



April 14, 2022

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

RE: 816-842 Queen Street (LD #2-22)
Preliminary/Final Land Development Plan Review
Pottstown Borough
145-22-0147

Dear Mr. Keller,

CEDARVILLE Engineering Group, LLC (CEG) has completed a review of the Preliminary/Final Land Development Plan Review for 816-842 Queen Street (LD #2-22). The site (Parcel 16-00-23080-00-7, 16-00-23084-00-3, 16-00-23088-00-8, 16-00-23092-00-4, 16-00-23096-00-9, 16-00-23100-00-5, 16-00-23104-00-1, 16-00-23108-00-6, and 16-00-23112-00-2) are located on the south side of the Queen Street east of Madison Street. The parcels occupy 1.144 acres and within the Traditional Towns Neighborhood (TTN) District with the Business Overlay (BO). The current application proposes consolidating the existing lots and expanding the existing building on site. Parking lot expansion and improvements in addition to an underground infiltration BMP is proposed with this project.

The following information was received by our office on March 14, 2022:

- A. Traffic Impact Assessment analysis prepared by McMahon Associates, Inc. dated February 9, 2022.
- B. Cover Letter prepared by Nave Newell, dated March 10, 2022.
- C. Application for Review of a Subdivision and Land Development Plan Checklist dated March 4, 2022.
- D. Borough of Pottstown Application for Review of a Subdivision/Land Development Plan dated March 4, 2022.
- E. Email of a brief project description to Winter Stokes.
- F. Copy of property deeds.
- G. Signed Notice for review dated March 4, 2022.
- H. Letter to Pottstown Borough Public Works Director regarding sewage capacity dated March 3, 2022.
- I. "Post Construction Stormwater Management Report and Site Drainage/Erosion & Sediment Calculations" prepared by Nave Newell dated March 1, 2022.
- J. Full size Plan Set titled "Preliminary/Final Subdivision and Land Development Plans for Precision Polymer Products, Inc." prepared by Nave Newell consisting of 15 sheets, Sheets 1-15 of 15 dated March 1, 2022.

The Plans have been reviewed for compliance with Chapter 9 – Grading and Excavating, Chapter 22 – Subdivision and Land Development, Chapter 26 – Water; Part 2 – Stormwater Management, and Chapter 27 - Zoning.

The following comments are offered for consideration:

Chapter 9 Grading and Excavating:

1. § 9-105.A - *The amount of site alteration proposed.*

The following information shall be provided:



- The compost filter sock proposed adjacent to the south property boundary, downslope of the proposed parking area, shall be labeled, with the appropriate size referenced with the Compost Filter Sock detail, Sheet 11.
 - A tabulation shall be provided with the Compost Filter Sock detail showing the proposed filter sock sizes associated with the labeling shown on Sheet 10.
 - Maintenance Program for Temporary Sedimentation Controls Structures Note 8, Sheet 11 shall be removed as no sediment basins or traps are proposed for this application.
 - The rock construction entrance shall be revised to the length shown on the Rock Construction Entrance detail, Sheet 11.
 - Inlet protection shall be provided for the existing inlets located in the alley south of the property.
2. § 9-109.B - A narrative report describing the project and giving the purpose and the engineering assumptions and calculations for control measures and facilities.

The following shall be addressed:

- The slope lengths for the two socks (4 and 5) shall be revised to be based upon the slope lengths reaching the socks prior to construction building addition.

Chapter 22 Subdivision and Land Development:

3. § 22-202 - *Formal Application Procedure.*

A Preliminary Plan must be submitted and reviewed prior to review of a Final Plan. CEG offers no objection to consideration of a waiver from this section of the Ordinance; however, this relief must be formally requested by the Applicant in writing prior to consideration.

4. § 22-400.2.C.1.(a) - *If any existing lines are to be abandoned, plans shall clearly note the following: "Any existing sewer or water lines to be abandoned, or any services which may have been previously abandoned not in accordance with the Authority standards, shall be cut and capped at the mains as per Pottstown Borough Authority specifications."*

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

5. § 22-400.3.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.*

§ 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.*

The plans shall show the referenced existing features in accordance with the above referenced Ordinance section. CEG offers no objection to consideration of a partial waiver from the referenced Ordinance section, provided the



below information is shown and that the referenced relief is formally requested by the applicant in writing prior to consideration:

- Existing topography shall be shown within the properties located between the existing parking lot and Eden Street.
- The slope of the existing stone culvert in which the proposed stormwater management is to tie into shall be shown on the Plan.

6. § 22-400.4.A.3.(a) – *"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 following shall be addressed:

- A note with the above language shall be added to the Plan.
- Construction Notes 4 shall be revised to remove the language stating building placement is conceptual.

7. § 22-400.4.D – *"Proposed Features: The plan shall clearly indicate all proposed physical features planned for the parcel, include but not limited to: Topographical information to depict areas of earthmoving and storm drainage."*

The following information shall be provided on the Plan:

- A detail of the manhole used to connect the 15-inch discharge pipe to the existing 22" x 26" stone culvert shall be provided.
- Construction Notes 4 shall be revised to remove the language stating building placement is conceptual.

8. § 22-A401.8 – *The names of all abutting subdivisions, developments, or landowners, with deed book, volume, and page numbers where recorded.*

The names of landowners and deed book volume and page numbers for all adjacent parcels (including those along Queen Street and the Alley) shall be shown on the Plan.

9. § 22-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.)*

A Phase One Environmental Site Assessment shall be prepared and submitted with subsequent submissions.

10. § 22-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.*

The following must be addressed:

- The Type 1A curb ramp detail on Sheet 15 shall be revised as follows:
 - The detail labeling includes references to Notes 20 and 23: the notes shall be added to the notes provided under the details.
 - The detail labeling includes references to Sheets 1, 8, and 9; the applicable notes from the appropriate RC Standard shall be provided with the detail.



- The triangular turning areas provided on the Plan shall be revised to a maximum of 5 feet long as shown on the Type 1A detail.
- A detail for Detectable Warning Surface (DWS) shall be added to the Plans.
- An ADA accessible route shall be shown from the proposed handicap parking spaces to an accessible building entrance. Currently only the entrance adjacent to the existing handicap parking is an accessible entrance.

11. § 22-A404.16 – *Plans for solid waste storage areas, including size and materials.*

The proposed location for refuse disposal shall be clearly shown on the Plan. Proposed refuse disposal areas shall comply with the applicable criteria set forth in Sections 510 and 511 of the Subdivision and Land Development Ordinance.

12. § 22-A404.17 – *The proposed layout shall include: Location, type, and size of any signs.*

The following signs shall be provided:

- Stop signs shall be provided at the proposed access to Queen Street and the existing access to the 20-foot-wide alley.

13. § 22-A408.2 - *The seal of the engineer or surveyor shall certify to the accuracy of the survey, the drawn plan, and the placement of all monuments.*

§ 22-A4408.19 – *All the following certifications must appear on the final plat.*

The surveyor certification shall be revised to use the same language as contained in the referenced section of the Ordinance; *“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.”*

14. § 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.*

§ 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.*

The following quantity of trees are required by the above referenced sections of the Ordinance.

Open Space Trees = 26,905 sf / 8,000 sf = 3.3 or 4 trees
Street Trees = 356 ft lot frontage (Queen Street) / 30 foot = 11.8 or 12 trees
Street Trees = 356 ft lot frontage (Alley) / 30 foot = 11.8 or 12 trees
Parking Lot Shade Trees = 41 spaces / 8 = 5.1 or 6 trees



Total Required Trees = $4+12+12+6 = 34$

The Applicant is proposing the following number of trees:

Open Space – 4
Street Trees – 12
Parking Lot Trees – 6
Total Trees = $4+12+6 = 22$

The following shall be addressed:

- The Landscape Requirements chart as provided on Sheet 8 indicates that 4 existing shade trees have been included toward the required total of 12 shade trees to be provided. To be considered acceptable, the applicant shall reference the size and species of the existing trees to demonstrate acceptability based upon the Subdivision and Land Development Ordinance, Attachment 11, Exhibit A.
- An additional 12 street trees shall be provided to comply with minimum street tree requirement associated with the alley frontage.

15. § 22-511.1 – *To protect residential areas, buffering shall be provided where any nonresidential use abuts a residential use.*

§ 22-511.2 – *Buffering shall consist of either.*

A. *Unless otherwise required by Chapter 27, Zoning, fences between four feet and five feet in height and constructed of the following materials (1-6)*

B. *A landscaped strip at least 15 feet wide planted with deciduous and evergreen trees and shrubs. At the time of installation, shrubs must be 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 openings wider than four feet. At least 50% of the trees and 75% of the shrubs shall be evergreen species.*

The following shall be addressed:

- A buffer shall be provided between the subject parcel and all adjacent residential properties in accordance with the above referenced Ordinance section.
- Buffer design shall be in accordance with Section 22-511.2 above. Landscaping used to meet buffering requirements shall be exclusive of the minimum requirements set forth in Sections 502,-508 of the Subdivision and Land Development Ordinance.
- Fencing to be utilized must meet the requirements set forth in Section 317 of the Borough Zoning Ordinance.

16. § 22-A504.4 – *A minimum of 0.01 acre of land shall be offered for dedication for each 1,000 square feet of building, structure or improvement proposed for any nonresidential land development plan.*

§ 22-A505.1 – *Subject to the discretion of Borough Council, an Applicant may elect to contribute a fee in lieu of dedication of such land. Such fee shall help the Borough defray the costs of providing open space and public recreational facilities to serve the residents and workers in the Borough.*

§ 22-A505.3 – *The value of any fee in lieu of land for opens space shall be equal to the average fair-market value of the land required by Section A504 above or the property value thereof. The formula to be used in computing the fee shall be fair-market value of one acre multiplied by the percent (in acres) of land to be dedicated. As an alternative, when agreed upon by the Borough, the Borough may elect to accept a flat fee of \$500 per dwelling unit or lot created for residential subdivisions/land developments that create less than five dwelling units/lots.*



The following shall be addressed:

- A note shall be added to the Plan clearly stating whether open space is being offered for dedication to the Borough or if the Applicant intends to request paying a fee in lieu.
- The referenced fee shall be based upon fair market value of the open space required, in accordance with the criteria set forth in Section 22-A505 of the Ordinance, or a fee as otherwise determined acceptable by the Borough. The open space required shall be computed based upon the additional building area proposed.

17. § 22-A512.1.C – *Outdoor lighting shall be designed, located and mounted at heights no greater than 12 feet above grade for non-cut-off lights, or 20 feet above grade for cut-off lights.*

The lighting detail for the proposed luminaire shall reference the BUG rating and note whether it is full cut-off. Should the luminaire be a non-cut-off light, it shall be mounted at a maximum height of 12 feet, or a different luminaire proposed.

18. § 22-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 existing light fixtures shall be revised to reduce the illumination at the property lines to a maximum of 0.3 footcandles.

19. § 22-A523 – *Raised curbs shall be constructed for the full length of all streets. Service streets shall be provided with a lip curb. Curb requirements may vary according to street hierarchy and intensity of development.*

Proposed curb shall be provided along the landscape island areas along the 20-foot-wide alley in accordance with the above referenced section of the Ordinance. CEG offers no objection to consideration of a waiver from this section of the Ordinance; however, this relief must be formally requested by the Applicant in writing prior to consideration.

20. § 22-A 700.1 - *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.*

§ 22-700.2 – 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 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.



Chapter 26 Water, Part 2 Stormwater Management:

21. § 26-221.4 - *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.*

§ 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 requirement under Title 25 of the Pennsylvania Code, the Clean Streams Law, and the Stormwater Management Act.*

§ 26-231.C - *Provisions for permanent access or maintenance easements for all physical SWM BMPs, such as ponds and infiltration structures, as necessary to implement the operation and maintenance (O&M) plan discussed in Subsection E(9) below.*

The following must be addressed:

- An Operation and Maintenance Agreement will be required for all proposed BMPs, shall be executed prior to recording of the Plan, and shall be recorded concurrently with the Plan.
- An easement must be giving the Borough the right but not the duty to enter the property in the event the BMPs are not being maintained properly. A Blanket Easement may be considered acceptable and must be noted on the Plan which is to be recorded if this is to be proposed.

22. § 26-221.5 - *Impervious areas.*

A tabulation of all impervious surface, both existing and proposed, shall be added to the Plan.

23. § 26-224 - *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.*

The following shall be provided:

- Calculations shall be provided to demonstrate that the existing pipe that the proposed BMP ties into has sufficient capacity to accommodate the flow discharge from the BMP.

24. § 26-231.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."

A signature block with the above referenced language shall be added to the PCSM Plan Sheet C7.0.

25. § 26-231.E.4 - *Expected project time schedule.*

The expected project start and end dates shall be added to the Plan.



Chapter 27 Zoning:

26. § 307. *Style of Architecture*

New buildings in the Conservation District shall be compatible with surrounding historic homes in:

1. *Architectural style*
2. *Form, either horizontal or vertical*
3. *Base, body, and cap*
4. *Scale*
5. *Texture and pattern of exterior materials*
6. *Proportion of walls to openings.*

Architectural Plans shall be provided to demonstrate compliance with the above referenced Ordinance section.

27. § 308. *Placement of Buildings.*

§ 315.1. *Additions - Because facades are so important to the appearance of a building, additions should be avoided at the front of a building. Whenever possible, additions should be constructed at the rear of a building, or the least conspicuous side. The more visible the addition from the street, the more important compatibility becomes.*

§ 315.2. *Design guideline: When reviewing proposals for additions, the Borough shall judge its suitability based on: (Photos on files at Borough Office).*

- A. *Placement.*
- B. *Height.*
- C. *Proportion of wall to openings.*
- D. *Form.*
- E. *Texture and pattern of exterior materials.*
- F. *Architectural style.*

Compliance with the above is subject to the review and approval of the Borough Zoning Officer.

28. § 317.1. *Fences and Walls. Design guideline (photos on file at Borough Office): One type of fence shall be used from the choices listed below:*

<i>Location</i>	<i>Max. Height</i>	<i>Materials</i>
<i>Front or side yard of a building that abuts a sidewalk</i>	<i>6 feet</i>	<i>Vinyl Composite Wood Ornamental iron, aluminum or steel Stucco over concrete block (capped with brick, slate or stone) Privacy fence permitted</i>

§ 317.2. *All fences shall be erected with the finished side facing outward, towards the adjacent property or street:*

§ 609.2. *Parking Lots in Conservation, Gateway Districts - 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).

Although hedges and other landscaping are encouraged, they may not substitute for a fence or wall. For landscaping requirements, see the Land Development Ordinance [Chapter 22], Section 508. (Additional photos on file at Borough Office).

The Landscape Plan indicates that Ornamental Fence is to be installed, and the Site Plan references Chain Link Fence. The following shall be addressed:

- The proposed fence shall be in accordance with the material as specified in the above referenced Ordinance section. Chain link fence is not acceptable.
- A detail of the proposed fence shall be provided, demonstrating compliance with the above referenced criteria.

29. § 346.3.B. *Conditional Uses. In addition to other conditional uses permitted in the Traditional Town Neighborhood District, a light manufacturing facility, building or addition shall be permitted by conditional use if greater than 20,000 square feet.*

The following shall be provided:

- A copy of the Decision and Order issued by Borough Council shall be provided.
- The order, and applicable conditions associated with the Conditional Use Decision shall be noted on the applicable Plan sheet to be provided.

30. § 346.5. *Design Guidelines. Sections 306 through 308 and 314 through 317 shall apply, except that any new building, or an existing building with a new addition, may be of any size so long as the applicant demonstrates to the satisfaction of Borough Council that the building architecture is compatible with the neighboring existing buildings within the neighborhood.*

§ 306.1. *The demolition of any existing building of historic value should be considered a last resort, only after the applicant can : [A.- B.].*

§ 306.2. *No building shall be demolished until a plat and design review of any proposed new buildings has been conducted by the Planning Commission and approved by Borough Council.*

The historical status of the referenced building to be demolished shall be verified by the Pottstown Zoning Officer.

31. § 608. *Off-Street Loading Areas. [Ord. 1968, 9/8/2003, § 608]*

All uses requiring regular shipments and deliveries shall provide sufficient off-street areas for the standing, turning, loading and unloading of trucks so that the parking and maneuvering of trucks on public streets will be avoided.

Loading areas associated with the proposed building shall be clearly shown on the Plan and shall demonstrate compliance with the above referenced Ordinance section.

Other Agency Approvals:

- A. Fire Marshall, Borough of Pottstown
- B. Zoning Officer, Borough of Pottstown
- C. Pottstown Borough Authority
- D. PA DEP – Sewage Facilities Planning Module



If Conditional Plan approval is to be considered, it shall be conditioned upon resolution of the comments referenced in this letter.

Please feel free to contact me with any questions or concerns.

Best Regards,
CEDARVILLE Engineering Group, LLC

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

cc: 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
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