



March 11, 2022

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

RE: The Hill School Turf Field  
Land Development Review  
Pottstown Borough  
145-22-0116

Dear Mr. Keller,

CEDARVILLE Engineering Group, LLC (CEG) has completed a review of the Minor Land Development Plans for The Hill School Turf Field. The location within the site (Parcel 16-00-15116-00-6) that this application is in reference to is located on the southwestern side of Jackson Street. The parcel is approximately 38.99 acres and within the Neighborhood Residential (NR) Zoning District. The site contains the existing facilities utilized by the Hill School. The current application proposes the installation of a turf field, bleachers, associated concrete walks, and a Managed Release Concept (MRC) Basin to manage stormwater runoff from the proposed improvements. The project proposes to disturb approximately 3.814-acres of area.

The following information was received by our office on February 16, 2022:

- Modification Request Letter dated February 11, 2022 requesting 22 separate waivers from the Borough of Pottstown Subdivision and Land Development Ordinance.
- PCSM/E&S Report prepared by Pennoni Associates, Inc., dated January 11, 2022 and last revised February 11, 2022.
- Borough of Pottstown Planning Applications for Minor Subdivision, Minor Land Development, Borough of Pottstown Application for Review of a Minor Subdivision/Land Development Plan, Associated Checklist, and Waiver of Ninety Day Review Time dated February 8, 2022.
- Pole Schedule and Details prepared by Structural Engineers, P.C. and Musco Lighting dated February 3, 2022.
- 11x17 Plan set titled "The Hill School Home Bleacher & Press Box Pottstown, PA" prepared by Southern Bleacher Company consisting of eight (8) sheets, Sheets 1 through 7 of 7, and cover sheet, dated January 3, 2022.
- Full size plans titled "The Hill School Turf Field" prepared by Pennoni Associates, Inc., Sheets 1-11 of 11, 1-4 of 4, 1-3 of 3 and 1-2 of 2 dated February 11, 2022.

The following waivers have been requested by the Applicant:

- 1) § 202 – Submitting a preliminary plat to the Borough Zoning Officer prior to submission of a Final Land Development Plan.
- 2) § 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
- 3) § 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.



- 4) § 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.
- 5) § A400 – The Plan shall be submitted as directed herein and shall show or be supplemented by the following information.
- 6) § A401.8 – The names of all abutting subdivisions, developments, or landowners, with deed book, volume, and page numbers where recorded.
- 7) § 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.
- 8) § 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.
- 9) § 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.
- 10) § 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.
- 11) § 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.)
- 12) § 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.
- 13) § 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.
- 14) § 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.
- 15) § A405.1 - The Plan scale shall be no smaller than 1-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.
- 16) § 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.
- 17) § A503.4.E – Steep slopes in excess of 20 percent as measured at 2-foot intervals for a cumulative grade change of 6 feet.
- 18) § 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.
- 19) § A504 – Open space and recreational facilities.



20) § 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:

Street Frontage(feet)	Number of Trees
Less than 40	1 tree minimum
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.

21) § 510 – Screening.

22) § 511 – Buffering.

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 be preliminary plans for the purposed 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. § 9-105.D – *Whenever any subdivision and/or land development is approved under the Subdivision and Land Development [Chapter 22] or Zoning [Chapter 27] Ordinance, any new construction or installation of a new structure or any change in use causes the landscape to be permanently disturbed as to either contours, soil or slope characteristics, or vegetation or any ground cover is to be permanently removed, a plan is required showing how resulting erosion a sedimentation shall be controlled. This plan shall include the following: Erosion and sediment control practices, both temporary and permanent, and the operation and maintenance arrangements.*

The following must be addressed:

- In accordance with the Pennsylvania Erosion and Sediment Pollution Control Manual, socks with diameter of less than 12 inches shall be limited to residential lots of less than ¼ acre or those tributary to a sediment basin or trap. All proposed compost filter sock shall be increased to a minimum diameter of 12 inches.
- Erosion and Sediment Control Note 1 shall be revised to indicate that the Borough of Pottstown shall receive notification and review for changes to the approved Plans.

Chapter 22 Subdivision and Land Development:

2. § 22-202 – *Formal Application Procedure*



A waiver has been requested from this section of the Ordinance to allow submission of a Final Plan rather than a Preliminary Plan. CEDARVILLE offers no objection to consideration of a waiver of this Ordinance requirement due to the scope of this project, as this project is being submitted as a Minor Plan under the provisions of Ordinance section 204.

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. CEG offers no objection to consideration of a waiver of this Ordinance requirement, contingent upon the following information being provided:

- The invert elevation of the existing sanitary sewer manholes, to the east and west of the proposed field, associated with the sanitary sewer crossing the north portion of the field, shall be shown to demonstrate that the existing line can be accommodated with no conflicts.

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. CEG offers no objection to consideration of a waiver of this Ordinance requirement.

5. §22-400.5. – Certificates and Assurances

- A. Certification of a "Phase One" Environmental Site Assessment shall be attached in accordance with ASTM (American Society for Testing and Materials) standards.

The Applicant has requested a waiver from this section of the Ordinance. CEG offers no objection this waiver request.

6. § A400 – The plan shall be submitted as directed herein and shall show or be supplemented by the following information.

A waiver has been requested from this section of the Ordinance by the Applicant to permit the submission of a Preliminary/Final Minor Land Development Plan. CEG offers no objection to consideration of a waiver of this Ordinance requirement, as this Plan is being submitted as a Minor Land Development Plan under the provisions of Ordinance Section 204.

7. § 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. CEG offers no objection to consideration of a waiver of this Ordinance requirement.

8. § 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. CEG offers no objection to consideration of a waiver of this Ordinance requirement, as the required information is shown in the vicinity of the project.

9. § 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. CEG offers no objection to consideration of a waiver of this Ordinance requirement, as the required information is shown in the vicinity of the project.

10. § 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.*

A waiver has been requested from this section of the Ordinance by the Applicant. CEG offers no objection to consideration of a waiver of this Ordinance requirement, as the required information is shown within the immediate project area.

11. § 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. CEG offers no objection to consideration of a waiver of this Ordinance requirement.

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

13. § 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. CEG offers no objection to consideration of a waiver of this Ordinance requirement, as the required information is shown in the vicinity of the project.

14. § 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. CEG offers no objection to consideration of a waiver of this Ordinance requirement.

15. § 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 shall be addressed:

- The proposed sidewalk grading of 4.0% designation for access leaving the parking area shall be verified and revised as necessary to create a maximum of 5% slope from the beginning of the proposed sidewalk to the termination at the proposed manhole. Currently the 249 and 248 contours create grades in excess of 5% (5.9% at center).
- A large-scale detail of the above referenced area shall be provided, showing applicable spot elevations and slopes to confirm compliance with ADA criteria.

16. § A404.11 - *Proposed contours and elevations that indicate filling, excavating, or regrading, and relating to existing grade. See the Borough of Pottstown Grading Ordinance for additional criteria.*

The following shall be addressed:

- The Plan shall be revised to provide additional spot elevations and grading along the perimeter of the turf field. The Plans appear to propose runoff to be collected at the edge of the proposed turf field; if this is the case, further clarification shall be provided on the Plan and detail as to how runoff will be positively conveyed through the artificial turf base and surrounding vegetated area.
- The direction of the 2% slope arrows on the northern and southern sides of the turf field shall be evaluated and re-aligned with the proposed direction of slope/flow.

17. § 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.*

A waiver has been requested from this section of the Ordinance by the Applicant. CEG offers no objection to consideration of a waiver of this Ordinance section, provided that comments included within this Letter under “Chapter 26 Water – Part 2 Stormwater Management” are adequately addressed.

18. § A405.1 - *The plan scale shall be no smaller than 1-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. CEG offers no objection to consideration of a waiver of this Ordinance requirement.

19. § 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.

A waiver has been requested from this section of the Ordinance by the Applicant. CEG offers no objection to consideration of a waiver of this Ordinance requirement, as there is no parking proposed as part of this project.

20. § 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. CEG offers no objection to consideration of a waiver of this Ordinance requirement, as this project proposed development of a previously developer portion of the lot.

23) § 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:*

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

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. CEG 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.

21. § 510 – *Screening.*

A waiver has been requested from this section of the Ordinance by the Applicant. CEG offers no objection to consideration of a waiver of this Ordinance requirement, as the application does not propose a proposed use outlined in Section 510.1.

22. § 511 – *Buffering.*

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

23. § A503.4 - *The following specific areas shall be preserved as undeveloped open space to the extent consistent with the reasonable utilization of land and in accordance with applicable State or local regulations.*

*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. CEG offers no objection to consideration of a waiver of this Ordinance requirement, as there are no naturally occurring steep slopes in within the proposed limit of disturbance.



24. § A504 – *Open space and recreational facilities.*

A waiver has been requested from this section of the Ordinance by the Applicant. CEG offers no objection to consideration of a waiver of this Ordinance requirement, provided the Applicant offers a fee in lieu of recreation space in accordance with the criteria referenced in Comment #25, below.

25. 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.*

§ 22-A505.4 – *Determination of the fair-market value of the land shall be the responsibility of the applicant and shall result in a reasonable value acceptable to the Borough Council using an MAI appraiser.*

Should the Applicant intend to offer a fee in lieu instead of offering land for open space, the following shall be addressed:

- A note shall be provided on the Plan indicating that a fee in lieu of land offered for dedication is to be provided.
- 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 net additional impervious area proposed.

26. § A512 – *Lighting.*

§ A513 – *Outdoor Recreational Lighting.*

§ A514 – *Lighting Design Procedures.*

The Applicant shall provide a Lighting Plan demonstrating conformance with the above referenced sections of the Ordinance.

27. § 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.*





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 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:

28. § 26-223.A – *The Design Storm Method (CG-1 in the BMP Manual) is applicable to any size of regulated activity. This method requires detailed modeling based on site conditions.*

Due to the existing site and soil conditions, the Applicant is proposing to utilize an MRC Basin to manage the increased stormwater runoff for the project. The following shall be addressed:

- Final acceptance of the use of an MRC Basin shall be at the discretion of PA DEP.
- In accordance with the Managed Release Concept documents issued by PA DEP dated August 25, 2020 (or most recent edition), the following shall be addressed:
  - The IWS (internal water storage) area shall be revised to a minimum of 835 cubic feet of storage area to manage the full 1" of runoff from impervious surface in accordance with "MRC Design Standard 1 – Runoff Capture".
  - The provided Calculations and Pond Reports shall be revised to limit the IWS storage to 15% of the total area when treating void storage as 30% in accordance with "MRC Design Standard 3 – Internal Water Storage (IWS)".
  - Dewatering calculations shall be provided demonstrating that the facility will dewater within 72 hours of the end of the design storm. Currently, the Hydrograph for Pond 13-P: Basin 1 exceeds 72 hours to dewater to the top of the soil layer (78-78.25 hours) in accordance with "MRC Design Standard 9 – Ponding Depth and Drawdown time".

29. § 26-223.A – *The Design Storm Method (CG-1 in the BMP Manual) is applicable to any size of regulated activity. This method requires detailed modeling based on site conditions.*

Due to the existing site and soil conditions, the Applicant is proposing to utilize an MRC Basin to manage the increased stormwater runoff for the project. The following shall be addressed:

- Final acceptance of the use of an MRC Basin shall be at the discretion of PA DEP.
- In accordance with the Managed Release Concept documents issued by PA DEP dated August 25, 2020 (or most recent edition), the following shall be addressed:
  - An additional set of rate control calculations demonstrating that the stormwater release rate for the 1.2inch/2-hour storm does not exceed 0.01 cubic feet of runoff from equivalent impervious area (approximately 0.044 cfs) shall be provided within the Report in accordance with "MRC Design Standard 2 – Release Rate for the 1.2-inch/2-hour Storm".
  - The provided routing Calculations and Pond Reports shall be revised to limit the IWS storage to 15% of the total area when treating void storage as 30% in accordance with "MRC Design Standard 3 – Internal Water Storage (IWS)".

30. § 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."*

The above referenced signature block shall be added to the Plans.



31. § 26-231.E.3 - *Stormwater runoff design computations, and documentation as specified in this Part, or as otherwise necessary to demonstrate that the maximum practicable measures have been taken to meet the requirements of this Part, including the recommendations and general requirements in § 221.*

The design of the emergency spillway shall be revised so that it conveys the 100-year post development storm, in the event the primary means of discharge fails. The emergency spillway shall not be used as a primary means of stormwater management.

32. § 26-231.E.7 - *Plan and profile drawings of all SWM BMPs, including drainage structures, pipes, open channels, and swales.*

The following shall be addressed:

- All elevations on the MRC Basin 1 detail labeled with a letter (i.e., orifice size/elev. (D)) shall be labeled with an accurate elevation, or a table added to the detail. Should a table be added to the detail, Notes 1. Non-Woven Geotextile Fabric shall be revised to remove the letter designations for designators different than the elevation designators.
- It is unclear how and where the proposed 1'x12" flat panel drains are to be located within the proposed Turf Field. A note stating to see Turf Field Specifications does not suffice for this application and locations shall be clearly shown on the Plan or Detail as applicable.

33. § 26-231.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 activities.*

The following shall be addressed:

- Operation and maintenance requirements for the Turf Field shall be added to Sheet CS9501 (2 of 3).
- The turf field shall be added to all notes referencing BMPs and Critical Stages on Sheet CS9501 (2 of 3).
- A site-specific construction sequence for the turf field shall be added to the Plans.
- Structural BMP 6.4.5 MRC Basin Operation & Maintenance 4.A shall be revised from "As Needed" to "A minimum of two times per year following runoff events greater than 0.8 inch" in accordance with Managed Release Concept Operation and Maintenance Schedule 4.

34. § 26-242.1 - *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)[1] covering all stormwater control facilities which are to be privately owned.*

The Applicant shall be required to prepare and execute an Operations and Maintenance Agreement prior to the recording of the Plan. The Applicant may use the provided Agreement within Appendix A of the Pottstown Stormwater Ordinance or have one prepared to the satisfaction of the Borough Solicitor.

35. § 26-263 - *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 containing the above referenced language shall be added to the Plan.

#### Chapter 27 Zoning:

36. § 27-600.1 – *Off Street Parking*  
*Off-street parking and loading provisions as set forth in these Parts shall be required in all instances, except the remodeling of existing buildings as follows:*



- A. *In the event of a change of an existing use in an existing building, no additional off-street parking shall be required if the total floor space does not increase and if the new existing use does not require any more spaces under this Part than the use it replaces.*
- B. *On-street parking spaces shall not be used to satisfy the requirements of this Part unless the Zoning Officer determines, in writing, that sufficient on-street parking exists along the frontage of the property line/lines. No more than 10% of the required parking spaces shall be on-street parking.*

§ 27-601.4.A - *The number of parking spaces required is as follows:*

Type of Use	Parking Spaces Required
Commercial, office, and institutional	3 spaces per 1,000 square feet

§ 27-800 - *Continuation of Use*

*A use or structure which is nonconforming, as defined in Section 800, at the time this Chapter and subsequent amendments become law, may be continued except as otherwise set forth in these Sections.*

§ 27-802 - *Regulation of Nonconforming Uses*

*Any nonconforming use, building or structure may be enlarged by not more than 10% of its floor and/or use area as it existed at the time of passage of this Chapter; provided that the lot or lots were in single ownership and purchased prior to the enactment of this Chapter. Any such enlargement shall conform to all regulations of the district where it is located. This provision may be used only once for each zoned lot.*

The Plans indicate that an additional institutional use is being added to the site in an area previously undeveloped. Documentation shall be provided demonstrating that there is adequate parking in the adjacent lot for this use, to the satisfaction of the Pottstown Borough Zoning Officer.

General Comments:

- 37. The waiver request note provided on Sheet 2 shall be revised to remove the “A” prior to the section number for Section 400.5.A.
- 38. The Anchoring Method or Material note on Sheet CS9501 shall be revised to specify an anchoring method or material. “As specified” is not acceptable for this application.
- 39. It is unclear why there are two locations labeled HP at the proposed swale along the northern corner of the work area. These labels shall be removed as there are higher locations immediately adjacent to each.
- 40. Additional spot elevations shall be provided in the area of the proposed steps leading to the bleacher access, and along the walkway accessing the bleachers.

Other agency approvals:

Approvals or permits from the following agencies may also be required. Written evidence of these approvals, acceptance, or exemptions shall be provided to the Borough:

- A. Montgomery County Conservation District – NPDES Permit
- B. Fire Marshall, Borough of Pottstown
- C. Zoning Officer, Borough of Pottstown



Please contact me with any questions or concerns.

Best Regards,  
**CEDARVILLE Engineering Group, LLC**

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

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  
Robin Rhoads, The Hill School  
John C. Medendorp, P.E., Pennoni Associates, Inc.