



May 11, 2022

File No. 21-08084

Jason Bobst, Township Manager
West Norriton Township
1630 Marshall Street
Jeffersonville, PA 19403

Reference: T-Mobile Expansion Project
Preliminary/Final Lot Consolidation & Land Development Review
TMP Nos. 63-00-05335-00-2, 63-00-05338-00-8, & 63-00-05332-00-5

Dear Mr. Bobst:

Pursuant to your request, Gilmore & Associates, Inc. has reviewed the submitted plans for the above-referenced project and offers the following comments for consideration by West Norriton Township.

I. Submission

- A. Lot Consolidation and Land Development Plans for T-Mobile, prepared by Bercek and Associates, dated March 21, 2022, consisting of seven (7) sheets.
- B. Underdrain Design Plan for Montgomery Avenue, dated January 12, 2022, as prepared by Bercek and Associates, Inc.
- C. Post Construction Stormwater Management Report, prepared by Bercek & Associates, dated January 26, 2022.
- D. Waiver Request Letter, as prepared by Bercek & Associates, dated March 28, 2022.

II. General Information

The Applicant proposes the lot consolidation and land development located within the LC&I Limited Commercial and Industrial Zoning District. The subject property is approximately 1.8 acres and currently contains a 29,845 square foot industrial building and small parking lot with two access points from S. Montgomery Avenue.

The Applicant proposes two phases for the above referenced project. Only Phase 1 has been submitted at this time. Phase 1 proposes to consolidate two (2) parcels with the subject property to create a new lot size of approximately 3.3 acres. Upon consolidation of the properties, the Applicant proposes to demolish the existing buildings on Lots 2 and 3, to construct a 3,250 square foot building addition to the existing industrial building. Additional improvements include the relocation of the southern access drive, tree removal, site grading and a proposed underground stormwater facility to control the runoff from both Phases.

Phase 2 proposes to consolidate the last parcel in this location, TMP 63-00-03628-00-8, to the new property and demolish the existing dwelling. Upon demolition of the building, the plans propose to construct a large building addition, relocated access drives and parking facilities and site grading improvements throughout the property.

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III. Review Comments

A. Zoning Ordinance

We have identified the following issues with the proposed plan regarding the requirements and provisions of the current West Norriton Township Zoning Ordinance:

1. §27-1003 – Every use requiring power shall be so operated that the service lines, substation and other facilities shall conform to the highest safety requirements known. Substations and other facilities shall be so constructed and installed as to be an integral part of the architectural features of the plant and, if visible from abutting resident properties, shall be concealed by coniferous planting where possible. We note that the Applicant has requested a deferral from the planting requirements until phase 2, however, we recommend the Board of Commissioners determine whether plantings and/or alternate screenings methods should be installed around the proposed generators to screen from the residential properties across Montgomery Avenue.

B. Waiver and Deferrals Requested

The Board of Commissioners may grant modification (waivers) of one or more provisions of this ordinance provided the Applicant proves undue hardship. All waivers shall be formally requested from the Township and shall be in writing and accompany and be part of the application for development. The Record Plan should list any waivers, applicable section numbers, and the date granted as applicable, including any conditions.

The following waivers have been requested:

1. §21-101 – Waiver to permit a driveway width of 20 feet in lieu of the maximum allowable of 18 feet.
2. §22-602 – A waiver is requested to allow for the combined Preliminary and Final Plan submission and approval.

Additionally, the following deferrals are requested until the submission of phase 2 of the project:

3. §22-505.1.A – A deferral is requested from providing the required sidewalks along existing streets.
4. §22-505.2.A – A deferral is requested from providing the required curbs along existing streets.
5. §22-507.3.E – A deferral is requested from providing the required landscaping until the proposed improvements of Phase 2.
6. §22-507.3.F – A deferral is requested from providing the required buffer plantings until the proposed improvements of Phase 2.
7. §22-515 – A deferral is requested from providing the required shade trees along the frontage of Montgomery Avenue.

C. Subdivision and Land Development Ordinance (SALDO)

We have identified the following issues with the proposed plan in regards to the requirements and provisions of the current West Norriton Township Subdivision and Land Development Ordinance:

1. §22-106 – We note that the plans propose a limit of disturbance of approximately 1.7 acres. As such, the Applicant will be required to obtain an NPDES permit from the PADEP. Any correspondence with DEP shall be forwarded to our office.

2. §22-106.3 – All grading shall provide proper drainage away from buildings and dispose of it without ponding. It appears that the grading in the area of the proposed basin and generators will direct runoff toward the existing house. The plans shall be revised modify the grading so that the runoff is not directed toward the existing building.
3. §22-403 – The Applicant is responsible for any other required approvals, permits, etc. (i.e. MCPC, MCCD, PADEP, PADOT, Fire Marshal, Township Traffic Engineer, etc.) as applicable. Copies of these permits and approvals should be submitted to the Township.
4. §22-502 – The Board of Commissioners may grant waivers or deferrals of one or more provisions of this ordinance provided the Applicant proves undue hardship. We note that several deferrals are requested until the submission of Phase 2. In the event that Phase 2 is not submitted or delayed for a certain amount of time, we defer to the Board of Commissioners and Solicitor to determine an appropriate amount of time to require the requested deferrals to be completed.
5. §22-504.4.K. – Parking lots with two-way access drives shall be a minimum of 25 feet in width. The Applicant shall clarify whether the proposed access driveway will be a one-way or two-way access. In the event the access will be two-way, then the plans shall be revised to provide a minimum width of 25 feet, or a waiver would be required.
6. §22-507.3.C – The trees proposed to be removed appear to have a caliper greater than 6 inches. We note that the Applicant has requested a deferral from landscaping, however, the plans shall be revised provide a table tracking the amount of caliper inches being removed so that the appropriate amount of replacement trees are installed when necessary.
7. §22-509.4 – We note that the proposed access drive encroaches onto the existing easement in the rear of the property. The Applicant shall submit a copy of the easement agreement to verify whether the access drive shall be relocated to be outside of the easement area.
8. §22-517.7.A – We defer to the Township Fire Marshal in regards to the placement of a fire hydrant on the frontage of the property.
9. §22-601 – The plans shall be revised to address the following general plan comments.
 - a. It appears that the tax map parcel number on the existing property to remain is missing a number and should be verified by the Applicant.
 - b. We note that the proposed fence along the frontage of Montgomery Avenue appears to stop after the proposed gate. The Applicant shall clarify whether the fence will extend to the new property line and the plans shall be revised accordingly.
 - c. The Applicant shall submit the legal description of the new lot for review and approval.
 - d. We note that the proposed underdrain design within Montgomery Avenue may conflict with other utilities, specifically the gas line in the same location. The Applicant shall verify the proposed design will not conflict with other utilities.
10. §22-602.2 – The certifications noted in this section of the ordinance should be added to the cover page. Additionally, the plans intended to be recorded shall be noted in the sheet index.
11. §22-1011 – As discussed at the Township Meeting on April 20, 2022, it is our understanding that the Township Traffic Engineer did not believe the proposed project warranted a Traffic Impact Study or any additional traffic improvements. This should be confirmed in writing prior to any decisions by the Board of Commissioners.

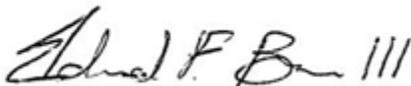
D. Stormwater Management Ordinance

We have identified the following issues with the proposed plan in regards to the requirements and provisions of the current West Norriton Township Stormwater Ordinance. Upon resubmission, additional stormwater comments may be forthcoming:

1. §26-131 – The Applicant shall address the following general plan issues with regard to the stormwater improvements:
 - a. We note that the proposed underground basin is designed to control the runoff from Phase 1 and Phase 2 of the project. At a minimum, the Applicant shall include the concept design of Phase 2 of the project to verify the proposed basin has the capacity to control the runoff from all new impervious surfaces of both Phases.
 - b. We note that the proposed basin will discharge into an existing stormwater pipe. we recommend that the existing stormwater pipe be televised to verify its condition.
 - c. Since the proposed basin is designed for Phases 1 and 2, a note shall be added to the Record Plans detailing the overall building area and impervious surface area that the proposed basin is designed for.
 - d. We note that the project proposes to remove and replace the existing stormwater pipe along the northeastern side and along the frontage of the property. The pipe replacement will bypass the proposed basin and will discharge into the existing stormwater inlet within Montgomery Avenue. We recommend the Applicant capture this drainage area within the proposed basin prior to discharging to the existing storm sewer system.
2. §26-131.2.E – The pre and post drainage area maps shall be added to the plans.
3. §26-131.2.B – The Applicant will be required to enter into a Stormwater Maintenance Agreement with the Township for the proposed stormwater improvements. The document will be prepared by the Township Solicitor and should be executed prior to the release of a grading permit for the project.

If you have any questions regarding the above, please contact this office.

Sincerely,



Edward Brown, P.E.
Project Manager
Gilmore & Associates, Inc.

EB/sl

cc: Michael Valyo, Director of Public Works and Planning
Sean P. Kilkenny, Esq., Kilkenny Law, LLC
John Walko, Esq., Kilkenny Law, LLC
Kathy Frederick, Assistant Township Secretary
Chris Fazio, P.E., Township Traffic Engineer
Erik Garton, P.E, Executive Vice President, Gilmore & Associates, Inc.
Thomas J. Gianiak, P.E., Gilmore & Associates, Inc.