

MEETING MINUTES

Project: Kennett Greenway – Chandler Mill Road Segment

Date: August 5, 2021, 1:45 pm

Location: Virtual

Subject: Permitting Pre-Application Meeting – 102 Program

Attendees: Michele Adams – Meliora
 Tara Dougherty – Meliora
 Mark DiMonte – Meliora
 Dan Wagner – McMahan
 Gordon Roscovich – Chester Count Conservation District (CCCD)
 Jim Favret – Biohabitats
 Jennifer Dowdell- Biohabitats
 Sarah Roberts – Biohabitats
 Christina Norland – Square Roots Collective

Stormwater Management

- CCCD confirmed there are no existing regulations regarding locating stormwater management within the floodway and floodplain and that it is depended on the site conditions.
- Meliora confirmed that porous pavement will not be used within the floodway or floodplain. The management systems outside of these regulated areas are still being decided.

CCCD directed Meliora to FAQ’s relating to the managed release concept. Meliora confirmed they are familiar with the concept and will utilize this guidance for handling high groundwater and other limiting factors.

Meliora confirmed infiltration testing has not been performed yet.

- August or September is the anticipated testing date.
- Design team is not expecting good infiltration.

CCCD asked how many separate stormwater management structures are being proposed; Meliora responded as follows.

- Many small practices along the length of the trail are anticipated.
- The trail subbase may be utilized for management.

CCCD informed the team that a site investigation will be needed to determine if there are any limiting zones for structural features.

Meliora asked CCCD if there are any Municipal Separate Storm Sewer (MS4) credits that could be obtained from managing runoff from the road. CCCD noted that this is a question for PADEP.

Meliora explained that many of the trees being proposed for removal are dying ash trees.

- The tree species have been surveyed and mapped.
- Any dying ash within the disturbance is being recommended to be removed and a planting plan is being prepared.

CCCD asked to confirm that the Erosion and Sediment Control (E&S) plan and sequence be consistent with the Traffic Control and Maintenance and Protection of Traffic (MPT) plan.

CCCD asked that any E&S control compost socks be shown 1' to 3' off the toe of slopes of fill to address constructability.

- Additionally, they recommended being very specific in the E&S notes as opposed to trying to include all instructions on the plan.

Culvert Extensions:

- Stormwater culverts will be considered points of discharge.
- CCCD directed the design team to refer to the instructions for the stormwater analysis requirements. (Page 25 of 31 of the manual)

Pennsylvania Natural Diversity Inventory (PNDI)

- Three (3) "hits"
- CCCD will need to be sent current receipt for "completed" hits.
- Any outstanding hits will be technical item to be navigated in the technical review stage.
- All reviews done in CCCD office. Gordon Roscovich will be the reviewer along with Molly.
- To submit, ePermitting is an option, but regular digital submission works fine as well.

In addition to typical construction details, any bypass setups should be documented.

The design team should refer to the E&S manual for information specifying the difference in handling excavated material from the stream, wetlands, and unregulated area.

Any seed mix specified should not contain any invasive species. Jute materials are preferred.

MEETING NOTES

Project: Kennett Greenway – Chandler Mill Road Segment
 Date: May 12, 2022, 11am
 Location: Virtual
 Subject: Regulatory Requirements
 Attendees: Molly Deger – Chester County Conservation District (CCCD)
 Michele Adams – Meliora
 Rich Farella – Meliora
 Tara Dougherty - Meliora
 Dan Wanger – McMahon

Discussion Summary

Updated per CCCD revisions provided via email on 5-17-2022

- Chapter 102 / Chapter 105 authorization / 404 certification:
 - CCCD noted that the floodway is excluded from the National Pollutant Discharge Elimination System (NPDES) boundary **if it meets the criteria of §102.5(i)**.
 - CCCD noted that the floodplain is typically in the NPDES boundary, but because Kennett Township is the permit applicant, the floodplain permitting would default to the PADEP. Therefore, the floodplain is most likely not included in the NPDES boundary. ***This will need to be confirmed with PADEP.***
- Proposed Managed Release Concept (MRC):
 - CCCD noted that MRC will require justification for use. There are 13 MRC design standards; a major deviation could require an individual permit.
 - Meliora discussed the proposed trail and stormwater system:
 - The entire proposed trail will be built on fill.
 - A series of lined subsurface gravel stormwater storage beds below the trail and vegetated buffer are proposed.
 - Stormwater infiltration is not proposed due to fill slope stability concerns. Infiltration testing will not be performed because infiltration is not proposed.
 - CCCD noted there is no waiver from the infiltration testing requirements, and a final determination of whether adequate predevelopment site characterization cannot be granted prior to the NOI being submitted and reviewed by CCCD. If infiltration testing per Appendix C of the PA SW BMP Manual is not being conducted, then the consultant would need to include a

detailed justification for how predevelopment site characterization per 102.8(g)(1) and the intent Design Standard #7 Pre-Development Site Characterization and Assessment of Soil and Geology is being met with the project narrative.

- Impervious Area Calculations:
 - Meliora asked if a boardwalk is considered impervious.
 - CCCD noted that municipal guidance should be followed if available. If guidance is not available, a justifiable curve number can be used; a curve number of 98 is unlikely.
- Subsurface MRC without vegetated water quality pre-treatment options:
 - CCCD can be flexible on the water quality solution. Maintenance access should be considered in the design.
 - Meliora proposed biochar and inlet water quality filters as options.
 - CCCD noted that these are acceptable options where required.
- Peak Rate Requirements:
 - Meliora noted that the small project exemption for peak rate management will apply to this project.
 - Managing the 2yr storm back to the 1yr (MRC Design Standard #4) is still likely required. **Requirement confirmed.**

Wanger, Daniel

From: Wanger, Daniel
Sent: Thursday, September 8, 2022 2:54 PM
To: Deger, Molly E.J.
Cc: Giampaolo, Steve; Jim Favret; Jennifer Dowdell; Brett Long; Corbett, Stanley; Cairns, Tammy S.; Healey, Shannon P.
Subject: RE: Pre-Submission Meeting Request for Project in Kennett Township

Thanks for taking the time to discuss this a little further Molly.

Since the application fee checks were already cut by the Township, we will have a separate a PE review fee check processed and delivered as soon as it is ready.

Much appreciated,
Dan

Daniel Wanger, P.E.
McMahon, a Bowman company
O: (610) 594-9995 | D: (484) 876-1264
bowman.com | mcmahonassociates.com

From: Wanger, Daniel
Sent: Thursday, September 8, 2022 12:12 PM
To: Deger, Molly E.J. <mdeger@chesco.org>
Cc: Giampaolo, Steve <sgiampaolo@mcmahonassociates.com>; Jim Favret <JFavret@biohabitats.com>; Jennifer Dowdell <jdowdell@biohabitats.com>; Brett Long <BLong@biohabitats.com>; Corbett, Stanley <stan.corbett@aecom.com>; Cairns, Tammy S. <tcairns@chesco.org>; Healey, Shannon P. <shealey@chesco.org>
Subject: RE: Pre-Submission Meeting Request for Project in Kennett Township

Hi Molly –

The BMPs being placed in the floodway are not needed for the PAG-02 (NPDES) Permit, as this permit only covers work outside of the stream/floodway/floodplain. The project is installing separate BMPs outside of the stream/floodway/floodplain in order to satisfy the requirements of the NPDES permit.

Work within the stream/floodway/floodplain for the project is being completed under a Chapter 105/Section 404 Joint Permit. BMPs being proposed within the floodway are for the satisfaction of the Township's stormwater management requirements only. For the project to submit an application for the Joint Permit, the project requires the Township's concurrence that the project is consistent with their stormwater management requirements.

May I give you a call this afternoon?

Thanks,
Dan

Daniel Wanger, P.E.
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From: Deger, Molly E.J. <mdeger@chesco.org>
Sent: Thursday, September 8, 2022 11:53 AM
To: Wanger, Daniel <dwanger@mcmahonassociates.com>
Cc: Giampaolo, Steve <sgiampaolo@mcmahonassociates.com>; Jim Favret <JFavret@biohabitats.com>; Jennifer Dowdell <jdowdell@biohabitats.com>; Brett Long <BLong@biohabitats.com>; Corbett, Stanley <stan.corbett@aecom.com>; Cairns, Tammy S. <tcairns@chesco.org>; Healey, Shannon P. <shealey@chesco.org>
Subject: RE: Pre-Submission Meeting Request for Project in Kennett Township

Hi Daniel,

I received information from both Chris Smith, Construction Permits Section Chief, and Ranju Sharp, Ch. 105 Section Chief, regarding Post Construction Stormwater Management BMPs in the floodway. The actual placement of the BMPs in the floodway will need authorization from the Chapter 105 staff. However, the Chapter 105 group will not be reviewing the design of the BMPs. As these BMPs are needed for the PAG-02 permit NOI/application, CCCD will need to review the design of the BMPs.

Therefore, a PE review will be required for this NOI submission as MRC BMPs are being proposed. Please adjust the District Service Fee accordingly. Alternatively, if the checks have already been processed and/or signed, then we will accept the fees as confirmed by our office below to receive the NOI and begin the completeness review as we acknowledge the confusion on this one. We will not begin the technical review until the supplemental payment is received, if applicable.

If you have any other questions, please let me know.

Molly Deger, PE
District Engineer
Direct: 610.455.1374
CCCD Main: 610.455.1360

From: Deger, Molly E.J.
Sent: Tuesday, September 6, 2022 6:47 AM
To: Cairns, Tammy S. <tcairns@chesco.org>; Wanger, Daniel <dwanger@mcmahonassociates.com>; Healey, Shannon P. <shealey@chesco.org>
Cc: Giampaolo, Steve <sgiampaolo@mcmahonassociates.com>; Jim Favret <JFavret@biohabitats.com>; Jennifer Dowdell <jdowdell@biohabitats.com>; Brett Long <BLong@biohabitats.com>
Subject: RE: Pre-Submission Meeting Request for Project in Kennett Township

Hi Dan,

I did reach out to PA DEP to confirm that CCCD will not be reviewing the MRC BMPs in the floodway. If we do need to, then we would ask that you pay for a PE review instead of the Standard Tech Review. If we are unable to confirm ahead of the checks being cut, we will likely request additional payment if it is determined that a PE review will be required.

Thank you,

Molly Deger, PE
District Engineer
Direct: 610.455.1374
CCCD Main: 610.455.1360

Attention: Chester has created our own Ch. 102 Pre-Application Meeting Request form. Moving forward, please use this Chester County form for all pre-app meeting requests. Take a look [here](#) or find it on our website under Application/Forms/Payments page.

From: Cairns, Tammy S. <tcairns@chesco.org>
Sent: Friday, September 2, 2022 12:56 PM
To: Wanger, Daniel <dwanger@mcmahonassociates.com>; Healey, Shannon P. <shealey@chesco.org>
Cc: Giampaolo, Steve <sgiampaolo@mcmahonassociates.com>; Jim Favret <JFavret@biohabitats.com>; Jennifer Dowdell <jdowdell@biohabitats.com>; Deger, Molly E.J. <mdeger@chesco.org>; Brett Long <BLong@biohabitats.com>
Subject: RE: Pre-Submission Meeting Request for Project in Kennett Township

Hello Daniel:

The fees are correct.

Tammy Cairns

Administrative Support / Permit & Publications Coordinator
Chester County Conservation District
688 Unionville Road, Suite 200
Kennett Square, PA 19348
Phone: 610-455-1364
Fax: 610-455-1361
www.chesco.org/conservation

From: Wanger, Daniel <dwanger@mcmahonassociates.com>
Sent: Friday, September 2, 2022 12:19 PM
To: Healey, Shannon P. <shealey@chesco.org>; Cairns, Tammy S. <tcairns@chesco.org>
Cc: Giampaolo, Steve <sgiampaolo@mcmahonassociates.com>; Jim Favret <JFavret@biohabitats.com>; Jennifer Dowdell <jdowdell@biohabitats.com>; Deger, Molly E.J. <mdeger@chesco.org>; Brett Long <BLong@biohabitats.com>
Subject: [EXTERNAL] - Re: Pre-Submission Meeting Request for Project in Kennett Township

EXTERNAL: Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Shannon -

Thanks for taking the time to meet yesterday to review this project in advance of our application for a General NPDES permit along Chandler Mill Road in Kennett Township. We are about to ask the Township to prepare the application fee checks for the project, and would just like to confirm with you that the amounts look appropriate:

Fee	Amount	Payable To:
District Service Fee (no PE Review)	\$2,350.00	Chester County Conservation District
Tier II Fee	\$1,000.00	Chester County Conservation District

NDPES Permit Fee	\$500.00	Chester County Conservation District Clean Water Fund
Disturbed Acreage Fee (4.4 AC)	\$400.00	Commonwealth of PA Clean Water Fund

Additionally, below are a few notes we took from the call:

PCSM calculations are organized and separated between Chapter 102 NPDES and Chapter 105 Joint permit areas. This will be explained in the project narrative description.

Proposed structural BMPs will outlet at existing roadway cross pipe extensions, so no additional point discharges are proposed.

The PCSM plan is color—coded based on project permit coverage, but the E&S plan is not because E&S measures relate to the project, regardless of permit type.

PCSM analysis was completed at one single downstream Discharge Point because existing structural outfalls (existing cross pipes underneath roadway) don't convey water from the project but rather upslope/off site water

Structural BMPs proposed outside of the Chapter 102 NPDES Permit area are designed as MRC's. These facilities are under review by the Township, and will not be subject to review by the CCCD since they are not to be part of the NPDES permit. Documentation will be kept as separate as possible.

The Township is reviewing the PCSM calculation package to provide a SW consistency letter for Joint Permit submission and we will work with both CCCD and Township to ensure any concerns are addressed by both groups.

Water quality requirements for the Chapter 102 NPDES permit area must be met (the spreadsheet text should appear "green" indicating requirements are satisfied). *Note: after the meeting, a measure was identified to be added to the project so that water quality requirements for the Chapter 102 NPDES permit area will be satisfied.*

Plans to be included as part of the electronic submission package include ESC plans, PCSM plans, and Landscaping Plans.

In addition to compost filter socks the project is using a hydraulically applied mulch blanket as we believe that this will be more effective than a rolled mulch blanket due to the extensive planting being completed by the project. The ESC plans will show filter bag locations is on the plan sheets but not piping (other than the standard details and in the sequence).

Thank you again for your assistance, and enjoy the Labor Day weekend,
Dan

Daniel Wanger, P.E. | Pedestrian and Bicycle Design Technical Leader
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dwanger@mcmahonassociates.com



From: Healey, Shannon P. <shealey@chesco.org>
Sent: Tuesday, August 23, 2022 2:44 PM
To: Wanger, Daniel <dwanger@mcmahonassociates.com>
Subject: Pre-Submission Meeting Request for Project in Kennett Township

Good Afternoon Dan,

I was forwarded your request to have a pre-submission for a project in Kennett Township. I saw you are available on the 9/1. How does 10:00 work?

Shannon Healey, CPESC

Urban Team Leader

Chester County Conservation District

688 Unionville Rd, Suite 200

Kennett Square, PA 19348

610-455-1377

www.chesco.org/conservation

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AECOM 302.781.5900 tel
Sabre Building, Suite 300 302.781.5901 fax
4051 Ogletown Road
Newark, DE 19713

September 9, 2022

Mr. Eden Ratliff
Kennett Township
801 Burrows Run Road
Chadds Ford, PA 19317

**Re: Greenway Trail Along Chandler Mill Road
Stormwater Management Analysis Consistency Letter**

Dear Mr. Ratliff:

This letter is to support the Greenway Trail project along Chandler Mill Road. We find the project to be consistent with applicable Kennett Township Stormwater Management Ordinance requirements. Discussion of the plan documentation provided to AECOM and the ordinance consistency determination follows.

Plan Submissions

The Chester County Conservation District verified via email on September 8, 2022 that the entirety of the stormwater management for the project would be subject to their review. As discussed with regard to Stormwater Management Ordinance consistency below, detailed technical review by AECOM is consequently not necessary to establish consistency. Reports, calculations, etc. as have been provided via August 31, 2022 and September 8, 2022 electronic submissions from the consultants retained by the Township to prepare the Chandler Mill Road Trail plan are accordingly not considered for the purposes of this letter.

The plans provided consist of a Post Construction Stormwater Management Plan prepared by McMahon, dated July 29, 2022 (24 sheets), and received by AECOM on August 31, 2022, as amended by revised sheets 3, 6 and 17 illustrating updates to the prior plan submission which were received on September 8, 2022. No revision date is noted on the revised plan sheets.

AECOM review of the project plans has been limited to the general criteria necessary to clarify consistency with the Township's Stormwater Management Ordinance, as detailed in the following section.

Stormwater Management Ordinance Consistency

The Kennett Township Board of Supervisors granted a waiver from the requirements of the Township's stormwater management ordinance for Township trail projects on June 19, 2019. This waiver included conditions, each of which are listed below with comments regarding consistency with the above-noted project inserted in *italic*.

1. All DEP Chapter 102 requirements as determined by the Chester County Conservation District to be applicable to the Township trail projects must be fully addressed.

The Chester County Conservation District (CCCD) is the delegated agency for review of Chapter 102 regulations and issuance of associated NPDES permits. Clarification provided by CCCD email dated September 8, 2022 indicated that all portions of this project will be subject to Chapter 102 review, including the area also subject to Chapter 105 permit requirements. This required CCCD review and approval, once granted, will accordingly ensure consistency with this condition.

2. The Township Engineer shall be directed to ensure the impervious cover resulting from all new trail projects be incorporated in TMDL plan calculations and associated stormwater improvements for future TMDL Plan revisions.

This condition will be addressed by the Township after trail completion and when an updated TMDL Plan is required. The project plan has no direct bearing on this condition and no inconsistency is possible.

3. All Township trails must be designed to avoid concentrated discharge and / or increases in flow rates which could result in adverse impacts to a downgradient property, unless agreed upon in advance by an affected property owner.

The project plan appears to satisfy this condition and no inconsistency is noted.

4. All Township trails must be designed to avoid concentrated discharges as may result in erosive conditions unless permanent erosion control measures are incorporated.

No such conditions are apparent on the current project plans, and we note CCCD review of E&S measures will further ensure consistency with this condition.

Please contact our office should you have any questions.

Sincerely,

AECOM



Stan Corbett
Associate Vice President, Municipal Department

cc: Daniel Wanger, PE, McMahon Associates, Inc.
Steve Giampaulo, PE, McMahon Associates, Inc.
Jim Favret, Biohabitats
Christina Norland
Heather Dorsey, PE, AECOM
Molly Deger, PE, CCCD