



April 4, 2017

Michael Mrozinski, Director of Community Development
Lower Providence Township
100 Parklane Drive
Eagleville, PA 19403

Reference: Providence Place
Preliminary Plan Submission No. 2

Dear Mike:

The engineers have revised the plans for Providence Place. The latest revision date is March 21, 2017. The application plan set now contains 15 sheets. I am happy to report that the engineers were able to address the vast majority of my outstanding concerns regarding the project. Outstanding issues of concern are identified below. Any comment from my February 21 review that no longer appears in this correspondence can be considered addressed.

Approvals/Permits/Reviews – Any approval the board would grant this application should be conditioned upon the applicant securing the following approval/permit/reviews - The applicant is currently in pursuit of the approvals.

1. FEMA – Conditional letter of map revision.
2. PA DEP – Waterway encroachment.
3. PennDOT – Highway occupancy permit.
4. PennDOT – Structural approval of work adjacent to their bridge.
5. PA DEP – NPDES permit.
6. LPVRS – For excavation and disturbance in connection in the vicinity of their interceptor.
7. Lower Providence Township Sewer Authority – For capacity rights.
8. PA DEP – Sewage facilities planning or waiver.
9. Lower Providence Township Zoning Hearing B – For steep slope and floodplain relief.
10. Review by Lower Providence Township Emergency Services

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Reference: Providence Place – Conditional Use Order

Threshold issues:

- A. CLOMR – The project proposes a reconfiguration of the floodplain associated with the Perkiomen Creek. This reconfiguration is accomplished by the construction of a large retaining wall. Once complete, the wall will elevate the proposed project to elevation outside of any flood hazard risk. FEMA's approval of this wall construction is through their conditional letter of map revision process. This acknowledgment is the single most important aspect of the project. Pursuit of this approval must occur as soon as possible. The applicant must understand their risk in proceeding with full site design before the approvals are granted. Should significant modifications be required in order to meet FEMA requirements the site plan would have to also change accordingly.

It is my understanding that the applicant is pursuing the conditional letter of map revision application to the US Army Corps of Engineers. We will work closely with the applicant to provide the local government components to that application.

- B. The wall – The Ridge Pike West District has certain architectural design guidelines. The Township will need to understand the aesthetic of the wall as you arrive in our community from Collegeville. It would not be appropriate to have an 18-foot-tall cold, stark, reinforced concrete wall as our entrance feature.

The plan now contains notes giving the Township some ability to review the final color and texture of the reinforced concrete wall that will separate the project from the Perkiomen Creek floodplain. We will look forward to further discussions on this topic as the plan proceeds through the approval process

- C. Traffic access and intersection improvements – Significant progress has been made with regard to intersection and access improvements. At this time, I am comfortable minimum thresholds have been crossed. We will defer to McMahan and Associates and PennDOT, as well as Montgomery County for final sign off on intersection improvement permitting.
- D. Floodplain – The applicant currently is in pursuit of permitting for floodplain construction with the Pennsylvania Department of Environmental Protection.

Zoning Ordinance review:

In order to fully comply with the standards identified in the Lower Providence Township zoning code regarding conditional use approval, the applicant must assure satisfactory submission of documents and approvals as follows:

- A. Parking – The applicant shows they have the ability to meet their minimum parking obligation. They are holding approximately 21 spaces in reserve. The applicant will need to relocate the proposed 21 reserve spaces to a location that meets with the zoning ordinance obligations. The reserve spaces are currently shown in the front yard of the building which is not permissible.

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- B. Section 86-401.B Floodplain – The applicant will need to provide proof to the Township that they have secured a zoning variance that allows for the placement of “earthen fill” within the FEMA designated “floodway” of the Perkiomen Creek.
- C. Section 86-402 Floodplain – Through their testimony, the applicant has suggested that they will mitigate any adverse impacts on adjacent properties due to their encroachment into the floodplain fringe. This encroachment takes the form of earthen fill and the construction of a large retaining wall. The plan describes a design which will account for the displacement of these floodwaters by the over excavation of portions of the site and a re-profiling of the stream cross-section. The implementation of the regrading plan and retaining walls will effectively change the limits of the regulated floodplain for this property. Owing to the three-dimensional nature of floodplain regulations, the buildings, parking and services will no longer be located within a flood hazard area. In order to assure the public that these goals have been met, the following tasks must be completed:
 - 1. Provide the Township engineer with the additional cross-sections, retaining wall design, and cut / fill earthwork analysis for the site as suggested by Woodrow and Associates’ December 5, 2016, review letter. We still await these drawings and calculations.
 - 2. Secure a “conditional letter of map amendment” from the Federal Emergency Management Agency. This conditional letter of map revision will indicate FEMA’s acknowledgment of the flood plain mitigation design. – In progress
 - 3. Secure stream encroachment approvals from the Pennsylvania Department of Environmental Protection. – In Progress

Subdivision and land development ordinance review:

- A. Section 123-31 – The code defines the ultimate right-of-way width for Germantown Pike to be 80 feet or 40 feet measured from centerline. The ultimate right-of-way line for Pechins Mill Road is 50 feet or measured 25 feet from centerline. There is an obligation to widen the existing road frontages to meet the cartway and right-of-way dimensions defined by the section of our code.
- B. Section 123-32 – This code section describes the obligation of the applicant to provide vertical curbing and storm sewer improvements along all existing road frontages.
- C. Section 123-33 – Sidewalks are required along all existing road frontages. Handicap accessible routes must be defined in conjunction with the sidewalk design. At our PennDOT meeting there was some agreement as to a limited sidewalk that would be appropriate for the Ridge Pike frontage. Waivers should be sought for any of the sidewalk deemed unnecessary. In the alternative, the applicant should discuss additional pedestrian connectivity from Pechins Mill Road, trail through the riparian corridor, and potential connections via the LPVRSIA interceptor easement to Township owned open space on the north side of Ridge Pike.

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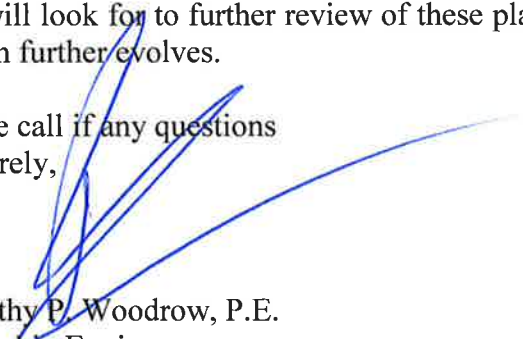
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- D. Section 123-37.E – Parking spaces are required to be setback 20 feet from any ultimate right-of-way. Some of the parking may exist as nonconforming to our code. We will need to review this section with our zoning officer and understand proper implementation of this provision.
- E. Section 123-48 – The applicant should discuss the potable water supply to the project. Further, any proposed fire hydrants intended to serve the site should be reviewed with our fire marshal.

We will look for to further review of these plans as the details and concepts become clear as the design further evolves.

Please call if any questions
Sincerely,



Timothy P. Woodrow, P.E.
Township Engineer
Woodrow & Associates, Inc.

TPW/del

cc: John Rice, Esq., Township Solicitor – Lower Providence Township
Casey Moore, P.E., McMahon Associates
Adam Brower, PE – Edward B. Walsh & Associates, Inc.
Thomas Keenan, Esq. – Keenan Ciccitto & Associates
Leader Senior Living