January 20, 2021

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

RE: 804 Farmington Ave – M&M Lube
Minor Land Development Review
Pottstown Borough
PTB-20-265

Dear Mr. Keller,

CEDARVILLE Engineering Group, LLC (CEG) has completed a review of the Minor Land Development Plans for 804 Farmington Ave – M&M Lube. The site (Parcel 16-00-08836-00-4) is located on the south east side of Farmington Avenue. The parcels occupy approximately 0.39 acres and within the Neighborhood Business (NB) Zoning District. The site contains an existing building and parking areas. The current application proposes a building addition adjacent to the existing building on the east.

The following information received by our office on January 15, 2021:

- Full size plan set consisting of three (3) sheets titled “M&M Lube – Building Addition” prepared by Boyer Engineering, LLC., last revised January 15, 2021.
- Building plans, no title block, title, or date prepared by Lancaster Pole Buildings, Inc.

The submitted plans propose the construction of a 980 square foot building addition and the reconfiguration of parking areas. No stormwater management is proposed with this application.

The following waivers are being requested with this application:

A. Section 22-A402.1 and Section 22-A402.2 – to not show the existing features and items within 100 feet of the project.
B. Section 22-510.1.A, Section 22-510.1.D, and Section 22-510.3 – to not require fencing along the Wilson Street frontage.
C. Section 22-511.2.A – to allow the existing chain link fence to remain.
D. Section 22-511.2.B – to allow the existing hedge along the eastern property line to satisfy the 15 foot buffer requirement.
E. Section 27-609.2 – to not require fencing along Wilson Street frontage.
The Plans have been reviewed in accordance with Chapter 9 - Grading and Excavating, Chapter 22 - Subdivision and Land Development (latest Amendment March 11, 2019), Chapter 26 Water Part 2 Stormwater Management (latest Amendment, Ordinance 2194 dated March 9, 2020), and Chapter 27 - Zoning of the Borough of Pottstown Ordinances.

This plan has been reviewed in accordance with Sections 204.B (1) and (2) of the Borough of Pottstown Subdivision and Land Development Ordinance as applicable for Minor Land Development Plans, as referenced:

1. § 22-204.B(1) – All minor plans shall be considered to preliminary plans for the purpose of submission for review and approval and shall comply with the requirements of Part 2.

2. § 22-204.B(2) – When a minor plan qualifies for approval or for approval subject to conditions, in accordance with this part, the minor plan may be granted concurrently preliminary and final plan approvals, provided that the plan includes the final plan certifications required by Section 402.

The following comments are offered for your consideration:

**Chapter 9 Grading and Excavating:**

1. This comment has been satisfactorily addressed.

**Chapter 22 Subdivision and Land Development:**

2. – 4. These comments have been satisfactorily addressed.

5. § 22-A402.1 – Within 100 feet of any part of the land being subdivided or developed: the location, names, width, radii, curbs, sidewalks, and surface 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.

   § 22-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 by the Applicant from the above referenced sections of the Ordinance. **CEG offers no objection to consideration of a waiver of the referenced Ordinance Sections for this application.**

6. – 7. These comments have been satisfactorily addressed.

8. § 22-A404.18 – Final landscape plan showing the location, number, size, and species of all trees, shrubbery, ground cover, and ornamental plantings that will be planted on the site and along public streets. All plants shall be identified by both their common and scientific names.

   § 22-503.1 – 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.
§ 22-504 – 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.

§ 22-505.1 – 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>
</tr>
</thead>
<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>

§ 22-508.1 – Trees shall be uniformly distributed along the perimeter of parking areas and within the interior of parking areas in a quantity of not less than one tree per every eight parking spaces.

December 10, 2020 Comment: A Landscape Plan shall be provided documenting the number, size, and species of existing and proposed trees to demonstrate compliance with the above referenced sections of the Ordinance. The following shall be noted:

- Existing landscaping to be considered and proposed landscaping shall be in accordance with the Borough of Pottstown Exhibit A: Tree List (Attachment 11).
- Supporting information in tabular form shall be provided on the Landscape Plan to demonstrate compliance with:
  - Section 503 – Shade Tree Requirements
  - Section 504 – Open Space Trees
  - Section 505 – Street Trees (Wilson Street)
  - Section 505 – Street Trees (Farmington Avenue)
  - Section 507 – Parking Lot Shade Trees

**Current Comment:** A minimum of 5 street trees are required along Wilson Street per the above referenced Ordinance requirement. An additional two (2) street trees shall be provided.

9. § 22-510.1.A, D – The following uses must be screened with a fence or wall:
   - Storage areas, including trash storage
   - Loading areas and parking area adjacent to streets

§ 22-510.2.A-F – Fences or walls shall be constructed of the following materials:

A. Brick
B. Stone
C. Wood
D. Concrete-based stucco
E. Wrought iron
F. Vinyl designed to look like wood:

§ 22-510.3 – Fences shall be higher that the material being screened, other than buildings. Fences shall have a minimum height of four feet. Although trees, shrubs and other landscaping are encouraged, they may not be used to substitute for fences.
December 10, 2020 Comment: The following information shall be provided to demonstrate compliance with the referenced section of the Ordinance:

- The location of proposed fences or walls shall be shown on the Plan. Screening shall be required in the following areas:
  - To the east of the Dumpster Area, at a length to adequately screen the residential properties to the east of the alley.
  - To the east of the proposed parking areas abutting the 20’ wide alley.
  - To the south of the parking areas abutting Wilson Street. Fencing shall not be located within the roadway right-of-way.
- A detail of the fence shall be provided on the Plan.

Current Comment: The applicant has requested a waiver from providing fences along the parking area and Wilson Street citing that the existing vegetation provides a sufficient screening. CEDARVILLE does not support this waiver request based upon the following:

- The applicant shall provide supporting information to the satisfaction of the Borough that the intent of this Ordinance section has been met prior to consideration of this request.
- The buffering requirement referenced in the Borough Zoning Ordinance (Section 27-609.2), which coincides with the referenced Ordinance section, must be complied with, and cannot be waived.

10. § 22-511.1.B – To protect residential areas, buffering shall be provided where any nonresidential use abuts a residential use or where the following districts abut any other district:
   - Gateway

§ 22-511.2.A-B – Buffering shall consist of either:
   A. Fences between four feet and five feet in height and constructed of the following materials:
      - Brick
      - Stone
      - Wood
      - Concrete-based stucco
      - Wrought iron
      - Vinyl designed to look like wood:
   B. A landscaped strip at least 15 feet wide planted with deciduous and evergreen trees and shrubs. At the time of installation, shrubs will have a minimum height of three feet and an expected height at maturity of at least six feet. There should be sufficient planting so there are no unobstructed opening wider than four feet. At least 50% of the trees and 75% of the shrubs shall be evergreen species.

December 10, 2020 Comment: This site abuts residential properties to the north and the NR Residential Zoning District to the east. The following shall be provided:

- If existing materials and/or plantings are to be used to meet the requirements referenced above, supporting information shall be provided on the Plan for consideration.
- If fencing is to be proposed, the location of the fence shall be shown on the Plan, and a detail of the fence will need to be provided.
- If landscaping is to be utilized, the information referenced above, along with supporting information to demonstrate compliance, shall be provided on the Landscape Plan.
Current Comment: The applicant has requested a waiver from the above referenced sections of the Ordinance. CEDARVILLE does not recommend consideration of this waiver request, unless the applicant provides supporting information to the satisfaction of the Borough that the intent of this Ordinance section has been met.

11. § 22-512 – Lighting.

December 10, 2020 Comment: A Lighting Plan consistent with Sections A512-A516 shall be provided for lighting associated with the proposed building addition. Proposed lighting shall meet the criteria set forth in Section 22-512 of the Ordinance.

Current Comment: The following Ordinance requirement are applicable to the Lighting Plan provided with this submission:

i. Section 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.

ii. Section A512.1.F - Parking lot lighting fixtures of more than 2,000 lumens shall be cutoff fixtures.

iii. Section A512.1.G - Light fixtures used to light buildings and landscaping shall be selected, located, aimed and shielded so that direct illumination is focused exclusively on the building facade, plantings or other site features and away from adjoining properties and the street right-of-way.

The following shall be addressed:

- The plan currently shows illumination of 1 footcandle at the eastern property line. The lighting configuration shall be revised to reduce the footcandle value at the eastern property line to a maximum value of 0.3.
- Documentation shall be provided that the proposed fixture is either full cutoff or meets the BUG requirement equivalent of a U = 0.
- The Plan Detail currently shows the fixture as tilted and being projected away from the building. The floodlight shall be aimed directly downward, and a note stating such shall be added to the Plan or a different fixture specified.

12. § 22-A408 – Certificate and assurances:

December 10, 2020 Comment: The Plan Certifications shown on Sheet 1 shall be revised to coincide with those referenced under Section 22-A408.19 of the Ordinance. References to “Township” shall be removed.

Current Comment: The following certifications shall be provided on the Plan and signed as applicable prior to Plan recording:
• Surveyors Certification:

I hereby declare that the plan shown and described hereon, as well as all other drawings which are a part of this plan set, are true and correct to the accuracy required by the Borough of Pottstown Subdivision and Land Development Ordinance and were prepared by me under my direction. The existing perimeter monuments shown hereon have been located as part of the survey and all other proposed perimeter monuments shall be set.

Professional Land Surveyor ___________________________ Date

• Borough Engineer’s Certification:

BOROUGH ENGINEER REVIEW

THIS PLAN WAS REVIEWED BY THE BOROUGH OF POTTSTOWN ENGINEER

THIS _______ DAY OF ____________________ 20__.

_______________________________

BOROUGH ENGINEER

13. § 22-A700.1 – No plan shall be approved finally unless the streets, walkways, curbs, gutters, streetlights, fire hydrants, shade trees, water mains, sanitary sewers, storm sewers, and other improvements as are required by this Chapter, or are depicted on the plan, have been installed in accordance with this Chapter. In lieu of the completion of any improvements required as a condition for the final approval of a plat, including improvements or fees required by subsection (2), immediately below, the developer shall deposit with the Borough financial security in an amount sufficient to cover the costs of such improvements or common amenities include, but not limited to, roads, storm water detention and/or retention basins and other related drainage facilities, recreational facilities, open space improvements, or buffer or screen planting that may be required.

December 10, 2020 Comment: Completion of site improvements or deposit of financial security of an amount acceptable to Borough Council must be provided to the Borough prior to Plan recording. If financial security is to be posted, it shall be incorporated into a Developer's Agreement to be executed prior to recording of the Plan. The Applicant or Applicant’s Counsel shall contact the Borough Solicitor regarding preparation of the agreement.

To determine the amount of financial security, a construction cost estimate of improvements shall be submitted for review and approval. The Applicant’s Engineer shall contact the Borough Engineer to confirm the improvements to be included as part of the estimate.

Current Comment: The above comment remains applicable.

Chapter 26 Water - Part 2 Stormwater Management:

14. § 26-221.1(A-B) – For all regulated activities, unless preparation of an SWM site plan is specifically exempted in Section 222
   • Preparation and implementation of an approved SWM site plan is required.

www.cedarvilleeng.com
• No regulated activities shall commend until the municipality issues written approval of an SWM site plan, which demonstrates compliance with the requirements of this Part 2.

§ 26-221.6 – Stormwater flows onto adjacent property shall not be created, increased, decreased, relocated, or otherwise altered without written notification of the adjacent property owner(s) by the developer. Such stormwater flows shall be subject to the requirements of this Part.

§ 26-221.12 – For all regulated activities, SWM BMPs shall be designed, implemented, operated, and maintained to meet the purposes and requirements of this Part and to meet all requirements under Title 25 of the Pennsylvania Code, the Clean Streams Law, and the Storm Water Management Act.

§ 26-222.1 (Amended per Ordinance #2194) – Regulated activities that result in cumulative earth disturbance of less than 1,600 square feet are exempt from the requirements in Sections 223 and 224 and subpart D of this part.

December 10, 2020 Comment: The following shall be provided:

• As referenced in Comment #1, the limit of disturbance area shall be shown and delineated on the Plan. Exemption of the requirement set forth in Sections 223 and 224 shall be considered only if it can be demonstrated that earth disturbance is limited to less than 1,600 square feet.
• If the criteria referenced above cannot be met, the following shall be noted:
  o Section 223, Volume Control: Worksheet 4 of the PA Best Management Practices Manual shall be completed to determine any required volume that will need to be managed. In accordance with Volume Control Guideline 1, BMP Manual Section 3.3.3, 20 percent of the existing pre-development impervious area will need to be modeled as meadow (good condition).
  o Note #12 on Sheet 1 indicates that no additional impervious coverage is being proposed. Compliance with Section 224, Rate Controls, shall not be required.

Plan and narrative information, in accordance with the applicable criteria set forth in the PA BMP Manual, shall be provided if disturbance of 1,600 square feet or greater is proposed.

Current Comment: The following shall be provided:

• The exact amount of proposed disturbance shall be noted on the Plans.
• The following note shall be provided on the Plan: “Limits of disturbance shall be clearly delineated prior to construction. If any construction occurs outside of this area, construction shall cease, and a Stormwater Management Plan shall be submitted for review and approval”.

15. This comment may be considered not applicable, conditioned on satisfactorily addressing Comment #14, above.

Chapter 27 Zoning:

16. § 27-327.1–Design guideline. New buildings within the Gateway Overlay District should be compatible with these styles. As existing buildings are renovated, and additions constructed, they should be designed to be compatible with the styles of existing buildings in adjacent traditional neighborhoods. (Photos on file at Borough Office).
§ 27-331.1– Fences and Walls.

December 10, 2020 Comment: Architectural Plans for the proposed building additions and screening fences/walls as referenced above shall be provided to the Borough for review.

Current Comment: Architectural Plans have been provided with this submission. The following shall be addressed:

- As referenced in the Memorandum Decision for the Zoning Hearing held on November 19, 2020, an addition of up to 791 square feet was to be permitted. The following discrepancies shall be addressed:
  - The Architectural Plans reference a finished floor area of 816 square feet (34’ x 24’) which exceeds the amount permitted per the above referenced Memorandum Decision. The floor area shall be decreased to meet this requirement.
  - The proposed building addition shown on the land development plan references a dimension of 35’ x 28’ totaling 980 square feet, exceeding the area reference on the Architectural Plan and the minimum permitted as referenced in the Zoning Hearing Memorandum Decision. The addition shown on the Land Development Plan shall be consistent with the floor plan shown on the Architectural Plan and must comply with the criteria set forth in the Zoning Hearing Memorandum Decision.

- CEDARVILLE defers comments relating to the building’s style to the Borough of Pottstown.
- The above is subject to review and approval by the Pottstown Borough Zoning Officer.

17. § 27-332.5 – Requirements for lot area, building setbacks, and building size:

- Minimum building coverage (auto service station) = 25%.
- Minimum side setback (auto service station) = 10 feet
- Minimum rear setback = 20’

December 10, 2020 Comment: The following shall be addressed:

- The Zoning Table on the provided Plan notes a building coverage of 17%. Comments relating to minimum building coverage are deferred to the Pottstown Borough Zoning Officer.
- The Plans show two side yards with a setback of ten feet, while the Zoning Data Table indicated that both a rear yard and a side yard are being considered. This shall be clarified and is subject to approval from the Pottstown Borough Zoning Officer.

Current Comment: The applicant has revised the Zoning Table to remove the proposed rear yard setback. The above referenced comment is subject to review and approval by the Pottstown Borough Zoning Officer.

18. § 27-508.1– No part of a public right-of-way, buffer area, required front yards, stormwater management systems, or parking spaces shall be used for outdoor storage.

December 10, 2020 Comment: Based on the current parking configuration, parking spaces 4-7 are only accessible as storage locations as they are currently not accessible as parking due to the location of spaces 8-11. These spaces shall be relocated as they are currently located within the lot front yard.

Current Comment: The applicant has revised the parking to eliminate the previously shown storage spaces (spaces 4-7), relocated two spaces (shown as spaces 10 and 11) adjacent to Farmington Avenue, and has left the four spaces (formerly shown as spaces 8-11, now shown as 6-9) adjacent to Wilson Street. Based upon the change in parking stall layout, the above comment may be considered not applicable as it pertains to
storage spaces, however the layout of the parking shall be revised to provide sufficient backup area, per Section 22-A528 of the Subdivision and Land Development Ordinance, as referenced below.

19. This comment has been satisfactorily addressed.

20. § 27-604 – Lighting of parking areas.

December 10, 2020 Comment: A Lighting Plan shall be provided to demonstrate compliance with the referenced Ordinance section, to include lighting to be provided as part of the building addition.

Current Comment: See Comment #11.

21. § 27-609.2 – Design guidelines: Whenever a parking lot abuts a street, it shall be screened by a four-foot-tall fence constructed of wood, vinyl designed to look like wood, brick, stone, stucco over concrete block (capped with brick, slate or stone), or ornamental iron (or ornamental aluminum, steel or vinyl designed to look like iron).

December 10, 2020 Comment: The subject property is located within a Gateway District; therefore, parking abutting Farmington Avenue and Wilson Street shall be screened in accordance with the above referenced section of the Ordinance.

Current Comment: The applicant has requested a waiver from this section of the Ordinance; however, the referenced section is part of the Zoning Ordinance and therefore cannot be considered for a waiver from the Subdivision and Land Development Ordinance. The above referenced requirement shall be complied with, or relief through a Zoning Hearing with the Pottstown Borough Zoning Hearing Board shall be required.

General Comments:

22. -23. This comment has been satisfactorily addressed.

24. December 10, 2020 Comment: The Plan shows three existing monitoring wells on the property. The applicant shall clarify the need for these monitoring wells and provide any applicable correspondence from DEP pertaining to the monitoring wells.

Current Comment: The applicant has stated that these monitoring wells are from the removal of the UST and that documentation/correspondence from DEP shall be provided. This documentation shall be provided prior to final plan approval.

25. December 10, 2020 Comment: The Zoning Ordinance section referenced under Parking Requirements, Sheet 1, shall be clarified, as the referenced section do not apply to parking regulations.

Current Comment: The applicant has stated the correct parking requirements have been applied, however no clarification to the classification and specific requirement have been noted on the Plan. The previous comment is still applicable.
New Comments:

26. The Waiver Requests Note shown on Sheet 1 of the Plan shall be revised to include all waivers indicated on the submitted Waiver Request Letter.

27. § 22-A528 – All dead-end parking lots shall be designed to provide sufficient back-up area of the end stalls.

   The layout of the stalls proposed adjacent to the intersection of Farmington Avenue and Wilson Street shall be revised to provide a minimum of ten (10) feet between the westernmost line of stall 9 and the southernmost line of stall 10.

Other agency approvals

Approvals from the following agencies may also be required. Written evidence of these approvals shall be provided prior to Plan recording:

A. Fire Marshall, Borough of Pottstown
B. Zoning Officer, Borough of Pottstown

Consideration of Minor Land Development Plan approval shall be conditioned on resolution of all outstanding comments referenced in this letter, appropriate action on all waiver requests, and satisfactory resolution of all zoning issues. Please contact me with any questions or concerns.

Best Regards,

CEDARVILLE Engineering Group, LLC

[Signature]

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

cc: Stephanie Drobbs, 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
    Brian Boyer, P.E., Boyer Engineering, LLC.
    Mike Moyer, Applicant