

February 12, 2024

Attention: Ms. Deborah Roesener  
Township Manager  
West Pottsgrove Township  
980 Grosstown Road  
Stowe, PA 19464

RE: Proposed Wawa Food Market - Stowe  
Preliminary/Final Subdivision Land Development Plan Application  
Corner of Grosstown Road and Old Reading Pike.  
Bursich Project No.: WES-01 / 248399.00

Dear Ms. Roesener:

In accordance with your request, we have reviewed the Conditional Use Plan for Land Development application submission for the Proposed Wawa Food Market. The submission consisted of the following materials prepared by Bohler Engineering PA, LLC.:

- Subdivision/Land Development Application for Proposed Wawa Food Market - Stowe, Preliminary/Final Plan, Dated 1/12/2024.
- Waiver Letter, dated 9/12/24.
- Full-size Preliminary/Final Land Development & Subdivisions, dated 1/12/24, sheets 1-25 of 25.
- 11x17 Preliminary/Final Land Development & Subdivisions, dated 1/12/24, sheets 1-25 of 25.
- Full-size ALTA/NSPS Land Title Survey, dated 2/17/23, sheets 1 of 1.
- 11x17 ALTA/NSPS Land Title Survey, dated 2/17/23, sheets 1 of 1.
- Phase 1 Environmental Report prepared by ECS Mid-Atlantic, LLC, dated 9/15/23.
- Stormwater Management Report, dated 1/12/24.
- Infiltration Testing Letter, prepared by Earth Engineering Incorporated, dated 10/25/23, revised 1/9/24.

**OFFICE LOCATIONS**[www.vancleefengineering.com](http://www.vancleefengineering.com)

Hillsborough, NJ  
908-359-8291

Mt. Arlington, NJ  
862-284-1100

Phillipsburg, NJ  
908-454-3080

Doylestown, PA  
215-345-1876

Pottstown, PA  
610-323-4040

Hamilton, NJ  
609-689-1100

Toms River, NJ  
732-573-0490

Freehold, NJ  
732-303-8700

Bethlehem, PA  
610-332-1772

- Report of Geotechnical Investigation, prepared by Earth Engineering, dated 12/4/23, revised 1/9/24.
- Waters of the U.S. Delineation by ECS Mid-Atlantic, LLC, dated 5/12/23.
- Department of the Army Preliminary Jurisdictional Determination Letter, dated 9/7/23 and approved Wetland Delineation Map.
- Pennsylvania State Historic Preservation Office Letter, dated 9/13/23.
- Transportation Impact Study, prepared by Traffic Planning & Design, Inc., dated 1/5/24.
- Scoping Response Letter (PennDOT), dated 1/5/24.
- Scoping Response Letter (County), dated 1/5/24.
- Pennsylvania Department of Conservation and Natural Resources, PNDI Receipt dated 4/19/23.
  - Phase 1 Habitat Assessment Survey, dated 6/29/23.
  - Pennsylvania Fish and Boat Commission Clearance Letter, dated 2/13/23.
- Pottstown Borough Authority Water Will-Serve letter, dated 12/12/23.

The site consists of two properties (tax parcel 64-00-03745-00-7 & 64-00-03748-00-4) in the Industrial Zoning District with a total of 3.01 acres. The property is bordered by Old Reading Pike to the south, County Trail Head Parking Lot to the north, Grosstown Rd. to the east, and Universal Machine Co. to the west. The application proposes constructing a 14,017-sf Wawa Food Market with gas station and 80,913-sf of impervious coverage.

We offer the following for your consideration:

#### **REQUESTED WAIVERS**

1. §301.2 and §301.3 – A waiver is requested from the requirements that the presentation of preliminary plan and final plan each be considered as separate submissions.
2. §411.5.A – A waiver is requested from the requirement that proposed grading shall be setback at least three (3) feet from the property lines, where zero (0) feet is proposed.

3. §415.1.A – A waiver is requested from the requirement that sidewalks and border areas are required on both sides of the street within the ultimate right-of-way, where sidewalk and border areas are only proposed along a portion of Grosstown Road.
4. §431.2.A – A waiver is requested from the requirement that a minimum driveway length of fifty (50) feet, where a driveway length of fifteen (15) feet on Grosstown Road and twenty- five (25) feet on Old Reading Pike, measured from the road ultimate right-of-way line to the internal driveway intersection is proposed.
5. §431.5.A – A partial waiver is requested from the requirement that parking lots with a capacity of forty-one (41) to one hundred (100) cars shall require a planting strip around the perimeter and an additional ten (10) percent planting areas within the perimeter of the lot, where three (3) percent of planting areas are proposed within the parking area.
6. §434.2.C(1) – A waiver is requested from the requirement to provide a ten (10) foot wide buffer planting area along all property lines and external street boundaries of the site, where a buffer planting area width of three (3) feet is proposed.
7. §434.5.C – A partial waiver is requested from the requirement that each planting island shall contain at least one shade tree plus shrubs and groundcover to cover the entire area, where shrubs and groundcover are provided, however the trees are placed in other areas of the site.

#### **ZONING ORDINANCE COMMENTS**

1. §1002. Special Exceptions. C. Petroleum Storage -This proposal may require a special exemption from the Zoning Hearing Board in accordance with Article XIX of the Zoning Ordinance.
2. §1604.3.c. – Sign Contents. A freestanding or monument sign shall contain only the name, address, logo, and/or contact information for the permitted use. *(The Zoning Board previously granted a variance for two free standing signs exceeding the square footage requirement of the ordinance. This comment applies to the display of gas prices).*
3. §1609.C. - Flashing, blinking, twinkling, animated, electronic changeable message, or LED signs, except signs showing only the time and temperature. This restriction specifically includes window signs but does not prohibit lighting or displays related to a holiday recognized by the Township, County, State, or Federal Government. *(The Zoning Board previously granted a variance for two free standing signs and a wall exceeding the square footage requirement of the ordinance. This comment applies to electronic changeable gas prices and LED signs. The subject signs will all be illuminated).* Type of illumination shall be specified.

### SUBDIVISION & LAND DEVELOPMENT ORDINANCE

1. §304.4.S – A note shall be added to the plan which states “Preliminary Plan – Not to be Recorded”.
2. §304.6.A.1)i. – Sight distance at proposed intersections with existing streets shall be included on proposed features/site plan.
3. §304.6.A.6)f. - Ground floor elevations of all proposed buildings shall be included proposed features/site plan.
4. §304.6.B.3)g & i. – Stormwater Management and E&S control facilities including: direction of flow & invert elevations. *Please confirm the inlet/manhole grate elevations and invert elevations in the calculations compared to the chart on the Utility Plan and the spot elevations on the grading plan, it appears that some of the figures are inconsistent.*
5. §304.6.D.1)a. – Cross sections and centerline profile for each proposed cartway, driveway or parking area shown on preliminary plan including: Road centerline grades and vertical curvature including road centerline elevations shown at horizontal intervals of 25 feet along vertical curves and 50 feet for straight edges. Profiles for sanitary sewers, water mains, storm drains, including locations of manholes, inlets, and catch basins.
6. §408.1.F - In the event that a tree over six inches in caliper must be removed for reasons stated in Section 408.1.D: “Trees over six inches...” above, said trees shall be replaced with approved trees of 2½ inches caliper at a rate of two new trees to each one tree removed. Acceptable species for replacement trees are listed in Appendix A.
7. §409.2. - Wetlands as defined by the U.S. Army Corps of Engineers and the Commonwealth of Pennsylvania in accordance with Section 404 of the Federal Clean Water Act of 1977 and Chapter 105 of the Pennsylvania Clean Streams Act Amendments of 1978 shall be preserved in subdivisions and land developments. Required permits shall be obtained at an early stage to determine the extent and location in proposed subdivision and/or land development.
8. §411.5.A. - All grading shall be set back from property lines at least three feet, or a sufficient distance, to prevent any adverse effects on adjacent properties.
9. §412.2.B. – No unfiltered stormwater coming from an area which has been disturbed shall be permitted onto an adjacent tract or discharge into any waterbody.

*(Additional E&S control is needed at the west side of the Old Reading Pike entrance area, where it abuts the residential lot. Additional E&S controls are required at the proposed entrance off Grosstown Road. Potable water, stormwater and wastewater are all proposed for installation in*

*an area where E&S controls must remain until site stabilization is achieved. Provide construction sequencing or relocation to address this).*

10. §415.1.A. – Sidewalks and border areas shall be required on both sides of the street within the ultimate right of way.
11. §418.1 - When a subdivision or land development is located on a street classified as a Principal Arterial or a Major Collector it shall provide for public access, where feasible, within the ultimate right- of- way for bicycle lanes.
12. §431.5.A. - Parking lots with a capacity of from 41 to 100 cars shall require a planting strip around the perimeter and an additional 10 percent planting area(s) within the perimeter of the lot. *(planting islands appear to be maxed out).*
13. §432.1.A. - Regardless of small size of a land development or subdivision proposal, curbs shall be required along all existing and proposed public streets within the right of way, private streets, common driveways, and common parking areas.
14. §434.2.C.1) - A buffer planting area of not less than 10 feet in width shall be established along all property lines and external street boundaries of the site proposed for subdivision or land development, unless otherwise specified in the Zoning Ordinance.
15. Figure 4.20 – Use of 6’ opaque fence is at discretion of Township. *(Discussion should be had with the Planning Commission at a minimum).*
16. §434.3.B.1) - Trees shall be planted at a rate of at least one tree per 40 linear feet of frontage or fraction thereof. Trees shall be distributed along the entire frontage of the property.
17. §434.5.C. - Each planting island shall contain at least one shade tree plus shrubs and/or groundcover to cover the entire area.
18. §439.1. – Trash enclosure details are to be provided.

#### **STORMWATER MANAGEMENT COMMENTS**

1. §301.Q(1) - Since this project is proposing to disturb more than one (1) acre of land, a chapter 102 NPDES permit is required. A copy of the NPDES permit shall be provided.
2. §301.Q(3) - Since this project is proposing to disturb wetland, a chapter 105 wetlands encroachment permit is required. A copy of the permit shall be provided.
3. §301.R – A riparian corridor conservation easement shall be granted to the Township including a minimum of 25’ surrounding any wetland or as further required by the Floodplain Conservation

District. It appears that wetland encroachments are proposed and a waiver from this section is required.

4. §303.A(2)(b) – On the DEP spreadsheet the general information form states there are 0.44 acres of existing impervious, however on the volume control section it states there are 0.39 acres of existing impervious. Please clarify.
5. §305.A.(1)(a)(i) – While it is understood that infiltration is not feasible on this site and the stormwater design is utilizing the “MRC” approach, the proposed underground basin appears to encroach into the limiting zones as indicated in the infiltration testing report. Please ensure that the basin design will not be negatively impacted by a constant base flow into the facility, considering the basin is proposed within an existing wetland area and that bedrock removal will not cause any detrimental effects.
6. §305.C – The proposed improvements (vehicle fueling station) is considered a “hotspot” with the potential for groundwater contamination. Considering the site will drain to the proposed Underground Basin in an existing wetland area, there is concern that a release or spill could contaminate the groundwater. The design should consider methods to restrict discharges and contain them within the facility should a spill occur.
7. §306(C)(1) – Twenty (20) percent of existing impervious shall be assumed to be meadow in the pre development condition.
8. §306(D) – It appears that a pre-development time of concentration (Tc) calculation has been provided in the report, however the calculations utilize 5 minutes. It also does not appear the Tc flowpath has been provided on the pre-development watershed plan. Also, please confirm the minimum Tc used in the post development calculations is acceptable per the TR-55 manual, as it appears to state the minimum Tc is 6 minutes.
9. §306(F) – Please utilize the runoff coefficients from Table B-2 in Appendix B in the storm sewer design calculations.
10. §307(B)(1) – Grass swales shall have a minimum bottom slope of 2 percent and their depth shall be sufficient to convey the 25-year storm event with a minimum of 1-foot of freeboard. Swales shall have sufficient freeboard to convey the 100 year storm discharge without creating any risk to the health, safety and welfare of the public, flooding, or other property hazard. Please confirm the swales are designed to meet these requirements.
11. §307(B)(2) – Easements shall be provided for the proposed swales.
12. §307(C)(1) – It appears that an existing inlet along Old Reading Pike, just downslope of the entrance drive will be cut off by the proposed curb. It is intended for this inlet to remain and be raised, or removed and replaced within the entrance drive to limit flows onto Old Reading Pike? Please clarify.

13. §307(C)(2) – It appears the storm sewer from yard drain 01 to existing inlet 01 is less than 15” diameter. A waiver from this section is required.
14. §307(C)(3) – Please provide a storm sewer trench backfill detail meeting the requirements of this section of the ordinance.
15. §307(C)(8) – Please provide details for the concrete inlet tops, specifically that they meet PennDOT publication 408 specifications and include the “Dump no waste – Drains to Waterway” plate.
16. §307(C)(9) – Please provide details for the manhole covers tops, specifically that they meet PennDOT publication 408 specifications and include the “Dump no waste – Drains to Waterway” plate.
17. §307(C)(13) – Please provide calculations for gutter flow spread to confirm it does not exceed ½ of the travel lane width or a maximum width of 8 feet where parking is permitted.
18. §307(C)(15) – It appears that the rainfall intensity utilized in the storm sewer calculations are higher than required. The conservative approach utilized is acceptable if the applicant wishes to provide additional capacity.
19. §307(D) – Please provide details/specifications/locations on the roof drain system meeting the requirements of the ordinance.
20. Please confirm the inlet/manhole grate elevations and invert elevations in the calculations compared to the chart on the Utility Plan and the spot elevations on the grading plan, it appears that some of the figures are inconsistent.
21. §307(F)(7) – Please provide observation ports into the chambers following manufacturer specifications.
22. §307(F)(8-9) – Please clarify the location of the underdrain for the Underground Basin in the plan or on a plan view detail. Please provide a detail showing the location of the underdrain in relation to the chambers, elevations, slopes, etc.
23. §307(F)(8) – It appears that the rotation of the Underground Basin outlet structure detail does not match the rotation on the plans. Please confirm the chambers and outlet pipe are shown in the correct location, the baffle wall will restrict flows as intended, etc.
24. §307(F)(8) – Please provide detailed dimensions of the Underground Basin on the details, specifically the perimeter dimensions, widths along with a section view to support the Underground Basin Design Information chart in the Underground Basin detail.

25. Please confirm the Stormtech module bed width in the Underground Basin outlet structure detail as it does not appear to match the SC-740 technical specification detail. Please confirm the top of rim elevation in the section view as it appears to reference 'D' instead of 'E'.
26. Consideration shall be given to bold the proposed BMP labels on the Post Construction Stormwater Management plans. Reference to the inlet filters for all inlets intended to receive them shall be provided on the storm sewer profiles.
27. §308(F)(1) – Any mature healthy trees with a 6 inch caliper or greater within the limits of disturbance shall be located in the field, shown on the plans and be protected and retained. Please provide a tree inventory to determine if any proposed 6 inch caliper or greater healthy trees are proposed to be removed. Note that dead trees do not require replacement, however photographic evidence for each dead tree shall be provided.
28. §308(F)(2) – If more than 5 mature trees (6-inch caliper or greater) are proposed to be removed, they shall be replaced at a rate of two (1 inch) caliper trees per 6 inch caliper tree removed.
29. §309(A) – All disturbance shall be in conformation with PA Chapter 102 regulations and in accordance with the requirements of Montgomery County Conservation District.
30. §309(C) – The applicant shall submit evidence to the Township that they have received approval from the Montgomery County Conservation District.
31. §310 – A riparian buffer easement shall be created and recorded as part of the Land Development, following the requirements of this section of the ordinance. It appears that a waiver will be required as disturbance to the wetlands is proposed.
32. §401(C) –Provisions for permanent access or maintenance easements for all physical stormwater BMPs shall be provided.
33. §401(D)(7) – Please provide profiles for the proposed storm sewers, so the storm sewers can be checked for compliance and conflicts with other utilities.
34. §401(D)(29) – Please provide proposed contours on the post-development and inlet watershed plans.
35. §401(D)(31) – Please provide a note on the PCSM plans indicating the Township shall be notified a minimum of 72 hours prior to construction of any stormwater management facilities.
36. §401(D)(34) – Please provide a detailed Stormwater Management Operation and Maintenance plan for all existing and proposed stormwater management facilities. Ensure that the requirements, notes, and signature blocks referenced in this section of the ordinance are included on the plan. The applicant will be required to execute a Stormwater Operation and Maintenance agreement with the Township.



37. §407 – Please include a general note on the PCSM plans referencing the as-built requirements of this section. The applicant shall provide both as-builts and certification of completion.
38. §503 – Please note that the applicant shall be required to execute a Land Development and Financial Security Agreement securing the timely installation and proper construction of all stormwater management facilities.

#### **SANITARY SEWER COMMENTS**

- 1.) Double sweep tees are to be used at all sanitary cleanout locations.
- 2.) Valve box construction details shall be added to plan.
- 3.) Quarterly water records from a similar convenience store shall be provided to evaluate required EDUs.

#### **TRAFFIC COMMENTS**

- 1.) The Township supports the finding of PennDOT’s preliminary traffic review findings, comment #3, related to the need for a turning lane at the proposed Grosstown Road entrance/driveway for north bound traffic.

#### **GENERAL COMMENTS**

- 1.) Paving details must specify the intended use/location.
- 2.) Utility trench bedding and backfill detail shall be added to the plan.
- 3.) Vehicle circulation plans appear to have been mislabeled for the type of delivery truck.
- 4.) Required reviews, approvals, permits include, but are not limited to, the following:
  - a. Township Codes Official
  - b. Township Fire Marshal
  - c. PennDOT
  - d. PaDEP Sewage Facilities Planning
  - e. Montgomery County Planning Commission
  - f. Montgomery County Conservation District
  - g. Montgomery County Health Department
  - h. Pottstown Borough Authority – for water service adequacy and design approval
  - i. U.S. Army Corps of Engineers & PA Dept. of Environmental Protection

Very truly yours,  
Van Cleef Engineering Associates, LLC



Gus Meyer  
Sr. Project Designer  
Van Cleef Engineering Associates, LLC

pc::     Jamie Ottaviano, Esquire, Township Solicitor (*via email*)  
         Joe Chrisman, Township Codes Official (*via email*)  
         Shawn Muntz, P.E., Applicant's Engineer (*via email; smuntz@bohlereng.com*)

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