



THE COUNTY OF CHESTER



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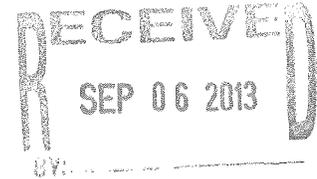
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PLANNING COMMISSION

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August 27, 2013

Thomas Haws, Jr., Chairman
Westtown Township Board of Supervisors
1039 Wilmington Pike
West Chester, PA 19382



Re: Westtown Township West Wynn I Area Act 537 Special Study

Dear Mr. Haws:

The Chester County Planning Commission (CCPC) has reviewed the Draft 537 Plan dated July 2013 as required by Section 71.31(b) of the Pennsylvania Sewage Facilities Act (Act 537). The Plan was prepared by URS Corporation. The Plan was received on July 31, 2013.

This Plan was prepared to address the June 7, 2013 PA DEP letter, which disapproved the Township's 2012 Act 537 Plan, as it related to the West Wynn I Area. This Special Study, which is an addendum to the 2012 Plan indicates that the Township requires more time to thoroughly investigate and verify the status of the systems located within the West Wynn I area. The Chester County Planning Commission continues to maintain that there are areas within the Township that will require public sewer due to the future need and available access to the public system.

The Chester County Planning Commission, in agreement with the Chester County Health Department's comments, support this effort to further study the West Wynn I Study Area and define the most suitable solution for both the Township and the residents. As with the August 2012 Act 537 Plan, **we support this as an interim plan for the Township until further evaluation is completed.**

The following comments are offered based on review of the document:

A. Consistency with the County Comprehensive Plan – *Landscapes2*:

1. The West Wynn I area is primarily defined as the Suburban Landscape, with a small portion located in the Natural Features Overlay. The Act 537 Plan is somewhat consistent with the policies of *Landscapes2*, as they relate to the Suburban Landscape, including *Landscapes2* Policy UI 2.5 which states: "Maintain, upgrade, or expand existing public sewer and water facilities to support redevelopment and new development in designated growth areas, where consistent with local land use planning, while discouraging the extension of those facilities in the rural, agricultural and natural landscapes." While the Special Study is only somewhat consistent with the policies set forth for the Suburban Landscape, because of known and suspected malfunctioning systems, smaller lot sizes, and some residents that may still utilize Well water. The CCPC understands that Westtown Township intends to use this Special Study to help further define the areas that may or may not require public sewer in the future for these reasons. As presented, the Special Study is somewhat consistent with the goals and policies of *Landscapes2*.

Page: 2

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2. *Watersheds*, the water resources element of the County comprehensive plan, identifies Objective 7.2 of Goal 7, "concentrate planned utility service areas to support designated growth areas," to be achieved through key strategies such as the extension of community wastewater facilities in Suburban Landscapes. Westtown Township detailed in the 2012 Act 537 Plan that they intended to expand the public sewer services area only where necessary. Therefore the goals for wastewater in Westtown Township are still somewhat consistent with those of *Watersheds*.

B. Selection of Alternative:

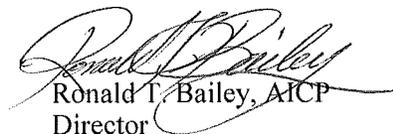
The selected alternative for Westtown Township is to continue use of on-lot systems until further evaluation is completed, and to implement a septage management plan and ordinance to gather information for future public sewer needs. The proposed alternative is supported by *Landscapes2* and adopted regional and local plans that support projected future demands, avoid capacity shortfalls, protect natural resources, and provide safe and reliable utility services." As proposed, this Special Study is somewhat consistent with the goals and policies of *Landscapes2*.

C. General Comments:

1. The CCPC supports the comments made by the Chester County Health Department in their letter, dated August 14, 2013.
2. The CCPC supports the need for more time for Westtown Township to thoroughly investigate and verify the status of existing facilities within the West Wynn I area, so that they may make the most appropriate decision based on needs.
3. The Special Study indicates that based on the information gathered to date approximately 15 percent of the study area may be experiencing existing on-lot sewage system problems. There is also a prevalence of small lot sizes (less than one acre, or in areas with public water service, less than ¾ acre) with potentially unsuitable soils associated with stream corridors traversing the neighborhood. This restriction of replacement areas may result in the need for Westtown Township to consider public sewer for this Study Area.

We hope that these comments will be of assistance as the Township prepares this Special Study for submission of this proposed plan to the PA DEP. The Planning Commission feels that this study areas will likely require public sewer due to both need and available access to the public system, should there be a non-cost prohibitive way to do so. If you have any questions, please contact Carrie Conwell at 610-344-6285.

Sincerely,


Ronald T. Bailey, AICP
Director

RTB/CC/yg

cc: Elizabeth Mahoney, PA DEP
Ralph DeFazio, Chester County Health Department
Robert Layman, Manager, Westtown Township
Stan Corbett, URS Corporation