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July 28, 2026  
Via: Hand Delivery

New Britain Township  
207 Park Avenue  
Chalfont, PA 18914

Attention: Doreen Curtin

Re: Preliminary Plan Review #1  
Walnut Street & 56 Walnut Street (TMP Nos. 26-001-099;  
26-001-099-001; 26-001-099-002 and 26-001-099-003)  
New Britain Township, Bucks County  
Bohler Project No. PAC250095.00

Dear Doreen:

On behalf of HCI DP Land Acquisition LLC ("Hanover"), the equitable owner of the above-referenced parcels, we submit the enclosed Preliminary Land Development application including the following:

- Nine (9) copies of Full-size Preliminary Land Development Plans, dated 7/28/2026.
- Five (5) copies of 11x17 size Preliminary Land Development Plans, dated 7/28/2026.
- Two (2) copies of the Post-Construction Stormwater Management Report, dated 7/28/2026.
- Two (2) copies of the Erosion and Sediment Control Report, dated 7/28/2026.
- Two (2) copies of Community Impact Analysis, dated 7/28/2026
- Two (2) copies of Environmental Impact Analysis, dated 7/28/2026
- Two (2) copies of Arboricultural Summary Judgment, dated 12/2/2025
- Two (2) copies of the Transportation Impact Study, dated 7/28/2026
- Two (2) copies of the Truck Turning Plans, dated 7/28/2026
- Two (2) copies of the County Line Road and Walnut Street Intersection Exhibit, dated 7/28/2026
- Two (2) copies of the Riparian Buffer Memorandum, dated 2/10/2026
- One (1) copy of the *Waiver Request Letter*, dated 7/28/2026.
- Three (3) copies of the *Sewer Planning Module Exemption Package*, dated 7/28/2026

**The following are our responses to comments found in the Preliminary Plan Review #1 letter, prepared by Gilmore & Associates, Inc, dated 6/16/26:**

IV. Review Comments

A. Zoning Ordinance

1. §27-305.L.L2 – A non-residential, accessory L2 Use Outside Storage or Display is permitted by Conditional Use. The L2 Accessory Use is defined as the keeping, in an unenclosed area, of any goods, junk, material, merchandise, or vehicles in the same place...for more than 24 hours. The trailer parking areas designated for each warehouse are considered an accessory L2 Use Outside Storage and require approval of a Conditional Use for each building.

**Response: The truck trailer parking areas are no different than vehicular (non-truck) parking spaces on the site and are not an “outside storage or display” (L2) accessory use. The L2 Accessory Use when applied to “outdoor storage” of vehicles refers to a vehicle storage lot as part of an automobile sales (J2) or truck terminal (K6) uses and not truck trailer parking associated with a permitted wholesale business, wholesale storage and warehousing (K3). See, Section 27-305.L.2.b.4.(c).**

2. §27-1802.a & §27-2110.a – No use in the IO Industrial/Office District shall exceed 35 feet in height. The Zoning Table notes a maximum building height of 42 feet and the Cover Sheet notes that a variance is requested from the maximum building height of 35 feet. We note that the Applicant’s request for a variance to allow a building height of 42 feet was denied by the Zoning Hearing Board on April 30, 2026, and appealed by the Applicant on May 29, 2026.

**Response: Acknowledged. The zoning table has been revised to list a maximum building height of 35 feet with an asterisk providing for an increase in building height to 42 feet should the variance be approved on appeal. Please refer to Plan Sheet C-300.**

3. §27-1802.b – The plans shall confirm that the layout complies with the maximum building coverage ratio of 50% and the maximum impervious coverage ratio of 65% based on the Ratio Base Site Area.

**Response: Calculations have been added to Plan Sheet C-300.**

4. §27-1900.c – The Applicant shall comply with our previous review of the Flood Study dated November 20, 2025, which is attached for reference.

**Response: Please see the separate responses to the referenced letter below.**

5. §27-1904.a.2 & §27-1906.b.2.(a) – Any areas subject to flooding and as last updated in the Websoil Survey are included in the Floodplain Overlay District. Floodplain soils, including Bowmansville-Knauers silt loam (Bo) and Buckingham silt loam (BwB) are included in the Floodplain Overlay District and shall be shown on a plan along with the floodplain. The Floodplain Overlay District shall also be identified on the plan.

**Response: The floodplain overlay district has been added to include floodplain soils in addition to the floodplain. Please refer to plan sheets C-200.**

6. §27-1904.a.2 – Within any portion of the Floodplain Overlay District not within the floodway, any development, new construction, fill, use, or activity shall be prohibited unless it is demonstrated that the cumulative effect of the proposed construction, development, or activity would not, together with all other existing and anticipated development, increase the Base Flood Elevation (BFE) at any point. Additional flood analysis shall be provided to demonstrate any improvements within the Floodplain Overlay District will not result in an increase to the BFE.

**Response: Grading and stormwater outfalls have been updated so that they no longer encroach into the Floodplain Overlay District. The study previously provided for fill within the Neshaminy Creek floodplain addressed the BFE for the encroachment associated with building 2. The post construction stormwater management report included with this submission addresses the watercourse crossing associated with the access to building 3. Once the extent of Walnut Street widening has been reviewed and approved by the Township, and the extent of fill within the**

**overlay district is better understood, an analysis for the downstream end of the culvert under Walnut Street will be prepared and submitted to the Township.**

7. §27-1904.d – No new construction or development shall be allowed within the identified floodplain area unless a permit is obtained from the DEP.

**Response: Acknowledged. Any required DEP permit or approval will be obtained as is needed.**

8. §27-1904.j – No new building or structure or any portion thereof shall be erected within the Floodplain Overlay District unless permitted as a special exception by the Zoning Hearing Board. A structure is defined as “Any man-made object having an ascertainable stationary location on or in land or water, whether or not affixed to the land.” A special exception is required for all proposed structures within the Floodplain Overlay District.

**Response: A Special Exception was processed for the rear area of Building 2 and is on appeal. To the extent one is required, a separate Special Exception application will be submitted for impacts related to the Walnut Street improvements.**

9. §27-1904.m.4 – Walls are prohibited in the Floodplain Overlay District.

**Response: The FEMA MAP will be revised following construction of the project which will result in changing the Flood Overlay District such that the wall northeast of building 2 will not reside within the district.**

10. §27-1904.o.1 – No encroachment, alteration, or improvement of any kind shall be made to any watercourse unless it can be shown through hydrologic and hydraulic engineering studies and analyses that the activity will not reduce, change, or impede the flood-carrying capacity of the watercourse in any way. The previously submitted Flood Study considered the proposed retaining wall at Building 2. The Flood Study shall be modified to demonstrate all proposed improvements within the Floodplain Overlay District will not reduce, change, or impede the flood-carrying capacity of the watercourse in any way. A permit is required from DEP for any watercourse encroachments and FEMA and DCED shall be notified.

**Response: Grading and stormwater outfalls have been updated so that they no longer encroach into the Floodplain Overlay District. The study previously provided is specific to the floodplain of the West Branch of Neshaminy Creek. There are no other proposed improvements within the floodplain for the West Branch of Neshaminy Creek, so that study will not address other activities within the overlay district. The post construction stormwater management report included with this submission addresses the watercourse crossing associated with the access to building 3. Once the extent of Walnut Street widening has been reviewed and approved by the Township, and the extent of fill within the overlay district is better understood, an analysis for the downstream end of the culvert under Walnut Street will be prepared and submitted to the Township.**

11. §27-1904.o.2 – No encroachment, alteration, or improvement of any kind shall be made to any watercourse until all required permits or approvals have been obtained from the DEP.

**Response: Acknowledged. Any required DEP permit or approval will be obtained as is needed.**

12. §27-1904.g – Fill may be placed within the Floodplain Overlay District only when allowed as a special exception by the Zoning Hearing Board. We note that the Applicant's request for a special exception to allow the placement of fill in the Floodplain Overlay District behind Building 2 was denied by the Zoning Hearing Board on April 30, 2026, and appealed by the Applicant on May 29, 2026.

**Response: Acknowledged. The applicant has appealed the special exception denial to Court which remains pending.**

13. §27-1906.b.2.(f) – The appropriate component of the DEP’s Planning Module for Land Development shall be included with a Zoning and/or Building application.

**Response: A Planning Module Exemption has been updated and is included with this submission for Township signatures.**

14. §27-2401.c – Restrictions must be placed in the deed or an easement recorded for each site that has natural resource protection areas within its boundaries. The means of natural resource protection shall be clarified.

**Response: A conservation easement subject to the Township’s review and approval can be recorded against the property to conserve natural resources. The conservation easement will be drafted as part of the final land development approvals process.**

15. §27-2802.c – All plant materials for buffers shall be from the Subdivision and Land Development Ordinance, Appendix D, Required Plant Material List.

**Response: Specified Plant Materials are based on Appendix D. Please see Plan Sheets L-101 through L-104.**

16. §27-2803.e – The required buffer yard easement shall be shown on the Record Plan along Schoolhouse Road to permanently protect the proposed buffer yard.

**Response: The buffer yard easement has been added to Plan Sheet C-507.**

17. §27-2904.e.2.(d) – Detailed spot elevations shall be shown to verify the slope of accessible parking spaces do not exceed 2% in any direction.

**Response: A spot elevation plan for ADA parking has been added. Please see Plan Sheets C-405 through C-409.**

18. §27-2906.c – Fire lanes shall be provided where required by state or federal regulations or other local ordinances. Per correspondence from the Fire Marshal dated June 4, 2026, secondary or emergency access shall be provided for Buildings 2 and 3. Fire lanes are defined as unobstructed paved or improved surface areas clearly defined by pavement markings and signs, at least 12 feet wide and designed to provide access for fire-fighting equipment.

**Response: Fire lanes have been designated on Plan Sheets C-301 through C-303.**

19. Appendix A Environmental Impact Statement Report (EIS Report) – We offer the following comments regarding the submitted “Environmental Impact Analysis” prepared by EH Creative Services, LLC, dated April 18, 2026:

- a. §27-Attachment b. – An updated EIS Report shall accompany and form a part of a final land development or subdivision plan.

**Response: The EIA has been revised based on the current preliminary land-development plans included in Exhibit 1 and will be updated as necessary with the final plan.**

- b. §27-Attachment c. – The EIS Report shall include text, tables, maps and analyses for the purpose of describing the project site, proposed use(s), environmental characteristics and the environmental effect of the proposal. The report does not include much of the information and notes “Where a topic has already been evaluated in a technical submission prepared by another

consultant, this report identifies that material and incorporates it by reference.” We recommend that following information be incorporated into the EIS Report:

1. §27-Attachment c.1. – The required projections for working population and visitor population for the proposed use in the overview.

**Response: The Overview now provides an estimated buildout employment population and addresses visitors, service personnel and construction workers. More detailed projections are not available because tenants and operating schedules have not been established.**

2. §27-Attachment c.3. – A location map in accordance with this section.

**Response: A location map meeting the requirements of this section will be included as an exhibit to the revised report. The map will depict the tract, surrounding roadway network, adjoining properties, applicable zoning and municipal boundaries, and the other geographic information required by Appendix A at a legible scale.**

3. §27-Attachment c.5.(a.) – The Overall Site Plan in accordance with this section.

**Response: The required location information and mapping are provided in the Location section and Exhibit 1.**

4. §27-Attachment c.6 – A physical resources inventory in accordance with this section including a narrative summarizing the Geotechnical Engineering report, Phase 1 Environmental Site Assessment, and soils map. In addition, a plan provided with the mapped geology, topography, soils, hydrology and the like.

**Response: The Physical Resources Inventory has been expanded to address the tract’s topography, soils, geology, surface and subsurface conditions, wetlands, floodplain, drainage and environmental conditions, with supporting materials included in the referenced exhibits.**

5. §27-Attachment c.7 – An inventory of the vegetation species and wildlife species associated with the natural environment of the tract and the narrative descriptions.

**Response: The Biological Inventory has been expanded by habitat type and addresses representative vegetation and wildlife, native and invasive species, specimen trees, habitat connectivity, protected-species coordination, field-investigation dates and study limitations.**

6. §27-Attachment c.8 – Identification of the current and past land use of the tract and narrative and mapping of existing encumbrances.

**Response: The Land Use and Existing Features inventories now address current and historic land uses, land-cover conditions, rights-of-way, easements and other identified encumbrances, with supporting information in Exhibits 1, 8 and 13.**

7. §27-Attachment c.9 – The required surface water inventory including information, summaries of calculations, mapping, and wetlands delineation.

**Response: A separate Surface Water Inventory has been added addressing streams, wetlands, floodplain and floodway areas, drainage conditions, runoff and the proposed stormwater-management measures.**

8. §27-Attachment c.10 – A subsurface water inventory in accordance with this section including narrative summaries of the Geotechnical Engineering Report, Phase 1 Environmental Site Assessment, and Phase II Limited Investigation.

**Response: A separate Subsurface Water Inventory has been added addressing groundwater conditions, the underlying aquifer, groundwater movement, infiltration limitations, recharge measures and the off-site groundwater condition.**

9. §27-Attachment c.11 – More specific existing features details as to the number of structures, type of crops, and location and types of existing utilities on the site.

**Response: Response: The Existing Features Inventory has been expanded to identify the principal structures, agricultural areas, natural features, roads, drainage facilities and utilities. Additional surveyed detail is provided in Exhibits 1 and 13.**

10. §27-Attachment c.12 – The Overall Existing Conditions/ Demolition Plan incorporated into the report identifying the noted resources.

**Response: The current Overall Existing Conditions/Demolition Plan is included in Exhibit 1 and identifies the existing natural and man-made features and their proposed disposition.**

11. §27-Attachment c.14 – Additional information provided in the Community Needs Inventory narrative regarding the current extent and capacity of local emergency services and their ability to serve the demands of the future users of the proposed site.

**Response: The Community Needs Inventory has been expanded to identify the applicable emergency and community-service providers, summarize publicly available capacity information and evaluate the project's anticipated service demands.**

12. §27-Attachment c.15 – The Will Serve letters from the Water and Sewer Authorities, and PECO (electric and gas), Verizon, and any other existing or proposed utility correspondence in the Utility Needs Inventory.

**Response: The Utility Needs Inventory has been expanded, and the available water, sewer, electric, natural-gas and communications correspondence is included in Exhibits 14 through 18.**

13. §27-Attachment c.16 – The Transportation System Inventory narrative expanded to include a summary of the results of the Traffic Impact Study, a summary of the proposed truck route options and offsite transportation improvements, the latest dates of the referenced documentation added to the narrative as applicable, and potential for future connection between Stewart Lane and Independence Lane discussed.



**Response: The Transportation System Inventory has been expanded to summarize projected traffic, intersection operations, truck routing and proposed improvements based on the updated Transportation Impact Study included as Exhibit 4.**

14. §27-Attachment c.17 – An expanded Adverse Impacts narrative to include specific information on the water quality and quantity, air quality, identification of significant plant or wildlife systems and their impact, before and after renderings of the site, impact to agricultural soils and crops, floodplain and floodplain soils, increase in impervious surfaces and stormwater demand, natural resource disturbance, etc. In addition, the narrative revised to indicate whether each of the potential adverse impacts will have primary or secondary implications.

**Response: The Adverse Impacts section has been expanded to classify and evaluate the project's principal beneficial and adverse, short- and long-term, and direct and indirect impacts.**

15. §27-Attachment c.18 – Exhibits or diagrams which will depict the type of remedial, protective and mitigative measures described in the Mitigation Measures narrative including measures proposed as required through existing procedures and standards.

**Response: The Mitigation Measures section has been reorganized to identify regulatory and project-specific mitigation measures and cross-reference the applicable plans and supporting exhibits**

16. §27-Attachment c.19 – The Irreversible Impacts narrative expanded to address the irreversible impacts of loss of prime farmland and farmland of statewide significance.

**Response: The Irreversible Impacts section has been expanded to address the permanent conversion of agricultural soils, woodland and other pervious land, disturbance of natural resources, removal of existing structures and long-term changes in visual and community character.**

## B. Subdivision and Land Development Ordinance Waivers

The following waivers from the Subdivision and Land Development Ordinance have been formally requested by the Applicant in the Waiver Request Letter dated April 6, 2026. Any waivers granted from public improvements are subject to Township Resolution 2007-12:

1. §22-705.3.C – From the requirement to improve the existing street abutting a subdivision or land development to the Township standards for ultimate right-of-way and cartway widths for County Line Road and Schoolhouse Road.
  - a. County Line Road (S.R. 2038) is an arterial street which requires a cartway width of 52 feet where the existing cartway is 45 to 52 feet wide along the property frontage. County Line Road is a state road owned by PennDOT and any improvements are subject to PennDOT approval. We recommend deferring a decision on this waiver request until Final Plan Submission in order for the Township to review and discuss PennDOT's requirements for County Line Road, its intersection with Walnut Street (T-402), and any offsite improvements.

**Response: The plans have been updated to show the widening on County Line Road and a waiver has been requested.**

- b. Schoolhouse Road (T-332) is a major collector street which requires a minimum half-width cartway of 24 feet with curb and sidewalk along the property frontage. The road is required to be

widened approximately 14 feet. The Applicant has provided a Phase 1 Northern Red-bellied Cooter Habitat (NRBC) Assessment indicating potentially suitable NRBC aquatic habitat in two areas onsite. One area is along Schoolhouse Road. In addition, a Clearance Letter from the Pennsylvania Fish and Boat Commission indicated that, based on the currently proposed design and layout, they do not foresee any adverse impacts to the NRBC from the proposed development. However, the Township Ordinance requires Schoolhouse Road to be widened. Before the Township Supervisors take any action on this waiver, we recommend that a Phase 2 Presence/Absence Survey be completed to prove whether the NRBC occupies the site. We note that if these species of turtles are observed in the area of road widening, a mitigation plan will be required and shall be coordinated with the Land Development plans.

**Response: The plans have been updated to show the widening on County Line Road and a waiver has been requested.**

2. §22-708.6.A – From the requirement that all off-street parking spaces be set back a minimum of twenty (20) feet from any side of any non-residential building to allow sufficient area for firefighting, sidewalk and foundation landscaping. The proposed parking spaces for Buildings 1, 2 and 3 are proposed 10 feet from the buildings.

**Response: Acknowledged.**

C. Subdivision and Land Development Ordinance Waivers

1. §22-502.1.B.(8) – The zoning classification(s), owner names and tax parcel numbers of all lands abutting the tract shall be provided on the Preliminary Plans.

**Response: Zoning classifications, owner names, and parcel numbers are indicated on the lot consolidation Plan Sheet C-207.**

2. §22-502.1.B.(9) – The tax parcels numbers, deed book and page numbers of all parcels being developed shall be provided on the Preliminary Plans.

**Response: The existing tax parcel numbers and deed references for parcels being developed are provided on Plan Sheet C-207.**

3. §22-502.1.B.(11) – Bearings and distances for all easements, including deed restricted areas such as, floodplain boundary, riparian buffers, wetland transitions areas or other covenants shall be provided on the Preliminary Plans.

**Response: Bearings and distances for easements have been added. Please refer to Easement Plan Sheet C-507.**

4. §22-502.1.B.(13) – Site capacity calculations, including net and gross acreage for all lots shall be provided on the Preliminary Plans. (Reference §27-2402)

**Response: Site capacity calculations were added to Plan Sheet C-300.**

5. §22-502.1.B.(16) – Architectural sketches are encouraged to be submitted showing elevation, perspective, building materials and colors. We recommend the Applicant formally present the architectural renderings to the Township Planning Commission and Board of Supervisors.

**Response: Acknowledged.**

6. §22-502.1.B.(20) – Plan notations regarding offers of dedication of public rights-of-way and improvements and plan notations for ownership and maintenance responsibilities of open space,



agricultural areas, easements, stormwater management facilities and utilities shall be provided on the Preliminary Plans.

**Response: Notes regarding offers of dedication has been added to plan sheet to Plan Sheet C-300. A note has also been added indicating that the property owner will be responsible for maintenance.**

7. §22-502.1.B.(21) – The Professional engineer's certification and Township Engineer's signature block shall be provided on a plan to be recorded.

**Response: The certification and signature blocks have been added to the cover page.**

8. §22-502.1.B.(23) – The total amount of impervious area accounted for in the stormwater design within each subdrainage area and bypass area shall be noted on the record plan.

**Response: Impervious area analyzed in the stormwater design has been summarized on the CN charts provided on PCSM Details Sheet C-821.**

9. §22-502.1.C.(2) – The source of the aerial photo used on the Aerial Plan shall be noted.

**Response: The source of the aerial map was added to Plan Sheet C-103.**

10. §22-502.1.C.(2) – The aerial photograph plan shall show the location and distance to the nearest park, stream, major intersection, public sidewalk, walking trail and other public amenities as directed by the Township. When these amenities are located further than 1,600 feet from the property boundary, corresponding notes shall be added to the plans stating this information.

**Response: Distances have been added to Plan Sheet C-103.**

11. §22-502.1.D. – Existing features within 100 feet of the tract boundary shall be shown on the Preliminary Plan.

**Response: Additional features outside of the site limits have been added to Sheets C-200 through C-204.**

12. §22-502.1.D.(4) – The location, pipe length, size and material of the existing water main at County Line Road shall be shown on the Preliminary Plans.

**Response: Additional water main information has been added to Plan Sheets C-201 through C-203.**

13. §22-502.1.D.(5) – The pipe length, size, material, slope, invert and rim elevations shall be shown for the existing sanitary sewer through the site shall be shown on the Preliminary Plans. The location of the sewer service for the existing dwelling shall also be shown.

**Response: Additional sewer system information has been added to Plan Sheets C-201 through C-203.**

14. §22-502.1.D.(6) – The pipe length, size, material, slope and invert and grate elevations of all existing storm sewer culverts and pipes on Walnut Street, County Line Road, Schoolhouse Road and any other existing storm sewer shall be shown on the Preliminary Plans.

**Response: Additional storm sewer information has been added to Plan Sheets C-201 through C-203.**

15. §22-502.1.E(1) – The preliminary plans shall include the following on the Grading and Utility Plans:

- a. Spot elevations along the proposed sidewalk along Walnut Street.

**Response: Spot elevations have been added along the Walnut Street sidewalk. Please refer to Plan Sheets C-401 through C-402.**

- b. The jagged contours across pavement and sidewalk revised to accurately represent the proposed grading for smooth surfaces.

**Response: Contours are further refined. Please see Plan Sheets C-401 through C-403.**

- c. Spot elevations provided at the center of the radius and corners of all parking lot islands to clarify the grading.

**Response: Spot elevations have been added to parking lot islands. Please refer to Plan Sheets C-401 through C-403.**

- d. Spot elevations provided at all building corners.

**Response: Spot elevations have been added at building corners. Please see Plan Sheets C-401 through C-403.**

- e. High point spot elevations provided between the proposed 285 contours along the access drive on the southwestern side of Building 2.

**Response: The high point has been specified on Plan Sheet C-401.**

- f. At the rear of Building 2, the slope along the curb from the BC 281.75 spot elevation to the BC 281.50 spot elevation revised to a minimum 0.5% slope.

**Response: The elevations have been revised to increase the pavement slope. Please refer to Plan Sheet C-401.**

- g. The slope along the curb from the BC 281.35 spot elevation to Inlets O-30 and O-40 at the rear of Building 2 revised to a minimum 0.5% slope.

**Response: The elevations have been revised to increase the pavement slope. Please refer to Plan Sheet C-401.**

- h. High point spot elevations provided between the “R” inlets along the northwestern side of Building 3.

**Response: High points have been specified on Plan Sheet C-403.**

- i. Top and bottom of wall elevations provided for the Lot 3 access road retaining wall.

**Response: Wall elevations have been added to Plan Sheets C-403 and C-404.**

- j. Fall protection provided along the wall for the Building 3 access road.

**Response: Fence is specified on the retaining wall detail. Please refer to Plan Sheet C-901.**

- k. Grading provided on the northern side of the Building 3 access road to direct runoff away from the wall.

**Response: Grading between curb and retaining wall has been revised to direct runoff away from the wall. Please refer to Plan Sheet C-404.**

16. §22-502.1.E.(5) – The material and slope of the proposed sanitary sewer lateral to the force main shall be shown on the Utility Plans. The force main material shall also be noted.

**Response: The material and slope of gravity sewer laterals have been added to Plan Sheets C-501 through C-503.**

17. §22-502.1.E.(8) – The pipe material proposed for the water and fire services shall be noted on the Utility Plans.

**Response: The materials for water services has been added to Plan Sheets C-501 through C-503.**

18. §22-502.1.I.(3) – Horizontal plan and profile for sanitary sewers, water mains and storm sewers, showing all required design information and elevations and profile of existing ground surface shall be provided on the Preliminary Plans.

**Response: Profiles for underground infrastructure have been included. Please refer to Plan Sheets C-601 through C-611.**

19. §22-502.1.I.(4) – Centerline profiles for all access drives from the parking area to the street intersection, showing , shall be provided on the Preliminary Plans.

**Response: Access drive profiles have been included. Please refer to Plan Sheets C-410.**

20. §22-502.1.I.(5) & §22-705.5 – Required and provided sight distance lines and measurements for each driveway shall be provided on the Preliminary Site and Landscaping Plans in accordance with PA Code Title 67, Publication 441, as amended.

**Response: Sight distance measurements have been indicated. Please refer to Plan Sheets C-301, C-302, L-101, and L-102.**

21. §22-502.1.J – The following construction details shall be added, replaced, or modified to be consistent with Township Standard details in the SALDO appendix E:

- a. Typical Roadway Widening Section Detail for Arterial, Collector, and Non-Residential Roads and/or Cross Section Detail

**Response: Typical sections have been added to Plan Sheet C-903.**

- b. Road Underdrain Detail

**Response: Underdrain detail has been added to Plan Sheet C-902.**

- c. Parking Space Striping Detail

**Response: Striping detail has been added to Plan Sheet C-901.**

- d. Pedestrian Crosswalk Detail

**Response: Crosswalk detail has been added to Plan Sheet C-902.**

- e. There are multiple details for internal pavement. The Standard Asphalt Pavement (Building 1, 2, and 3) detail shall be removed as the minimum specifications are provided on the Township Non-Residential and Multi Residential Driveways, Parking Areas and Loading Areas Paving Section Detail.

**Response: The paving section on Plan Sheet C-901 has been deleted. The Township section is provided on Plan Sheet C-904.**

- 22. §22-502.1.J.(1) – Details for the proposed retaining walls, guiderails, stop bar striping, gore striping, culverts and other proposed improvements shall be provided on the Preliminary Plans.

**Response: Additional details have been added to the plan set.**

- 23. §22-505 – The “Community Impact Analysis for Chalfont Industrial Park”, (CIA) prepared by EH Creative Services, LLC, dated April 18, 2026 does not include many elements required within the document but includes a list of “Plans and Reports reviewed and incorporated by Reference.” The CIA report shall be revised to include the following elements required by §22-505:

- a. §22-505.4.A.(1) – A description of the proposed project, including the proposed sizes of buildings and lots. The report, as submitted, does not include the sizes of each of the four existing lots, sizes for each of the three individual buildings, or a comprehensive description of the extent of alterations and improvements to the site.

**Response: Response: Section 22-505.4.A has been revised to identify the four existing parcels and the size of each proposed building in Tables A-1 and A-2, and to describe the proposed site alterations and improvements.**

- b. §22-505.4.A.(3) – A plan, drawn at a scale not exceeding one-inch equals 100 feet, shall be included with the Community Impact Assessment Report, which shows the information required by this section. The report, as submitted, does not include the required plan. The Overall Site Plan and Overall Existing Conditions /Demolition Plan shall be incorporated into the report.

**Response: The current Preliminary Subdivision and Land Development Plans, including the Overall Site Plan and Overall Existing Conditions/Demolition Plan, are incorporated as Exhibit 1 at the required scale.**

- c. §22-505.4.B – The report shall demonstrate compatibility of the proposed project with the New Britain Township Comprehensive Plan. The report indicates that the proposal is generally consistent with the Comprehensive Plan as it concentrates industrial development in an area identified for non-residential growth, relies on public infrastructure, and has been accompanied by technical studies necessary to avoid, minimize, and mitigate environmental and circulation concerns. The narrative shall discuss encroachments into the identified Floodplain Overlay District, natural resource disturbance, proposed use and truck restrictions, traffic impacts, emergency access, and required zoning variances.

**Response: T Section 22-505.4.B has been revised to address the floodplain, natural-resource disturbance, proposed use, truck restrictions, traffic impacts, emergency access and requested zoning relief.**

- d. §22-505.4.D – Physical resources such as topography and shall be described in a narrative and mapped at a scale not exceeding one-inch equals 100 feet. The Overall Existing Conditions /Demolition Plan shall be incorporated into the report.

**Response: Section 22-505.4.D now provides the required physical-resources narrative, and the applicable existing-conditions, slope, riparian-buffer and floodplain plans are incorporated in Exhibit 1.**

- e. §22-505.4.D.(1) – The geological characteristics of the tract, including the location and boundaries of rock formations, faults and fractures. The Geotechnical Engineering Report prepared by Geo-Technology Associates, Inc. dated August 28, 2025, last revised November 14, 2025, shall be submitted and incorporated into the report.

**Response: The geologic discussion has been expanded, and the Geotechnical Engineering Report dated August 28, 2025, revised November 14, 2025, is incorporated as Exhibit 6.**

- f. §22-505.4.D.(3) – The existing and proposed surface runoff from the tract shall be calculated, including the potential development of the remainder of the watershed. The flow, depth, capacity and quality of the receiving waters shall be investigated and need for any on-site streambank stabilization evaluated. The report, as submitted, does not include the required information. The information shall be provided and the Overall Riparian Buffer and Slope Disturbance Plan showing the floodplain shall be incorporated into the report. While the report indicates that the “Proposed Industrial Development Flood Study” prepared by Bohler Engineering concludes that the layout has been organized to avoid encroachment within the Special Flood Hazard Area to the greatest extent feasible and shows that the flood elevations will not increase, we note that it appears that the proposal can be revised to avoid encroachments within the floodplain.

**Response: Section 22-505.4.D now summarizes the runoff, receiving-water, floodplain and streambank-stabilization analyses. The supporting plans and calculations are incorporated in Exhibits 1 through 3.**

- g. §22-505.4.D.(4) –The report, as submitted, does not include the required information for groundwater resources, including aquifers and aquifer recharge areas, depth to groundwater and water supply capabilities. The referenced Phase 1 Environmental Site Assessment prepared by The Vertex Companies, LLC shall be provided for review.

**Response: Section 22-505.4.D now addresses the aquifer, observed groundwater depths, recharge and infiltration conditions, and public water service. The Phase I Environmental Site Assessment is incorporated as Exhibit 8.**

- h. §22-505.4.D.(5) – The Community Impact Assessment Report references a Phase I and Phase II environmental site assessment completed for the site. These assessments shall be submitted to the Township for review.

**Response: The Phase I and Phase II environmental site assessments are incorporated as Exhibits 8 and 9 and summarized in Section 22-505.4.D.**

- i. §22-505.4.E – Biological Resources Inventory. Biological resources shall be characterized in a narrative description and mapped at a scale not exceeding 1" = 100'. The report, as submitted, does not include the required information. The Overall Existing Conditions / Demolition Plan shall be incorporated into the report. The referenced Wetlands Report prepared by Valley Environmental Services Inc. shall be incorporated into the report.

**Response: Section 22-505.4.E now provides the biological-resources narrative and mapping references. The Wetland Report is incorporated as Exhibit 7, with current resource mapping in Exhibit 1.**

- j. §22-505.4.E(1) – The report, as submitted, does not include the required information for the existing vegetation on the tract, including the locations and boundaries of woodlands and forest areas, specimen trees, shrubs and other plants and ground cover. The Overall Existing Conditions / Demolition Plan shall be incorporated into the report and the narrative revised to include an inventory of native and invasive flora.

**Response: The vegetation inventory has been expanded to identify representative flora. Woodland areas, specimen trees and vegetation disturbance are shown in Exhibit 1.**

- k. §22-505.4.E(2) – The existing wildlife on the tract, including their species and habitats. This map may draw upon vegetation, hydrology and soil maps in order to express habitat characteristics associated with terrestrial and aquatic wildlife on the tract. The report, as submitted, does not include the required information. A plan including the required information shall be incorporated into the report and the narrative shall be revised to include an inventory of native and invasive fauna.

**Response: The wildlife and habitat inventory has been expanded using the habitat assessment, PNDI review and agency correspondence in Exhibits 10 through 12, together with the resource mapping in Exhibit 1.**

- l. §22-505.4.F – Land Use and Existing Features Inventory. An identification of the land uses and existing features on the tract and mapped at a scale not exceeding 1" = 100'. The report, as submitted, does not include the required information. The Overall Existing Conditions / Demolition Plan shall be incorporated into the report.

**Response: Section 22-505.4.F now identifies the tract's land uses and existing natural and man-made features, with the required mapping incorporated in Exhibit 1.**

- m. §22-505.4.F(1) – The land cover characteristics of the tract, including paved or other surfaces, woodland, cultivated areas, pasture, lawns, landscaped areas, etc. The report, as submitted, does not include the required information. An aerial map showing the property boundary shall be incorporated into the report at a scale of 1" = 100'.

**Response: The revised narrative describes the tract's land-cover characteristics, and the Aerial Plan showing the property boundary is incorporated in Exhibit 1.**

- n. §22-505.4.F(2) – Any encumbrances on the tract, such as easements, rights-of-way or deed restrictions. The report, as submitted, does not include the required information. The ALTA/NSPS Land Title Survey shall be incorporated into the report.

**Response: The revised CIA identifies the principal easements, rights-of-way and other encumbrances, and the ALTA/NSPS Land Title Survey is incorporated as Exhibit 13.**

- o. §22-505.4.F(3) – Any existing features not part of the natural environment, including principal and accessory buildings, roads, driveways, utility lines and sewer and water facilities. The report, as submitted, does not include the required information. The Overall Existing Conditions / Demolition Plan shall be incorporated into the report.



**Response: The revised CIA identifies the existing buildings, roads, driveways and utility facilities. Their locations and proposed disposition are shown in Exhibits 1 and 13.**

- p. §22-505.4.G – Historic Resources Inventory. An identification of the man-made features that are 50 or more years old, both on the tract and on adjacent properties. The report indicates that the PA State Historic Preservation Office database identifies the property as the Abraham Krout Farm which includes a structure(s) exceeding 150 years of age, however, is currently listed as “Not Eligible” for the National Register of Historic Places.” The Overall Existing Conditions / Demolition Plan shall be incorporated into the report and shall identify these resources.

**Response: Section 22-505.4.G now identifies the Abraham Krout Farm and other resources exceeding 50 years of age. The existing improvements are shown in Exhibit 1 and supported by Exhibit 8.**

- q. §22-505.4.H – Community Needs Inventory. The community needs assessment shall indicate in narrative form the following types of services: schools, parks, recreation areas, libraries, hospitals and other health care facilities, fire protection, police protection, ambulance and rescue services. The assessment will indicate the demand for these facilities and services and the ability of the existing facilities and services to meet the demand. Additional information shall be provided in the narrative regarding the current extent and capacity of local emergency services and their ability to serve the demands of the future users of the proposed site.

**Response: Section 22-505.4.H has been expanded to address the existing community-service providers, anticipated project demand and the ability of existing services to serve the proposed nonresidential development..**

- r. §22-505.4.I – Utility Needs Inventory. An identification of the utility needs associated with the users of the proposed land development. The Will Serve letters from the Water and Sewer Authorities, and PECO (electric and gas), Verizon, and any other existing or proposed utility correspondence shall be incorporated into the report.

**Response: Section 22-505.4.I now summarizes the project's utility needs, and the sewer, water, PECO and Verizon correspondence is incorporated as Exhibits 14 through 18.**

- s. §22-505.4.J – Transportation System Inventory. An identification of the relationship of the transportation and circulation system needs of the proposed project to the existing street or highway network. A discussion of this relationship shall be in narrative form and shall indicate factors such as methods to be used for traffic control within the tract and at points of ingress to and egress from it and expected traffic volumes generated from the project, including their relationship to existing traffic volumes on existing streets for both peak hour and non-peak-hour traffic conditions. In addition, there shall be a discussion of the physical condition of existing streets that will service the proposed project and what improvements are proposed to remedy any physical deficiencies. The report, as submitted, does not include the required information. In addition to referencing the project Traffic Impact Study, associated truck turning plans, and transportation correspondence, we recommend the Report include a summary of the results of the Traffic Impact Study and the truck turning and offsite transportation improvement plans. The report shall also discuss the potential connection between Stewart Lane and Independence Lane.

**Response: Section 22-505.4.J now summarizes the traffic volumes, roadway conditions, truck routing, turning movements and proposed improvements. It also confirms that no Stewart Lane/Independence Lane connection is proposed.**

- t. §22-505.4.K – Demographics. An identification of the demographic characteristics related to the proposed subdivision and/or land development. The characteristics shall be presented in narrative form, with related tables and shall show the projected number of future users of the project, and their social and economic characteristics. Such information shall be presented for build-out condition and during construction. The report, as submitted, does not include the required information, specifically with respect to a table of a typical or prospective staffing breakdown of the future users of the site for each building.

**Response: Section 22-505.4.K now includes employee projections by building and addresses both buildout and construction-period employment.**

- u. §22-505.4.L – Fiscal Impact. An identification of the economic and fiscal characteristics associated with the proposed subdivision and/or land development. The characteristics shall be presented in narrative form, with related tables and shall show the fiscal impact to the costs and revenues of the Township and the Central Bucks School District. Such information shall be presented for build-out condition and during construction. The analysis shall follow the methods presented in the most recent works by the Center for Urban Policy Research of Rutgers University. The report, as submitted, does not include the required information, specifically with respect to the following:

1. No narrative was submitted.

**Response: Section 22-505.4.L now includes a narrative explanation of the Rutgers fiscal-impact methodology, assumptions, revenues, costs and conclusions.**

2. No calculation was submitted to substantiate the assumed number of 555 employees.

**Response: The revised CIA substantiates the 555-employee estimate by applying one employee per 1,000 square feet and providing supporting regional benchmarks.**

3. No calculation was submitted to substantiate the assumed Earned Income Tax (EIT) Revenue of \$13,524 to both the New Britain Township and Central Bucks School District. The report shall be revised to include the methodology used to determine total employees, anticipated earned income, anticipated location of residence of employees, percentage and number of employees anticipated to reside in New Britain Township, and percentage of EIT to go to New Britain Township.

**Response: The EIT methodology has been revised to identify the employee, wage, residency and tax-rate assumptions and the resulting revenues to the Township and School District.**

4. There appears to be an error in the calculation for the Local Services Tax in the Fiscal Impact Summary Table.

**Response: Response: The Local Services Tax calculation in Table L-2 has been corrected to \$28,860.**

5. The Fiscal Impact Summary Table appears to have an error with respect to the rate of Earned Income Tax for New Britain Township. The PA Department of Community & Economic Development lists the EIT rate for residents of New Britain Township at 0.625% and not the .5% noted in the table.

**Response: The Township EIT rate has been corrected to 0.625 percent**

6. No calculation was submitted to substantiate the anticipated “estimated” \$48,868 annual costs to New Britain Township annually, attributed to the proposed development.

**Response: The prior cost estimate has been replaced with a detailed marginal-cost analysis based on the Township's 2026 budget. The revised annual Township service cost is \$51,027, as shown in Table L-1.**

- v. §22-505.4.M – Compliance with Nuisance Standards. An identification of the existing, construction related and future (after buildout) compliance with provisions of the Township Zoning Ordinance [Chapter 27], regulating noise, smoke and storage and waste disposal. The referenced Hanover Chalfont Pre-Construction Noise Study shall be finalized and incorporated into the report for review.

**Response: Section 22-505.4.M has been revised to address existing, construction and post-buildout nuisance conditions. The issued March 27, 2026 noise study is incorporated as Exhibit 19.**

- w. §22-505.4.N – Analysis of Impacts. The implications of the proposed subdivision and/or land development in terms of the type of beneficial or adverse impacts which may result and whether these impacts are short term or long term. In indicating such effects, the analysis shall state whether the beneficial or adverse impacts will have a direct or indirect influence on a particular resource, condition or characteristic. While the report contains a general narrative, we recommend the report be expanded upon to include specific information on the water quality and quantity, air quality, identification of significant plant or wildlife systems and their impact, before and after renderings of the site, impact to agricultural soils and crops, floodplain and floodplain soils, increase in impervious surfaces and stormwater demand, natural resource destruction, etc. In addition, the narrative shall indicate whether each of the potential adverse impacts will have primary or secondary implications.

**Response: Section 22-505.4.N now includes an impact matrix addressing the identified resources and classifying each impact by benefit or adversity, duration, and primary or secondary implication.**

- x. §22-505.4.O – Mitigation Measures. An identification of measures to mitigate any adverse impacts. The applicant shall submit exhibits or diagrams that will depict the type of remedial, protective or mitigative measures described in narrative form. The measures shall include the following:

1. §22-505.4.O.(1) – Mitigation measures that pertain to existing procedures and standards related to current requirements of the state, county and/or Township, such as sedimentation control, stormwater runoff control, water quality control and air quality control. The report, as submitted, does not include the required information or exhibits.

**Response: Table O-1 now identifies the applicable regulatory mitigation measures, with supporting plans and technical materials incorporated in the cited exhibits.**

2. §22-505.4.O.(2) – Mitigation measures related to impacts that may be unique to a specific project, such as revegetation, screening, fencing, emission control, traffic improvements, traffic control, noise control, relation of people and/or businesses and

land acquisition. The report, as submitted, does not include the required information or exhibits.

**Response: Table O-2 now identifies the project-specific mitigation measures, including resource protection, landscaping, stormwater, traffic, noise, screening and emergency-access measures.**

- y. §22-505.4.P – Irreversible Impacts. An identification of any irreversible environmental or community changes that would be directly or indirectly caused by the proposed subdivision and/or land development. The report, as submitted, does not include the required information, specifically with respect to the impact of the loss of soils classified as “prime farmland” and “farmland of statewide significance” by the US Department of Agriculture.

**Response: Section 22-505.4.P now expressly addresses the irreversible loss of prime farmland and farmland of statewide importance, together with other permanent environmental and community changes.**

- z. The conclusion states that the development is consistent with the zoning district, compatible with the surrounding corridor setting, responsive to environmental constraints, and adequately served by public infrastructure. However, we note the following inconsistencies with this statement:

- The project is not compliant with the zoning ordinance regarding floodplain regulations.

**Response: The conclusion has been revised to acknowledge the floodplain issues and to condition its planning opinion upon the requested zoning relief and completion of the land-development review.**

- The project is not compliant with the zoning ordinance regarding building height.

**Response: The revised CIA acknowledges the requested building-height variance and does not treat that relief as having been granted.**

- The project is not compliant with the zoning ordinance regarding fire lanes.

**Response: The revised CIA acknowledges that final fire-lane and emergency-access compliance remains subject to Fire Marshal and land-development review.**

- Conditional Use is required for outdoor storage for separate trailer parking.

**Response: Trailer parking is not considered outdoor storage, therefore it does not require conditional use approval.**

- The project proposes encroachments into the natural resources.

**Response: The revised CIA expressly acknowledges natural-resource encroachments and addresses the associated impacts and mitigation in Sections 22-505.4.B, E, N, O and P.**

- The project proposes removal of 86 specimen trees.

**Response: The revised CIA acknowledges specimen-tree removal, with the current inventory and removal quantities shown in Exhibit 1 and related mitigation addressed in Sections E, N, O and P.**

- The project is not adequately served by public infrastructure as two streets along the property have truck restrictions and access routes for trucks to the arterial streets are inadequate.

**Response: Sections 22-505.4.B and J now address the truck restrictions, designated truck route, traffic findings and proposed roadway and intersection improvements.**

- The project proposes underground Managed Release Concept (MRC) stormwater facilities. Additional infiltration testing and alternative layout may allow for traditional infiltration facilities and above ground facilities that can promote natural filtration and evapotranspiration.

**Response: The revised CIA incorporates the current stormwater report as Exhibit 3 and describes the proposed combination of subsurface detention, aboveground infiltration, level spreaders and riparian-buffer treatment.**

- Green infrastructure and low impact development practices are not documented

**Response: Green-infrastructure and low-impact measures are now documented in Sections 22-505.4.D, N and O and in Exhibits 1 and 3.**

24. §22-506 – We note that the Traffic Impact Study (TIS) anticipates 555 employees with an opening year of 2034. Trucks are proposed to be directed to County Line Road and State Route 309 via Line Lexington Road. Upon review, we offer the following comments related to the TIS:

- a. The traffic study recommends modifications to the southeast corner of the County Line Road and Line Lexington Road intersection to accommodate truck traffic. The truck turning movement for the County Line Road and Line Lexington Road intersection shows a conflict with the curb. The radius shall be revised to eliminate the conflict. We note that there are steep grades, existing inlets and utilities (utility pole and hydrant) on that corner that would need to be considered during the design.

**Response: Please see the enclosed truck turning plan with the proposed radius modification. The design will be coordinated further during the PennDOT HOP process.**

- b. The report indicates that the Bethlehem Pike and Line Lexington Road intersection has more than 5 reportable crashes for several of the years reviewed, but notes causation factors were due to driver error (improper/careless turn, running red light, driving too fast for road conditions) and not correctable. However, there are some measures that could be implemented to mitigate the causes of the crashes, such as dilemma zone detection, increased all-red time, etc., and shall be discussed within the report.

**Response: Crash mitigation methods have been included in the report.**

- c. We note that several 95th percentile queues exceed the available storage at the Bethlehem Pike and Line Lexington Road intersection. Although this is an existing condition, consideration shall be given to directing truck traffic in both directions of County Line Road so that the development does not exacerbate an already deficient condition.

**Response: The applicant is proposing improvements at the intersection, as noted in the TIS. The queues for the noted movement are anticipated to be comparable under no-build and build conditions, with the queue increasing by 1 to 2 vehicles during the peak hours.**

- d. Due to existing steep grades, proposed volumes, horizontal alignment, and the short queueing distance existing between Route 309 and County Line Road along Line-Lexington Road, consideration should be given to using Trewigtown Road to access Route 309 as the designated truck route for the development. The horizontal and vertical geometry of the signalized intersection at Trewigtown Road and Route 309 is more conducive to accommodating trucks. The lane widths appear adequate, the adjacent land uses are mainly commercial/industrial uses, and the grades at the intersection are more favorable for trucks. The intersection of Trewigtown and Route 309 and County Line Road would have to be analyzed using vehicle turning templates to identify any necessary mitigation measures.

**Response: Truck turns at the County Line Road/Trewigtown Road intersection are enclosed. Per the truck turns it is anticipated that an increased radius on the southeast corner would be required to accommodate the northbound Trewigtown Road right turn movement onto County Line Road. Based on right-of-way information received to date, this modification would require right-of-way acquisition. As such, this modification for an alternate truck route is not proposed at this time.**

- e. The 95th percentile queues at the County Line Road and Line Lexington Road decrease in the PM projected conditions despite no capacity-adding improvements being recommended. The analysis shall be revised to resolve this issue.

**Response: The TIS has been revised accordingly.**

- f. We note that the conflict factor analysis for the Bethlehem Pike and Line Lexington Road intersection supports a protected/prohibited left-turn phase. Additional narrative on these findings shall be provided with justification on why this phasing plan was not recommended.

**Response: While the conflict factor analysis supports protected/prohibited phasing for the SB left turn movement, the nearby planned Sheetz development in Hatfield Township is currently working with PennDOT for improvements to the signalized intersection in their Township. As part of the Sheetz development, a new 5-section signal head with protected/permitted left turn phasing for the NB approach to match the existing condition of the SB approach. Through coordination for that application, protected/prohibited phasing is not planned for the SB approach. As such, the phasing at the intersection is consistent with the coordination with PennDOT as part of the other application.**

- g. The study indicates that another development (Sheetz) is proposing Flashing Yellow Arrow (FYA) indications at the Bethlehem Pike and Line Lexington Road intersection as part of their mitigation. The report should be updated to identify the anticipated timing of the other development and whether those improvements will be implemented prior to the opening of the proposed warehouse development. We note that the capacity analyses for the base conditions assume the FYA is in place. If the other development will not be constructed first, the analyses should be revised to show existing equipment for the base conditions and identify any mitigation that will be necessary due to just the warehouse development. This improvement should be added to "Table II – Recommendations" as a contingency if the Sheetz development is not constructed before the warehouse development. Whichever project is constructed first should install the advanced phasing.

**Response: The nearby Sheetz development is anticipated to be open in 2027 and therefore the recommended signal improvements associated with the Sheetz development are included in the 2034 base and projected synchro files. Per more recent PennDOT coordination, FYA is no longer planned by the Sheetz application. However, as noted previously, a new 5-section signal head with protected/permitted left turn phasing for the NB approach is proposed to match the existing condition of the SB approach. The 2034 Base and Projected Conditions have been updated to reflect the above change.**



- h. Based on the truck turning exhibits, it appears that roadway widening is required on the northeast corner at the intersection of County Line Road and Walnut Street to accommodate the turning movements and wheel paths of design vehicles.

**Response: Please see the enclosed truck turning plans.**

- i. If intersection improvements are identified at County Line Road and Walnut Street and/or County Line Road and New Britain Boulevard, these improvements shall be identified as recommendations in the report.

**Response: The relevant improvements have been added to the recommendations.**

- j. The provided copy of the scoping application includes direct access from County Line Road to Building 2. However, the updated plans have removed this access. Consideration should be given to using this driveway as a possible right-in/right-out configuration to reduce impacts on the traffic signal operation at Walnut Street and to provide a secondary access per the Fire Marshal.

**Response: An access to County Line Road is no longer proposed.**

- k. An auxiliary turn lane analysis for the intersection of County Line Road and Walnut Street shall be provided.

**Response: The requested auxiliary turn lane analysis is included in the revised TIS.**

- l. As indicated in the trip generation analysis, filtered trip generation data was utilized per ITE and PennDOT Publication 282. The report shall be revised to include the filtered data calculations assumed in Table 5.

**Response: As noted in the TIS, the trip generation methodology is consistent with PennDOT's policy. The requested ITE calculations are included in the Appendix E.**

- m. The Applicant shall indicate if operations are anticipated on the weekend. If so, the weekend peak trips shall also be analyzed.

**Response: The study time periods were coordinated and agreed to during the scoping process. Nevertheless, the trip generation for a warehouse use is typically nominal, and significantly less than the trip generation during the weekday A.M. and P.M. peak hours. In addition, traffic on the adjacent roadways is typically less than on a Saturday than during the weekday A.M. and P.M. peak hours. Therefore, it is standard practice to evaluate the weekday A.M. and P.M. peak hours and identify necessary improvements based on those time periods, which would also accommodate traffic conditions on a weekend when traffic volumes are lower.**

- n. The queues identified in Table 11 do not support the initial queue observations (0 cars) in Appendix G for the Bethlehem Pike and Line Lexington Road intersection. The data shall be verified and the analyses updated accordingly.

**Response: The data has been verified, and the analysis is consistent with prior evaluations of the intersection.**

- o. The trip generation and distribution calculation summary for the 309 Plaza Expansion project in Appendix D indicates that trip generation data was obtained from the 11th Edition of the Trip Generation Manual. However, the 11th Edition does not have a Land Use Code 948 (Automated



Car Wash). Additionally, if the 12th Edition was used for this, there is no “tunnel” independent variable. The report shall clarify where the information was derived from.

**Response: Land Use #948 (Automated Car Wash) exists in the 11<sup>th</sup> Edition of ITE Trip Generation Manual, with tunnel as the independent variable. As summarized in the correspondence in Appendix D, Hatfield Township could not locate a copy of the original TIS completed for the Car wash. Therefore, it was agreed to use ITE 11<sup>th</sup> edition trip generation. As such, the same trip generation for the planned development is consistent with the prior coordination with Hatfield Township, and review by PennDOT as part of another application.**

- p. For the capacity analyses at the Walnut Street and County Line Road intersection, the westbound approach has a “No Turn on Red” restriction that shall be included.

**Response: The TIS has been revised accordingly.**

- q. It shall be verified that the heavy vehicle percentages used in the capacity analyses along Walnut Street at the proposed site driveways are consistent with the projected truck traffic volumes presented in Table 7. Additionally, it shall be verified that the heavy vehicle percentages assumed in the auxiliary lane warrant analyses accurately reflect the projected truck traffic volumes.

**Response: The heavy vehicle percentages in the analyses were updated in the projected conditions based on the projected heavy vehicle increase and truck route.**

- r. Given the existing traffic volumes at the Walnut Street and County Line Road intersection, verify that there is no initial queue volume for the eastbound approach. The table provided in Appendix G does not include the eastbound direction.

**Response: The eastbound approach was observed. Similar to the WB direction, train crossings created temporary longer queues. However, outside of the train crossings, the queue appeared to clear.**

- s. The storage lengths for the turning lanes at County Line Road and New Britain Boulevard/Driveway intersection shall be verified and updated accordingly (i.e., WB left is approximately 75' and SB left is approximately 150').

**Response: Through comparing the as-built signal plan to the recent site aerials, it appears the WB left turn lane stop bar was moved west, closer to the intersection, extending the storage length to 115'. It appears the SB Left storage length was extended to 175'. Additionally, the projected queues will be accommodated within the existing storage lengths under either length.**

- t. The grade for the northbound approach of the Line Lexington Road and County Line Road intersection shall be revised to be consistent with the information shown on the signal plan for the adjacent intersection (i.e., -9%). Additionally, verify the peak hour factor and heavy vehicle percentages per the turning movement counts.

**Response: The northbound Line Lexington Road approach grade was confirmed to be -9% as shown on the signal plan for the 309/Line Lexington Road signal plan, and the analysis was revised accordingly. The peak hour factors and heavy vehicles percentages were confirmed to be consistent with the October 2025 count used in the TIS.**

- u. The text below Table 3 shall be revised to reference the traffic count being conducted on June 18, 2025 rather than July.

**Response: The TIS has been revised accordingly.**

25. §22-600.1.A – The entire extent of watercourses shall not be altered, regraded, filled, piped, diverted or built upon, except roads and trails may cross watercourses where design approval is obtained from the Township and PADEP. Based on the current layout, a Chapter 105 permit will be required for any alterations to the watercourses.

**Response: Acknowledged.**

26. §22-600.1.G – The Overall Riparian Buffer and Slope Disturbance Plan shall include the slope disturbance for the aboveground basin at Building 3, installation of the sanitary force main and the full extent of the Building 3 access road.

**Response: This is no longer applicable. The aboveground basin nearby Building 3 has been removed from the plans.**

27. §22-600.1.H – No impervious surface area shall be located within 25 feet of a wetland boundary, and no more than 20% of such areas shall be disturbed. Any DEP regulations concerning activities in wetlands margins shall also be met. A retaining wall and fill are currently proposed within the wetlands margin. The Overall Wetland and Woodland Plan shall quantify the wetlands margin disturbance near Walnut Street.

**Response: The wetland margin area and disturbance (14%) have been specified on Plan Sheet C-205.**

28. §22-600.1.I – The Overall Riparian Buffer & Slope Disturbance Plan shall include the natural resource disturbance for the proposed utilities, access roads and grading, stormwater facilities, etc.

**Response: The overall riparian buffer and slope disturbance plan has been updated to include the additional disturbance areas. Please refer to the Natural Resources Plan Sheets C-205 to C-206.**

29. §22-600.1.I.(3)(e) – Parking lots are prohibited in the riparian buffer. A portion of the Building 2 paved area is located within the riparian buffer.

**Response: The plans have been revised to eliminate the encroachment.**

30. §22-600.1.I.(4) – The riparian revegetation plan shall be prepared by a qualified professional, who has specific experience in the delineation of riparian buffer areas. The qualified professional who prepared the Reforestation Matrix and Mix on Sheet 70 shall be noted.

**Response: The Reforestation Matrix and Mix was prepared as a collaborative effort between Bohler's Landscape Team and Rockwell Associates Urban Forestry, Natural Resources and Landscape Consultants. Please refer to the associated Memorandum prepared by Rockell regarding the Riparian Buffer Area.**

31. §22-600.1.I.(4)(b) – Three shrubs shall be provided for every 20 linear feet of waterway in the riparian revegetation area. In addition, invasive plants shall be removed whenever practicable. The plans shall demonstrate compliance with this section.

**Response: Shrubs have been added accordingly for lengths of riparian reforestation areas within Zone 1 as per 22-600.1.I.(4)(b) on the Landscape Plans. We note that there is existing vegetation to remain within most Zone 1 Riparian Buffer Areas.**

32. §22-601 – A Natural Resource Protection chart shall be provided to calculate the land with resource restrictions and the total resource protection land. All proposed disturbances shall be considered in the chart.

**Response: The natural resource data on Plan Sheet C-206 has been update to reflect all disturbances.**

33. §22-703.4.A.(1) – The area within any existing easement shall not be counted toward the minimum lot area. The Net Lot Area on the Lot Consolidation Plan shall subtract the existing easements.

**Response: The net area provided on the Lot Consolidation Plan is not part of the calculation for minimum area for development. The net area in this instance is intended to represent the land remaining under ownership of the developer after right-of-way and recreation areas are dedicated to the township. The nomenclature on the Lot Consolidation Plan has been revised to clarify.**

34. §22-704.1 – Easements shall be provided as necessary for watercourses, stormwater facilities, drainage swales, utilities, deed restricted or conservation areas, natural resource protected areas, pedestrian or vehicular access, buffers, public access for recreational trails and/or other purposes. The required easements for resource protection areas, buffers, and stormwater management facilities shall be provided.

**Response: Easements have been added to the plans. Please refer to the Easement Plan Sheet C-507.**

35. §22-704.5 – Easements shall be described by metes and bounds in the deed of the property and shall be shown on the site plans. Deeds to all lots with easements shall state all restrictions on buildings or plantings within the easement area. All required and proposed easements shall be shown and described. Deed restrictions for the easements shall be placed in the deed.

**Response: Bearings and distances have been added to describe easements. Please refer to the Easement Plan Sheet C-507.**

36. §22-705.1.G – All plans that require access to a street or highway under the jurisdiction of PennDOT shall either require a highway occupancy permit prior to recording of final plans or an acknowledgment on the site plan of the requirement to obtain a highway occupancy permit prior to the issuance of a use and occupancy permit. The highway occupancy permit is required pursuant to §420 of the Act of June 1, 1945 (P.L. 1242, No. 428), known as the "State Highway Law." Prior to formal application for a highway occupancy permit, the applicant shall submit a highway occupancy permit application, plans supporting documentation to the Township for review and approval, in accordance with the provisions of 67 Pa. Code, Chapter 441.3(J), as amended. A highway occupancy permit is required for the improvements within the County Line Road legal right-of-way.

**Response: Acknowledged.**

37. §22-705.1.I – Prior to applying the final wearing course to any existing or proposed roadway, the applicant must submit as-built plans for review and approval by the Township Engineer. A note to this effect shall be included on the record plan and in the sequence of construction for the widening of Walnut Street.

**Response: The note has been added to Plan Sheet C-300.**

38. §22-705.3.C & §15-304 – Where a subdivision and/or land development abuts or contains an existing street, the applicant shall be required to improve the street to the Township standards for ultimate right-of-way and cartway widths. The following comments related to existing street improvements shall be addressed:

- a. Truck traffic is currently restricted on Walnut Street for the entire frontage and Schoolhouse Road (Reference Township Code Chapter 15 Motor Vehicles and Traffic §15-304). We note that the Applicant previously submitted a Petition to allow truck traffic on Walnut Street. The response to the request from the Township Solicitor is attached for reference indicating that the Petition does not apply. If the Ordinance is formally amended by the Board of Supervisors to allow truck traffic, a structural analysis will be required of Walnut Street to verify the infrastructure is adequate for the anticipated vehicle loading. There shall be a discussion about what improvements are proposed to remedy any physical deficiencies, once determined (i.e., widening, lane widths, pavement adequacy, structural adequacy, culvert extension/replacement, etc.).

**Response: Acknowledged.**

- b. The plans show an access drive for Building 3 extending over TMP #26-001-100-011 from Independence Lane. Though there is a Township right-of-way easement on the property, the property contains an existing stormwater basin which will be impacted by the proposed access drive, associated grading and retaining walls. Additional information shall be provided to demonstrate the access road can be installed as shown. Also, since improvements are shown outside of the right-of-way, Temporary Construction Access Easements shall be secured with the impacted property owners.

**Response: Additional detail has been added. No improvements are proposed outside of the existing right-of-way.**

- c. The Township anticipated a future connection from Independence Lane to Stewart Lane with the development of TMP# 26-001-099 evidenced by the existing right-of-way easements over the two adjacent properties. We note that the proposed improvements may impact the ability to make this connection in the future. We recommend the connection be discussed further with the Township.

**Response: Acknowledged.**

- d. Existing and proposed ultimate and legal rights-of-way and cartway widths along County Line Road, Walnut Street and Schoolhouse Road shall be clearly identified.

**Response: Additional labels have been added to Plan Sheets C-201, C-202, C-301, and C-302.**

- e. We recommend that all proposed public improvements be completed prior to issuance of the first occupancy permit.

**Response: Acknowledged.**

- f. A 3-to-6-foot grass strip is required along Walnut Street between the curb and sidewalk for the area between Buildings 1 and 2.

**Response: Dimensions have been added to Plan Sheets C-301 and C-302.**

- 39. §22-705.3.G – Where a subdivision and/or land development abuts or contains an existing street, the applicant shall be required to mill and overlay the entire width of the roadway a depth of 1-1/2 inches or install a leveling course and wearing course where requested by the Public Works Superintendent. Mill and overlay shall be proposed for Walnut Street and Schoolhouse Road along the frontage.

**Response: Mill and overlay has been indicated on Plan Sheets C-301 and C-302.**

40. §22-705.4.F – The minimum right-of-way radius at an intersection shall equal the curb radius plus 10 feet. A radius shall be provided for the ultimate rights-of-way at the intersections of Walnut Street and County Line Road and Walnut Street and Schoolhouse Road. The requirements for the higher classification street shall apply.

**Response: Radii have been incorporated into the right-of-way. Please refer to Plan Sheet C-207.**

41. §22-705.5.C – Within the area of clear sight triangles, obstructions to visibility shall not be permitted within the ranges of height between two feet and seven feet above the edge of paving. Any plant materials placed within clear sight triangles shall be properly maintained to continually comply with the height restrictions herein. The site plan shall contain a notation stating that the applicant is required to maintain the area of the clear sight triangle, and the Township has the right to enter the area and perform maintenance if deemed critical to public welfare.

**Response: A note has been added to Plan Sheets C-300 and L-100.**

42. §22-705.13.C – All access drives and driveways shall be provided with a stopping area of 20 feet, at a maximum grade of 4%, measured from the edge of cartway. Spot elevations shall be provided at the driveways to demonstrate the required stopping area is provided.

**Response: Spot elevations have been added to Plan Sheets C-401 through C-403.**

43. §22-705.13.D – Non-residential, two-way driveways shall have a minimum curb radius of 25 feet. The access driveway radius to Independence Lane is proposed to be 15 feet.

**Response: Larger radii are specified at Independence Lane on Plan Sheet C-304.**

44. §22-705.14.C – Pavement underdrains shall be placed along both sides of all proposed streets and in areas of cartway widening of existing streets. Pavement underdrains shall be provided along the Walnut Street widening.

**Response: Underdrains have been included on the typical section for Township Roads. Please refer to plan sheet 903**

45. §22-705.15.B – Spot elevations shall be provided for the crosswalk at the southeastern driveway of Building 1 to verify it does not exceed a 2% cross slope.

**Response: Spot elevations have been added to Plan Sheet C-401 along the crosswalk at the southeastern driveway to Building 1.**

46. §22-705.17 – The applicant shall be responsible for furnishing and installing all traffic signals, traffic regulatory signs, speed limit signs and pavement striping and markings that are required by the Township or PennDOT. The applicant shall coordinate furnishing and installing these items with the Public Works Superintendent. Labor and materials furnished by the Township shall be paid by the applicant. The applicant shall install such traffic signals, signs and markings prior to the issuance of the first building permit. All traffic signals, signs and markings shall comply with specifications of PennDOT for Traffic Signs, Signals, and Markings (PennDOT Publication 68), as amended, and PennDOT Publication 203, Work Zone Traffic Control (1967 Pa. Code, Chapter 203), as amended. We recommend that the following be addressed:

- a. Any additional signage and striping required by the Public Works Superintendent shall be provided along Walnut Street and Schoolhouse Road.

**Response: Acknowledged.**

- b. Signage shall be proposed on Walnut Street opposite the proposed Building 1 and 2 site driveways prohibiting trucks from turning left out of the site.

**Response: Proposed signage has been added to Plan Sheets C-301 and C-302.**

- 47. §22-706.1.B – Curbs shall be installed along the property frontage of every existing street abutting a proposed subdivision and/or land development. All accessible routes shall meet ADA and PennDOT standards. No curb is proposed along County Line Road or Schoolhouse Road.

**Response: Curbs have been provided on County Line and Schoolhouse Roads. County Line Road is a PennDOT road and improvements associated with County Line Road are subject to PennDOT review and approval. Schoolhouse Road is adjacent to possible habitat for the Northern Red Bellied Cooter (NRBC) and any improvements adjacent to Schoolhouse Road may affect that habitat. Note that a NRBC nesting study is currently underway to evaluate the presence and likelihood that impacts could result from road improvements. Waivers are being requested regarding installation of curb along County Line and Schoolhouse Roads.**

- 48. §22-706.2.B – Sidewalks shall be installed along the property frontage of every existing street abutting a proposed subdivision and/or land development. No sidewalk is proposed across the West Branch Neshaminy Creek along County Line Road or along the Schoolhouse Road frontage including the intersections.

**Response: Sidewalks have been provided on County Line and Schoolhouse Roads. County Line Road is a PennDOT road and improvements associated with County Line Road are subject to PennDOT review and approval. Note that the proposed sidewalk along County Line Road ends where appurtenances for the bridge across Neshaminy Creek begin. The bridge presently includes an approximately 18' wide shoulder to accommodate pedestrian traffic. Schoolhouse Road is adjacent to possible habitat for the Northern Red Bellied Cooter (NRBC) and any improvements adjacent to Schoolhouse Road may affect that habitat. Note that a NRBC nesting study is currently underway to evaluate the presence and likelihood that impacts could result from road improvements. Waivers are being requested regarding installation of sidewalk along County Line and Schoolhouse Roads.**

- 49. §22-706.3 – All curbs and sidewalks shall be designed and constructed in accordance with specifications and details listed in the Appendix and in accordance with current ACI and PennDOT standards. All curbs and sidewalks shall provide access for persons with disabilities in accordance with Americans with Disability Act, as amended.

- a. The applicant shall demonstrate that accessible routes meet ADA standards by providing sufficient spot elevations to verify grades. All curbs shall be designed in accordance with the latest PennDOT standards. Curb ramps shall be provided at all intersections. Details at a scale of 1" = 5' shall be provided for all proposed curb ramps and accessible routes throughout the site.

**Response: Blowups of curb ramps have been added. Please refer to Plan Sheets C-405 through C409.**

- b. All curb ramps shall be provided with "brick red" detectable warning surfaces or other approved contrasting color.

**Response: The warning surface color has been specified on Plan Sheet C-901.**

- 50. §22-707.1.A – The Board of Supervisors upon recommendation by the Planning Commission, may require pedestrian walkways or trails to connect industrial facilities to parks, etc. No trails are currently proposed. If required, the walkways shall meet the design standards of this section.



**Response: Sidewalks have been proposed to provide pedestrian access.**

51. §22-708.1.G – All parking areas shall include clearly defined and marked traffic patterns. Major vehicular routes shall be separated from major pedestrian routes within the lot. We offer the following comments related to traffic patterns:

- a. Signage shall be provided clearly identifying designated truck access points, truck routes, and areas where truck traffic is prohibited within the site.

**Response: Additional signage has been added to Plan Sheets C-301 through C-304.**

- b. Signage shall be provided to discourage passenger cars from entering the truck lots, where appropriate.

**Response: Additional signage has been added to Plan Sheets C-301 through C-304.**

- c. The plans shall be revised to identify the signage per the legend on Sheets C-301 to C-304. It is unclear where pedestrian and “Do Not Enter” signs are proposed.

**Response: The plan has been updated to indicate signs designated in the legend. The legend has also been updated.**

- d. “Do Not Enter” signs shall be provided for the driveway on the south side of Building 2 facing the truck loading area to prohibit trucks from entering the employee parking area.

**Response: “Do Not Enter” signs are now indicated. Please refer to Plan Sheet C-301.**

- e. “Do Not Enter” signs shall be provided for the driveway on the south side of Building 3 facing the truck loading area to prohibit trucks from entering the employee parking area.

**Response: “Do Not Enter” signs are now indicated. Please refer to Plan Sheet C-303.**

- f. Details for all proposed markings shall be on the plans (i.e. crosswalk, stop legend, etc.).

**Response: Additional details have been provided on Plan Sheets C-901 and C-902.**

- g. The plans shall be revised to indicate that all crosswalks shall be a minimum of 4 feet from an adjacent stop bar.

**Response: The plans have been revised to provide the required separation between crosswalks and stop bars. Please refer to Plan Sheets C-301 through C-302.**

52. §22-708.1.H – Parking lots shall integrate green stormwater infrastructure by the use of plants and soils to naturally detain, treat, and infiltrate runoff from impervious surfaces. Bioretention, infiltration, amended soils, or other designs shall be incorporated into all new parking areas. Runoff from the warehouse parking areas are generally directed to underground basins and the plans do not appear to provide the required green stormwater infrastructure.

**Response: The stormwater design has been revised to incorporate riparian forested buffers as the primary means of stormwater management to meet runoff volume and water quality requirements. As revised, all parking areas rely on green infrastructure, either through discharge to the infiltration basin or to the riparian forested buffer.**



53. §22-708.2.D – No more than 15 parking spaces shall be permitted in a continuous row without being separated by a minimum 10' by 18' planting island. The trailer parking for Building 1 and the loading parking areas for all three warehouses do not comply.

**Response: The striped islands used for light poles north of Building 1 have been reconfigured as planted islands to comply with the requirement of no more than 15 parking spaces shall be permitted without a landscape island. Please refer to Plan Sheets C-301, C-302, L-101, and L-102.**

54. §22-708.2.F – Where parking stalls are proposed adjacent to a sidewalk or walkway, the minimum width of the sidewalk or walkway shall be increased to a minimum width of 6 feet. The sidewalk adjacent to the parking spaces at Building 3 is 5.3 feet wide.

**Response: The dimensions of the sidewalk north of Building 3 have been adjusted. Please refer to Plan Sheet C-303.**

55. §22-708.4.B – Each access drive shall have a minimum width of 25 feet and maximum width of 30 feet at the street line for two-way use. The access driveways for Buildings 1 and 2 exceed 30 feet in width.

**Response: The access drives have been reduced from 36 feet wide to 30 feet wide. Please refer to Plan Sheets C-301 and C-302.**

56. §22-708.6.H – Parking aisle, access drive and service drive intersections shall be provided with stop signs and painted stop bars. Stop signs and stop bars shall be proposed.

**Response: Additional stop signs and stop bars have been added throughout. Please refer to Plan Sheets C-301 through C-303.**

57. §22-709.1.C – Each loading space and the area needed for maneuvering shall be located entirely on the lot being served and shall not conflict with parking aisles, stalls, access drives or service drives. We have the following comments regarding the Vehicle Circulation Plan:

- a. Templates shall be provided to demonstrate that there are no conflicts for WB-67 trucks accessing the loading stalls on the far east and west ends of the truck loading areas for each building.

**Response: An additional series of plan sheets has been added to demonstrate the various turning movements. Please refer to Plan Sheets C-305 through C-312.**

- b. All permitted truck movements shall be depicted for each site access point, including left-in, left-out, right-in, and right-out movements, as applicable.

**Response: An additional series of plan sheets has been added to demonstrate the various turning movements. Please refer to Plan Sheets C-305 through C-312.**

- c. The movements for trucks making a left onto County Line from Walnut Street shall be depicted.

**Response: An additional series of plan sheets has been added to demonstrate the various turning movements. Please refer to Plan Sheets C-305 through C-312.**

- d. All permitted truck movements shall be depicted for New Britain Boulevard and Independence Lane and New Britain Boulevard and County Line Road to show that these intersections have adequate turning radii for truck traffic.

**Response: An additional series of plan sheets has been added to demonstrate the various turning movements. Please refer to Plan Sheets C-305 through C-312.**

- e. The Vehicle Circulation Plan shall depict movements to demonstrate that there is adequate area for trucks to maneuver into the parking spaces.

**Response: An additional series of plan sheets has been added to demonstrate the various turning movements. Please refer to Plan Sheets C-305 through C-312.**

- f. Building 1

1. We recommend that restrictions be considered for the Building 1 access driveway entrances to keep passenger cars and truck traffic separated such as truck access at the western driveway and passenger car access at the eastern driveway.

**Response: Dual means of access for both auto and truck traffic are more efficient for a facility of this size. The additional restrictions have not been implemented.**

2. The truck movements currently show trucks encroaching into the opposing lane at both Building 1 access driveway entrances from Walnut Street. These conflicts shall be eliminated.

**Response: An additional series of plan sheets has been added to demonstrate the various turning movements. Please refer to Plan Sheets C-305 through C-312.**

- g. Building 2:

1. It appears WB-67 trucks entering and exiting the Building 2 site driveway encroach into the opposite wheel path. These conflicts shall be eliminated.

**Response: An additional series of plan sheets has been added to demonstrate the various turning movements. Please refer to Plan Sheets C-305 through C-312.**

- h. Building 3:

1. The WB-67 templates encroach into the opposing lanes to be used by passenger vehicles and/or other trucks at the bend in the site driveway just east of the building. This conflict shall be eliminated.

**Response: An additional series of plan sheets has been added to demonstrate the various turning movements. Please refer to Plan Sheets C-305 through C-312.**

2. The truck movements provided for WB-67 trucks at the south end of the building overlap the curb throughout the proposed turn around bulb. The conflict shall be eliminated.

**Response: An additional series of plan sheets has been added to demonstrate the various turning movements. Please refer to Plan Sheets C-305 through C-312.**

3. Separate viewports shall be provided to clearly distinguish between the proposed movements for each vehicle.

**Additional plan sheets and viewports have been added to the plans.**

4. Truck turning movements shall be provided at Independence Lane and the access driveway.

**Response: An additional series of plan sheets has been added to demonstrate the various turning movements. Please refer to Plan Sheets C-305 through C-312.**

58. §22-710.2 – Fire hydrants shall be installed in locations as recommended by the Township Fire Marshal's office and approved by the Board. The location of the proposed fire hydrants shall be in accordance with §22-710.2 and reviewed and approved by the Fire Marshal.

**Response: Acknowledged.**

59. §22-710.3 – Access to all sides of buildings for industrial uses shall be provided to permit fire apparatus access to the building and roof. The Vehicle Circulation Plan shall show fire truck access to the front of Building 1. The Vehicle Circulation Plan shall be reviewed and approved by the Fire Marshal.

**Response: A travel path for the fire truck through the auto parking in front of building 1 has been added. Please refer to plan sheet C-3068.**

60. §22-710.4 – At least one emergency access shall be provided for subdivisions with a proposed single access loop street or cul-de-sac street. Based on the Fire Marshal's review letter dated June 4, 2026, full access or emergency access shall be provided for Buildings 2 and 3.

**Response: The proposed development does not have single-access loop street or a cul-de-sac street. Therefore, Section 22-710.4 is not applicable. Access has been provided around all four (4) sides of the proposed buildings as well as an access path to the street.**

61. §22-711.4.A – Retaining wall specifications and design details shall be approved by the Township Engineer prior to final plan approval by the Township. Design plans, specifications and details, signed and sealed by a licensed professional engineer, shall be provided for all proposed walls. Wall style, finish and color shall be coordinated with proposed building architecture.

**Response: A retaining wall detail has been added to Plan Sheet 901. Proposed grade elevations for the high and low sides of walls on Plan Sheets C-401 through C-404. Additional design information can be provided in the future in support of the final plans.**

62. §22-711.2.E – Provisions shall be made to effectively accommodate the increased surface runoff caused by changed soil and surface conditions during and after development. Hydrographs and other supporting documentation shall be provided to demonstrate the runoff rate from the site during construction will not exceed the predevelopment rates.

**Response: Hydrographs and other design data is included with this submission that evaluates increases in runoff for proposed conditions. Similar data can be provided in support of the NPDES permit submission which will be provided prior to approval of the final plan.**

63. §22-711.4.A – The proposed contours which tie into the retaining wall at the Building 3 access road have a slope of 2:1 where 3:1 is the maximum slope permitted.

**Response: The grading has been revised to reduce the slope in this location. Please refer to Plan Sheet C-403.**

64. §22-711.4.C – The top or bottom edge of slopes shall be a minimum of five feet from property lines in order to permit normal rounding of the edge without encroaching onto the abutting property. The

proposed grading of improvements extend beyond the property lines; into the ultimate right-of-way of Walnut Street, County Line Road, Independence Lane, TMP #26-001-100-011 (141 Independence Lane, lands n/f of 101 Independence Lane Associates, LLC) and within 5 feet of TMP #26-001-100-012 (140 Independence Lane, lands n/f of Schultz).

**Response: The grading in these locations has been revised so that the nearest slope is at least five feet from the nearest property boundary. Please refer to Plan Sheets C-401 through C403.**

65. §22-711.4.D – Fill shall not encroach on wetlands, watercourses and floodplains. A minimum grading buffer of 5 feet shall be maintained from wetlands, watercourses and floodplains unless other federal, state or Township standards require a more restrictive buffer. Fill placed adjacent to wetlands, watercourses or floodplains shall have suitable protection against erosion. Grading along the access drives for Buildings 1 and 2, and level spreaders are within 5 feet of the floodplain.

**Response: Grading along the access drives has been revised to outside of the Floodplain Overlay District and to be more than 5 feet from any floodplain.**

66. §22-711.5.A – A note stating “The top six inches of soil that existed naturally on the site prior to subdivision and/or land development shall be stockpiled on the site. Following construction, the stockpiled soil shall be redistributed uniformly on the site to a minimum depth of six inches” shall be added to the plan.

**Response: The note has been added to Plan Sheet C-300.**

67. §22-711.5.E – Any areas of erosion along any on-site embankment, existing watercourse, etc., shall be identified and details provided for means and method of stabilization. A permit shall be obtained from the County Conservation District and/or PADEP as required. The Applicant shall evaluate the on-site embankments and existing watercourses to identify any areas of erosion. A detailed report of the evaluation and details for the method of stabilization shall be provided.

**Response: An Erosion Control Report is included with this submission. Erosion control plans, notes, and details are included within the plan package.**

68. §22-711.7.B – The following comments related to soil protection shall be addressed:

- a. The sequence of construction is generic. A detailed construction sequence will be required for the construction of the retaining walls, storm sewer, basin conversion, underground basin for the Building 3 access road, etc.

**Response: The content of the sequence has been expanded. Please refer to plan sheet C-809.**

- b. If the project is phased, a phasing plan and sequence shall be provided for review to ensure that all public improvements are completed prior to issuance of the first occupancy permit.

**Response: The project is not intended to be phased.**

- c. The limits of disturbance (LOD) extend into the floodplain at the northeastern corner of the site adjacent to Schoolhouse Road where no improvements are shown. The purpose of the LOD at this location shall be clarified.

**Response: The LOD has been revised in that location. Please refer to plan sheet C-802.**

- d. The erosion control detail tables shall be filled out to provide site specific information.

**Response: Erosion control details have been added to the plan set and site specific data has been included within the details. Please refer to Plan Sheets C-810 through C-811.**

- e. The size of all filter sock and the filter sock diversion shall be noted on the plans.

**Response: The details for filter sock and diversions include sizing data. Please refer to plan sheet C-8-10.**

- f. Erosion controls shall be provided for the sanitary sewer stream crossings.

**Response: The sanitary sewer crossings are expected to be installed via boring activities so that disturbance within the stream areas does not occur. Because open trenching is not proposed, controls are not necessary.**

- g. Clean out elevations shall be provided for the sediment basins.

**Response: A clean out elevation has been specified with the skimmer detail on Plan Sheet C-811.**

- h. A detail is provided for a Compost Sediment Trap. The location of the compost sediment trap shall be shown on the plans.

**Response: A compost sediment trap is no longer proposed. The detail is not applicable.**

- i. Details for the 6' by 6' riser and any other associated temporary structures for the sediment trap shall be provided.

**Response: Sediment traps are no longer proposed. The detail is not applicable.**

- j. Filter sock is shown across the stream at the Walnut Street culvert and shall be revised.

**Response: Filter sock has been updated so that it does not encroach into the stream at Walnut Street. Please refer to Plan Sheet C-801.**

- k. The plans show filter sock over proposed sidewalk and through pavement on Walnut Street. The filter sock shall be relocated beyond the limits of the proposed improvements.

**Response: The filter sock has been adjusted. Please refer to plan sheet C-805.**

- l. Erosion control matting shall be shown downslope of the level spreaders and the type of matting specified as well.

**Response: The matting has been added to Plan Sheets C-805 through C-807. Additionally, the type of matting is specified with the level spreader detail provided on Plan Sheet C-817.**

- m. The topsoil stockpiles are proposed in an area of fill. The stockpile locations shall consider the sequence of construction and the location finalized.

**Response: The stockpiles have been situated in locations where they will not interfere with the primary elements of construction such as getting the building pad graded and much of the areas adjacent to the building graded to the extent they can be stabilized. They may not be located in the most efficient location for efficient construction sequencing, but they are in functional locations relative to overall construction activities and site stabilization.**

- n. A proposed rock filter is shown beneath the paved area behind Building 2. The use of this rock filter shall be clarified.

**Response: The rock filter will be utilized in a location of concentrated flow in the initial stages of construction. It will become obsolete as construction progresses.**

69. §22-713.2.E. – Any specimen tree having a diameter of thirty (30) inches or more, measured at twelve (12) inches above natural grade line, shall not be removed, whether located within a woodland area or standalone. All trees to be removed are shown on the Tree Protection and Removal Plans. The Landscape Compliance Chart on Sheet 55 indicates 86 trees with a diameter of thirty (30) inches or more are to be removed with 63 noted as “Poor/Dead” on Sheet 64. The chart notes a waiver which is not included in the waiver request letter. We recommend that a certified arborist review and document the health of the specimen trees proposed to be removed.

**Response: An arborist report has been submitted and the waiver has been included in the waiver request letter.**

70. §22-713.3.A. – All 10-foot by 18-foot planting islands shall contain one shade tree. Several islands in the parking lots for each building do not include a shade tree.

**Response: A shade tree has been provided in each planting island.**

71. §22-713.3.C. – Any lot with 30 parking spaces or more shall have landscaped areas within the paved area equal to a minimum of 5% of the total paved area. The total paved area shall exclude landscape strips around the perimeter. The Landscape Compliance chart lists a landscape area that demonstrates compliance. However, a plan view shall be provided highlighting the areas used to calculate the landscape area to verify the landscaped areas for each building.

**Response: A plan view demonstration of the calculated areas has been added. See Sheet L-107.**

72. §22-713.3.D. – All planting islands and strips shall be underlain by soil improved to a minimum depth of 30 inches, not stone or bituminous material. A soil improvement detail and the notes on the landscape plan shall include the removal of all construction debris and existing compacted soils. The specifications for the soil improvement mix shall be provided with the landscape details.

**Response: The planting island detail on Sheet L-107 has been revised to show 30” of planting soil. The Landscape Specifications on Sheet L-106 include soil specifications.**

73. §22-713.4.A. – Street trees shall be planted every 30 feet along all proposed streets and existing streets. Five additional trees are required for a total of 82 street trees along Walnut Street. Schoolhouse Road requires 12 street trees and none are proposed. The buffer yard trees cannot be used to satisfy the street tree requirement.

**Response: The 82 required street trees have been provided along Walnut Street. An additional 12 trees have been proposed along Schoolhouse Road. See Sheet L-102.**

74. §22-713.5.B.(1)(a)1 – For every parking lot buffer that abuts a sidewalk or a street for a parking area of five spaces or more, one shade tree and 10 evergreen shrubs shall be planted for each 30 feet of buffer length and one square foot of perennial plantings for every linear foot of total buffer. The Landscape Plan double counts the street trees as the parking lot buffer shade trees. The street trees shall not be used to satisfy the parking lot buffer requirement. The required canopy trees for the parking lot buffer shall be provided.



**Response: Additional shade trees for the parking lot buffer have been provided along County Line Road and Walnut Street. See Sheets L-101 and L-102.**

75. §22-713.5.B.(2) – A minimum six-foot opaque fence or wall, on at least three sides, with a staggered row of evergreen trees planted every 10 feet along the fence perimeter shall be provided around trash collection areas and mechanical units. All trash collection areas and ground level mechanical units shall be identified on the plans and buffering provided.

**Response: Trash receptacles are not provided, therefore screening is not provided.**

76. §22-713.5.B.(4) – A minimum six-foot wooden shadow-box fence, or approved equal, on at least three sides, with evergreen trees planted every 10 feet along the fence perimeter is required for outdoor storage areas. The trailer parking is considered an outdoor storage area and buffering shall be provided if a Conditional Use is approved.

**Response: The truck trailer parking areas are no different than vehicular (non-truck) parking spaces on the site and are not an “outside storage or display” (L2) accessory use. The L2 Accessory Use when applied to “outdoor storage” of vehicles refers to a vehicle storage lot as part of an automobile sales (J2) or truck terminal (K6) uses and not truck trailer parking associated with a permitted wholesale business, wholesale storage and warehousing (K3). See, Section 27-305.L.2.b.4.(c).**

77. §22-713.5.B.(10) – Proposed and existing conservation easements shall be physically delineated in the field by a concrete monument at the intersection of the easement with the property line. A two- or three-rail split-rail tapered fence or stone-shaped concrete monument corner may be substituted at the discretion of the Board of Supervisors. Physical delineation shall be provided for the required conservation easement(s).

**Response: Concrete monuments have been indicated for conservation easements. Please refer to Plan Sheet C-507.**

78. §22-713.6 – All notes from Sections B through D of this section shall be included on the Landscape Plans.

**Response: The referenced notes have been added as General Landscape Notes 13, 14, and 15. See Sheet L-100.**

79. §22-713.6.A – Trees shall be a minimum of 10 feet from all existing and proposed underground and overhead utilities. The proposed trees and underground utilities shall be revised as necessary to provide the 10-foot separation.

**Response: Trees and utilities have been revised to improve separation between those items**

80. §22-713.6.E – The Landscape Compliance Chart shall be revised to note the requirements for plant diversity in parking lots and proposed compliance.

**Response: Section 22-713.6.E has been added to the Landscape Compliance Chart. See Sheet L-106.**

81. §22-714.4.B – Public streetlights shall be required for all nonresidential subdivisions along any existing street intersection abutting the proposed subdivision, where required by the Board, and any other location where lighting will improve the function of the street, sidewalk or pedestrian access way, where required by the Board. No streetlights are currently proposed.

**Response: We await determination from the Board as to whether streetlights are required.**

82. §22-714.4.D – The site plan shall contain a plan notation stating, "All streetlights shall be installed and energized prior to the issuance of the first occupancy permit for any subdivision and/or land development or first phase or section thereof and the lighting and maintenance costs shall be assessed to affected property owner."

**Response: Streetlight energization note hinges on the above determination.**

83. §22-714.5.C.(1) – For all industrial applications, a note shall be added to the record plan that all lighting fixtures shall be controlled by programmable timers that accommodate seasonal and annual variations and battery or mechanical (e.g., spring-wound) backup to extinguish light sources between 11:00 p.m. and dawn or within one hour of the close of business, whichever is earlier, to conserve energy and mitigate nuisance glare and sky lighting consequences. Security lighting may be permitted up to 25% of the total number of fixtures onsite."

**Response: General Lighting Note 14 has been added to the plans. See Sheet L-200.**

84. §22-714.8 – Medium Activity Nonresidential Parking, Loading Facilities and Drives (e.g., Industrial) shall have a minimum coverage of 0.4 footcandles. Building 3 access driveway to Independence Lane does not provide the required lighting coverage.

**Response: The Building 3 access driveway has been lit to a minimum of 0.4 footcandles. See Sheets L-204 and L-205.**

85. §22-714.8 – Building entrances shall have a minimum coverage of 2.0 footcandles. Building 2 and the central entrance for Building 1 do not meet this requirement.

**Response: Additional lighting has been provided at the entrances to Buildings 1 and 2. See Sheets L-201 and L-202.**

86. §22-715.2.C.(2) & G.(2) – The amount of land to be dedicated for park and recreational areas for nonresidential land development projects shall be 2,500 square feet per 4,000 square feet of building area. Based on a combined building area of 554,950 square feet for Buildings 1, 2, and 3, the amount of park and recreation land that would be required is 346,844 square feet (7.96 acres). The Preliminary Plan designates 7.96 acres at the northern portion of the site as "Recreation Area". The following comments shall be addressed:

- a. §22-715.2.G.(2) – Where, upon agreement with the applicant, it is determined that the dedication of all or any portion of the land area required for park and recreation purposes is not feasible because of the size, shape, location, access, topography, or other features of the land or any other need of the Township, the applicant shall pay to the Township a fee-in-lieu of dedication of such land. Based on the current fee schedule, the fee would be \$2,500 per 4,000 square feet of building area or \$346,844.00.

**Response: The plan includes an offer of dedication for land which meets the ordinance requirement for providing recreational area, therefore no fee-in-lieu is required.**

- b. §22-715.3.A.(1) – The land proposed for dedication shall be easily and safely accessible, have good ingress and egress, and have access to an external public street. We recommend that a Site Plan be provided for the park and recreation land so the access can be discussed. As noted previously, the Township planned for a connection from Stewart Lane to Independence Lane. This connection would bisect the proposed Park and Recreation Land.

**Response: Access is available from Independence Lane.**

- c. §22-715.3.A.(4) – No more than 25% of the recreation area shall be floodplain or areas with slopes above 8%, or both. The floodplain and steep slopes areas shall be quantified, and these resources shall not exceed 25%.

**Response: The area exceeds 8% is approximately 22%.**

- d. §22-715.3.A.(6) – Site(s) designated for passive recreation may contain lands with natural resource restrictions, provided that the land can be used by residents for passive recreational activities. The recreation area includes floodplain, steep slopes, woodlands, watercourse, and riparian buffer. The park and recreation land designation i.e. lawn, natural, active, passive, or agricultural) shall be discussed.

**Response: Acknowledged.**

- e. §22-715.3.A.(7) – The development plans and recorded plans shall show 1.) the recreational activities and/or facilities for which an area is intended, and 2.) the legal basis by which the recreational, park or open space use is preserved. We recommend the park and recreation land be subdivided, if possible, and dedicated to New Britain Township in lieu of an easement to the Township.

**Response: The plan includes an offer of dedication for land which meets the ordinance requirement for providing recreational area.**

- f. §22-715.3.A.(9) – On-site improvements on the dedicated park and recreation land shall be commensurate with the adjacent on-site development improvements, including but not limited to grading, curbing, utilities and walking paths. No grading, curbing, utilities or walking paths are proposed. As previously noted per §22-707.1.A, the Board of Supervisors upon recommendation by the Planning Commission, may require pedestrian walkways or trails to connect industrial facilities to parks, etc.

**Response: Sidewalks are provided along Schoolhouse Road, Walnut Street, and County Line Road to provide pedestrian connectivity to the property.**

- g. §22-715.3.B – If the Board determines that a park and recreation land dedication is in the public interest, such park and recreation land shall first be offered for dedication to the Township. Acceptance of the dedication shall be by adoption of a resolution of the Board and acceptance of a deed of dedication in a form acceptable to the Township Solicitor. If the Township does not accept dedication, the land may be owned and maintained by an entity that the Board determines is acceptable to ensure proper long-term oversight and maintenance of the land. Deed restrictions and/or easements in favor of the Township shall be required on all park and recreation land to ensure its permanent use for park and recreation purposes and to prohibit the construction of buildings on the land, except buildings for noncommercial recreation or to support maintenance of the land.

**Response: The plan includes an offer of dedication for land which meets the ordinance requirement for providing recreational area..**

- h. §22-715.4 – For preliminary and final plans, the Planning Commission shall review the plan for conformance to this section and may on its own motion require formal review by the Park and Recreation Advisory Board, which shall promptly review if so requested.

**Response: Acknowledged.**

87. §22-716 – Concrete monuments shall be accurately placed at all outbound existing property corners, including changes in direction of boundary where they do not currently exist, along the street ultimate right-of-way line at all intersections, curves and changes in direction if right-of-way and at the beginning and end of all easements, including changes in direction of easement. The monuments shall be shown.

**Response: Concrete property markers have been added to the Lot Consolidation Plan. Please refer to Plan Sheet C-207.**

88. §22-717 – A note shall be added to the record plan that all utilities shall be placed underground.

**Response: A note has been added to Plan Sheet C-300.**

89. §22-718.3 – The applicant shall construct sufficient water mains to make service available to each building in the land development. The system shall be designed to comply with the standards and requirements of the applicable water authority and shall be subject to its approval. We recommend that final approval of the plans by the Township be conditioned on approval by the North Penn Water Authority.

**Response: Acknowledged.**

90. §22-718.4 – The public water supply system shall be designed with adequate capacity and fire hydrants for firefighting purposes. The water system, including the location of all fire hydrants, shall be reviewed by the Township Fire Marshal's office and approved by the Board.

**Response: Acknowledged.**

91. §22-720.3 – A partially completed PADEP Sewage Facilities Planning Mailer was submitted with a previous preliminary plan application. The mailer shall be revised to provide all missing information, reference numbers 6 and 8. Prior to submitting the planning module to the Township for approval, the information shall be provided and the planning module shall be executed by the applicant, responsible engineer, CNBJSA, Department of Health and Bucks County Planning Commission. A Sewage Facilities Planning Module shall be approved by the Township, Authority, and PADEP prior to final plan approval by the Township.

**Response: The Mailer has been revised to include information for numbers 6 and 8 and has been resubmitted to the Township for processing.**

92. §22-720.4 – All public sanitary sewer systems shall be designed and constructed in accordance with standards of the Township and Chalfont-New Britain Township Joint Sewage Authority, as well as in accordance with PADEP Sewerage Manual and Domestic Wastewater Facilities Manual, as amended. We recommend that final approval of the plans by the Township be conditioned on approval by the Chalfont-New Britain Township Joint Sewer Authority.

**Response: Acknowledged.**

#### D. Stormwater Management (SWM) Comments

1. §22-712.2.A.(1) – Whenever a stream, intermittent stream, natural drainageway or waters of the commonwealth is located within a development site, it shall remain open in its natural state and location and shall not be piped, unless required or approved by the appropriate federal, state or Township agency. An analysis should be provided to demonstrate that the flood-carrying capacity of any watercourse to be altered is being preserved.

**Response: A flood analysis for the West Branch of Neshaminy Creek was previously provided. The post construction stormwater management report included with this submission addresses**

**the watercourse crossing associated with the access to building 3. Once the extent of Walnut Street widening has been reviewed and approved by the Township, and the extent of fill within the overlay district is better understood, an analysis for the downstream end of the culvert under Walnut Street will be prepared and submitted to the Township.**

2. §22-712.2.A.(3) – A permanent easement shall be provided along any watercourse, including any associated wetlands and floodplain, located within the boundary of any property being developed for the protection and maintenance of the watercourse area. The terms of the easement shall prohibit excavation, the placing of fill or structures, clearing, and any alterations that may adversely affect the watercourse. The required width of any such easement shall be the greater width as determined by the Township Engineer, U.S. Army Corps of Engineers, PADEP or other public agency having jurisdiction, but in no case shall be less than 50 feet. Where riparian buffers and wetland margins are required, the permanent easement shall be extended to a greater width. The Site Plan and development agreements shall contain a provision permitting access to such easement(s) for inspection or emergency repair/maintenance by the Township.

**Response: Please refer to the response to SLDO comment #34 above. A note indicating the Township's ability to access the easements has been added to Plan Sheet C-300.**

3. §22-712.2.G.(4) – A stormwater management study shall be submitted with all subdivision and/or land development applications, and shall include computations and supporting data for the design of all erosion control facilities. An Erosion and Sedimentation Control Report shall be provided.

**Response: An Erosion Control Report is included with this submission. Erosion control plans, notes, and details are included within the plan package.**

4. §22-712.2.K – The location, size, slope, invert and material of all roof drains shall be shown on the plans and associated calculations provided.

**Response: Roof drain laterals have been added to the utility plans. Please refer to plan sheets C-501 through C-503. The pipe size, slope, and inverts are specified on Plan Sheets C-505 and C-506.**

5. §22-712.4.D – Storage facilities shall completely drain both the volume control and rate control capacities over a period of time not less than 24 and not more than 72 hours from the end of the design storm. Dewatering calculations shall be provided for Basin AGB 1-3.

**Response: The dewatering calculation has been added to the Post Construction Stormwater Management Report.**

6. §22-712.4.E – The grading and utility plan shall contain a note that all detention basin embankments shall be placed in lifts not to exceed one foot in thickness. Each lift shall be compacted to a minimum of 95% of Modified Proctor Density as established by A.S.T.M. D-1557.

**Response: The note has been added to Plan Sheets C-402 and C-404.**

7. §22-712.4.F – Outlet pipes from detention facilities shall be designed to control the peak rate for the 100-year design storm. All basin outlet pipes shall be reinforced concrete pipe having watertight joints, with a minimum size of 15 inches. All basin outlet pipes shall be specified as O-ring RCP.

**Response: The outlet pipes from the detention facilities are sized to accommodate basin discharge from the 100 year storm event. The details for the aboveground basin specifies the use of concrete pipe with the appropriate specifications. Please refer to the details on PCSM Details Sheet C-818.**

8. §22-712.4.G – The emergency spillway lining shall extend to the toe of the embankment on the exterior of the berm and shall extend to an elevation of three feet below the spillway crest on the interior of the berm. The spillway liner shall extend over the crest of the spillway.

**Response: The emergency spillway liner has been added to Plan Sheet C-814.**

9. §22-712.4.H – The maximum spillway length shall not exceed 75 feet. The spillway length for Basin aboveground basins 1 to 3 exceeds the 75-foot maximum length.

**Response: The spillway length has been reduced to be less than 75' wide. Please refer to the spillway detail included on Plan Sheet C-811**

10. §22-712.4.J – A cutoff trench (keyway) of impervious material shall be provided under all embankments that require fill material. The cut-off trench shall be a minimum of 8 feet wide, 3 feet deep and have side slopes of one horizontal to one vertical. A construction detail shall be provided for the cutoff trench/ basin keyway and berm construction.

**Response: The basin berm cross section has been added to the plans. Please refer to E&S Details Sheet C-811.**

11. §22-712.4.K – The [outlet structure] inlet grate shall only be used as an emergency outflow and the grate elevation shall be equal to or higher than the 100-year water surface elevation, but at least six inches below the emergency spillway elevation. The outlet structure grate for Basins 1-3 and 3-4 are less than 6 inches higher than the 100-year water surface elevation and shall be revised.

**Response: The design of the outlet structures have been adjusted to provide 6 inches of freeboard. Please refer to the Post Construction Stormwater Management Report.**

12. §22-712.4.L – Two anti-seep collars shall be installed around the basin outlet pipe and shall be centered within the normal saturation zone of the berm. The anti-seep collars and their connections to the pipe barrel shall be watertight. Anti-seep collars shall be proposed and calculations and details provided.

**Response: Antiseep collar calculations and details have been provided. Please refer to the Erosion Control Report and the details E&S Details Sheet C-811.**

13. §22-712.4.O – Energy dissipating devices (cable concrete, rip rap, or equivalent) shall be provided at all discharge points and calculations and details provided.

**Response: Calculations and details for riprap aprons and level spreaders have been added to the Erosion Control Report and Plans. Please refer to Plan Sheets C-817 and C-818 for design information.**

14. §22-712.4.P.(1) – Bioretention and infiltration facilities shall be planted with vegetation and/or seed mix other than turf grass to encourage evapotranspiration. Planting soil depth shall be at least 18" where only herbaceous plant species will be utilized. If trees and woody shrubs are used, soil media depth shall be increased depending on plant species. A minimum of 18 inches of planting soil shall be provided in Basin 1-3. Planting soil shall be amended with a composted organic material. A typical organic amended soil is combined with 20-30% organic material (compost), and 70-80% soil base (preferably topsoil).

**Response: Stormwater facility plantings per SALDO and PADEP have been provided.**

15. §22-712.4.R.(3) – Inlets or storm manhole structures with steps shall be located at each corner of underground detention basins to provide access for maintenance. Structures shall be provided for access at the corners of all underground MRC basins.



**Response: Additional structures have been added to underground detention basins. Please refer to Plan Sheets C-501 through C-503. MRC basins are no longer proposed.**

16. §22-712.4.R.(5) – An emergency overflow weir shall be provided for outlet structures to convey basin inflow in excess of design flows or in the event the outlet structure becomes blocked and is unable to convey the design flow. The minimum capacity of the emergency overflow weir shall be equivalent to the 100-year peak inflow rate for the post-development design storm. Weir spillway calculations shall be provided for all underground MRC basins.

**Response: The MRC basins are no longer proposed.**

17. §22-712.4.S – All Managed Release Concept stormwater facilities shall be in accordance with the most recent Managed Release Concept design guidance provided by PADEP. The following comments related to the PADEP design guidance for MRC facilities dated August 15, 2025 shall be addressed:
- a. MRC storage systems shall have a proprietary Manufactured Treatment Device (MTD) for pre-treatment of the volume up to the 2 year/24-hour storm. The plans include a detail for an Arcadia Stormwater Separator. The location of this device shall be specified on the plans and documentation shall be provided to demonstrate certification from the NJDEP or TAPE.

**Response: The MRC basins are no longer proposed.**

- b. Volume up to the 2-year/24-hour storm for an MRC Storage System shall be directed to a forebay or settling chamber. Flows to the MRC are diverted to separate underground basins, however, the inverts through these forebay/ settling chambers are the same as the rate control portion of the MRC basin and do not detain these flows. Details for the outlet structure from these forebay/ settling chambers shall be provided to demonstrate how these flows are detained.

**Response: The MRC basins are no longer proposed.**

18. §22-712.5.A – All storm sewer systems shall provide the required capacity for the 100-year design storm based on the Rational Method, as determined by the PennDOT Design Manual, Part 2, as amended, and the U.S. Department of Commerce, Hydraulic Design Series No. 5, Hydraulic Design of Highway Culverts, as amended. Storm sewer systems located along a Township road or state highway shall also be designed to convey the 100-year peak flow rate. Pipe capacity calculations shall be provided for all proposed storm pipes. A minimum of one foot of freeboard shall be provided between the one-hundred-year water surface elevation and the top of inlet grate or manhole rim.

**Response: Pipe capacity calculations have been added to the Post Construction Stormwater Management Report. The calculations are based on the 100 year storm event and provide one foot of freeboard.**

19. §22-712.5.I – When there is a change in storm sewer size at an inlet or manhole structure, the top of pipe elevations shall be the same. For equal storm sewer sizes, a minimum of two inches shall be provided between the inlet pipe and the outlet pipe invert elevations. The required two-inch drop between pipes shall be provided at all storm sewer structures.

**Response: Crowns of dissimilar pipe sizes have been matched and two inch drops are proposed across all other stormwater connection structures. Please refer to the stormwater profiles on Plan Sheets C-602 through C605.**

20. §22-712.6.C – Inlet spacing in paved areas shall be arranged so that a minimum of 80% of the gutter flow tributary to the inlet will be captured. The designer shall be required to verify that bypass surface runoff from the 100-year design storm will enter the storm sewer piping system at some point, prior to

discharge into a stormwater facility or other approved outlet point. Inlet capacity calculations shall be provided.

**Response: Inlet capacity calculations have been added to the Post Construction Stormwater Management Report.**

21. §22-712.6.D – Storm sewer inlet spacing shall not exceed 300 feet. The pipes from Z-50 to Z-70 and T-10 to T-20 exceed 300 feet.

**Response: The location of inlets has been adjusted so that none are more than 300 feet apart. Please refer to plan sheets C-501 through C-504.**

22. §22-712.6.E – At least one inlet shall be required at the curb tangent on the upstream side of all access drive and driveway intersections with public roadways. Additional inlets shall be provided at the driveways for Buildings 1 and 2. In addition, there is an inlet shown in the middle of the southern driveway for Building 1. The inlet shall be relocated to the curb tangent.

**Response: Additional inlets have been added at the Walnut Street Driveways to buildings 1 and 2. Please refer to Plan Sheets C-501 and C-502.**

23. §22-712.8.B – A Type "DW" endwall shall be provided at the termination of all storm sewer systems. Headwalls shall be provided for the culverts crossing beneath the Lot 3 access road.

**Response: The pipe system that passes runoff from the east side of the access road to the west side has been reconfigured to include a DW endwall. Please refer to plan sheet C-504. The equalization pipes that connect existing Detention Basin 2 with the new underground storage will not have endwalls.**

24. §22-712.13.A.(1) – When any stormwater facility is proposed within a land development, a blanket or defined easement shall be provided. The defined easement or note of a blanket easement, and the terms of the ownership and required maintenance, shall be provided on the recorded post-construction stormwater management plan. Easements shall be provided for the proposed stormwater management facilities.

**Response: Stormwater management easements have been added. Please refer to Plan Sheet C-507**

25. §22-712.13.A.(2) – A stabilized access to a stormwater facility shall be provided for maintenance and operation. Access to detention basins and similar facilities shall be constructed of \* Access shall be provided to Basins 1-3 and 3-4a.

**Response: An access has been graded into basin 1-3. Please refer to Plan Sheet C-402. Basin 3-4a has been eliminated.**

26. §§26-121.8.C & 26-132.2.C.(11) – To the maximum extent practicable, incorporate the techniques for low impact development practices described in the PA Stormwater Best Management Practices Manual; PADEP No. 363-0300-002 (2006). A justification must be included in the SWM site plan if BMPs other than green infrastructure methods and LID practices are proposed to achieve the volume, rate and water quality controls. "For any SWM site plan that proposes to use any BMPs other than green infrastructure and LID practices to achieve the volume and rate controls required under this Part, the municipality will not approve the SWM site plan unless it determines that green infrastructure and LID practices are not practicable" in accordance with §26-134.3.

**Response: The stormwater design has been revised to incorporate riparian forested buffers as the primary means of stormwater management to meet runoff volume and water quality**

**requirements. As revised, stormwater management relies on green infrastructure, either through discharge to the infiltration basin or to the riparian forested buffer.**

27. §26-123.2.C.(5) – The stormwater management design is primarily composed of MRC basins which are used at locations where infiltration is not feasible. The PA Stormwater BMP Manual states that “(suitable infiltration) areas should be identified early in the design process and should not be subject to a building program that precludes Infiltration BMPs. An exemption should not be provided for “full build-outs” where suitable soils otherwise exist for infiltration.” The Stormwater Infiltration Report completed by GTA shows that testing completed adjacent to the proposed buildings, such as INF-13, 14, 24, 3 and 54 showed favorable infiltration rates. No testing was completed where the buildings are proposed. Additional infiltration testing shall be completed at the building footprints to determine if an alternate building layout would allow for traditional infiltration facilities.

**Response: Due to the existence of floodplains and wetlands on the site, there are no alternate locations in which to place the buildings. Regarding the listed test locations, test INF-14 found desirable infiltration rates without discovering groundwater or bedrock which are prohibitive to infiltration. However, as is prevalent across the site, the nearest tests did not find conditions favorable to infiltration. INF-13 to the east discovered bedrock at too shallow an elevation to accommodate infiltration measures. And INF-15 to the west discovered shallow groundwater and that the soil in that location would not infiltrate at all. Together, no two of the tests could be considered together in a way that could support design of an infiltration system. Infiltration measures should not be implemented based on one test. Tests INF-24 and INF-54 discovered shallow bedrock, and in avoiding the bedrock for the purpose of performing the test, the resultant test elevations are too different to be considered in tandem as support for an infiltration system. So, although promising rates were discovered in some locations, the locations of those rates are at elevations which will not support infiltration measures or are isolated from other tests which could validate them as support for infiltration measures. Additionally, because riparian forested buffers have been implemented, infiltration testing is not pertinent to the design.**

28. §26-123.2.C.(6)(b) – Field tests shall be provided at the level of the proposed infiltration surface. Test pits and infiltration testing shall be completed within the footprint and design elevation of UGB 3-1a and 3-1b.

**Response: MRC basins are no longer part of the stormwater management design. Additional testing is not necessary to support the design as resubmitted.**

29. §26-124 – Development sites must control proposed development conditions runoff rates to existing conditions runoff rates for the lower order design storms (i.e. 2-year post to 1-year pre). Once comments from the letter are addressed, it shall be confirmed that the stormwater management design meets this requirement.

**Response: Acknowledged.**

30. §26-124.C – On-site drainage facilities shall be designed to safely convey off-site flows through the development site. Offsite flows getting to the stormwater facilities for Building 3 shall be included in the analysis of these basins.

**Response: Runoff from offsite areas to the north are included in the design for building 3. Please refer to the Post Development Drainage Area Map included in the Post Construction Stormwater Management Report. No other offsite areas are expected to drain to building 3.**

31. §26-132 – The following comments related to the SWM Site Plan Requirements and design shall be addressed:

- a. Several of the underground basins are shown beneath the loading dock ramps. These foundations for these ramps may conflict with the underground systems. The conflicts shall be resolved.

**Response: Underground stormwater facilities are no longer under loading dock ramps. Please refer to Plan sheets C-501 through C-503.**

- b. All stormwater facilities shall be labeled on the Utility Plans and PCSM plans and shall be coordinated with the labels in the PCSM Report.

**Response: The appropriate labels have been provided on the PCSM plans for stormwater facilities.**

- c. A drainage area plan shall be provided for the Lot 3 access road.

**Response: The drainage area plan for the existing stormwater management infrastructure in the vicinity of the building 3 access road has been added to an appendix in the Post Construction Stormwater Management Report.**

- d. An inlet drainage area plan shall be provided for all proposed inlets.

**Response: An inlet drainage map has been added to an appendix in the Post Construction Stormwater Management Report.**

- e. Pipe information and details shall be provided for the Equalizer pipes and "CVT" culverts along the Building 3 access road.

**Response: A cross section of the building 3 access road has been added which specifies pipe information for the equalizer pipes. Please refer Plan Sheet C-903. Culvert design has been added to the Post Construction Stormwater Management Report.**

- f. Details shall be provided for all diversion structures and associated weirs.

**Response: The diversion structures are no longer proposed.**

- g. The plans provide generic details of the ADS Stormtech Chambers. Specific details for each basin shall be provided, including layout dimensions, elevations, chamber sizes and models, cleanout locations and underdrain location, size and elevations. The storage volumes modeled in the report shall be verified.

**Response: The design will be provided to ADS to confirm the basin sizing and layout and for them to provide a detailed layout of their system. These details will be provided on the final plan once the stormwater management design has been found to be acceptable.**

- h. The Underground MRC Basin Outlet Control Structure table lists the outlet control structure for the rate control basins as the outlet control for the forebay/ settling chambers and shall be revised to list the outlet control from these facilities as applicable.

**Response: MRC basins are no longer proposed.**

- i. The Outlet Control Structure for Above Ground Basins table lists several rows for the same outlet structure with conflicting information. The detail shall be revised to clarify the outlet structure configuration and verify the structures modeled in the report.

**Response: The detail for the outlet control structure has been revised. Please refer to Plan Sheet C-818.**

- j. Based on the elevations listed in Underground MRC Basin Outlet Control Structure table, several of the orifice heights will conflict with the weir elevation and shall be revised.

**Response: MRC basins are no longer proposed.**

- k. The Typical Basin Spillway Lining Detail lists the elevation for the Building 1 basin and shall be revised to include infiltration for the Building 3 basin. The type of matting shall be specified as well.

**Response: The aboveground basin for building 3 is no longer proposed. A mat type has been added to the Typical Basin Spillway Lining Detail on Plan Sheet C-817.**

- l. The elevations of the basin spillways shall be noted on the plans.

**Response: The spillway elevation for AGB 1-3 has been added to Plan Sheet C-811.**

32. §26-132.2.B.(2)(c) – The following comments related to the modeling of the stormwater management design shall be addressed:

- a. The stormwater report includes modeling of the modified basin at the Building 3 access road. However, the existing outlet structure and pipes, as well as a proposed or modified outlet structure is not shown on the plans and details of the underground basin are not provided in the details. The plans shall be revised to show all existing pipes and structures associated with this basin as well as all proposed modifications to determine the impact of the access road and if the modified design is sufficient to provide adequate capacity and rate control.

**Response: Additional details for the existing features within the detention basins on the 141 Independence Lane property have been added to the plans. Please refer to the Existing Conditions Plan Sheet C-204. A cross section of the building 3 access drive has been added to provide additional detail for the proposed underground storage system which mitigates storage volume reduction from the existing detention basin. Please refer to Plan Sheets C-903.**

- b. The Pre-Development Curve Number calculations include 1.12 acres of impervious area where the zoning table notes 19,262 s.f. of impervious area. The pre-development impervious areas shall be clarified and revised accordingly.

**Response: The areas evaluated for the stormwater management design do not directly correlate to the site property area as some onsite areas are not analyzed while some offsite areas are analyzed. Therefore, the areas summarized in the zoning table are expected to vary from the areas of stormwater analysis.**

- c. Diversion Structures 1, 2 and 4 model two separate outlet pipes to the forebay/ settling chambers. These diversion structures in plan view provide a single pipe from the structure towards these basins and shall be verified and revised.

**Response: The diversion structures are no longer proposed.**

- d. The pipe sizes modeled for the outlet structures and diversion structures are not consistent with the pipe sizes listed in the Storm Pipe Schedule and Underground MRC Basin Outlet Control Structure table and shall be revised for consistency.

**Response: The diversion structures and MRC outlet control structures are no longer proposed.**

33. §26-132.2.C.(9) – The following signature block for the design engineer: "I, (Design Engineer), on this date (date of signature), hereby certify that the SWM site plan meets all design standards and criteria of The Neshaminy Creek Watershed Act 167 Stormwater Management Ordinance or Plan."

**Response: The signature block has been added to the cover sheet.**

34. §26-132.2.C.(10) – A statement signed by the applicant acknowledging that any revision to the approved SWM site plan must be approved by the municipality and that a revised Erosion and Sediment Control Plan must be submitted to the Conservation District shall be provided on a plan to be recorded.

**Response: The statement has been added to the cover sheet.**

35. §26-132.2.E – The SWM site plan shall include an operations and maintenance (O&M) plan for all existing and proposed physical stormwater management facilities, as well as schedules and costs for O&M activities. This plan shall address long-term ownership and responsibilities for O&M. The Long-Term Operation Maintenance Schedule is generic and shall be revised to specify the inspection and maintenance responsibilities for the underground MRC basins, above ground MRC basins, infiltration basins, level spreader, stormwater conveyance systems, etc.

**Response: A table of O&M specifications has been added to Plan Sheet C-817.**

36. §26-133.A – The NPDES Permit for Stormwater Discharges from Construction Activities and any other permit under applicable state or federal regulations shall be submitted to the Township.

**Response: Acknowledged.**

37. §26-162.3.A.(9) – A 20-foot-wide access easement shall be provided around all stormwater facilities and BMPs that would provide ingress to and egress from a public right-of-way.

**Response: An easement plan for stormwater facilities has been added to the plan set. Please refer to Plan Sheet C-507.**

38. §26-162.3.B – The identity and contact information associated with the person(s) responsible for O&M shall be added to the Long-Term Operation Maintenance Schedule.

**Response: The landowner has been specified as the responsible party in the Long-Term Operation and Maintenance Schedule notes included on Plan Sheet C-817. Contact information can be provided prior to recording any O&M agreements.**

39. §26-162.3.D – A statement, signed by the facility owner, acknowledging that the stormwater facilities and BMPs are fixtures that can be altered or removed only after approval by the municipality shall be provided on an O&M plan sheet to be recorded.

**Response: The statement has been added to the cover sheet for signature prior to recording.**

40. §26-164.1 – The Applicant shall sign an Operation and Maintenance (O&M) agreement with the municipality covering all stormwater facilities and BMPs that are to be privately owned. The O&M agreement shall be transferred with the transfer of ownership and shall be prepared by the Township Solicitor.

**Response: Acknowledged. The O&M Agreement will be entered into as an administrative condition of final plan approval.**



41. §26-172 – Roof drains and sump pumps shall discharge to infiltration or vegetative BMPs and to the maximum extent practicable satisfy the criteria for disconnected impervious areas. The location and discharge point of all roof drains shall be shown on the plan to verify compliance.

**Response: Roof drains have been added to the plans. There are no sump pumps proposed. All roof drains are tributary to either an infiltration basin or a vegetative BMP in the form of a riparian forested buffer.**

42. §26-173.1 – A note stating “No person shall modify, remove, fill, landscape, or alter any stormwater management (SWM) best management practices (BMPs), facilities, areas, or structures unless it is part of an approved maintenance program and written approval of the municipality has been obtained” shall be added to a plan sheet to be recorded.

**Response: The note has been added to Plan Sheet C-300.**

43. §26-173.1 – A note stating “No person shall place any structure, fill, landscaping, or vegetation into a stormwater facility or BMP or within a drainage easement which would limit or alter the functioning of the stormwater facility or BMP without the written approval of the municipality” shall be added to a plan sheet to be recorded.

**Response: The note has been added to Plan Sheet C-300.**

44. Township Resolution #2024-02 – The Applicant is required to pay a fee for all proposed stormwater BMPs to provide a financial guarantee for the timely installation, proper construction and continued maintenance by the owner of the subject property prior to plan recording. The fee shall be 5% of the total construction cost of the proposed BMPs with a minimum of \$100.00, but not to exceed \$10,000.00. The Applicant’s professional shall submit a cost estimate once the design is finalized.

**Response: Acknowledged.**

**The following are our responses to comments found in the Flood Study Review #1 letter, prepared by Gilmore & Associates, Inc. dated 11/20/2025:**

1. §27-1904.a.2 & 27-1906.b.2.(a) – Any areas subject to flooding and as last updated in the Websoil Survey are included in the Floodplain Overlay District. The floodplain soils shall be shown and identified on the plans to confirm whether or not any additional improvements are proposed within the Floodplain Overlay District. The Floodplain Overlay District shall also be identified on the plan.

**Response: The floodplain overlay district has been added to the plan so that it includes floodplain soils in addition to the floodplain. Please refer to plan sheet C-201.**

2. §27-1904.d – No new construction or development shall be allowed within the identified floodplain area unless a permit is obtained from the DEP.

**Response: A permit will be obtained from PADEP or the appropriate government agency for any new construction within the identified floodplain.**

3. §27-1904.o.1 – No encroachment, alteration, or improvement of any kind shall be made to any watercourse unless it can be shown through hydrologic and hydraulic engineering studies and analyses that the activity will not reduce, change, or impede the flood-carrying capacity of the watercourse in any way. The Applicant is required to widen Walnut Street per the Subdivision and Land Development Ordinance Section §22-705.3.C. Widening of Walnut Street would require filling in a portion of the Floodplain Overlay District.

**Response: The widening of Walnut Street and the improvements included with this widening will be evaluated and a study will be prepared for these improvements once the extent of road improvements has been confirmed by the Township. A permit will be obtained from PADEP for this modification as is needed.**

4. §27-1904.g – Fill may be placed within the Floodplain Overlay District only when allowed as a special exception by the Zoning Hearing Board.

**Response: A Special Exception was processed for the rear area of Building 2 and is on appeal. To the extent one is required, a separate Special Exception application will be submitted for impacts related to the Walnut Street improvements.**

5. §27-1906 – All Floodplain Overlay District administrative requirements shall be included in a formal submission to the Township's Floodplain Administrator in accordance with this section. In addition, the following items shall be addressed:
  - a. The municipality must acknowledge and sign off on the request for a LOMR (Letter of Map Revision) to show the community's concurrence that the revision is consistent with local floodplain ordinances. The Township's Floodplain Administrator must sign the Community Acknowledgement Form before FEMA approves it.

**Response: Acknowledged.**

- b. In conjunction with completing the Community Acknowledgement Form, the Township must acknowledge that compliance with Sections 9 and 10 of the Endangered Species Act (ESA) has been achieved independent of FEMA's process. Section 9 prohibits anyone from "taking" or harming an endangered species. Information shall be provided to document compliance.

**Response: A PNDI was completed for the proposed development. The PNDI identified potential impacts to the Northern Red Bellied Cooter (NRBC). A NRBC habitat assessment was subsequently completed. No habitat was found in the vicinity of the project's floodplain encroachments. The floodplain encroachments have been cleared from harming any endangered species.**

6. General comment – Though offsite, the mapped floodway appears to be outside of the "Calculated Existing Flood Hazard Zone" on the adjacent parcel TMP #26-001-100-004.

**Response: The floodway has been corrected in this location. Please refer to Plan Sheet C-201**

7. SALDO §22-712.2.A.(1) and Stormwater Management §26-103.1.H. – Whenever a stream, intermittent stream, natural drainageway or waters of the commonwealth is located within a development site, it shall remain open in its natural state and location and shall not be piped, unless required or approved by the appropriate federal, state or Township agency. An analysis should be provided to demonstrate that the flood-carrying capacity of any watercourse to be altered are being preserved.

**Response: An analysis of the West Branch of Neshaminy Creek was provided for improvements proposed within the Creek's floodplain. The post construction stormwater management report included with this submission addresses the watercourse crossing associated with the access to building 3. Once the extent of Walnut Street widening has been reviewed and approved by the Township, and the extent of fill within the overlay district is better understood, an analysis for the downstream end of the culvert under Walnut Street will be prepared and submitted to the Township.**

Should you have any questions or require additional information, please contact our office as soon as possible. Thank you.

Sincerely,

**BOHLER, LLC**

A handwritten signature in black ink that reads "Lindsey Breylinger". The signature is written in a cursive, flowing style.

Lindsey Breylinger, Associate