



April 19, 2022

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

RE: 144 West High Street
Preliminary/Final Land Development Plan Review
Pottstown Borough
145-21-0204

Dear Mr. Keller,

CEDARVILLE Engineering Group, LLC (CEG) has completed a review of the Preliminary/Final Subdivision Land Development for 144 West High Street. The site (Parcels 16-00-15404-00-6 and 16-001-37600-00-3) are located on the southern side of High Street at the intersection with Manatawny Street. The parcels occupy 0.51 acres (22,361 SF) and 0.67 acres (29,100 SF) and within the Downtown (D) District. The site contains an existing parking lot and Montgomery County Community College North Hall Building. The current application proposes to remove an existing parking lot and install a lawn/open space area, pavilion, landscaping, pedestrian path and replace a retaining wall along Manatawny Creek.

The following information was submitted by Cowan Associates, Inc. and was received by our office on March 15, 2022:

- A. Full size Engineering Plans Titled "Montgomery County Community College North Hall Improvement Project", Sheets 1 to 5 of 5, dated September 29, 2021 and last revised March 11, 2022.
- B. Borough Application for Review of a Subdivision/Land Development Plan and Checklist and 90-Day Waiver.
- C. Post-Construction Stormwater Management Report dated September 30, 2021.
- D. Memorandum dated September 16, 2021 regarding requirements for ADA spaces from Michael Smith, P.E., BCO.
- E. Montgomery County Planning Commission – Application Request for County Review.
- F. Applicant Request for Review Letter dated October 6, 2021.
- G. Full size Engineering Plans for the proposed retaining wall design Sheets 1 to 6 of 6, dated March 11, 2022.
- H. GP-6 Permit.
- I. Response letter dated March 11, 2022 prepared by Cowan Associates, Inc. to CEDARVILLE review letter dated November 12, 2021.
- J. Electrical Plans prepared by Spillman Farmer Architects and Lehigh Valley Engineering consisting of 10 sheets, 1-10 of 10 dated March 11, 2022.
- K. Email correspondence regarding approval of GP-11 Permit.
- L. Architectural Plans prepared by Spillman Farmer Architects dated March 11, 2022.
- M. Petition for Vacating Alley prepared by Fox Rothschild LLP sent via email and dated March 1, 2022.

No Ordinance Modifications (Waivers) have been requested by the applicant.



The Plans have been reviewed for compliance with Chapter 8 – Floodplains, 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 8 Floodplains:

1. *This comment has been satisfactorily addressed.*

Chapter 9 Grading and Excavating:

2. *Section 9-105.A - The amount of site alteration proposed.*

November 12, 2021 Comment: The following information shall be provided:

- A topsoil stockpile surrounded with silt sock shall be shown on the Plan. A Sequence of Construction shall be provided on the Plan. The following shall be provided:
 - The sequence shall address the removal of materials from the site and how the existing paving will be disposed of.
 - A specific sequence shall be provided for work proposed within Manatawny Creek, to clearly specify the placement of the cofferdams, dewatering pump, and desilting facility.
- Seeding specifications proposed for the site shall be appropriate for areas subject to periodic flood inundation. The Plans propose Ernst Mix 180 or 181-1 Seed Mix (appropriate for rain gardens) in the vicinity of the proposed wall; however, the application of this mix is limited to the property to the south. This shall be clarified.
- The downstream end of the cofferdam must be closed off to prevent back flow into the work area.
- The top and bottom of bank elevations of Manatawny Creek shall be clearly shown.
- The location of the pump and desilting facility/pumped water filter bag shall be shown on the Plan.
- Erosion and sedimentation controls shall be extended to the south and west of the proposed wall to adequately manage sedimentation in the area of the wall.
- Clarification as to how construction traffic will access the rock construction entrance as shown. If the intent is to access via the existing paving, this shall be noted in the construction sequence.

Current Comment: The following information shall be provided:

- The following shall be addressed:
 - A specific sequence shall be provided for work proposed within Manatawny Creek, clearly outlining the placement of the dewatering pump and desilting facility.
 - A specific step shall be added to the sequence for the removal of cofferdam, pump, and desilting facility.
 - Specifications for the proposed seed mix appropriate for areas subject to periodic flooding shall be provided on the Plan. The previously submitted Plans referenced the installation of Ernst 180 or 181-1 Seed Mix, however this has been removed from the current Plan submission.
 - The limit of seed mix application shall be extended to encompass all disturbed area between the proposed wall and Manatawny Creek, including the area to the west of the site.
 - The current Plans indicate that the previously shown Right of Entry Easement No. 2, which was shown on the previous submission within the property to the west in the area of Manatawny Creek, has been eliminated, however the configuration of the Limit of Disturbance line and the location



of the proposed cofferdam indicate that a means of Right of Entry will still be required in this area. This shall be addressed.

- Plan Sheet SP-4 shows the Limit of Disturbance line extending into the Reading Company parcel to the south, adjacent to the existing North Hall Building. If encroachment into this area is proposed, an easement will be required to permit Right of Entry.
- The Limit of Disturbance line, Sheet SP-4, shall be revised to encompass the area of the proposed paved walkway adjoining the sidewalk along the south side of High Street.
- The top and bottom of bank elevations of Manatawny Creek shall be clearly shown on the Improvements Plan, Sheet SP-4.
- The location of the proposed pump and desilting facility shall be shown on Sheet SP-4.
- Erosion and sedimentation controls shall be extended to the south and west of the proposed wall to adequately manage sedimentation in the area of the wall. This includes all improvements to the wall within the Reading Company property.
- The construction sequence references access to the site and construction entrance via Hill Street. This reference shall be revised to High Street.
- The configuration of the rock construction entrance shall be revised to extend to the paved portion of the former Manatawny Street. As shown, the construction vehicles will need to cross disturbed earth prior to leaving the site.
- The proposed cofferdam shall be reconfigured to:
 - Provide sufficient area between the proposed wall and the rear face to cofferdam for installation of the wall.
 - The cofferdam shall be extended to the north to adequately convey flow around the full length of the wall.

3. *Section 9-109.B - A narrative report describing the project and giving the purpose and the engineering assumptions and calculations for control measures and facilities.*

November 12, 2021 Comment: An Erosion and Sediment Control Narrative and Calculations shall be provided, to include the following:

- Calculations to support silt sock sizing.
- Supporting calculations associated with the proposed cofferdam, which shall demonstrate accordance with the manufacturer's specifications, as required by the Pennsylvania Erosion and Sedimentation Control Manual.

Current Comment: An Erosion and Sediment Control Narrative and Calculations shall be provided in accordance with the above referenced section of the Ordinance. Approvals or permits from other review agencies does not preclude the need to meet the requirements of the Borough of Pottstown. The Erosion and Sediment Control Calculations shall include the following:

- Accurate calculations to support silt sock sizing shall be provided. The current table provided with the standard detail #4-1 shows identical slopes and slope lengths for every sock.
- Supporting calculations shall be provided to support the design height of the proposed cofferdam, to demonstrate the height provided is a minimum of two feet above base flow, in accordance with the Pennsylvania Erosion and Sedimentation Control Manual.

Chapter 22 Subdivision and Land Development:

4. *Section 22-202 - Formal Application Procedure.*



November 12, 2021 Comment: The Plans currently do not reference whether this is a Preliminary Plan or Preliminary/Final Plan.: this shall be referenced on the Plan. If the applicant proposes to submit this Plan as a Preliminary/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.

Current Comment: The Plans have been labeled “Preliminary/Final” Plans. 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. The applicant’s response letter references that a “waiver request letter dated March 11, 2022”, was submitted however this correspondence was not received by our office.

5. *Section 22-400.2.A Show the boundary of the parcel and label the bearing and distances.*

November 12, 2021 Comment: The following shall be addressed:

- The referenced ownership of the property to the south is “Reading Company” however there is no parcel boundary shown which defines the line associated with the right-of-way of High Street and Manatawny Street. This shall be clearly shown on the Plan. The property boundary between the Pottstown owned road between the two subject parcels and the railroad ROW must be provided.
- Ownership of the 33-foot strip of land located between Parcels 160015404006 and 160013760003 shall be clarified. This strip currently includes improvements associated with the applicant’s property, including those associated with the existing North Hall Building and the existing driveway accessing the existing parking lot which is to be removed. The following shall be addressed based upon ownership of this strip:
 - If this strip is owned or is to be owned by Pottstown Borough:
 - The right-of-way associated with the proposed configuration of Manatawny Street will need to be revised to conform with the alignment and shall encompass the entire width of Manatawny Street.
 - A Subdivision Plan will be required to be submitted and recorded concurrently with the Land Development Plan to accommodate the change in parcel boundary lines.
 - The Plans show that the proposed Manatawny Street alignment is to connect with a “paved alley” located within property owned by the Reading Company and not contiguous with Borough right-of-way. Evidence of an easement or other documentation deemed acceptable to the Borough Solicitor.
 - Signage and pavement marking shall be required to ensure adequate circulation is maintained at point where Manatawny Street’s width decreases to less than 22 feet. Proposed traffic patterns shall be subject to the Borough’s review and approval.
 - If this strip is owned or is to be owned by the applicant:
 - If it is confirmed that the strip is currently owned by Pottstown Borough, vacation of the right-of-way, in a form and subject to approval by the Borough Solicitor, shall be required.
 - A Subdivision Plan will be required to be submitted and recorded concurrently with the Land Development Plan to accommodate the change in parcel boundary lines.
 - An easement or appropriate documentation, to the satisfaction of the Borough Solicitor, shall be prepared, approved, and executed to permit the connection as proposed.

Current Comment: The following shall be addressed:



- Execution of the submitted vacation petition shall be subject to the review, approval of the Borough Solicitor, and shall require the execution of applicable Ordinances as deemed required by the Solicitor. Upon execution, the plan to be recorded shall reference the applicable Ordinance.
6. *Section 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.*

November 12, 2021 Comment: The Plan shall be revised to provide the above referenced information. CEG offers no objection to consideration of a partial waiver to the above section of the Ordinance; conditioned upon:

- Topography and dimensioning associated with the “Paved Alley” to the south of the existing building (North Hall) on Parcel 160013760003 shall be shown for the entire width of the alley, to the eastern edge of the building.
- Topography sufficient to clearly show existing top and bottom of bank, from High Street south to the limits of wall construction, shall be shown.

Current Comment: The Plan shall be revised to provide the above referenced information. CEG offers no objection to consideration of a partial waiver to the above section of the Ordinance, conditioned upon:

- Dimensioning associated with the “Paved Alley” to the south of the existing building (North Hall) on Parcel 160013760003 shall be shown for the entire width of the alley, to the eastern edge of the building.
- Topography sufficient to clearly show existing top and bottom of bank, from High Street south to the limits of wall construction, shall be shown on the Land Development Plans.

7. *This comment has been satisfactorily addressed.*
8. *This comment has been satisfactorily addressed.*
9. *This comment has been satisfactorily addressed.*
10. *This comment has been satisfactorily addressed.*
11. *This comment has been satisfactorily addressed.*
12. *This comment has been satisfactorily addressed.*
13. *Section 22A-403.9. – Identification of features (On site) Zoning district lines, where applicable.*



November 12, 2021 Comment: The limits of wetlands shall be show on the Plan, as delineated by wetlands scientist. If no wetlands exist, certification shall be provided stating this, from a qualified wetlands scientist.

Current Comment: The applicant's response letter indicates that certification has been provided however this information was not included with the documents received by our office. The previous comment is still applicable.

14. *Section 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.*

November 12, 2021 Comment: The following must be addressed:

- Additional spot elevations, slopes, and applicable ramp details must be provided to demonstrate compliance with ADA requirements, where the proposed paved pathway meets the "cheek wall" shown adjacent to High Street along with the High Street sidewalk.
- The proposed removal of the parking areas includes the removal of handicap accessible parking. A Plan shall be provided addressing:
 - The area where the ADA parking spaces that have been removed will be replaced.
 - Full ADA accessibility from the above referenced spaces to the portion of North Hall which currently accommodates ADA access.
- Plans shall clearly show how ADA access shall be maintained from High Street and North Hall to the proposed pergola. If a portion of the proposed paved pathway is to be used for this accessibility, spot elevations shall be provided to demonstrate compliance with current ADA standards and specifications.

Current Comment: The following must be addressed:

- A large-scale detail shall be provided, where the proposed paved pathway meets the existing sidewalk along the south side of High Street, to demonstrate compliance with PennDOT RC-67M and ADA Standards for Accessible Design.
- The proposed removal of the parking areas includes the removal of handicap accessible parking. A Plan shall be provided addressing:
 - The removed ADA parking spaces shall be relocated and clearly shown on the Plan. The applicant has indicated that proposed parking spaces are shown on the Plan however no area for parking is present. Lawn is not an acceptable parking space for this application.
 - The Plans shall demonstrate ADA compliance from the above referenced spaces to the portion of North Hall which currently accommodates ADA access.
- Plans shall clearly show how ADA access shall be maintained from High Street and North Hall to the proposed pergola. Spot elevations and slopes shall be provided to demonstrate compliance with current ADA standards and specifications for the entire length of the proposed path where necessary.
- The Plans shall clearly show the existing easement which permits pedestrian access through the Reading Company property. If no easement exists, a proposed easement and associated agreement, acceptable to the Borough Solicitor, shall be provided and executed.



15. *Section 22-A404.6 - All final easements or rights-of-way where provided for or owned by public services or private agreement and any limitations on such easements or rights-of-way. Rights-of-way shall be shown and identified accurately on the plan, and easements either shall be shown or described specifically on the plan. Easements should be located in cooperation with the appropriate public facilities.*

NEW COMMENT - *Section 22-A404.10 – Existing tree masses or individual trees over six inches in diameter that are to be cleared and existing structure that are to be demolished.*

NEW COMMENT - *Section 1200 – STREEET – Includes Street, avenue, boulevard, road, highway, freeway, parkway, and lane, ether public or private used or intend to be used by vehicular traffic or pedestrians. Streets are further classified by function in Section A5 of this Chapter.*

November 12, 2021 Comment: The following must be addressed:

- If the alley to the rear of the building is to serve as an extension of public access from Manatawny Street, an access easement shall be required to encompass the paved alley to the south of North Hall. If this easement currently exists, it shall be shown on the Plan with reference to where this easement information was obtained from clearly referenced.
- A “Proposed Right of Entry Easement No. 1” is shown, encompassing the proposed and existing wall to the south of the subject tract, located on the Reading Company property. It shall be clarified as to whether this is a temporary easement used for construction purposes only. Clarification as to ownership and maintenance responsibilities associated with the wall shall be provided. If the wall is to be maintained by the applicant, the easement along with any associated agreements shall be reviewed and deemed acceptable by the Borough Solicitor. If this easement is not deemed acceptable, reconfiguration of this lot line and the submission of a concurrent Subdivision Plan may be required.
- A “Proposed Right of Entry Easement No. 2” is shown, encompassing the proposed future pergola which encroaches on the Reading Company property. It shall be clarified as to whether this is a temporary easement used for construction purposes only. Clarification as to ownership and maintenance responsibilities associated with the wall shall be provided. If the wall is to be maintained by the applicant, the easement along with any associated agreements shall be reviewed and deemed acceptable by the Borough Solicitor. If this easement is not deemed acceptable, reconfiguration of this lot line and the submission of a concurrent Subdivision Plan may be required.
- As referenced previously, ownership of the 33-foot area between Parcels 16001540006 and 16001376003 shall be clarified. If this parcel is to be owned and maintained as public right-of-way by the Borough, it will need to be reconfigured to fully encompass Manatawny Street.

Current Comment: The following must be addressed:

- Sheet SP-2 indicates that the crosshatched area encompassing the current section of Manatawny Street represents a 22-foot-wide access easement. The following shall be provided:
 - It shall be clarified as to whether the access easement is to be utilized by vehicles, or whether its use will be limited to pedestrians.
 - Evidence of an easement associated with the Reading Company alley, located to the south of the existing building, shall be provided, to confirm the right of access from the parking areas to the south to North Hall.
 - Bearings and distances associated with the limits of the easement shall be shown.
- A “Proposed Right of Entry Easement” is shown, encompassing the proposed and existing wall to the south of the subject tract, located on the Reading Company property. As previously required, it shall be clarified as to whether this is a temporary easement used for construction purposes only. Clarification as to



ownership and maintenance responsibilities associated with the wall shall be provided. If the wall is to be maintained by the applicant, the easement along with any associated agreements shall be reviewed and deemed acceptable by the Borough Solicitor. If this easement is not deemed acceptable, reconfiguration of this lot line and the submission of a concurrent Subdivision Plan may be required.

- All steps to fully complete and execute the submitted vacation petition shall be subject to the review and approval of the Borough Solicitor.
- Additional easements shall be required for the areas located within the proposed Limits of Disturbance, including the area to the west of the proposed retaining wall (within the property to the west) and the area of disturbance proposed within the alley (Reading Company) adjacent to the proposed building.
- Sheet SP-3 shall be revised to clearly show all facilities to be demolished, including but not limited to:
 - Parking stalls and associated pavement markings.
 - Marking associated with traffic control and crosswalks.

Based upon the above referenced definition of a street, the accessway as currently shown shall be considered a street if access to the alley located within the Reading Company property is still to be provided. CEG offers the following:

- If the access is to be limited to pedestrians only, CEG offers no objection to consideration of a waiver of the above referenced Ordinance section and the applicable Ordinance Sections included in Appendix A5, provided the following is complied with:
 - The Plans and associated agreements clearly state that this area is to be restricted to pedestrians only.
 - This access shall be available for emergency vehicles and shall be subject to the review of the Borough Fire Marshall. This access shall be sufficient to accommodate the weight of emergency vehicles, with sufficient turnaround provided. Adequate access and turn-around shall be confirm via Autoturn analysis.
 - The Plans shall clearly show how vehicular access will be limited to emergency vehicles only.
 - An easement and associated agreement shall be provided to permit use through the Reading Company property, in a form acceptable to the Borough Solicitor.
- If the access is to be utilized by vehicular traffic with access being provided to the alley located on the Reading Company property. CEG will offer no objection, provided at a minimum, the following is adequately addressed:
 - The Plans and associated agreements clearly the limit use to the specific properties in which access shall be provided.
 - The applicant shall adequately demonstrate, to the satisfaction of the Borough Planning Commission and Borough Council, as to how traffic will be minimized within the Reading Company alley to permit full access to the applicable properties which the alley will serve. The Plan shall clearly show where the limits of alley access exist.
 - This access shall be available for emergency vehicles and shall be subject to the review of the Borough Fire Marshall. Adequate access and turn-around shall be provided through a cul-de-sac bulb (per Subdivision and Land Development Appendix A%) or equivalent turnaround area as approved by the Borough Fire Marshal.
 - Signage shall be provided at the entrance clearly indicating that the access is restricted to the use of the above referenced properties and is not to be used by the public. This shall be clearly shown on the Plan.
 - Stop signs shall be provided at the access to High Street for vehicles exiting onto High Street.



- A stop sign shall be provided where the access meets the alley located on the Reading Company property.
- An easement and associated agreement shall be provided to permit use through the Reading Company property, in a form acceptable to the Borough Solicitor.

16. *Section 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.

Section 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.

Section 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.

Section 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.

Section 22-503.2 Planting Specifications. When planted, all trees must be at least 12 feet high, with a minimum caliper of two and one half to three inches in diameter measured six inches above the ground. The trees shall be deciduous, symmetrical in shape, with a trunk that is clean and straight, and without branches for a distance of seven feet above the ground. All trees must be guaranteed for a minimum of 18 months and conform with the recent edition of the American Standard for Nursery Stock published by the American Association of Nurserymen.

November 12, 2021 Comment: Landscaping is being proposed as shown on the Landscaping Plan, Sheet SSP-3. The Proposed Tree Schedule shall be updated to demonstrate compliance with the quantities and sizes as required in accordance with the above referenced Ordinance section.

Current Comment: Landscaping is being proposed as shown on the Improvements Plan, Sheet SP-4. The Proposed Tree Schedule shall be updated to demonstrate compliance with the quantities and sizes as required in accordance with the above referenced Ordinance sections. This includes specifying which plantings are to be used to meet each specific Ordinance requirement.

17. *Section 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.*

November 12, 2021 Comment: The applicant shall confirm whether site lighting is proposed. If no lighting is proposed, a note shall be included on the Plan referencing this. If lighting is proposed, a Lighting Plan shall be required to demonstrate compliance with the criteria set forth in Sections 22-A512 through 22-A514 of the Subdivision and Land Development Ordinance.

Current Comment: The following shall be addressed:

- 1) *Section 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 light.*



Section 22-A512.1.F - Parking lot lighting fixtures of more than 2,000 lumens shall be cutoff fixtures.

The following shall be addressed:

- A column shall be added to the Site Luminaire Schedule that clearly notes the height of the luminaire/mounting for each proposed fixture.
- All fixtures 20 feet or greater in height shall be full cutoff fixtures.
- All fixtures more than 2,000 lumens shall be revised to be cutoff fixtures.

- 2) *Section 22-A512.1.D - All lighting fixtures must be located at least ten feet from property lines defining rear and side yards. Light sources should not be located within any perimeter-landscaped areas except on pedestrian walkways.*

Section 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 following shall be addressed:

- Property lines shall be clearly shown on the Photometric Plan.
- All fixtures within 10 feet of a property line shall be relocated as necessary to provide the minimum offset required by the above referenced section of the Ordinance.
- All existing fixtures shall be included in calculating photometrics and isofotcandles. Currently no existing light fixture shown on the Plan is included as “on”.

- 3) *Section 22-A514.3 - The level of illumination shall be based upon the primary activity in each area to be lighted. The following standards for various activities prescribed by the Illuminating Engineering Society chart represents a number of exterior lighting uses for general reference. Footcandle designations represent measurements for the average intensity at grade.*

<i>Utility Lighting</i>	<i>Maximum Footcandle</i>	<i>Minimum Footcandle</i>
<i>Pedestrian way</i>	<i>1</i>	<i>0.5</i>
<i>Driving</i>	<i>1</i>	<i>0.5</i>
<i>General Landscape Area</i>	<i>2</i>	<i>1</i>

The following shall be addressed:

- All existing fixtures shall be included in calculating photometrics and isofotcandles. Currently no existing light fixture shown on the Plan is included as “on”.
- All lighting fixtures shall be revised to provide the minimum and maximum illumination values as shown above. Currently multiple places along the walking paths and pedestrian routes exceed the maximum illumination/footcandle value and drop below the minimum footcandle value.

18. *Section 22-A519.2 - Storm Drainage. Provision of storm sewers, inlets, catch basins, and manholes shall meet the requirements and the approval of the Borough Engineer as regards to both design and location. All catch basins shall be connected to a manhole.*



November 12, 2021 Comment: If proposed Manatawny Street is to be owned and maintained by Pottstown Borough, a Plan and supporting calculations associated with the inlets and storm sewer shall be provided. Profiles of storm sewer shall be provided as part of the profile of Manatawny Street, as referenced below.

Current Comment: The applicant has indicated that the intent is to vacate the subject portion of Manatawny Street. If vehicular traffic is to utilize this area, storm sewer may be warranted based upon the design of the applicable Section of the Ordinance referenced below.

19. Section 22-A520.2 – Dead-end Streets. Dead end streets are prohibited, unless designed as cul-de-sac or design for access exclusively to neighboring tracts.

November 12, 2021 Comment: If proposed Manatawny Street is to be owned and maintained by Pottstown Borough, or privately owned to be used by the public, an access easement from the Reading Company, along with approval from the Reading Company for the improvements proposed shall be required. If this information is not provided, Manatawny Street shall be designed as a cul-de-sac street in accordance with the applicable sections of the Ordinance.

Current Comment: The applicant has indicated that the intent is to vacate the subject portion of Manatawny Street. The above referenced documentation from the Reading Company shall be provided.

20. Section 22-A520.2 – Dead-end Streets. Dead end streets are prohibited, unless designed as cul-de-sac or design for access exclusively to neighboring tracts.

November 12, 2021 Comment: If proposed Manatawny Street is to be owned and maintained by Pottstown Borough, an access easement from the Reading Company, along with approval from the Reading Company for the improvements proposed shall be required. If this information is not provided, Manatawny Street shall be designed as a cul-de-sac street in accordance with the applicable sections of the Ordinance.

Current Comment: The applicant has indicated that the intent is to vacate the subject portion of Manatawny Street. If the access to be maintained is to be utilized by vehicular traffic this access shall be designed as a cul-de-sac in accordance with the above referenced criteria, or with adequate turnaround for emergency vehicles, as approved by the Borough Fire Marshall.

21. Section 22-A521.3 – Streets approaching intersections shall be as near perpendicular to one another as is practical. At an intersection, the grade of the dominant street shall be continuous; the grade of the subordinate streets shall have an approach that is as near level as is practical. Intersection streets of equal classification shall have approaches that are as near level as is practical.

November 12, 2021 Comment: If proposed Manatawny Street is to be owned and maintained by Pottstown Borough, or is to be owned and maintained as a private street to be utilized by the public, the following shall be addressed:

- The horizontal alignment of Manatawny Street at the intersection with High Street shall be revised to align perpendicular to High Street.
- A profile of Manatawny Street shall be provided to demonstrate that a leveling area is being provided in accordance with the above referenced section of the Ordinance.

Current Comment: The applicant has indicated that the intent is to vacate the subject portion of Manatawny Street. The following shall be provided:



- An Autoturn Analysis shall be provided demonstrating that emergency vehicle access can be maintained through the entire length of the cul-de-sac, to the rear of the building.

22. *Section 22-A522 – Streets alignment.*

Section 22-A522.1 - Directional Changes. Changes in street direction including horizontal curves, radii, super elevation of curves, and tangents between revers curves shall be by classification of street and in accordance with the current edition of a Policy on Geometric Design of Highways and Streets, American Association of State Highway Transportation officials.

Section 22-A522.2 - Grades. There shall be a minimum centerline grade of three-quarters percent and a maximum centerline grade of 10 percent on all streets. For distance up to 1,5000 g=feet, grades exceed 10 percent may be permitted on recommendation of the Borough Engineer.

Section 22-A522.3 - Vertical Curves. Vertical curves are required for changes in grade greater than one percent. The rate of change of grade on vertical crest and sag curves and sight distances shall be in accordance with the current edition of a Policy on Geometric Design of highways and streets, American Association of State Highway Transportation Officials.

Section 22-A522.4 - Surface Drainage. The slope of the crown on proposed streets shall be one-quarter inch per foot except for super elevated settings which shall be a directed by the Borough Engineer. Adequate drainage shall be provided at low points along streets and where required to intercept runoff.

November 12, 2021 Comment: If proposed Manatawny Street is to be owned and maintained by Pottstown Borough or is to be owned and maintained as a private street to be utilized by the public, Plans shall be provided demonstrating compliance with the above referenced criteria.

Current Comment: The applicant has indicated that the intent is to vacate the subject portion of Manatawny Street. The previous comment may be considered not applicable upon adequately addressing the above referenced comments.

23. *This comment has been satisfactorily addressed.*

24. *§ 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.*

Section 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.



November 12, 2021 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 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:

25. *Section 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.*

Section 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.

November 12, 2021 Comment: The following must be addressed:

- The applicant shall provide clarification to the purpose of permeable pavement and whether it is being utilized as a stormwater BMP to meet the requirements set forth in the Borough's Stormwater Management Ordinance. If the permeable pavement is being used for a stormwater BMP, the following shall be noted:
 - 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.

Current Comment: Sheet SP-2 shows the labeling associated with the proposed pathway as a "Prop. Paved Pathway", however the Legend references this area as "Proposed Porous Walkway". If a porous walkway is to be used, the following shall be provided in accordance with the Pennsylvania Stormwater Best Management Practices Manual:

- The porous paving design shall be in accordance with BMP 6.4.1 as referenced in the BMP Manual.
- An Operation and Maintenance Agreement will be required for the proposed porous paving, 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 BMP is 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.



Chapter 27 Zoning:

26. *Section 27-A339. Floodway District (FW). In the Floodway District, no development shall be permitted except where the effect of such development on the flood heights is fully offset by accompanying improvements which have been approved by all appropriate local and/or Commonwealth authorities as required above.*

November 12, 2021, Comment: The following shall be noted:

- Supporting Hydraulic and Hydrologic calculations shall be provided to demonstrate compliance with the above referenced Ordinance section.

Applicability of Zoning Relief required shall be subject to the determination of the Pottstown Borough Zoning Officer.

Current Comment: The above comment remains applicable.

27. *Section 27-601.4.A Number of Spaces.*

The number of parking spaces required is as follows:

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

November 12, 2021, Comment: A tabulation shall be provided demonstrating that the referenced minimum parking criteria can be complied with after removal of the parking spaces proposed as part of this project.

Current Comment: A total of 28 parking spaces are being eliminated as a result of this project. The Applicant shall provide supporting parking calculations, to the satisfaction of the Borough Zoning Officer, that adequate parking is maintained for this use in accordance with the referenced Ordinance section.

General Comments:

28. November 12, 2021, Comment: Plan Sheet SP-1 appears to show an Autoturn Analysis of a vehicle making a turning movement from Manatawny Street to the existing paved alley to the rear of North Hall. The movement is incomplete and appears to indicate that this turning movement is not possible. The following shall be addressed:

- The Autoturn Analysis shall utilize an emergency vehicle approved by the Borough Fire Marshal.



- The turning movements shall be revised to show a full movement and shall clearly demonstrate that the emergency vehicle has the ability to adequately access the alley.

Current Comment: The above comment remains applicable. Coordination with the neighboring properties, as referenced on the applicant's response letter, does not adequately address this comment.

29. November 12, 2021, Comment: The note "CONCRETE RETAINING WALL W/ 42" GUARD IN AREAS WHERE THE WALL HEIGHT EXCEEDS 30" is not sufficient. The following shall be shown on the Plans consistent with the structural drawings:

- Top and Bottom of Wall elevations shall be labeled TW and BW and be shown at approximately 25' intervals and at critical locations.
- Legend must be added to the Structural Plans for clarification.
- Footer and drainage elements of retaining walls to be incorporated into the civil drawings.

Current Comment: The following shall be shown on the Plans consistent with the structural drawings:

- Top and Bottom of Wall elevations associated with the proposed retaining wall shall be labeled TW and BW and be shown at approximately 25' intervals and at critical locations on Sheet SP-4.
- The orientation of the Pergola as shown on the Land Development Plans does not correspond with that shown on the Structural Plans; this shall be revised accordingly.
- The limits of retaining wall removal and replacement shall coincide with the Structural Plans and Civil Plans to show consistent limits for the existing wall to be removed and replaced.
- A legend shall be provided on the Structural Plans.

30. November 12, 2021, Comment: Design certification from a professional Structural Engineer must be provided for the retaining walls.

Current Comment: The applicant's response letter indicates that a Structural Engineer's seal has been provided, however none is present on the information received by our office. The previous comment remains applicable.

31. November 12, 2021, Comment: The applicant shall indicate where the parking eliminated as part of this project, previously utilized for North Hall, shall be accommodated as a result of this project.

Current Comment: The above comment remains applicable. A general statement stating there is parking elsewhere on Campus does not adequately address this comment.

Other Agency Approvals:

- A. Fire Marshall, Borough of Pottstown
- B. Zoning Officer, Borough of Pottstown
- C. Pennsylvania Department of Environmental Protection (Chapter 105 Permit)
- D. FEMA (Map Amendment, if applicable)

Please note that Plan resubmission may result in additional comments.



Please feel free to contact me with any questions.

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
Scott P. McMackin, P.E., Cowan Associates, Inc.
Montgomery County Community College - Applicant