



WEST WHITELAND TOWNSHIP
Planning Commission
Agenda
Tuesday, April 30, 2024
7:00 P.M.

[Etiquette for
hybrid meetings](#)

Meeting will be held in-person and via Zoom

[Register for Zoom Meeting](#)

Call by Phone: 1-646-558-8656

Meeting ID: 87308970242 Passcode: 507637

Meeting Packets can be found on the Township website.

Reminder to meeting participants: Please speak clearly into the microphone.

CALL TO ORDER

REVIEW OF MEETING MINUTES

Approval of Meeting Minutes: April 17, 2024.

PUBLIC COMMENT/CONCERNS/QUESTIONS

Comments or questions regarding issues NOT on the agenda should be raised at this time. Members of the public will have an opportunity to ask questions and comment upon agenda items during the discussion on those items.

PLANS

Valley Creek Homes

Address: 301-305 Church Farm Lane

Fourth Review: Conditional Use

Request: Application for construction of 300+ dwelling units of mixed type as an age-restricted, active adult community with recreation amenities.

NEW BUSINESS

OLD BUSINESS

ANNOUNCEMENTS

The tentative meeting agenda for the May 14th PC meeting.

ADJOURNMENT

Next Meeting: May 14, 2024



MEMORANDUM

TO: Planning Commission
FROM: John R. Weller, AICP
Director of Planning and Zoning
SUBJECT: Valley Creek Active Adult Community conditional use application
DATE: April 26, 2024

APPLICANT: Valley Creek Homes, LLC
c/o The McKee Group
940 W. Sproul Rd., Ste. 301
Springfield, PA 19064

SITE ADDRESS: 301-305 Church Farm La.
Exton, PA 19341

TAX PARCELS: 41-3-8, 41-3-8.1, 41-3-8.2, 41-3-8.4

ZONING: O/L, Office/Laboratory / IN, Institutional Overlay

DESCRIPTION: Conditional use application for an active adult community with 316 dwelling units and ancillary facilities on 100.47 acres.

Background

The subject property is a mostly vacant tract of 100.47 acres in the Office/Laboratory (O/L) zoning district located along the north side of Swedesford Rd. between the Malvern Hunt community in East Whiteland Twp. and Exton Park. There are nine vacant single-family homes along the Swedesford Rd. frontage of the property that will be demolished as part of this project. The historic¹ Pickwick mansion – also along Swedesford Rd. and vacant – will be retained, but the associated stable will be demolished. Several tributaries of Valley Ck. cross the site, and FEMA has identified a 100-year floodplain for one of them; a ninety-foot-wide gas pipeline easement owned by Williams/Transco crosses the northern end of the tract.

This conditional use application proposes the construction of an active adult community with 316 dwelling units (95 single-family homes, 98 twins, and 123 townhouse units), a community center/clubhouse with a swimming pool for the exclusive use of the residents and their guests, an internal road system, and 15.19 acres of permanent open space. The principal access will

¹ Township historic resource no. 327. The mansion (site no. 327.01) is on the National Register of Historic Places; the associated stable (site. no. 327.02) is a Township-designated resource, but is not on the National Register.

be from Swedesford Rd., directly opposite the intersection with Valley Creek Blvd., with a secondary access to Old Valley Rd. at the north end of the property.

Section §325-15.B(5) of the West Whiteland Township Zoning Ordinance (“Zoning”) allows uses permitted by the Institutional overlay (“IN”) district in the O/L district, and §325-45.F of the Zoning allows active adult communities in the IN district on tracts of 75 acres or more. The proposed use is therefore permitted by the Zoning, and the Zoning Officer has determined that this project complies with the applicable standards of §325-45.F. Conditional use review is required by §325-124.A(1) due to the number of proposed dwelling units.

The Township Historical Commission reviewed this application at their meeting of September 11, 2023. At the conclusion of discussion, the Commission unanimously passed a motion recommending approval of the conditional use, subject to four conditions recommended by our historic preservation consultant:

- That a densely landscaped screen be provided to block the view of the Pickwick mansion from the new townhouses;
- Prior to its demolition, photographic documentation of the Pickwick stable shall be provided to the Township;
- Provide photographic documentation of the exterior of each of the nine single-family homes prior to their demolition; provide photographic documentation of the interior of whichever home is in the best condition; and
- Clarify alterations proposed to Church Farm La.

The Applicant presented this application to the Planning Commission on September 5, 2023, January 23, 2024, and March 5, 2024. At the January and March meetings, there was extensive discussion regarding connections to the existing road network and the impact upon Church Farm La. in particular. Residents in attendance objected to the proposed road design, as it eliminated the existing intersection of Church Farm La. with Swedesford Rd. and required them to go through the new community to get to their homes. It was also noted that, while there is little motor vehicle traffic on Church Farm La., it is popular with walkers and bicyclists.

Since the March meeting, the Applicant has met with several of the affected residents and Staff and has significantly revised the design of Church Farm La. in response to their concerns. The plan now features a 14-foot wide cartway for motor traffic from Swedesford Rd. (opposite one of the entrances to Exton Park) to a point immediately north of the Rouse property. South of the Rouse property, Church Farm La. will be a recreational trail extending to Swedesford Rd. and connecting to the trail system in the proposed community, which will provide a signalized crossing of Swedesford Rd. and connection to the Chester Valley Trail.

It is our understanding that this arrangement is acceptable to the residents, particularly since the new connection to Swedesford Rd. eliminates the need for a connection to Church Farm La. from the new community. The new cartway is characterized as a private access drive (similar to the existing Church Farm La.) rather than a public street, so that it need not meet the design standards for public roads. The proposed alignment will be on property owned by the Township, and the Board of Supervisors have advised that they are agreeable to this design. Finally, Staff also supports this design, noting that it allows current residents continued access to their

properties by a low-volume route while preserving the existing alignment for recreational use. We have considered how traffic can be controlled on the new access – such as with signage limiting access to local traffic or stating that this is not a through street – but a final determination on this issue need not be made at this time.

The Applicant has also revised the design of the access to Old Valley Rd. at the north end of the project site, labelled Road H. The Commission will recall that a number of residents expressed concern about the impact of this access upon Old Valley Rd., but it is critical that a project of this size have a minimum of two connections to the public road network. While the alignment of Road H is the same as what we have seen before, the cartway is now much narrower (16 feet rather than 28 feet) and appears to be for emergency use only; the adjacent sidewalk has also been eliminated. While this responds to the residents' concerns, Staff prefers the prior design with the sidewalk, which included improvements to Old Valley Rd. eastward from the new intersection, as previously discussed. While we respect the residents' desire to retain the existing character of the road, this is an issue of public safety.

Tonight is the fourth presentation of the conditional use application to the Commission.

Criteria for approval of a Conditional Use

The criteria for Conditional Use approval are found in §325-124.C(1) of the Zoning. In the interest of brevity, the criteria that have been met to the satisfaction of Staff in prior reviews are not included below.

- (e) Where pertinent, the effects of the proposal with respect to congestion on the roads or highways; the most appropriate use of land; conserving the value of buildings; safety from fire, panic, and other dangers; adequacy of light and air; the prevention of overcrowding of land, congestion of population, and adequacy of public and community services will not have a substantially adverse effect thereon.

The current Bowman review notes that this project will generate less traffic than the office park previously approved for this site and that it will not result in undue congestion of the road network.

Comment #2a of the Spotts, Stevens and McCoy ("SSM") review repeats their prior concern that the Applicant's request for a waiver from our restrictions against fill in riparian buffer areas and floodplains is only to accommodate additional dwellings, suggesting that the design overcrowds the site. The Applicant has responded that the intent of the buffer – to protect the stream from the effects of runoff – is met by the natural topography, which slopes *away* from the stream at this location. SSM acknowledges this but has remaining concerns about placing fill in a floodplain area, so their objection stands.

The Commission may wish to discuss this further with the Applicant. Until this concern is resolved, these criteria will not be met.

- (f) The proposed change is reasonable in terms of the logical, efficient, and economical extension of public services and facilities including, but not limited to, public water, sewers, police and fire protection, transportation, and public schools.

Staff previously noted that the office development approved for this site in 2000 indicated that the Township has long deemed this location suitable for the extension of sanitary sewerage, water supply, and emergency services. We have already noted that Staff concurs with Bowman's conclusion that the traffic impact will be acceptable and will not create undue congestion. Since residency will be limited² under the provisions of the Housing for Older Persons Act of 1995, there should be a positive impact upon the public schools, as the project will generate revenue for the district but no additional students.

The previous Staff review stated that we had remaining concerns about the connections to the existing road network and the impact upon Church Farm La. in particular. As more fully described above in the "Background" section, the Applicant is now proposing a new alignment for the southern portion of Church Farm La. that will preserve that road as a single-access lane providing access to a handful of properties. It is our understanding that the affected residents are satisfied with this arrangement, and Staff is also satisfied that our prior concern on this issue is resolved.

The Applicant has also revised the design of Road H, which is the connection to Old Valley Rd. The prior plan showed a 28-foot-wide cartway with an adjacent sidewalk to Old Valley Rd.; the current plan shows a 16-foot-wide cartway and no sidewalk. While this responds to the residents' concerns, Staff is of the opinion that this is too narrow. We would accept a cartway narrower than 28 feet, but it should be wide enough to function as a full-time access – not restricted to emergency use – and we would like the sidewalk reinstated. As previously discussed, Old Valley Rd. east of the Road H intersection must be improved to match the cartway east of the Malvern Hunt Way intersection, but bollards or a similar barrier to prevent motor vehicles from travelling west along Old Valley to the Church Farm La. intersection would be acceptable.

The Commission needs to advise as to the preferred design of Road H before we can determine if these criteria have been met.

- (g) The natural features and processes characterizing the proposed site and its surroundings shall not suffer unmitigated degradation; that the management of stormwater, the provision of water and/or sewer service, and any other alterations to the site's predevelopment conditions shall be consistent with Township goals, practices, and plans in these regards and that demand for water and energy by the proposed use shall be minimized to the optimal extent.

As this property was most recently in agricultural use, it qualifies as open space, although not in a natural condition. The developer will be required to manage stormwater in compliance with the Township's Stormwater Management Ordinance, and such compliance will be reviewed in detail during the land development review. For conditional use applications we require only that applicants demonstrate the feasibility of compliance with this Ordinance. The SSM review advises that while the overall stormwater

² See definition of "active adult community" in §325-8 of the Zoning.

management strategy is sound, they still have concerns,³ which Staff advises must be more fully resolved prior to Commission action, particularly since SSM states that resolution of these issues may result in a reduction in the number of dwelling units.

Until the SSM concerns are satisfactorily addressed, Staff is of the opinion that these criteria have not been met.

- (i) Development of highway frontage insofar as possible has been designed so as to limit the total number of access points, reduce the need for on-street parking, and encourage the frontage of buildings on parallel marginal access roads or on roads perpendicular to the highway.

The tract has frontage upon Swedesford Rd., which the Comprehensive Plan classifies as an arterial road, and Old Valley Rd., which is classified as a local access road and has very little traffic. The principal access will be from Swedesford Rd., opposite the intersection with Valley Creek Blvd. along the south side of the tract, and there is a secondary access to Old Valley Rd., along the north side. Earlier versions of this plan provided an access to Church Farm La. from the western side of the tract and were unclear about the final design of the southern section of Church Farm La. The Commission, nearby residents, and Staff were all unsatisfied with this arrangement. We find what is now proposed a significant improvement.

Staff is now satisfied that these criteria have been met.

Consultant Reviews

There is no new review from our consultant for sanitary sewerage, Carroll Engineering. The sewer system has sufficient capacity to serve this community, and an earlier Carroll review raised mostly administrative items; a more detailed review would not be appropriate until the land development review stage when the Applicant will be required to show the configuration of the system and other details. The last review by the Codes Department similarly raised concerns that will be addressed by the land development plan, so there is no new review from Mr. Greenawalt either.

- **SSM review dated April 24, 2024.** The first six comments address waivers that the Applicant intends to request from the Stormwater Management Ordinance (comments #2 through #5) and the Subdivision and Land Development Ordinance ("S/LDO"). Waivers are granted as part of the land development approval – which is the next phase of plan review – although the Township has approved conditional use applications stating that certain waivers will be favorably considered.
 - Comment #2 provides a detailed consideration of waivers requested from the riparian buffer area ("RBA") requirements, which protect streams from the adverse impacts of stormwater runoff. The Commission may recall from the Applicant's previous appearance their statement that the RBA's in this particular case did not provide any meaningful protection of this kind due to the topography: runoff in this area travels away from the stream, not toward it as is typical. Comment #2a states

³ Comments #10 and #13 of the SSM review dated April 24, 2024.

that SSM is not convinced on this point, and they do not support the requested waiver. Comment #2b notes that the waiver requests must be updated to accommodate the proposed realignment of Church Farm La.,⁴ as it appears that about 875 linear feet of the new road may be within an RBA. Comment #2c advises that a waiver to allow stormwater basins in the RBA is appropriate, provided that the basins are properly designed.

- Comment #3 notes that SSM typically supports waivers requested from the requirement to infiltrate stormwater where the geology is inappropriate but adds that this waiver may not be necessary in this case, based upon the proposed design of the stormwater facilities. Comment #4 similarly states that they do not object to the requested waiver, but it may prove unnecessary.
- Comment #5 states that they do not support relief from the basin design standards, adding that the State Department of Environmental Protection may not agree to the waiver either.
- Comment #6 supports the waiver requested from street design standards in §281-26.B(1) of the S/LDO to allow the design of the townhouse access roads as shown, provided that emergency vehicles will not be impeded.

Comments #7 and #8 review compliance with the floodplain regulations in the Zoning. SSM acknowledges that the Applicant has started the process to amend the limits of the regulated flood hazard area (by means of the "CLOMR," or "Conditional Letter Of [Floodplain] Map Revision," cited in the review) but it may need to be modified due to the revisions to the plan. Comment #8 notes that the Zoning does not allow fill within a floodplain area and that a variance will be required, even though the fill is to be placed in accordance with a CLOMR.

Comment #9 raised a variety of concerns regarding the realignment of Church Farm La. Staff agrees that the issues of ownership and maintenance must be resolved, but we are of the opinion that this can be better addressed during the land development review. At this time, the Commission should advise whether you are agreeable to the concept and general alignment of the proposed change.

Comments #10 and #16 review the proposed stormwater management facilities. As before, SSM is of the opinion that the overall concept is sound but expresses concern about the adequacy of specific elements of the system. Comments #10 and #13 suggest that the Applicant acknowledge that it may be necessary to reduce the number of lots in order to satisfy the applicable regulations.

Comments #17 through #28 address miscellaneous concerns requiring clarification, additional information on the plan, or minor revisions. Staff agrees that ownership and maintenance responsibilities for the proposed trail must be defined, but that this is more suitably addressed during the land development review. At this time, the Commission should advise on whether the trail configuration is acceptable.

- **Theurkauf Design and Planning ("Theurkauf") review dated April 17, 2024.** Comment #1 addresses the conditional use criteria, repeating points from the previous review. Comment #2 notes the realignment of Church Farm La. and lists the affected

⁴ The review erroneously refers to this as an "emergency access," both here and in comment #14.

properties. As previously noted, Staff has been advised that this configuration is acceptable to the affected residents.

Regarding our compensatory planting requirements, comment #5 advises that compliance appears feasible but expresses concern about the extent of clearing, noting the loss of mature woodlands and significant trees.

Comment #6 states that most of the required site element buffers are accommodated, except for those around the Pickwick mansion and five of the stormwater management basins. Theurkauf does not support waivers⁵ to allow the plan as shown.

Comments #8 through #12 advise that compliance with the remaining landscaping requirements appears feasible (conditional use applications are not required to include detailed landscaping plans) and directs the Applicant to provide details on the land development plan.

- **Bowman review dated April 24, 2024.** Comments #1 and #2 note that the Applicant has provided sufficient evidence that this project will generate less traffic than the office development previously approved for this site and that traffic from this project will not unacceptably degrade conditions at nearby intersections. Bowman agrees with the actions recommended by the Study, adding that there will be a more detailed review of the improvements during the land development review. Comment #3 adds that updated traffic counts should be conducted during the land development phase and that the effects of the data center project proposed in East Whiteland are to be included when evaluating future conditions.

Comment #5 provides extensive comments on the parking provisions. The greatest concern appears to be allowing on-street parking both in “bump out” areas and along the curb in the twin-home section. The Commission may wish to review this further with the Applicant, as Staff shares Bowman’s concerns about sight distance; in addition, it appears that there are very few locations (other than the bumped-out areas) where on-street parking may be safely accommodated due to the number of driveways. We question how many vehicles could feasibly be parked in this way and whether it is preferable to prohibit parking along the curb.

Comment #8 questions the locations where the new roads have centerline curve radii smaller than what is specified in the S/LDO. Bowman directs the Applicant to provide information to support the requested waivers. As noted above, waivers are not typically granted as part of the conditional use review, but in this case the waivers are necessary to allow the proposed road configuration. If the waivers are not granted, the Applicant would need to revise the design significantly. We therefore concur with Bowman in that the justification for the waivers should be provided at this time.

Most of the remaining comments note the need for additional information and details relative to the road and pedestrian networks. While Staff is content to let these be “will comply” items for the conditional use review, the Applicant should confirm that they will be able to resolve these issues in the course of the land development review process.

⁵ Comment #12 of the SSM review also refers to the redesign of the basins as “naturalistic,” as defined in §281-35.F(4) of the S/LDO, which would resolve this concern since no buffer would be required. The Applicant should confirm this and provide revised drawings showing how this will be achieved.

Finally, comment #14 states that, based upon the number of dwelling units, the traffic impact fee for this project is \$142,002.00.

Staff Comment

The Applicant has made significant progress since our most recent meeting with them, and Staff is particularly pleased with how they have addressed the matter of preserving Church Farm La. However, we are of the opinion that significant issues remain and need to be resolved prior to action by the Commission.

- **CONDITIONAL USE CRITERIA** – The previous Staff memo advised that four of the eleven conditional use criteria in §325-124.(1) of the Zoning had not been met to our satisfaction. As described above, Staff is of the opinion that one of these has been resolved, but we still have concerns about the density of the project – the “overcrowding” noted in §325-124.C(1)(e) – and the requirement to preserve natural features and processes pursuant to §325-124.C(1)(g). The Commission should advise as to their preference regarding the design of Road H (the connection to Old Valley Rd.) to determine if §325-124.C(1)(f) is satisfied.
- **ENVIRONMENTAL IMPACTS** – Our principal concerns on this topic are the activity proposed in the riparian buffer areas and the stormwater management provisions described in comments #2a, #10, and #13 of the SSM review. It is critical that these all be resolved prior to approval of the conditional use as SSM has stated that such resolution may require reducing the number of dwelling units. Comment #5 of the Theurkauf review expresses concern about the extent to which existing woodlands and large trees will be removed to accommodate this design.
- **ROAD SYSTEM** – We have already noted our concern about the redesign of Road H and the need for the Commission to advise on this point. The Applicant should resolve the concerns about parking pursuant to comment #5 of the Bowman review as well as provide the documentation supporting the waivers needed to allow the street design shown pursuant to comment #8 of that same review. We note that resolution of these concerns has the potential to change the site design significantly and perhaps the number of dwelling units. The Commission may wish to provide guidance on these points.

In conclusion, Staff is of the opinion that the plan continues to improve, but we still advise that action by the Commission is premature. Three of the conditional use criteria have not been met to our satisfaction and our concerns regarding environmental impacts the road system must be addressed to the extent that any remaining issues would not significantly affect the site design or the number of dwellings.

Attachments

1. SSM review dated April 24, 2024.
2. Theurkauf review dated April 17, 2024.
3. Bowman review dated April 24, 2024.
4. Plan set prepared by JMR Engineering, dated August 8, 2023, most recently revised April 9, 2024.



April 24, 2024

Mr. John R. Weller, AICP
Director of Planning and Zoning
West Whiteland Township
101 Commerce Drive
Exton, PA 19341

RE: Valley Creek Active Adult Community
Proposed Residential Subdivision
Conditional Use Application
SSM File 101008.0378

Dear Mr. Weller:

We have reviewed the above-referenced submission consisting of the following revised documents:

- Conditional Use Plans (117 sheets), prepared by JMR Engineering, LLC, dated August 8, 2023, most recently revised April 9, 2024.

Valley Creek Homes, LLC is proposing to construct an age-restricted active adult community on a 100-acre property located on the north side of East Swedesford Road. The tract is bounded by Church Farm Lane to the west, Old Valley Road to the north and the East Whiteland Township line to the east. The site is zoned O/L Office/Laboratory and IN – Institutional Overlay districts. The plan indicates the project being constructed in four phases.

This most recent plan includes significant changes to the site layout including the relocation of the emergency access; elimination of the emergency access stream crossing; and moving the multi-modal trail to the top of the stormwater management basin berm.

Issues regarding landscaping and buffering, sanitary sewer and traffic will be addressed by Theurkauf Design and Planning, Carroll Engineering Corp. and Bowman, respectively.

We have the following comments.

WAIVER REQUESTS

1. A revised waiver request letter shall be submitted consistent with the revised layout and the waiver requests noted on the plans shall be updated accordingly.
2. Section 270-15.T(2)(a)(b) and (c) – The requested waiver is to allow encroachments (fill) within Riparian Buffer Zones 1, 2 and 3 at three different locations.
 - a. Location 1- to permit portions of 6 single-family dwellings, Lots 240-245, (formerly Lots 239-244 on the February 6, 2024 plans) within Zones 2 and 3. The previous request suggests the reason this is required is to construct fill required to obtain a FEMA Conditional Letter of Map Revision (CLOMR) and will *“better define the existing drainage path of the northern stream.”* We disagreed with this assessment as the fill is placed so that the lots may be



created without being within the floodplain. Regarding better defining the drainage path, the fill will straighten the stream, disrupting its natural sinuosity and may increase floodplain velocities. This is a potential negative affect to the stream by rendering the riparian buffer less effective. For these reasons, we do not support this portion of the waiver request.

The February 5, 2024 waiver request letter states:

“Our waiver request is based upon meetings held with Ted Otteni in September 2021, and recent meetings with Township Staff and Representatives. The objective of our design is to meet the intent of the Riparian Buffer Area, which is described in the Ordinance as follows: These requirements are established due to:

- (a) The environmental sensitivity of the RBA and the potential for adverse impact when disturbed by construction and other earthmoving activity; and*
- (b) The potential of the RBA to mitigate the negative effects of development on lands adjacent to the stream.*

Mitigation

The rear portion of Lots 239-245 are located within the existing farm field, and partially encroach into Riparian Buffer Zone 2/3 due to an upstream wetland area. Therefore, the proposed lots will not drain to the wetlands, and the existing wooded buffer area around the stream will remain undisturbed.

The east side of the CLOMR floodplain corridor which is bordered by the rear of the proposed single-family lots, shall be vegetated with ERNMX-181 series, Native Steep Slope Series. This will serve to revegetate the fill area with native plantings in the existing farm field area. This practice has been utilized as a mitigation practice in a recent project in West Whiteland Township, which requested the same waiver.”

It should be noted that the March 5, 2024 Planning Commission meeting minutes indicate that during the discussion of development in the riparian buffer the applicant’s engineer stated FEMA approved a CLOMR revising the floodplain based on site conditions and that no fill will be placed in the floodplain by the applicant. This is not the case. A CLOMR acknowledges a revised floodplain boundary based on proposed changes to the floodplain corridor, in this case filling the revised existing conditions floodplain to develop Units/Lots 201 through 204, 229 through 237 and the adjacent portions of Roads D, E and F. The revised floodplain follows the proposed fill slopes along the rear of Lots 239 through 245.

It is our opinion, based on past experience, that filling in the floodplain to create low-lying lots in areas that were formerly floodplain will result in lots that are problematic for their owners in the future. In this case, future flood events may well wash out areas of the fill that is proposed for the rear yards. As the encroachment is proposed primarily to gain more building lots, and as the rear yards will not serve as a viable riparian buffer, we continue to not support this waiver request.

- b. Location 2 – to permit the construction of the emergency access which now parallels the stream. The previous waiver request proposed the emergency access to connect Church Farm Lane and Road D near Lot 136. The revised plan removes this stream crossing and proposes the emergency access road through Exton Park on the west side of the stream. The RB2 and RB3 boundaries are not plotted on the plan, but it appears that approximately 875’ of the



emergency access will be located within RB2 or RB3. The Riparian Buffer Zones shall be shown and the waivers updated accordingly.

- c. Location 3 – to permit stormwater basins within easements previously designated for stormwater basins. The existing riparian buffer is a cultivated field, thus it is our opinion that there is no net detriment in constructing stormwater basins in this location as long as the basins are properly designed with reverse siphons such that runoff is drawn off the bottoms to mitigate heat effects. We therefore support this request, conditioned on proper basin design, including design for thermal impacts. For clarity, the request at this location should note that the encroachment includes the retention basin outfalls and rip-rap aprons as well as portions of the multi-modal trail.
3. Section 270-20 – To not require stormwater infiltration, due to the presence of underlying karst geologic formations (significant potential for sinkhole formation). Based upon the provided karst report we normally would not object to this request and note that issuance of an NPDES permit will satisfy this requirement. However, in accordance with Section 270-20.A(1) if the runoff volume required by § 270-19 cannot be infiltrated, then alternative methods consistent with the PA BMP Manual (as amended) or other PaDEP guidance, such as the managed release concept (MRC), may be used to manage this volume with approval from the Municipal Engineer. The applicant proposes the use of MRC and will submit that design as part of the Preliminary Plan. Therefore the waiver will likely not be required and accordingly should be removed from the plans at this time.
4. Section 270-21.D – Section 270-21.D – To allow an orifice size that is smaller than the required minimum orifice size for stormwater management facility outlet structures. The provided justification is the intent to utilize the Managed Release Concept (MRC) design protocol in lieu of stormwater infiltration BMPs. Although we do not object to this request, it may be premature and ultimately not needed. The actual section states “The minimum orifice size in the outlet structure to the BMP shall be three inches in diameter unless otherwise approved by the Township Engineer...” An MRC design has not been presented and therefore the need for a smaller than 3” diameter is not known at this time. Also, if the Township Engineer approves the use of a smaller orifice then a waiver is not required. We therefore recommend that this waiver request be tabled at this time.
5. Section 270-29.C(2) – To not require an aquatic bench or shelf at least 10 feet wide and with a gentle slope not exceeding 10H:1V along the entire perimeter of the retention basin. The waiver has been requested to maximize the volume of the retention basins so that runoff rates may be reduced to the maximum extent possible. However, the aquatic bench is below the permanent water surface elevation, and therefore does not affect the volume used for rate control. In addition, it is likely that PaDEP will require this as part of the NPDES permit. We therefore do NOT support this waiver request.
6. Section 281-26.B(1) – To allow the proposed roads to have centerline horizontal radii less than 150 feet. Road B and Road E have center line radii of 75 feet. Roads A, B and C have center line radii of 28 and 75 feet, respectively. These roads are not to be dedicated and are configured more like parking lot loops. They have townhouses around the outside perimeter and common parking areas on the inside of the loop. We support a waiver for these three roads, conditioned upon demonstration that emergency vehicles will have sufficient maneuvering capability.



COMPLIANCE WITH ZONING ORDINANCE

7. It should be noted that a CLOMR was issued based on the initial street and lot layout, which has subsequently been revised. The major differences between the initial layout and the current layout include elimination of the emergency access stream crossing and additional fill to develop Lots 229 through 236 and for the multimodal path at the proposed termination of the existing Church Farm Lane. An updated CLOMR must be obtained that is based upon work currently proposed, during the Preliminary Plan stage.

A zoning permit will be required before any construction or development is undertaken within the floodplain, Section 325-61.B. Issuance of the CLOMR does not negate the need for the zoning permit.

8. Within any identified floodplain area, the use of fill shall be prohibited, Section 325-63.C(1). The proposed fill placement for some of the single-family lots, roads and stormwater management basins will require a Zoning Variance. Issuance of the CLOMR does not negate the need for the Zoning Variance when the subdivision plan application is made.

COMPLIANCE WITH SUBDIVISION AND LAND DEVELOPMENT ORDINANCE

9. The plan now shows a private 14' wide paved relocated Church Farm Lane through the Township's Exton Park property from Swedesford Road to the existing Church Farm Lane north of the Rouse property. The road is located within a proposed 30' wide easement. It is unclear who will be responsible for routine and perpetual maintenance of the road. A copy of the easement agreement shall be submitted to the Township for review by the Solicitor. If the easement is approved by the Township, bearings and distances for the entire easement shall be shown on the Preliminary Subdivision Plan when it is submitted, Section 281-16.C(8).

COMPLIANCE WITH STORMWATER MANAGEMENT ORDINANCE

10. In general, it appears that the overall stormwater management design concept (with some modification) will be able to control the post-construction stormwater runoff in accordance with Stormwater Management Ordinance requirements. Computations were provided for the two proposed retention basins, but no designs for the multiple additional water quality and volume control BMPs (underground beds and rain gardens) were submitted at this time. In some instances, the proposed BMPs will not meet MRC design criteria. For example, BMP – MRC1 will not be able to provide the minimum soil media depth and still be able to discharge above the permanent pool elevation of Basin #2. Also, not all of the runoff will be able to discharge through a water quality BMP. Therefore we cannot confirm that sufficient water quality treatment is provided.

We recommend that the Conditional Use record contain a statement by the applicant acknowledging that during the Preliminary/Final Plan process that the number of lots may need to be reduced in order to meet Stormwater Management Ordinance requirements.

11. A General NPDES Permit for construction activities will be required, Section 270-17.A(1)(b). The proposed stormwater management basins within the adjoining easement will contain permanent pools. Valley Creek is a Cold Water Fishes, Migratory Fishes stream. The proposed basins are located in the upper reaches of the watershed. Because the permanent pools will be a



heat sink, we recommend that the stormwater design eliminate or mitigate the heat sink effect. We believe that PaDEP may have the same concerns.

We recommend that the Conditional Use record contain a statement by the applicant acknowledging that meeting PaDEP NPDES permit requirements may require mitigation of stormwater thermal impacts.

12. The side slopes in retention basins below the permanent water surface level shall not exceed 5H:1V, Section 270-29.C(3). The detail indicates 3:1 slopes for the retention basins. The applicant indicated that the slopes will be revised on the Preliminary Plans. We find this acceptable.
13. The design and grading of the proposed rain gardens shall provide for safe discharge of the larger magnitude storm flows, assuming the rain gardens are sized primarily for the MRC design storm and the 2-yr 24-hr storm for the NPDES Permit PCSM Plan design. No grading for emergency spillways has been shown on the current plans. The response letter indicates that the detailed design of these facilities will be submitted with the Preliminary Plans.

We recommend that the Conditional Use record contain a statement by the applicant acknowledging that detailed grading design related to stormwater BMPs may impact the grading of lots and roadways, which may in turn result in a reduction of the number of building lots.

14. The increased runoff resulting from construction of the proposed emergency access on the Exton Park property shall be addressed in the post-construction stormwater management calculations to show compliance with Section 270-22, Stormwater Peak Rate Control Requirements.
15. When the subdivision plan is submitted, the storm sewer in the Road E loop shall be revised to be located entirely inside the curb line, Section 270-29.E(1).
16. A revised proposed floodplain analysis shall be resubmitted to the Township and include the shear stress analysis.

GENERAL COMMENTS

17. The plan proposes an 8' wide multi-modal path (trail) on the Exton Park property. The path is provided in conjunction with vacating existing 25' wide and 50' wide access easements on the park property along the western boundary of the Valley Creek Homes property. Project General Note 36 states that the portion of the trail from Church Farm Lane to the intersection of Valley Creek Boulevard is to be dedicated to the Township. It is unclear if the proposed "Blvd Entrance" noted on the plan is to be named Valley Creek Boulevard. If so, the "Blvd Entrance" labels shall be revised accordingly.

In addition, the plan proposes another portion of multi-modal path within the Old Valley Road right-of-way. If this path is acceptable to the Township, Note 36 shall be revised to include this portion of the path.

The Township should decide if dedication of these portions of the path is acceptable.

18. The existing wet pond located partially on the property to the northeast of Unit 93 and south of the Malvern Hunt stormwater basin at the rear of 18 Corbin Drive shall be delineated and labeled on all applicable plan sheets.



19. The square foot net tract area in the table on Sheet A0 was revised to reflect the corrected total encroachment; however, the net tract area in acres was not revised.
20. The 8' wide multi-modal path was relocated to the top of the southern retention pond (Basin #2) berm and requires filling within the floodway of Tributary A of Valley Creek No. 2. A PaDEP Chapter 105 encroachment permit will be required for this encroachment.
21. The RB2 and RB3 zones shall be shown on the Exton Park property on all applicable plan sheets.
22. The plan has been revised to eliminate the previously proposed Church Farm Lane emergency access to the development by modifying Road H to be a 16' wide emergency access directly accessing Old Valley Road. A 12' wide emergency access/multi-modal path is now proposed within the eastbound lane of Old Valley Road, from Road H to Malvern Hunt Way.

The "Road H" label shall be revised to "Emergency Access." The plan shall also specify how public vehicular access will be restricted.
23. The plan shall note the transition of the multi-modal path width from 10' to 8' near the Swedesford Road crossing opposite Church Farm Lane.
24. Project General Note 31 is a partial duplicate of Note 28 and shall be deleted.
25. The proposed conditions floodplain shall be labeled and included in the Legend on all applicable plan sheets.
26. The blacked out areas on Sheets B4, B6, B7 and B9 shall be removed.
27. The following general revisions shall be made to the Landscape Plans:
 - a. The Limit of Disturbance on sheets G-5, G-7, G-8 and G-10 shall be revised.
 - b. The old proposed contours on sheets G-10 and G-11 shall be removed.
 - c. The shade tree in the emergency access at Old Valley Road on sheet G-11 shall be moved.
 - d. The 50' screen buffer and Ernst seed mix areas at the old emergency access road shall be revised.
28. The extra set of existing contours shall be removed from sheets H-1 through H-12.

If you have any questions please feel free to call me.

Sincerely,
Spotts, Stevens and McCoy

A handwritten signature in blue ink, appearing to read "Kent D. Morey", is written over the typed name.

Kent D. Morey, P.E., CBLP
Senior Engineer
kent.morey@ssmgroup.com

cc: Mark Stabolepszy, P.E.



MEMORANDUM

TO: John Weller, AICP, West Whiteland Township Director of Planning and Zoning
Patrick Gorman, AICP, Township Assistant Planner
Jack Robinson, P.E., JMR Engineering LLC
Lisa Thomas, RLA, Glackin Thomas Panzak, Inc.
Alyson M. Zarro, Esq., Riley Riper, Hollin & Colagreco

FROM: Edward A. Theurkauf, RLA, ASLA, APA

DATE: April 17, 2024

SUBJECT: **REVIEW COMMENTS – VALLEY CREEK
CONDITIONAL USE PLAN DATED 4-9-24**

Please note our review comments pertaining to the following documents received on 4-10-24, and to a site visit on 8-11-23:

- Conditional Use Plan consisting of 117 sheets; and
- Response Letter dated 4-9-24 from Jack Robinson

Issues that have been addressed are so noted. New comments are in **bold**.

**REVIEW COMMENTS – VALLEY CREEK
CONDITIONAL USE PLAN DATED 4-9-24**

April 17, 2024

1. Conditional Use Requirements – Section 325-124.A of the zoning ordinance (ZO) requires that the conditional use plan demonstrate feasibility of compliance with all pertinent requirements, including recreation and open space, buffering, vehicular and pedestrian access, and landscaping. Further, the following specific standards apply:
 - a. The proposed use shall be reasonable in terms of the logical extension of public services, including road access, sidewalks, and multimodal accommodation. Road access to properties on Old Valley Road and Church Farm Lane shall be reviewed for acceptability.
 - b. The natural features of the site shall not suffer unmitigated degradation. The Township shall determine acceptability of the proposed forest clearing along Swedesford Road.
 - c. The proposed use shall constitute an appropriate use in the area and shall not substantially injure or detract from the use of surrounding property or from the character of the neighborhood.
 - Screen buffer from the Pickwick House is inadequate
 - Basin/BMP buffers are inadequate
 - d. The impact on historic resources shall be mitigated. The screen buffer from the Pickwick House is inadequate.

2. Access for Neighboring Properties – Church Farm Lane **is proposed for realignment, which would affect** the following properties:
 - 41-3-7 Rouse Residence
 - 41-3-5 Concepcion Residence
 - 41-2-84.7 Hollenshead Residence
 - 41-2-84.12 West Whiteland Township Barn

The Township shall consider this proposal for acceptability.

3. Pedestrian Streetscape – **The Planning Commission and Township Staff have determined the proposed streetscape and driveway configurations to be acceptable.**

4. Multimodal Trail Accessibility – A 10-foot wide multimodal trail is proposed to connect Old Valley Road and Exton County Park to the Chester Valley Trail from Church Farm Lane and along the property frontage to Valley Creek Boulevard, **thus retaining existing connectivity.**

REVIEW COMMENTS – VALLEY CREEK
CONDITIONAL USE PLAN DATED 4-9-24

April 17, 2024

A fence or gate placed west of the Road H entrance on Old Valley Road to stop through vehicle traffic would interfere with bicycle and pedestrian access. If motor vehicles are to be restricted from this section of Old Valley Road, a gate or bollard system that allows continued pedestrian and bicycle access should be employed.

5. Tree Protection and Compensatory Plantings – Section 281-34.A (SLDO) requires that every effort be made to preserve mature trees and other significant existing vegetation. Compensatory plantings per section 281-34.G (SLDO) are required for mature trees that are removed.

There is a mature woodland area of approximately 6.5 acres that is mostly proposed for removal. In addition, there are a number of significant large trees around the former Church Farm School faculty housing that would be removed. Historic aerial imagery verifies that the woodland area is over 100 years old. Other than these areas, the site is largely non-wooded.

Given the amount of clearing proposed and available areas for tree planting, compliance with the compensatory tree planting requirement is judged to be feasible. The land development plan shall include a tree survey by size, species, and condition in order to determine compensatory planting requirements and applicable tree preservation credits.

Prior to conditional use approval, consideration should be given to layout and/or unit mix changes to allow for greater preservation of existing woods and large trees.

6. Buffers – Section 281-35.A (SLDO) requires planted buffers along property lines and stormwater basins. Screen buffers are to be 50 feet wide and perimeter buffers are to be 25 feet wide. Buffers are required and proposed as follows:

<u>Buffer Location</u>	<u>Use/Condition</u>	<u>Buffer Required</u>	<u>Proposed</u>
East/Malvern Hunt	Residential	25 feet	yes
South/Swedesford Road	Arterial street	25 feet	yes
Pickwick outparcel	Historic	50 feet	35 feet
West/Twp. Park	Recreational	50 feet	yes
West/Rouse	Residential	25 feet	yes
North/County Park	Recreational	50 feet	yes
Basins	BMPs	25 feet	<25 feet

The proposed buffer for the Pickwick House is partly off site on the Pickwick parcel, which is noncompliant. **Placing the buffer partly onto the Pickwick property would restrict usability of the very asset that the buffer requirement is intended to protect. I am not in support of this waiver request.**

**REVIEW COMMENTS – VALLEY CREEK
CONDITIONAL USE PLAN DATED 4-9-24**

April 17, 2024

BMP – MRC #s 3, 5, 6, 9, and 11 shall be reconfigured to provide the required 25 foot perimeter buffer, or shall be designed as naturalistic basins per section 281-35.F.4 (SLDO) in which case no perimeter buffer would be required. **Although the applicant states that the basins and BMPs will be naturalistic**, the plans indicate basin/bmp side slopes at 3:1, which **do not qualify as naturalistic basins and thus** require 25 foot perimeter buffers.

This issue shall be addressed prior to conditional use approval.

7. Dog Park Location – This issue is resolved.
8. Street Trees – Section 281-36 (SLDO) requires one street tree for every 50 feet of road frontage in addition to required buffer plantings. Street trees shall be located within the right-of-way, between the edge of pavement or curb and sidewalk, or right-of-way. Street trees are required and proposed as follows:

<u>Frontage/Length</u>	<u>Required</u>	<u>Proposed</u>
Swedesford Road/1,660	33	39
Church Farm Lane/945	19	*
Old Valley Road/760	15	17
Blvd Entrance/1,800	36	44
Road A/1,000	20	20
Road B /4,250	85	85
Road C/1,700	34	34
Road D/7,700	154	155
Road E/5,200	104	82
Road F/1,800	36	41
Road G/800	16	15
Road H/400	8	9

* Requirement met by existing to remain

Compliance is deemed to be feasible. The land development plan shall be revised to show the required quantities of trees on roads **E and G**.

9. Site Element Screens – Section 281-35.G (SLDO) requires vegetated screens for parking lots and trash enclosures. The clubhouse parking lot and any proposed trash facilities will need to be screened accordingly.

This shall be addressed on the land development plan.

**REVIEW COMMENTS – VALLEY CREEK
CONDITIONAL USE PLAN DATED 4-9-24**

April 17, 2024

10. Utility Screening – Section 281-35.B.6 (SLDO) requires all utility equipment to be fully and completely screened in a manner compatible with the architectural and/or landscaping style of the project from any adjacent streets or residential uses. The requirement applies to the pump house, electrical transformers, and similar facilities.

This shall be addressed on the land development plan.

11. Parking Lot Landscaping – Section 281-37.B (SLDO) requires parking lots with five or more spaces to have one planting island spaced not more than 135 feet apart or every 15 parking stalls, and each planting island shall contain one shade tree. This applies in multiple places in the development.

This shall be addressed on the land development plan.

12. Building Façade Landscaping – Section 281-37.D (SLDO) requires plantings between the clubhouse façade and parking lot, including one shade tree and five shrubs (or 50 herbaceous perennials) per 50 feet.

This shall be addressed on the land development plan.

13. **Conclusion – The following shall be resolved prior to conditional use approval:**

- **Outparcel road access**
- **Amount of proposed forest clearing**
- **Pickwick House screen buffer**
- **Basin perimeter buffers**

The remaining issues shall be addressed on the land development plan.

Please contact this office with any questions.



April 24, 2024

Mr. John R. Weller, AICP
Director of Planning & Zoning / Zoning Officer
West Whiteland Township
101 Commerce Drive
Exton, PA 19341

RE: Traffic Engineering Review
Valley Creek Active Adult Community – Conditional Use Plan
West Whiteland Township, Chester County, PA
Bowman Project No. 313683-01-001

Dear Mr. Weller:

Bowman completed a traffic review of the proposed age-qualified residential development located on the north side of Swedesford Road opposite Valley Creek Boulevard. The site consists of 95 single-family homes, 98 twin homes and 123 townhomes, with access provided to Swedesford Road, Church Farm Lane, and Old Valley Road. Our traffic review is based on the following document.

- *Conditional Use Plan for The Valley Creek Active Adult Community*, prepared by JMR Engineering, LLC, revised April 9, 2024.

Based on our review of the above document, we offer the following comments for consideration.

1. ZO Section 325-124.C(1)(e), (f), (i) and (j) – According to the traffic study, this site was previously approved for approximately 1.2 million square feet of office space. Based on the previously submitted traffic study, the proposed homes generate significantly less traffic than would be generated by 1.2 million square feet of office space.
2. ZO Section 325-124.C(1)(e), (f), (i) and (j) – Based on the results of the traffic study, the proposed residential development alone will not impact the area off-site intersections. Also, per the traffic study, it is proposed to restripe the eastbound Swedesford Road approach to the access intersection to provide a 75-foot left-turn lane for traffic entering the site, as well as upgrade the traffic signal equipment at the access intersection. In addition, the traffic study recommends traffic signal timing changes at the intersection of Swedesford Road and Ship Road. More detailed design and review of the access/traffic improvements will occur during land development.
3. ZO Section 325-124.C(1)(e), (f), (i) and (j) – During land development and as part of the traffic signal design, new traffic counts should be conducted at the intersection of Swedesford Road and Valley Creek Boulevard. Furthermore, the updated traffic analysis should account for the traffic associated with the planned one million square-foot data center located along Swedesford Road just to the east in East Whiteland Township. If the updated traffic analysis reveals the need for

new or modified traffic improvements, then those improvements should be addressed by the applicant.

4. The revised plans offer most roads within the community to the Township for dedication, with the exception of Roads A, B and C within the townhouse section of the community, as described in General Note 33 on Sheet 3.
5. The plans propose different approaches to on-street parking within each section of the community, as follows:
 - Townhouse Section - 28-foot wide roads with perpendicular parking.
 - Twin Home Section - 28-foot wide roads with bumped-out parallel parking and conventional on-street parking.
 - Single-Family Home Section - 28-foot wide roads with on-street parallel on one side of the road.

We offer the following comments related to the proposed on-street parking:

- a. Although we understand the applicant prefers bumped-out, on-street parking within the twin home section of the development, we recommend consistent on-street parking arrangements within both the single-family home and twin home sections of the development in the form of conventional on-street, parallel parking (without bumped-out parking spaces). The applicant's response indicates that within the twin home section of the development, cars will be permitted to park within both the bumped-out spaces and along the edge of the road outside of the bumped-out spaces. This may result in a sight distance issue for vehicles in the bumped-out spaces, whereby their line of sight may be hindered by vehicles parked on the edge of the road outside of the bumped-out spaces. At minimum, areas for no parking should be designated near the bumped-out spaces to ensure clear sight lines.
 - b. The bumped-out, on-street parking spaces within the twin home portion of the development are located within the road right-of-way, and as such, it should be confirmed whether the Township will be responsible to maintain these parking spaces, or whether they will be maintained by the Homeowners Association.
 - c. We generally do not recommend on-street, perpendicular parking, which is proposed within the townhome section; however, since the townhouse roads are proposed to be private, we will defer to the Township as to whether this is acceptable.
 - d. During land development, no parking signs should be shown on the plans on one side of the streets within the single-family home section, and no parking signs may be required within the twin home and townhouse sections of the community outside of the areas of the designated parking spaces.
6. SALDO Section 281-28.F – During land development, the available sight distances should be labeled on the plans at all accesses, and a PennDOT-style sight distance note stating the required sight distances should be included on the plan.

7. The plans indicate Old Valley Road is proposed to be converted to a 12-foot wide shared emergency access/multi-use pedestrian path, with a paved emergency access (Road H) provided between Old Valley Road and Road E. This configuration should be reviewed by the Township's emergency service personnel.
8. SALDO Section 281-26.B – There are multiple locations within the development where the roadway centerline curve radius does not meet the Township's required curve radius of 150 feet, most of which occur along Roads A, B, and C, and there are two locations along Road E with a proposed centerline radius of 75 feet at approximately Sta 21+50 and Sta 25+00. The applicant requests a waiver to allow horizontal curve radii of less than 150 feet. The waiver request letter should be revised to indicate the specific locations for the requested waiver. Furthermore, the applicant should provide justification for the proposed radii based on AASHTO horizontal curve design requirements, as well as truck turning templates for the largest emergency service vehicle and the largest anticipated delivery vehicle to validate the proposed design. The applicant's engineer proposes to provide the additional information as justification for the waiver request during land development. Therefore, until such time as the information is provided and found to be acceptable to justify the design, we do not recommend approval of the waiver request or approval of the internal road alignment as part of the conditional use review.
9. SALDO Section 281-28.E – The plans should be revised to show sight distance lines at each of the internal intersections for traffic exiting the side street, as well as left-turn traffic entering the side street (looking ahead and behind). These sight distance line should be provided on the landscape plans, and should also consider the location of on-street parking. The applicant's engineer indicates this information will be provided as part of the land development submission.
10. SALDO Section 281-31.B – The applicant and the applicant's engineer should ensure that all proposed pedestrian facilities along all internal roads (including curb ramps and pedestrian access routes) are consistent with current ADA requirements. In general, the plans should be revised to show curb ramps/crosswalks to accommodate a pedestrian crossing at all corners of all internal intersections, including one curb ramp for each crossing. Detailed designs, including separate grading details (with spot elevations at all proposed grade breaks), and all dimensions for construction, including widths, lengths, and all slopes, should be provided for each individual ramp. The applicant's engineer this comment is a "will comply" and will be addressed during land development.
11. PennDOT approval is required since the access is located at a signalized intersection. The Township should be copied on all submissions to PennDOT. The traffic signal modifications should include the upgrades listed below, as well as upgraded ADA curb ramps on all four corners of the intersection, and a new pedestrian crossing of the proposed site access, which the applicant's engineer states is a "will comply".
 - a. New street name signs
 - b. New LEDs
 - c. Video detection
 - d. New controller unit

- e. Dilemma zone radar
 - f. Countdown ped signals
 - g. New compliant push buttons
12. The plans propose a new pedestrian crossing of Swedesford Road at the intersection with Church Farm Lane (South). We recommend the following information and improvements should be provided to accommodate this proposed pedestrian crossing:
- a. ADA compliant curb ramps on the north and south sides of Swedesford Road.
 - b. Pedestrian warning signing along Swedesford Road in both directions.
 - c. Provide pedestrian sight distances for pedestrians crossing at this location.

The applicant's engineer states this comment will be addressed during land development to the satisfaction of the Township.

13. During land development, a more detailed design should be provided for the road improvements along Swedesford Road, which include the new access intersection, improvements to Church Farm Lane and its intersection with Swedesford Road, and the pedestrian crossing. Additional comments will follow upon review of these plans during land development.
14. Chapter 295-12 – The subject development is located within the Township's Act 209 Transportation Service Area, and as such, is subject to the Township's Transportation Impact Fee which is equal to \$1,449.00 per new weekday afternoon peak hour trip. Based on the traffic study, the proposed 316-unit age-qualified development will generate 98 new weekday afternoon peak trips, and the resultant Transportation Impact Fee is **\$142,002**.

Upon resubmission, the applicant's engineer should compose a letter that describes how each comment has been addressed and where revisions are located. Additional comments may follow upon review of future submissions.

If there are any questions or if clarification is requested, please contact our office.

Sincerely,



Christopher J. Williams, P.E.
Vice President & Regional Manager – Mid-Atlantic

Q:\PA-EXTO-MC\mcm\eng\WESTWHI1\821691 - VC Age Qual\Reviews\2024-04-24\Review\2024-04-24 Weller Valley Creek Homes Review .docx