuercus macrocarpaBur OakQuercus palustrisPin OakQuercus phellosWillow OakQuercus prinusChestnut OakQuercus roburEnglish Oak

Quercus roburf. fastigiataFastigiate English OakQuercus rubraNorthern Red OakStyphnolobium japonicumChinese Scholar TreeTaxodium distichumCommon Baldcypress

Tilia cordata 'Chancellor' Chancellor Littleleaf Linden

American Linden

Tilia americana

Tilia tomentosa Silver Linden

Ulmus americana 'New Harmony' New Harmony American Elm

Note: Any other cultivar of Ulmus americana with a demonstrated resistance to Dutch Elm

Disease shall be permitted.

Ulmus parvifolia 'Emer II' Elmer II ALLEE Lacebark Elm
Zelkova serrata 'Green Vase' Green Vase Japanese Zelkova
Zelkova serrata 'Village Green Village Green Japanese Zelkova

#### Shade or Canopy Tree – Suitable for Property Lines or Buffer Strips

Minimum Mature Height – 30' or more.

Acer rubrum October Glory' October Glory Red Maple

Acer saccharum Sugar Maple

Aesculus x carnea Red Horsechestnut

Betula nigra River Birch

Carpinus betulusEuropean HornbeamCarpinus carolinianaAmerican HornbeamCarya ovataShagbark Hickory

Celtis occidentalis Hackberry

Fagus grandifolia American Beech

Ginkgo biloba (male clones only)
Gleditisia triacanthos 'Inermis"
Gymnocladus dioicus
Halesia tetraptera
Ginkgo (Male Clones Only)
Thornless Honey Locust
Kentucky Coffeetree
Carolina Silverbell

Koelreuteria paniculata Panicled Goldenraintree

Liquidambar styraciflua Sweetgum

Metasequoia glyptostroboides Dawn Redwood

Nyssa sylvatica Black Tupelo

Ostrya virginiana American Hophornbeam

Oxydendrum arboretum Sourwood — (in low-pH soil only)
Platanus x acerfolia 'bloodgood" Bloodgood London Plantree

Quercus alba White Oak

Quercus bicolor Swamp White Oak

Quercus coccineaScarlet OakQuercus imbricariaShingle OakQuercus macrocarpaBur OakQuercus palustrisPin OakQuercus phellosWillow OakQuercus prinusChestnut Oak

Quercus robur Fastigiata'Fastigiate English OakQuercus rubraNorthern Red Oak

Quercus velutina Black Oak

Sassafras albidum Sassafras

Taxodium distichumCommon BaldcypressTilia americanaAmerican Linden

Tilia cordata 'Chancellor' Chancellor Littleleaf Linden

Tilia tomentosa Silver Linden

Ulmus americana 'New Harmony' New Harmony American Elm

Note: Any other cultivar of Ulmus americana with a demonstrated resistance to Dutch Elm

Disease shall be permitted.

Ulmus parvifolia 'Emer II' Elmer II ALLEE Lacebark Elm Zelkova serrata 'Green Vase' Green Vase Japanese Zelkova

Zelkova serrata 'Village Green Village Green Japanese Zelkova

# Ornamental Trees – Suitable Near Overhead Utility Wires, and for Property Line Buffers, Site Element Screening and Parking Lot Greening (Planting Islands and Planting Strips)

Minimum mature height – 15' or more, with maximum height of 25'.

Acer buergerianumTrident MapleAcer griseumPaperbark MapleAcer triflorumThree-flower MapleAcer truncatumShantung MapleAmelanchier canadensisServiceberry

Carpinus carolinianaAmerican HornbeamCercis canadensisEastern RedbudChionanthus retususChinese Fringe TreeCornus alternifoliaAlternate-Leaf DogwoodCornus floridaFlowering Dogwood

Cornus kousa Dogwood (Cultivars)

Cornus florida x Cornus kousa Rutger's Dogwood

Cornus masCornelian Cherry DogwoodCornus officianalisJapanese Cornel DogwoodCotinus obovatusAmerican Smoketree

Crataegus crusgalli var. inermis Thornless cockspur hawthorn

Crataegus laevigata "Superba"English hawthornCrataegus x lavalleiLavalle hawthornCrataegus phaenopyrumWashington hawthornCrataegus viridis "Winter King"Winter king hawthornHamamelis virginianaCommon Witchhazel

Hamamelis mollis Chinese Hybrid Witchhazel

Magnolia virginianaSweetbay MagnoliaMalus "Adirondack"Adirondack crab appleMalus "Prairifire"Prairifire crab apple

Malus "Professor Sprenger" Professor Sprenger crab apple

Prunus x 'Okame' 'Okame' Cherry
Prunus x Yeodensis' 'Yeodensis' Cherry

Prunus sargentii 'Spire' Columnar Sargent Cherry

Prunus subhirtella var. autumnalis Higan Cherry
Prunus virginiana Chokecherry

Prunus virginiana "Schubert"

Syringa reticulata "Ivory Silk"

Syringa reticulata "Summer Snow"

Canada red chokecherry

Japanese tree lilac

Japanese tree lilac

#### **Large Deciduous Shrubs – Suitable for Property Line Buffers Screens**

Minimum Mature Height – 15' or more

#### Key

#### W = Wet Site Tolerant D = Dry Site Tolerant

Aesculus parvifloraBottlebrush BuckeyeAronia arbutifoliaWRed ChokeberryAronia melanocarpaBlack ChokeberryCalycanthus floridusWCommon SweetshrubClethra alnifoliaSummersweet Clethra

Cornus racemosaW or DGray DogwoodCornus sericeaRedosier DogwoodCorylus americanaAmerican Hazelnut

Diervilla sessilifolia Southern Bush-honeysuckle

Forsythia 'Meadowlark' Forsythia

Hamamelis vernalisVernal WitchhazelHamamelis virginianaCommon WitchhazelHydrangea quercifoliaOaklead Hydrangea

*Ilex verticilata* Winterberry

Philadelphus x lemoinei D Sweet Mockorange
Rhus glabra Smooth Sumac
Salix caprea Pussy Willow

Viburnum dentatumArrowwood ViburnumViburnum farreriFragrant Viburnum

Vibernum nudum "Winterthur or Brandywine"

Witherod

Viburnum prunifolium Blackhaw Viburnum

Viburnum trilobum American Cranberrybush Viburnum

#### **Evergreen Shrubs – Suitable for Buffers and Screens**

Minimum Mature Height – Four Feet (4') or more

Ilex crenataJapanese HollyIlex glabraInkberry (Cultivars)Juniperus communisCommon JuniperJuniperus virginianaEastern RedcedarKalmia angustifoliaSheep LaurelKalmia latifoliaMountain-laurelLeucothoe fontanesianaFetterbush

Leucothoe racemose Sweetbells Leucothoe
Pieris floribunda Mountain Pieris

Prunus laurocerasus Common Cherry Laurel
Prunus laurocerasus 'Otto Luyken' Otto Luyken' Cherry Laurel
Rhododendron sp.(viscosum, vaseyi, etc.) Rhodoendron and Azalea

Taxus sp. Yew

Schipkaensis Skip Laurel

Viburnum rhytidophyllum Leatherleaf Viburnum

## Shrubs – Suitable for Building Foundation, Front Yard Landscaping or Parking Lot Greening (Planting Islands and Planting Strips)

Baccharis halimfolia Groundsel-tree

Buxus Microphylla Littleleaf Boxwood (needs winter wind protection)

Clethra alnifoliaSummersweetFothergilla gardeniaDwarf FothergillaForsythia 'Arnold Dwarf'Arnold Dwarf Forsythia

Hypericum frondosum 'Sunburst' Sunburst Golden St. Johnswort

*Ilex glabra* Inkberry

Itea virginica Henry's Garnet Virginia Sweetspire

or 'Little Henry'

Myrica pennslvanica Northern Bayberry

Rhus aromatica 'Lo-Grow' 'Low-Grow' Aromatic Sumac

Rosa hybrida 'Ratko' Double Knockout Rose

Spiraea x bumalda 'Goldflame' Bumald Spiraea

Viburnum dentatum Arrowwood Viburnum

#### **Evergreen Trees – Suitable for Property Line Buffers or Screens**

Minimum Mature Height – 20' or more

Albies balsamea Balsam Fir Abies concolor White Fir

Chameacyparis thyoidesAtlantic WhitecedarCryptomeria japonicaJapanese Cedar

Cuppressocyparis leylandiiLeyland CypressIlex opacaAmerican HollyPicea abiesNorway SprucePicea glaucaWhite SprucePicea omorikaSiberian SprucePinus strobusEastern White PinePinus thunbergiiJapanese Black Pine

Pseudotsuga menziesii Douglas Fir

Thuja occidentalis Eastern Arborvitae

Thuja plicata Giant (Western) Arborvitae

Tsuga Canadensis Canadian Hemlock

## Deciduous and Evergreen Trees and Shrubs, Wildflowers and Grasses - Suitable for Wet Meadows, Edges, and Bioretention Facilities

#### **Trees**

Acer rubrumRed MapleAmelanchier canadensisServiceberryBetula nigraRiver Birch

Carpinus carolinianaAmerican HornbeamIlex opacaAmerican HollyLiquidambar styracifluaSweetqum

Magnolia virginiana Sweetbay Magnolia Metasequoia glyptostroboides Dawn Redwood Black Gum Nyssa sylvatica Platanus occidentalis American Sycamore Quercus bicolor Swamp White Oak Taxodium distichum **Bald Cypress** Thuja occidentalis cv. nigra Dark American Arborvitae Tilia Americana American Linden

#### Shrubs

Aronia arbutifolia Red Chokeberry
Aronia melanocarpa Black Chokeberry

Cephalanthus occidentalisButtonbushClethra alnifoliaSummersweetCornus amomumSilky Dogwood

Ilex verticillata Winterberry Holly (Cultivars, male & female grouped)

Myrica cerifera Southern Bayberry

**Note**: Southern Bayberry shall not be planted near structures, as the leaves, stems and branches contain flammable aromatic compounds.

#### Viburnum trilobum

#### American Cranberrybush

#### Wildflowers/Perennials

Asclepias incarnataSwamp MilkweedAster nova-angliaeNew England AsterAster puniceusPurple-stemmed Aster

Aster laevis Smooth Aster

Daucus carota Queen Anne Lace

Eupatorium fistulosum Hollow Joe-pye Weed

Eupatorium dubium Joe-pye Weed

Helenium nudiflorum Purple-headed Sneezeweed

Hibiscus moscheutos Swamp Rose Mallow

Jewelweed Impatiens capensis Jewelweed Impatiens pallida Iris versicolor Blue Flag Iris Lilium canadense Canada Lily Lobelia cardinalis Cardinal Flower Blue Lobelia Lobelia siphilitica Ludwigia alternifolia Seedbox Monarda didyma Beebalm Penstemon digitalis Beardtongue Pycnanthemum virginianum Mountain Mint

Rudbeckia laciniata Green-headed Coneflower

Rudbeckia trilobaBlack-eyed SusanScirpus acutusHardstem BulrushSenecio aureusGolden RagwortSolidago giganteaLate Goldenrod

Solidago graminifolia Lance-leaved Goldenrod

Tyha latifolia Common Cattail
Zizia aurea Golden Alexander

#### **Grasses**

Panicum virgatumSwitchgrassSorghastrum nutansIndian GrassTridens flavusRed Top

## Deciduous and Evergreen Trees and Shrubs, Wildflowers and Grasses - Suitable for Dry Meadows, Edges, and Stormwater Detention Basins

#### Trees

Acer rubrum Red Maple

Celtis occidentalis

Gleditsia triacanthos inermis Juniperus virginiana

Liquidambar styraciflua

Quercus bicolor Quercus coccinea Quercus macrocarpa

Quercus palustris

Quercus rubra

Sassafras albidum

Thuja occidentalis

Hackberry

Thornless Honey Locust Eastern Red Cedar

Sweetgum

Swamp White Oak

Scarlet Oak Bur Oak Pin Oak

Red Oak (Cultivars Recommended)

Sassafras

Dark American Arborvitae

#### **Shrubs**

Comptonia peregrine Cornus racemosa

Diervilla sessilifolia Hamamelis virginiana

Myrica pennsylvanica Rosa Carolina Rhus aromatic Rhus copallina Rhus glabra Rhus typhina

Viburnum lentago

Sweetfern

**Gray Dogwood** 

Southern Bush Honeysuckle

Common Witchhazel Northern Bayberry Pasture Rose

Fragrant Sumac Shining Sumac Smooth Sumac Staghorn Sumac

Nannyberry Viburnum

#### Wildflowers and Grasses

Andropogon gerardi Andropogon scoparius Asclepias tuberosa

Aster pilosus Aster simplex

Elvmus canadensis

Carex sp.

Monarda fistulosa Panicum virgatum Pvcnanthemum tenufolium

r ychanthemum tenurc Rudbeckia hirta Solidago nemoralis Solidago speciosa Sorghastrum nutans Tridens falvus

Veronicastrum virginicum

Big Bluestem Grass Little Bluestem Grass Butterfly Weed

Aster

White Aster

Sedge

Canada Wild Rye Wild Bergamot Switchgrass

Slender Mountain Mint Black-eyed Susan Old Field Goldenrod Showy Goldenrod Indian Grass

Indian Grass Red Top Culver's Root



Worcester Township 1721 Valley Forge Road PO Box 767 Worcester, PA 19490-0767

Attention:

Tommy Ryan, Township Manager

Reference:

Review of Worcester "Green" Conservation Ordinances

Dear Mr. Ryan:

At the Worcester Planning Commission meeting of November 12, 2020, the members requested my review of the Montgomery County Planning Commission Memorandum Dated November 5, 2020 regarding a review of Worcester's "Green" Conservation Ordinances. This memorandum was prepared by Brian J. Olszak, Senior Planner of Montgomery County Planning Commission. I have reviewed this memorandum and the County's suggestions in conjunction with potential changes to those sections of the Township's ordinances that deal with "Green" conservation areas. Based on my review of the memorandum, I offer the following comments:

- 1. <u>Floodplain Conservation</u>: During my time as Township Engineer, I cannot remember any instance where the Township allowed construction in a floodplain. This is primarily due to the large lots which compose a majority of Township Zoning, and the development of properties with intentional avoidance of floodplain areas. The County did however recommend several changes to be considered in the floodplain conservation district.
  - a. <u>Section 150.136.B</u> This section regulates the flood elevation and the minimum height above the base flood elevation for new structures constructed in the floodplain. Our ordinance requires 1 ½ feet. In most other municipalities, 1 foot is the height required. The County indicates that Worcester may increase this height if desired. Since we already are above the suggested minimum height of 1 foot, I do not think that increasing this height any further (above 1 ½ feet) is justified.
  - b. <u>Section 150-138.D.2</u> Worcester and many other communities permit expansions and enlargements of existing structures in the flood plain conditioned upon that improvement not increasing the 100-year flood elevation more than 1 foot at any point. The County is suggesting that we could make this more restrictive by not allowing any additional increase in elevation from construction in the floodplain. As I mentioned previously, it is a rare occurrence that anyone applies to do any construction in the floodplain. I do not think the 1-foot elevation increase is unreasonable and would suggest retaining that criteria. I do not think that the few instances where construction might occur would have a negative cumulative impact on the floodplain elevations in the Township.

- c. <u>Section 150-139.B.3</u> Based on my above comment, I would not make any changes to this section for the same reasons.
- Slope Conservation: The County has confirmed that our ordinance is in line with most other ordinances in the area, in conjunction with steep slopes and how they are defined. In addition, development is prohibited in areas with stopes greater than 25%. As the County indicates, steep slopes normally come into play in the laying out of developments and subdivisions and in these cases, we can address how the steep slopes area handled. The County does indicate that there could be disturbance of steep slopes outside the land development process, such as when a single residential lot is developed. They do indicate that the Township could revise the ordinance to include prohibiting vegetation removal in steep slope areas on these single residential lots or other areas in the Township. I believe that including this type of prohibition would be beneficial since currently we have no recourse if a property owner disturbs steep slopes on a single property. I would therefore be supportive of this change.

The County also indicates that there is no limitation to how much regrading of slopes under 25% can occur on a single property. The County does recommend a potential revision which effects the slopes between 15% and 25% to limit disturbance of these areas to 25% of all slopes on the property. Again, I do not see many instances where these type of steep slopes are disturbed or regraded, but I think the County suggestion is a good one and would support limiting the disturbance of slopes between 15% and 25% to 25% of the area.

- a. <u>Section 130-32.1</u> I would recommend that the Township revise the subdivision and land development ordinance to define steep slopes as 15% and 25% to match the zoning ordinance.
- b. <u>Section 150-9</u> Worcester does limit the areas of steep slopes in lot area calculations for residential zoning districts when minimum lot sizes are calculated. The County points out that this requirement is not present for the non-residential lot areas. I would therefore be supportive of revising the lot area calculation standard to apply to both residential and non-residential lot areas.
- 3. <u>Riparian Corridor Conservation</u>: The County has indicated that Worcester's ordinance is better than many other ordinances that they have come across because it includes sections on Corridor Management and Replenishment. The County does however make certain additional recommendations to strengthen this ordinance.
  - a. <u>Section 150-146.6.A.2</u> The County suggests the potential to increase zone 2 of our current riparian corridor from 50 feet to 75 feet, which would increase the total corridor from 75 feet to 100 feet. Most other ordinances that I am familiar with in other municipalities consistently define Zone 1 as 25 feet and Zone 2 as 50 feet. This could impact many properties in the Township because of the additional area required for the riparian corridor. I therefore would be reluctant to see an increase in this width at this time.

4. Recommended Plant Species List: The County suggests removing certain Invasive Species trees from the list of recommended plant species with Section 130-28H. Also, removing certain Pest or Disease prone species. I am in agreement with the County's recommended removals for our current plant list.

The County also recommends adopting by reference to Section 130-28H.6, the Department of Conservation and Natural Resources "Invasive Species List". This would keep our list updated based on the DCNR's current management practices of state land. I am not opposed to this recommendation.

The County recommends consideration of a more comprehensive plant list for Section 130-28H. They provide a ten (10) page list of recommended plant species in all landscape categories. I am not opposed to considering adopting the list in part, or in whole as a supplement to our current list.

- 5. <u>Street Trees</u>: The County has reviewed the section of the Ordinance on Street Trees and has made several recommendations.
  - a. <u>Section 130-28.G.2</u> The County feels that the wording of this section is confusing in the way it is written. It has to do with where street trees are permitted and where they are no permitted. They suggest replacing the language in Section 130-16.E(5) to read "Street trees shall not be located within "X feet(5 or 10 ft is recommended) of streets rights-of-way, sidewalks, underground and above-ground utilities, and site triangles." I do not have a problem with clarifying the language in this Section with the County's recommended change.
  - b. <u>Section 130-28.G.4.b</u> This section sets forth the standards for the number of street trees required, but then suggests a different spacing requirement for "primary streets" where there could be up to 50 feet "on center" spacing. It is not clear if street trees are required on primary streets or if the spacing is only flexible. The County recommends calculating the number of street trees based on a standard spacing (they recommend 25' of frontage) and then using some flexibility in the location of these trees and the spacing of the trees. We currently encourage applicants to use flexibility in location of street trees. Reducing the spacing form 50' to 25' will double the number of street trees required. I am not opposed to reducing the spacing, but this will result in a larger number of street trees, which sometimes makes it difficult to locate all of the required trees in acceptable locations. In this case, the County would suggest a fee in lieu of placement of all the street trees.
  - c. <u>Section 130-28.G.4.c</u> This section deals with the minimum setback required from rights-of-way but does not provide a maximum set back. The thinking is if a street tree is too far away from the street, it may no longer be considered a street tree. Also, the benefits of sidewalk shading and street trees are lost. The County suggests wording to allow a flexibility in the exact placement from the curb or cart way edge and establishing a maximum setback to achieve more consistent results with the application of street trees. This does make sense and I am not opposed to setting a maximum setback on the property in order to utilize the required number of street trees.

6. <u>Buffers Between Districts</u> – Requirements for landscape buffers in the Township are located in Section 130-28.G.5 of Township Code. However, there are some individual zoning districts that also contain their own specific buffering requirements which are generally limited to specific lists or generally state that a buffer is required. The County makes several suggestions regarding buffers.

- a. <u>Buffers Throughout Zoning</u> The County describes the application of buffers both by location and width according to specific zoning districts and suggest that there should be more uniformity throughout the zoning districts. I think this is larger issue than what may be anticipated in this review, and the County suggests that in the future, the Township may wish to investigate more uniformity in the application buffering requirements in all the zoning districts. I would agree that this is something we might want to look at in the future.
- b. <u>Section 130-28.G.5.b.1</u> This section allows an applicant to use existing vegetation of appropriate species and quantities on properties that can be considered in fulfillment of certain landscape requirements. The County suggests that the Township may want to consider conditioning a developer or applicant's inclusion of existing vegetation by requiring the removal of dead, dying, diseased, and invasive tree species in the existing tree masses. I am in support of this condition.
- c. <u>Section 130-28.G.10</u> This section stipulates several buffer requirements for the RPD (Rural Preservation District). The County correctly points out that this district no longer exists and suggests that the section should be repealed and or applied to another section of the ordinance, such as the conservation subdivision ordinance.
- 7. Parking Lot Landscaping The County makes numerous suggestions in conjunction with parking lot landscaping. They suggested that the Township may wish to utilize the provisions in the Montgomery County Planning Commissions "Sustainable Green Parking Lot Guidebook". In addition to this, the County recommends modifying the perimeter buffering requirements for parking lots and adding additional street buffering options for more constrained sights which could permit less of a reliance on landscaping and a greater reliance for ornamental fences and walls as well as lower shrub plantings.

The County also suggests a looking at the interior parking lots and how the requirements of the ordinance allows and provides with regard to planting islands and spacing of parking lot trees.

Overall, I think this is something should be looked at in greater detail and perhaps looking at this as a separate project. I do think there are some good points, and some of the recommendations and suggestions would be beneficial to Worcester Township. I therefore think unless the planning commission wishes to place a great deal of effort on this one particular subject, that it may be beneficial to look at it in the future as a separate project.

8. Other Conservation Sections: The County references the conservation subdivision standards and protection of certain features within the required open space. They also indicate that these protections are generally not well defined. I would agree with that and am not opposed to clarifying these features and resources in order to make certain that they are protected. These features include ground water recharge areas, hedge rows, groups of trees, drainage swales, and springs and there could be additional resources added to this list as well.

The above represents all comments on the December 3, 2020 memorandum prepared by the County. Please contact me if you have any questions or need any additional assistance on any of my responses above.

Very truly yours,

CKS ENGINEERS, INC

Township Engineers

Joseph J. Nolan, P.E.

JJN/paf

CC:

Stacy Crandall, Assistant Township Manager

Andrew Raquet, Assistant Zoning Officer/Codes Clerk

File