November 17, 2020

Justin Keller, Borough Manager  
Pottstown Borough  
100 E. High Street  
Pottstown, PA  19464

RE: The Hill School New Dormitory  
Land Development Review  
Pottstown Borough  
PTB-20-359

Dear Mr. Keller,

CEDARVILLE has completed a review of the Land Development Plans for The Hill School New Dormitory. The location within the site (Parcel 16-00-15116-00-6) that this application is in reference to is located in the center of the southern property area between Beech Street and High Street. The parcel is approximately 38.99 acres and within the Traditional Town Neighborhood (TTN) Zoning District. The site contains the existing facilities utilized by the Hill School. The current application proposes demolition of existing building facilities and parking and installation of a new dormitory building and associated parking in its place.

The following information was submitted by Pennoni Associates, Inc., and was received by our office on October 20, 2020:


The following Modifications (Waivers) have been requested by the Applicant:

A. § 202 – Submitting a preliminary plat to the Borough Zoning Officer prior to submission of a Final Land Development Plan.
B. § 400.2.C – Show all existing underground features on the parcel, including but not limited to:
   a) Sanitary sewer lines and water lines.
   b) Storm drainage.
C. § 400.3.A – Show physical features and topography on the property surrounding the subject parcel for a distance of 100 feet unless a greater distance is deemed necessary by the Zoning Officer because of unconventional topographic conditions.
D. § A401.8 – The names of all abutting subdivisions, developments, or landowners, with deed book, volume, and page numbers where recorded.
E. § A402.1 – Within 100 feet of any part of the land being subdivided or developed: the location, names, width, radii, curbs, sidewalks, and subsurface conditions of existing streets and alleys; the location and dimensions of existing rights-of-way and easements; the location of watercourses, floodplains, floodways, sanitary sewers, storm drains and catchments, utilities above and below ground; the location and width of existing curb cuts and/or driveways; the location of any zoning district boundary, municipal or county boundary, or recreational area; and other similar features.

F. § A402.2 – Within 100 feet of any part of the land being subdivided or developed: contour lines and elevation data; the location of existing structures and their use; parking areas; and significant landscape features.

G. § A403.6 – Existing and proposed sewer lines, water lines, fire hydrants, utility transmission lines (above or below ground), culverts, bridges, railroads, watercourses, and other significant man-made or natural features. Any existing services to be abandoned or which may have been previously abandoned not in accordance with the Authority standards shall be clearly indicated on the plan. The plan shall be noted as required in §400, Subsection 2C1.

H. § A403.8 – Streets, including streets recorded but not constructed, on or abutting the tract, including names, right-of-way widths, cartway or pavement widths, radii, curb lines, sidewalks, and approximate grades.

I. § A403.12 – Existence and location of identified "recognized environmental conditions" per the standards of the American Society of Testing and Materials E 1527-00. If a Phase One Environmental Site Assessment has not been performed, such an assessment will be included with the application. (This requirement may be waived in the case of an application for a single-family dwelling.)

J. § A404.1 - The total tract boundary lines of the area being subdivided or developed with accurate distances to hundredths of a foot and bearings to nearest 15 seconds. These boundaries shall be determined by accurate survey in the field, which shall be balanced and shall close with an error of closure not to exceed one foot per 10,000 feet; provided, however, the boundary(s) adjoining additional un-platted land of the subdivider, for example, between separately submitted final plan sections, are not required to be based upon field survey, and may be calculated. These closure computations shall accompany the final plan. The location and elevation of all boundary lines or perimeter monuments shall be indicated, along with a statement of the total area of the property being subdivided or developed.

K. § A404.2 - The layout of streets, alleys, crosswalks, sidewalks, and public trails, including the names and widths of cartways and ultimate rights-of-way. The following data for the cartway centerlines and right of way lines of all recorded, except those that are to be vacated, and/or proposed streets, and for the right-of-way lines of all existing streets within the property.

L. § A405.1 - The plan scale shall be no smaller than one-inch equals 100-feet. The plan shall be prepared with a standard engineer's scale suitable to the size of the parcel and the required plan details.

M. § 503.1 – Total Number. The total number of trees required by this chapter shall be determined by computing the number of trees needed for street frontage, parking lots, and open space, and adding the results. When the sum results in a fraction, the fraction shall be rounded up to the next higher whole number. Existing trees more than three (3) inches in caliper may be counted toward the total.

N. § 503.4.E – Steep slopes in excess of 20 percent as measured at 2-foot intervals for a cumulative grade change of 6-feet.

O. § 504 - In areas of any developed lot where there are no buildings, one shade tree shall be provided for every 8,000 square feet of total lot area. This shall be in addition to trees required for street frontage and parking lots.

P. § 504.A – Open space and recreational facilities.

Q. § 505 – Street Trees
   a) Except as modified by Chapter 25, Trees, of the Code of Ordinances of the Borough of Pottstown, as amended, shade trees shall be provided along street frontage as follows:

<table>
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<tr>
<th>Street Frontage(Feet)</th>
<th>Number of Trees</th>
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<tbody>
<tr>
<td>Less than 40</td>
<td>1 tree minimum</td>
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</table>

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40 to 59 2 trees minimum
60 or more At least 3 trees, with a minimum of 1 tree every 30-feet with an average spacing of at least 1 tree every 30-feet

b) Wherever possible, there shall be a planting strip in accordance with § 202, Specifications for Sidewalks and Curbs, of Subpart 2A, Construction and Maintenance Standards of Sidewalks and Curbs, Part 2, Sidewalks, Chapter 21, Streets and Sidewalks. If the construction and installation of a planting strip in accordance herewith is not possible, then individual tree wells shall be created in accordance with § 206, Street Tree Wells, of said Chapter 21.

R. § 509 - Bollards of concrete-filled steel pipes (or equally sturdy material), wooden frames, or wheel stops are preferred to curbing for protecting trees.
S. § 510 – Screening.
T. § 511 – Buffering.

The Plans have been reviewed in accordance with Chapter 9 Grading and Excavating, Chapter, Chapter 22 Subdivision and Land Development (latest Amendment March 11, 2019), Chapter 26 Water Part 2 Stormwater Management, and Chapter 27 Zoning, of the Borough of Pottstown Ordinances.

The following comments are offered for your consideration:

Chapter 9 Grading and Excavation:

1. § 9-105.D – Erosion and sediment control practices, both temporary and permanent, and the operation and maintenance arrangements

   The following items shown on the Erosion and Sediment Control Plans shall be revised:
   a) Compost Filter Sock 2 does not display on Sheet CS8001.
   b) Proposed utility information must be shown on the E&S Plan Sheet. Currently these improvements are not visible.
   c) The line type for the staging area shall be revised to one different than the limit of disturbance for clarity.

Chapter 22 Subdivision and Land Development:

2. § 22-202 – Formal Application Procedure

   A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.

3. § 400.2.C – Show all existing underground features on the parcel, including but not limited to:
   1) Sanitary sewer lines and water lines.
   2) Storm drainage.

   A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement, as the required information is shown in the vicinity of the project.
4. § 400.3.A – Show physical features and topography on the property surrounding the subject parcel for a distance of 100 feet, unless a greater distance is deemed necessary by the Zoning Officer because of unconventional topographic conditions.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.

5. § 400.5.4.2.(a) – From the proposed building(s) to front, side and rear property lines.

§ 400.5.4.2.(b) – From the proposed building(s) to existing building(s) on adjacent properties and building(s) to remain on the lot.

Dimensional lines shall be added to the plan noting the distance from the proposed building to the above referenced features.

6. § 400.5.4.3 – All plans shall clearly note:

"The proposed building(s) shall be staked in the location as shown on the plan and approved by the Building Inspector/Zoning Officer prior to the issuance of a building permit. Also, setback or separation dimensions as indicated on the plan shall be maintained throughout the construction. Field adjustments for building location may require an amended plan, subject to the discretion of the Borough or its representatives."

The above referenced note shall be added to the Plan.

7. § 400.5.A – Certification of a “Phase One” Environmental Site Assessment shall be attached in accordance with ASTM (American Society for Testing and Materials) standards.

This waiver has been requested for previous projects involving this applicant, however this request was not included with the current application. If requested, CEDARVILLE would offer no objection to consideration of a waiver of this Ordinance requirement.

8. § A401.8 – The names of all abutting subdivisions, developments, or landowners, with deed book, volume, and page numbers where recorded.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.

9. § A402.1 – Within 100 feet of any part of the land being subdivided or developed: the location, names, width, radii, curbs, sidewalks, and subsurface conditions of existing streets and alleys; the location and dimensions of existing rights-of-way and easements; the location of watercourses, floodplains, floodways, sanitary sewers, storm drains and catchments, utilities above and below ground; the location and width of existing curb cuts and/or driveways; the location of any zoning district boundary, municipal or county boundary, or recreational area; and other similar features.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.
10. **§ A402.2** – Within 100 feet of any part of the land being subdivided or developed: contour lines and elevation data; the location of existing structures and their use; parking areas; and significant landscape features.

A waiver has been requested from this section of the Ordinance by the Applicant. **CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.**

11. **§ A402.3** – Additional off-site information may be required at the discretion of the Borough where necessary to ensure proper development of the parcel and its compatibility with the surrounding development.

The total acreage of the site noted on Sheet CS0002 shall be revised to be consistent between the area noted on Note #2 (113.6221 acres), Note #3 (80.33 acres), and the Zoning Compliance Summary (38.9852 acres).

12. **§ A403.6** – Existing and proposed sewer lines, water lines, fire hydrants, utility transmission liens (above or below ground), culverts, bridges, railroads, watercourses, and other significant man-made or natural features. Any existing services to be abandoned or which may have been previously abandoned not in accordance with the Authority standards shall be clearly indicated on the plan. The plan shall be noted as required in §400, Subsection 2C1.

A waiver has been requested from this section of the Ordinance by the Applicant. **CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.**

13. **§ A403.8** – Streets, including streets recorded but not constructed, on or abutting the tract, including names, right-of-way widths, cartway or pavement widths, radii, curb lines, sidewalks, and approximate grades.

A waiver has been requested from this section of the Ordinance by the Applicant. **CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.**

14. **§ A403.9** – Wetlands, floodplains, floodways, and types of soils.

Soil information shall be added to the plans. This includes boundary information, types, hydrologic soil groups, and any testing results.

15. **§ A403.10** – The location of percolation test holes and any test borings and a report of such tests.

**§ A403.11** – Locations of any environmental monitoring wells or soil borings.

Sheet CS0201 shows the locations of multiple test/boring locations. The legend for all sheets that show these locations shall be updated to note the type of tests, and testing results shall be added to the applicable plan sheets.

16. **§ A403.12** – Existence and location of identified “recognized environmental conditions” per the standards of the American Society of Testing and Materials E 1527-00. If a Phase One Environmental Site Assessment has not been performed, such an assessment will be included with the application. (This requirement may be waived in the case of an application for a single-family dwelling.)

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A waiver has been requested from this section of the Ordinance by the Applicant. **CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.**

17. **§ A404.1** - The total tract boundary lines of the area being subdivided or developed with accurate distances to hundredths of a foot and bearings to nearest 15 seconds. These boundaries shall be determined by accurate survey in the field, which shall be balanced and shall close with an error of closure not to exceed one foot per 10,000 feet; provided, however, the boundary(s) adjoining additional un-platted land of the sub-divider, for example, between separately submitted final plan sections, are not required to be based upon field survey, and may be calculated. These closure computations shall accompany the final plan. The location and elevation of all boundary lines or perimeter monuments shall be indicated, along with a statement of the total area of the property being subdivided or developed.

A waiver has been requested from this section of the Ordinance by the Applicant. **CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.**

18. **§ A404.2** - The layout of streets, alleys, crosswalks, sidewalks, and public trails, including the names and widths of cartways and ultimate rights-of-way. The following data for the cartway centerlines and right-of-way lines of all recorded, except those that are to be vacated, and/or proposed streets, and for the right-of-way lines of all existing streets within the property.

A waiver has been requested from this section of the Ordinance by the Applicant. **CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.**

19. **§ A404.3** - The layout of buildings, parking lots, driveways, and access points to existing streets. Where applicable, compliance with American Disabilities Act requirements shall be shown. Plans, including sizes and materials, for private drives; parking areas and the layout of parking spaces and aisles; loading areas; and trails and plazas. A statement of the intended use of all nonresidential lots, or in the case of land developments, building units, with reference to restrictions of any type that exist or will exist as covenants in the deed for the lots or units contained in the subdivision and, if covenants are recorded, including the book and page number from the County deed records.

Additional spot elevations shall be provided along the proposed sidewalk, extending from the westernmost proposed ADA ramp to the building, to demonstrated compliance with current ADA requirements.

20. **§ 242.1** – Prior to final approval of the SWM site plan, the property owner shall sign and record an operation and maintenance (O&M) agreement (see Appendix A)†† covering all stormwater control facilities which are to be privately owned.

The Applicant and/or Applicant’s Counsel shall contact the Borough Solicitor regarding preparation of the Operation and Maintenance Agreement. The Operation and Maintenance Notes included on the PSCM Plan, Sheet 16, shall be considered adequate for incorporation into the agreement. The Operation and Maintenance Agreement shall be recorded concurrently with the plan.

21. **§ A404.21** - Stormwater runoff calculations for the entire site and the location, layout and elevations for any detention facilities or collection and conveyance facilities. See the Borough of Pottstown Stormwater Management Ordinance for additional criteria.

See Stormwater Management Comments below.
22. § A405.1 - The plan scale shall be no smaller than one-inch equals 100 feet. The plan shall be prepared with a standard engineer's scale suitable to the size of the parcel and the required plan details.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.

23. § 503.1 – Total Number. The total number of trees required by this chapter shall be determined by computing the number of trees needed for street frontage, parking lots, and open space, and adding the results. When the sum results in a fraction, the fraction shall be rounded up to the next higher whole number. Existing trees more than three inches in caliper may be counted toward the total.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement conditioned upon a payment in lieu of deficient landscaping being provided, however it is unclear based upon the table shown on Sheet L-4.0.01 where this deficiency exists, as the current table shows no reference to minimum Ordinance requirements. The applicant should re-evaluate this request based upon the information the referenced Ordinance criteria.

24. § 503.3 – Species and Location. All tree species required by this Part shall conform to the approved Tree List of the Borough of Pottstown, as specifically enumerated and set forth in § 104, Planting of Trees on Public Rights-of-Way, contained in Chapter 25, Trees, of the Code of Ordinances of the Borough of Pottstown, as amended. A copy of the approved Tree List is attached hereto and incorporated herein, marked as Exhibit A.[1] In addition, the location of plantings of such required tree species shall also comply with all applicable requirements of Chapter 25. In the event there is any conflict or inconsistency with respect to the requirements of this Part or Chapter 25, the requirements of Chapter 25 shall control.

The following plantings are not approved trees provided on the approved tree list referenced above:
   a) ASgm, Acer saccharum
   b) QA, Quercus alba
   c) QI, Quercus imbricaria
   d) TA, Tilia americana
   e) TD Taxodium distichum
   f) CV, Chionanthus virginicus
   g) MVh, Magnolia virginiana

The above planting may be used but shall not count toward the minimum landscaping as required by Ordinance Sections 503-507. The table included on Sheet L-4.0.01 shall be updated to demonstrate compliance with applicable Township Ordinance requirements, referenced below.

25. § 504 – In areas of any developed lot where there are no buildings, one shade tree shall be provided for every 8,000 square feet of total lot area. This shall be in addition to trees required for street frontage and parking lots.

A waiver has been requested from this section of the Ordinance by the Applicant. Prior to consideration of this request, the applicant shall calculate the shade trees provided vs. those as required by Ordinance. If it is determined that insufficient landscaping is being provided, CEDARVILLE would offer no objection to consideration of a waiver of this Ordinance requirement, conditioned upon a payment in lieu of deficient landscaping being provided by the Applicant.
26. § 505 – Street Trees
   A. Except as modified by Chapter 25, Trees, of the Code of Ordinances of the Borough of Pottstown, as amended, shade trees shall be provided along street frontage as follows:

<table>
<thead>
<tr>
<th>Street Frontage (feet)</th>
<th>Number of Trees</th>
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<tbody>
<tr>
<td>Less than 40</td>
<td>1 tree minimum</td>
</tr>
<tr>
<td>40 to 59</td>
<td>2 trees minimum</td>
</tr>
<tr>
<td>60 or more</td>
<td>At least 3 trees, with a minimum of 1 tree every 30-feet with an average spacing of at least 1 tree every 30-feet</td>
</tr>
</tbody>
</table>

B. Wherever possible, there shall be a planting strip in accordance with § 202, Specifications for Sidewalks and Curbs, of Subpart 2A, Construction and Maintenance Standards of Sidewalks and Curbs, Part 2, Sidewalks, Chapter 21, Streets and Sidewalks. If the construction and installation of a planting strip in accordance herewith is not possible, then individual tree wells shall be created in accordance with § 206, Street Tree Wells, of said Chapter 21.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement as this project does not front or propose access to a public street.

27. § 509 - Bollards of concrete-filled steel pipes (or equally sturdy material), wooden frames, or wheel stops are preferred to curbing for protecting trees.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement, as the trees proposed have been located a sufficient distance from curbing alleviate potential damage from vehicles.

28. § 510 – Screening.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.

29. § 511 – Buffering.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.

30. § A503.4.E – Steep slopes in excess of 20 percent as measured at 2-foot intervals for a cumulative grade change of 6 feet.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement.

31. § A504 – Open space and recreational facilities.

A waiver has been requested from this section of the Ordinance by the Applicant. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement, provided that a fee in lieu of open space is provided as referenced in Comment #32, below. A minimum of 0.01 acres of open space is to
be provided for each 1,000 square feet of improvements proposed. The applicant shall reference the total area of improvements proposed on the plan.

32. § A505 – Fee in lieu of open space.

A fee in lieu of open space shall be provided based on the increased improvement area of the parcel. Based on the provided Zoning Compliance Summary, the project proposes to add approximately 1.6% additional impervious area or 0.62 acres. This increase correlates to roughly 27,171 square feet of improvements for a fee based on 0.27 acres of open space.

\[(16.9\% - 15.3\%) * 38.9852 * 43560 / 1000 * 0.01 = 0.27\]

Per section A505.3 and A505.4, the value of any fee in lieu of land shall be equal to the average fair-market value of the land required by section A504 or a proportional value thereof, shall be the responsibility of the Applicant using an MAI appraiser, and shall be subject to the approval of Borough Council.

33. § A512.1.E – All outdoor lighting shall be designed and located such that the maximum illumination measured in footcandles shall be 0.3 maintained footcandle at any property line, and 2.0 maintained footcandles at any street right-of-way. Fixtures should be placed to provide uniform distribution of light and to avoid intense lighting that produces excessive glare. The average intensity illumination for outdoor lighting shall not exceed 6 footcandles in intensity as measured at grade.

The Lighting Site Plan, Sheet E-2.0.04 must be revised to include footcandles demonstrating compliance with the above referenced section of the Ordinance. Please note, Section A514 has additional lighting design requirements that must be followed based on-site usage.

34. § A512.1.F – Parking lot lighting fixtures of more than 2,000 lumens shall be cutoff fixtures.

All fixtures shall note either full cutoff or an acceptable BUG rating of U = 0. Fixtures that do not meet the requirements of the above referenced section of the Ordinance must be revised to acceptable models.

35. § A512.1.F – Parking lot lighting fixtures of more than 2,000 lumens shall be cutoff fixtures.

All fixtures must note either full cutoff or an acceptable BUG rating of U = 0.

36. § A525.3 – Width. Sidewalks shall have a clear width of at least four feet, six inches; wider clearance widths from five to 20 feet may be necessary and required near pedestrian generators and employment centers.

The proposed sidewalks shall be revised to have a minimum width of four feet, six inches.

37. § 700.1 – No plat shall receive final approval until all the streets, sidewalks, street trees, and other improvements as required by the Borough and shown on the plat have been completed. In lieu of the completion of the improvements, the developer may deposit with the Borough financial security in an amount sufficient to cover the costs of the improvements plus 110% of the cost of the improvements.

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§ 700.2 – The developer will submit an estimate of the cost of improvements which will be reviewed by the Borough Engineer. If the developer needs more than a year to complete the improvements, the Borough may require more financial security.

Completion of site improvement or financial security of an amount acceptable to the Borough prior to plan recording. A construction cost estimate shall be submitted for review and approval of financial security to be posted. The referenced financial security shall be incorporated into a Developer’s Agreement to be executed prior to plan recording.

Chapter 26 Water Part 2 Stormwater Management

38. § 221.4 – For all regulated earth disturbance activities, erosion and sediment control BMPs shall be designed, implemented, operated, and maintained during the regulated earth disturbance activities (e.g., during construction) to meet the purposes and requirements of this Part and to meet all requirements under Title 25 of the Pennsylvania Code and the Clean Streams Law. Various BMPs and their design standards are listed in the Erosion and Sediment Pollution Control Program Manual (E&S Manual), No. 363-2134-008 (April 15, 2000), as amended and updated.

See comment #1 above.

39. § 221.10 – Normally dry, open-top, storage facilities should completely drain both the volume control and rate control capacities over a period of time not less than 24 and not more than 72 hours from the end of the design storm.

Dewatering calculations to verify the dewatering time noted on the provided stormwater calculations must be provided within the Stormwater Report, based upon the results of soil infiltration as referenced in Comment 46, below.

40. § 221.4 – The design storm volumes to be used in the analysis of peak rates of discharge should be obtained from the Precipitation-Frequency Atlas of the United States, Atlas 14, Volume 2, Version 3.0, United States Department of Commerce, National Oceanic and Atmospheric Administration (NOAA), National Weather Service, Hydrometeorological Design Studies Center, Silver Spring, Maryland. NOAA’s Atlas 14 can be accessed at: http://hdsc.nws.noaa.gov/hdsc/pfds/.

It shall be clarified as to why the applicant has included NJ DEP 1” 2hr rainfall data and routings within the Stormwater Report. If this data is not intended to be included, it shall be removed in subsequent submissions.

41. § 223.A.2.a – Existing (predevelopment) nonforested pervious areas must be considered meadow in good condition.

All areas in the Pre Project-Area Totals Worksheet and used in calculation treated as “undisturbed lawn” shall be revised to meadow as required by the above referenced section of the Ordinance.

42. § 224 – Post-development discharge rates shall not exceed the predevelopment discharge rates for the one-, two-, five-, ten-, twenty-five-, fifty-, and one-hundred-year, twenty-four-hour storms. If it is shown that the peak rates of discharge indicated by the post-development analysis are less than or equal to the peak rates of discharge indicated by the predevelopment analysis for one-, two-, five-, ten-, twenty-five-, fifty-
and one-hundred-year, twenty-four-hour storms, then the requirements of this section have been met. Otherwise, the applicant shall provide additional controls as necessary to satisfy the peak rate of discharge requirement.

Based on a preliminary review of the routing calculations provided, the following inconsistencies must be addressed:

a) Peak rates for the post development release rates for the 2, 5, and 25 year storms shown on the first sheet of the stormwater calculations titled “Borough Stormwater Management Requirements” do not coincide with the respective calculation for catchment 11L. This sheet shall be revised accordingly.

b) The time of concentration for the bypass used in HydroCAD shall be revised to a minimum value of 5 minutes.

c) Time of concentration flow paths for the pre- and post-developed conditions, used to compute the times of concentration used in the calculations, shall be added to the Drainage Area Plans.

d) Soils types and information associated with each soil type must be provided to support the use of hydrologic soil type “B”.

e) The Post Development Drainage Area Plan references a total drainage area of 118,743 square feet, which does not coincide with the drainage area referenced in the calculations (134,173 sf).

f) The Post Development Drainage Area Plan references four bypass subareas totaling 53,281 sf; however, the calculations indicate that only 52,259 was accounted for in the calculations. This shall be clarified and revised as required.

g) BMP routing calculations indicate that a four-inch orifice shall be used to manage flows, utilizing an outlet structure with an 18-inch outlet pipe, however the detail provided shows the 18-inch pipe as the primary orifice. The detail of the outlet structure shall be revised to demonstrate that the four-inch orifice functions independently of the 18 in pipe, or the calculation shall be revised using the 18-inch orifice as the primary control.

43. § 231.D – The following signature block for the municipality:

“(Municipal official or designee), on this date (date of signature), has reviewed and hereby certifies that the SWM site plan meets all design standards and criteria of Municipal Ordinance No. 2125.”

The above referenced signature block shall be added to the Stormwater Plan as required by the above referenced section of the Ordinance.

44. § 231.E.1 – The overall stormwater management concept for the project.

The following shall be provided:

- The thickness of line types used to delineate drainage areas shall be increased for legibility.
- Post Construction Stormwater Management Plan Note 1 shall be revised to include dates for the Reports (and a title page added to the report), while removing the E&S Report if one is not prepared.

45. § 231.E.4 – Expected project time schedule.

The expected project time schedule shall be added to the Plans.

46. § 231.E.5 – The SWM Plan shall provide the following information: A determination of site conditions in accordance with the BMP Manual. A detailed site evaluation shall be completed for projects prosed in
areas of carbonate geology or karst topography, and other environmentally sensitive areas, such as brownfields.

Soli infiltration testing shall be complete in accordance with the Pennsylvania BMP Manual, Appendix C, to demonstrate suitability for infiltration of the proposed BMP at the location and depths proposed.

47. § 231.E.7 – Plan and profile drawings of all SWM BMPs, including drainage structures, pipes, open channels, and swales.

The detail for the infiltration BMP shall be revised to include:

- Additional detail showing how the 10-80 LF 12’ ADS pipes are to be installed, and how runoff shall be conveyed to these pipes. The detail appears to specify solid pipe and does not show a means of allowing conveyance to these pipes.
- The dimensions of the MRC Internal Water Storage bed shall be shown on the detail.
- The purpose of the 4-inch perforated underdrain shall be clarified, as the point of discharge is unclear.
- The size, material, and specifications associated with the Riser/Outlet Structure must be shown. The detail references a 12-inch Nyoplast dome grate; however, it appears a minimum diameter of 18 inches will be required for the outlet structure to be able to accommodate the 18-inch outlet pipe.
- The proposed configuration of the 4-inch orifice and 18-inch outlet pipe in the Riser/Outlet Structure must be provided. The detail currently does not show the 18-inch outlet pipe.
- Additional specifications pertaining to the Soil Mix must be provided to support the 30% void content referenced in the calculations.
- The minimum width of the BMP berm shall be specified.
- The proposed plan grading shall be revised to incorporate the BMP berm emergency spillway.
- Operation and Maintenance Notes for the proposed BMP shall be provided.

The plans shall be revised as follows:

- Grading associated with the emergency spillway shall be shown within the berm of the BMP.
- The riprap apron proposed at Endwall RR-2 shall be reconfigured to be contained within the floor of the BMP.
- The plan references a 6-inch perforated underdrain; however, the detail shows a 4-inch underdrain to be installed. This shall be revised accordingly.
- Endwall RR-3 proposes concentrated flow to an existing steep embankment, which will result in accelerated erosion. A level spreader or similar facility shall be utilized to further dissipate flows exiting the storm sewer.
- The top of grate of the proposed BMP outlet structure shall be revised to coincide with the detail.

48. § 231.E.9 – The SWM site plan shall include an O&M plan for all existing and proposed physical stormwater management facilities. This plan shall address long-term ownership and responsibilities for O&M as well as schedules and costs for O&M facilities.

The PCSM Plan shall include applicable operation and maintenance information as referenced above.
49. § 242.1 – Prior to final approval of the SWM site plan, the property owner shall sign and record an operation and maintenance (O&M) agreement (see Appendix A) covering all stormwater control facilities which are to be privately owned.

The Applicant and/or Applicant’s Counsel shall contact the Borough Solicitor regarding preparation of the Operation and Maintenance Agreement. The Operation and Maintenance notes included on the PSCM Plan, Sheet 16, shall be considered adequate for incorporation into the agreement. The Operation and Maintenance Agreement shall be recorded concurrently with the plan.

50. § 243 – For SWM site plans that involve subdivision and land development, the applicant shall provide a financial guarantee to the municipality for the timely installation and proper construction of all stormwater management controls as required by the approved SWM site plan and this Part in accordance with the provisions of Sections 509, 510, and 511 of the Pennsylvania Municipalities Planning Code.

All items shown on the PCSM plan shall be included within the financial guarantee as required by Comment #40.

51. § 263 – No person shall modify, remove, fill, landscape, or alter any SWM BMPs, facilities, areas, or structures without the written approval of the municipality.

A note with the above referenced language shall be added to the PCSM Plan.

Chapter 27 Zoning

52. § 309.2 – In Neighborhood Residential or Traditional Town Neighborhood Districts: A new building, or an existing building with a new addition, may be 30% to 100% larger than other buildings facing the same block as a conditional use if the applicant can demonstrate to the satisfaction of Borough Council that the facade of the new building will be compatible with existing buildings on the block regarding:
   A. Form, either horizontal or vertical.
   B. Base, body, and cap.
   C. Scale.
   D. Texture and pattern of materials.
   E. Proportion of walls to openings.

Due to the increased building size of the proposed building when compared to the existing building(s) to be demolished, the Zoning Officer must make a determination as to if a special exception is applicable as described by the above referenced section of the Ordinance.

53. § 310.1 – Design guideline: The height of new buildings shall be either:
   A. Within 15% of the perceived height of the buildings on either side of the new building, or
   B. Within 15% of the average perceived height of the buildings facing the same side of the block within a radius of 250 feet

Existing and proposed building heights shall be added to the Zoning Compliance Summary Table on Sheet CS0002.

54. § 311 – Base, Body, and Cap
   §312 - Proportion of Building Walls to Openings
CEDARVILLE defers comments relating to the above referenced sections of the Ordinance to the Borough of Pottstown Zoning Officer.

§ 610.4 – Number of spaces.
[Amended by Ord. 2067, 12/14/2009, § 5; by Ord. 2133, 2/9/2015; and by Ord. 2136, 5/11/2015]

A. The number of parking spaces required is as follows:

<table>
<thead>
<tr>
<th>Type of Use</th>
<th>Parking Spaces Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single-family dwelling, detached or semidetached, 1 bedroom</td>
<td>2 spaces</td>
</tr>
<tr>
<td>Single-family townhouse, 1 bedroom</td>
<td>2 spaces</td>
</tr>
<tr>
<td>Single-family dwelling, detached or semidetached, more than 1 bed</td>
<td>2 spaces</td>
</tr>
<tr>
<td>Single-family townhouse with more than 1 bedroom</td>
<td>2 spaces</td>
</tr>
<tr>
<td>Multiple-family dwelling unit, studio apartment or 1 bedroom</td>
<td>2 spaces per dwelling unit</td>
</tr>
<tr>
<td>Multiple-family dwelling unit, 2 or more bedrooms</td>
<td>2 spaces per dwelling unit</td>
</tr>
<tr>
<td>Multiple-family dwelling units for ages 55 and older</td>
<td>2 spaces per dwelling unit</td>
</tr>
<tr>
<td>Commercial, office, and institutional</td>
<td>3 spaces per 1,000 square feet</td>
</tr>
<tr>
<td>Industrial</td>
<td>1 space per 1,000 square feet</td>
</tr>
<tr>
<td>Warehouse</td>
<td>0.25 space per 1,000 square feet</td>
</tr>
</tbody>
</table>

B. In addition to being subject to the required off-street parking spaces provided above, the following uses shall also require additional off-street parking spaces as follows:

<table>
<thead>
<tr>
<th>Type of Use</th>
<th>Parking Spaces Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult day care</td>
<td>1 space per every 7 adults</td>
</tr>
<tr>
<td>Boarding home</td>
<td>1 space for owner-occupier; and 1 space per lodging room</td>
</tr>
<tr>
<td>Bed-and-breakfast/tourist home</td>
<td>1 space</td>
</tr>
<tr>
<td>Child care facility - day care center</td>
<td>1 space per every 4 children</td>
</tr>
<tr>
<td>Child care facility - family day care</td>
<td>1 space per every 4 children</td>
</tr>
<tr>
<td>Child care facility - group day care home</td>
<td>1 space per every 4 children</td>
</tr>
<tr>
<td>Preschool and day care facility</td>
<td>1 space per every 4 children</td>
</tr>
<tr>
<td>Continuing care home</td>
<td>2 spaces together with 1 space if residents total 59 or fewer, 2 spaces if residents total 60 to 500, spaces if residents total 501 to 1,000, or 8 spaces if residents total more than 1,000, in order to accommodate minimum staffing; and 1 space per every 20 residents</td>
</tr>
<tr>
<td>Group home</td>
<td>1 space per every 2 residents; and 1 space for staff</td>
</tr>
<tr>
<td>Personal care home</td>
<td>1 space per every 5 beds; and 1 space per each staff member during maximum shift</td>
</tr>
<tr>
<td>Rooming house</td>
<td>1 additional space per room</td>
</tr>
<tr>
<td>Treatment center</td>
<td>1 space per each staff member during maximum shift</td>
</tr>
</tbody>
</table>

A parking tabulation and breakdown noting number of lodgings and total non-residential floor space shall be provided to document that despite the Owner not expecting an increase in enrollment, that should the
facility be used to capacity, it provides all required parking as required by this section of the Ordinance. The spaces shall not be used for the Music House or other existing structures to remain.

56. § 604 –Lighting of parking areas.
All parking areas for more than 10 vehicles serving business uses and collective residential parking shall be adequately illuminated during the hours between sunset and sunrise when the use is in operation. Any lighting used to illuminate any off-street parking area, whether required or not, shall be so arranged or shielded to protect any adjacent residential premises from the glare of the illumination.

Fixtures shall be equipped with or be capable of being back fitted with light directing devices such as shields, visors or hoods when necessary to redirect offending light distribution. Lights shall be installed or aimed so that they do not project their output into the window of a neighboring residence, an adjacent use, directly skyward, or onto a roadway.

See Comment numbers 36, 37 and 38 above.

Other agency approvals
Approvals or permits from the following agencies may also be required. Written evidence of these approvals, acceptance, or exemptions need to be submitted to the Borough:

A. Montgomery County Conservation District (NPDES Permit)
B. Pennsylvania Department of Environmental Protection – Sewage Facility Planning Module
C. Pottstown Borough Authority Pottstown (proposed sanitary sewer)
D. Fire Marshall, Borough of Pottstown
E. Zoning Officer, Borough of Pottstown

Consideration of Land Development Plan approval shall be conditioned on resolution of all outstanding comments referenced in this letter and appropriate action on all waiver requests. Please feel free to contact me with any questions.

Best Regards,
CEDARVILLE Engineering Group, LLC

Robert E. Flinchbaugh, P.E.
Senior Municipal Manager

cc: Stephanie Drobins, Pottstown Borough Licensing and Inspections
Charles D. Garner, Esquire, Pottstown Borough Solicitor
Keith A. Place, Pottstown Borough Director of Licensing and Inspections
Winter Stokes, Pottstown Borough Zoning/Planning Administrator
Ginny Takach, Pottstown Borough Secretary
John C. Medendorp, P.E., Pennoni Associates, Inc.
Robin Rhoads, The Hill School