

WEST WHITELAND TOWNSHIP
Planning Commission
Agenda
Tuesday, June 9, 2020
7:00 P.M.

This Meeting will be held by teleconference via Zoom.

CALL TO ORDER

REVIEW OF MEETING MINUTES

1. Approval of Meeting Minutes: May 19, 2020

PUBLIC COMMENT/CONCERNS/QUESTIONS

PLANS

1. 690 E. Lincoln Associates, LLC
Address: 690 E. Lincoln Hwy.
First Review: Conditional Use
Request: Construction of a Wawa convenience store and gas station at the former Entenmann's bakery site.
2. Ship Run Developers, LLC
Address: 500 E. Lincoln Hwy.
First Review: Conditional Use
Request: Construction of 95 single-family detached homes, 54 townhouse homes at the rear of the Labor's Training Facility.

NEW BUSINESS

ANNOUNCEMENTS

ADJOURNMENT

Next Meeting: June 16, 2020

Directions to access the Zoom Meeting

Option 1:

Click this link to register: <https://us02web.zoom.us/meeting/register/u5Eoceutri0uswEs-eNk2QhaaaEpgFmMGw>

Option 2:

Use your phone and call +1-646-558-8656. When asked, enter the Meeting and Password.

[Virtual Meeting Etiquette](#)

[Zoom Instructions](#)

If you have any questions regarding the projects please e-mail us at questions@westwhiteland.org



MEMORANDUM

DATE: June 5, 2020
TO: Planning Commission
FROM: John R. Weller, AICP
Director of Planning and Zoning
SUBJECT: 690 E. Lincoln Hwy.
Conditional use application

APPLICANT: 690 East Lincoln Associates, LLC
c/o E. Kahn Development Corp.
120 Pennsylvania Ave.
Malvern, PA 19355

SITE ADDRESS: 690 E. Lincoln Hwy.
Exton, PA 19341

TAX PARCELS: 41-5-176 (part), 41-5-177.2, and 41-5-177.3

ZONING: O/R, Office/Residential

DESCRIPTION: Construction of 3 commercial buildings with a total floor area of 23,038 sq.ft. and a gas station on a 6-acre lot. Conditional use review is required pursuant to §325-28.2 of the West Whiteland Township Zoning Ordinance (“Zoning”) to allow the construction of a vehicle fueling station and §325-124.A for the construction of non-residential buildings with a total floor area exceeding 20,000 sq.ft.

Background

The subject property has a gross area of 6.00 acres (5.30 developable acres) and is found at the southwest corner of the intersection of Lincoln Hwy. and Ship Rd. The site is occupied by vacant commercial and light industrial buildings that were formerly used by Entenmann’s as a bakery, retail store, and distribution center. The property surrounds the historic St. Mary’s Chapel, which is on a separate lot not owned by the Applicant and is situated directly at the intersection; the Applicant’s property has frontage and existing accesses to both Lincoln Hwy. and Ship Rd. Overall, the site is moderately to gently sloping from a high point at its southeast corner along Ship Rd. down to Ship Road Run stream, which lies just beyond its western boundary. There are some wooded areas around the periphery, but much of the site is paved; there are no FEMA-designated flood hazard areas.

This property was affected by a Zoning amendment adopted in May 2019 that allowed commercial development in this zoning district within 750 feet of the intersection of Lincoln Hwy. and Ship Rd. The same amendment also allowed vehicle fueling stations when accessory to a convenience store. The Zoning Officer has determined that this design complies with the applicable use provisions and area and bulk standards of the Zoning.

The Applicant is proposing to remove all of the existing buildings on their property and to construct three commercial buildings: a 10,540 sq.ft. building and a 6,900 sq.ft. building - neither of which have a specified use - and a 5,600 sq.ft. Wawa convenience store with a gas station. The project also includes the construction of a new road (labelled "Couplet" on the drawing) consistent with the Township's Transportation Capital Improvements Plan. The plan also provides for reconfiguration of the lot lines such that the lots and portions of lots comprising the site will be combined into a single lot.

The Township received this submission at the same time as the conditional use application of Ship Run Developers, LLC for the residential development on the adjoining site at 500 E. Lincoln Hwy. While these projects have different developers, they have been working cooperatively. This arrangement is noted in several of the consultant reviews.

Tonight is the first presentation of the conditional use application to the Planning Commission.

Criteria for approval of a Conditional Use

The criteria for Conditional Use approval are found in §325-124.C(1) of the Zoning:

- (a) The proposed use shall meet all of the specific standards and regulations for eligibility which appear in the section of the Zoning Ordinance authorizing the proposed conditional use.

The project requires conditional use review for two reasons: the construction of a vehicle fueling station where none existed previously (Zoning §325-28.2) and the construction of more than 20,000 sq.ft. of floor area of new non-residential space (§325-124.A). Commercial uses, including the convenience store portion of the Wawa, are permitted by right pursuant to Zoning §325-15.1.B(10).

Section 325-28.2 lists four requirements for vehicle fueling stations:

- **The property must have direct vehicular access to either Lincoln Hwy. or Pottstown Pk.**
- **A traffic impact study must be provided with the conditional use application.**
- **One off-street parking space is to be provided for every two fuel-dispensing units.**
- **Compliance with specific lighting standards.**

The Zoning Officer has determined that the plan is consistent with all of these requirements, although some details (like lighting) are more properly addressed during the land development review phase.

Section 325-124.A does not specify any additional standards for construction of the commercial buildings, so they need only comply with the area and bulk standards of the O/R zoning district. The Zoning Officer has determined that the zoning data provided on Sheet 1 of the plan set are correct, and that the design shown complies with applicable standards.

This criterion has been met.

- (b) The size, scope, extent, and character of the exception desired is consistent with the plan for future land use in West Whiteland, and with the spirit, purpose, and intent of the Zoning Ordinance.

The project site was part of the study area for the “Lincoln Highway and Whitford Road Corridors Plan,” which was adopted as an amendment to the Township Comprehensive Plan in March 2015. The “Future Land Use Recommendations” map in the Plan shows this property in the “MU1” category, which is to include office and residential uses. This area was subsequently re-zoned O/R Office/Residential to be consistent with that Plan, and the area around the Ship Rd. intersection was later made subject to an overlay provision to accommodate commercial uses at the historically commercial crossroads.

In June 2019, the Township again amended the Comprehensive Plan to incorporate the Bicycle and Pedestrian Plan. This Plan element shows a new multi-modal trail connecting the Chester Valley Trail and the County’s proposed extension to that Trail along the former Norfolk Southern rail line along the south side of the Exton By-Pass. That connecting trail passes through this tract in general alignment with the “Couplet” road. The Applicant’s plan shows what appears to be a sidewalk at this location, but not a multi-modal trail, which would be wider.

Lacking the multi-modal trail, Staff is of the opinion that this criterion has not been fully met.

- (c) The suitability of the property for the use desired and the new or expanded use, if approved, will be susceptible of regulation or restriction by appropriate conditions and safeguards.

The Board of Supervisors has the right to attach reasonable conditions to any conditional use application and to make provisions for the enforcement of those conditions. This criterion has been met.

- (d) The public interest in, or the need for, the proposed use or change, and the proposal will serve the best interest of the Township, the convenience of the community (where applicable), and the public health, safety, morals, and general welfare.

The Township’s Comprehensive Plan establishes what is meant by “the best interest of the Township;” §325-2.A of the Zoning states that its overall purpose is to promote, protect, and facilitate the public health, safety, morals, and general welfare. Based upon our conclusion above in (b), Staff is of the opinion that this criterion has not been fully met.

- (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.

Our most critical concerns among these criteria are road congestion and the impact upon the adjacent chapel (“conserving the value of buildings”). Regarding the first, we note that the plan includes a portion of a road improvement project known as the Ship Road Couplet. The intent of this project is to accommodate more traffic at the Lincoln Hwy./Ship Rd. intersection without worsening the existing congestion and perhaps improving it. This segment, along with the new “Road D” and changes to traffic patterns on Ship Rd. resolve Staff concerns regarding congestion.

St. Mary's Chapel is not only a Class I historic resource that contributes to the character of the Township, but it also has emotional and spiritual significance to many of our residents. Some residents expressed concern about the impact upon the Chapel during the hearings for the Zoning amendment. We note that the Chapel is one of three historic structures in proximity to this site and that this project will therefore be reviewed by the Township Historical Commission on June 8, 2020. We note that the review from CHG, the Township's historic preservation consultant, expresses concern about the potential impact of the proposed Wawa upon the Chapel but also notes that the effect will be mitigated by landscaping. He adds that we have yet to receive any architectural renderings of the Wawa or the canopy over the pumps: a sympathetic design could further mitigate the visual impact. In addition, recall that the edge of the canopy will be about 100 feet *farther* from the Chapel than the closest Entenmann's building; the store will be farther away than that.

Staff suggests that the Applicant provide information about the architecture and external appearance of the proposed buildings, and of the Wawa and gas pump canopy in particular. A better understanding of how these structures will look is necessary to determine whether these criteria have been 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.

This project will not require any extension of the existing public sewer or water supply network. Neither the Fire Marshal nor the Chief of Police have expressed any concern regarding anticipated additional demand for their respective services. As a non-residential project, it will not affect the number of students in the public school system.

Staff is satisfied that 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.

Most of the project site was previously developed for commercial and light industrial use and is therefore not now in a "natural" condition. However, as described in the attached review by Theurkauf Design and Planning ("Theurkauf"), portions of the site are now heavily wooded and are to be cleared. Theurkauf advises that the plan does not address the compensatory planting requirement.

For conditional use applications, it is our practice to require that applicants demonstrate the feasibility of their stormwater management strategy, although final design is not required until the land development phase. Comments #16 through #21 of the attached review by Spotts, Stevens and McCoy ("SSM") describe various concerns on this matter and questions whether the need for the requested waiver from the infiltration requirement has been adequately demonstrated.

The Applicant should meet with Theurkauf and SSM to resolve these outstanding issues and thereby satisfy these criteria.

- (h) The character and type of development in the area surrounding the location for which the request is made and the proposed change or modification, if permitted, will constitute an appropriate use in the area and will not substantially injure or detract from the use of surrounding property or from the character of the neighborhood.

As noted above under item (e), there are three structures that the Township has identified as historic resources at the intersection of Lincoln Hwy. and Ship Rd. in proximity to the site. The CHG review notes that there has long been commercial activity at this intersection and there are no residences in the immediate vicinity. Even though there is no residential neighborhood to speak of, Staff remains concerned about the possibility of adverse impact to the historic character of the intersection. The Theurkauf review raises concerns on this point since the proposed landscaping does not satisfy various buffer requirements.

As with criterion (e), above, Staff advises that the Applicant be directed to provide additional information regarding the appearance of the proposed buildings, landscaping, and site lighting in order to allow a proper evaluation of this criterion.

- (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.

As noted above, the site already has driveway access to both Lincoln Hwy. and Ship Rd. that was put in place by Entenmann's. The proposed development will retain these accesses, but they will be augmented by two new public roads, shown on the drawing as "Couplet" and "Road D." Additional driveways from these roads will also serve the new buildings. No on-street parking is proposed. Of the three planned buildings, only the Wawa store will front Lincoln Hwy.

Staff is of the opinion that these criteria have been met.

- (j) The probable effects of proposed development on highway congestion have been considered, and adequate access arrangements are provided in order to protect major highways from undue congestion and hazard.

As required, the Applicant has provided a traffic impact study that has been reviewed for the Township by McMahon Associates ("McMahon"). A more detailed analysis of their findings is in the "Consultant Reviews" section below. For purposes of determining whether this criterion has been met, suffice it to say that McMahon has considered the impacts of both the additional development and the proposed new road segments and concluded that the issue of congestion has been satisfactorily addressed.

Staff is satisfied that this criterion has been met.

- (k) The impact upon on-site and adjacent historic resources of the Township has been mitigated.

As stated above, there are three identified historic resources within three hundred feet of this property:

- St. Mary's Chapel, 694 E. Lincoln Hwy. - Class I, Township Site #032
- Ship Inn, 100 N. Ship Rd. - Class I, Township Site #311
- Ss. Philip & James Rectory, 723 E. Lincoln Hwy. - Class III, Township Site #343

As of this writing, the Township Historical Commission has yet to review this project, but they are scheduled to do so at their meeting on June 8, 2020; Staff will advise the Planning Commission of their comments verbally at tonight's meeting. As has already been noted, our historic preservation consultant has expressed some concern on this point. While there is extensive landscaping and the proposed buildings will be farther from the historic buildings than the Entenmann's building is, the Applicant should provide more information about the architecture and exterior appearance of the new buildings in order to allow a complete assessment of this criterion.

Staff is not yet satisfied that this criterion has been met.

- (l) Where the property or a portion of the property that is the subject of the application is improved at the time of the conditional use application, the Township may require that any existing development and/or uses on the property comply with all previous conditions of approval of a land development, subdivision, conditional use, special exception, zoning variance, or waiver of any provision of Chapter 281, Subdivision and Land Development, previously granted for the property.

There are no such conditions relative to the existing development on the subject property; this is a moot issue.

Consultant Reviews

Since no lighting plan was provided with this application there is no review from Stubbe Consulting, our lighting consultant. The Commission will also note that our usual traffic engineering consultant, Traffic Planning and Design, is the Applicant's traffic engineer. For this reason, McMahon is the Township consultant for this project. Finally, the Township Fire Marshal has not provided a written review for this project but has advised Staff that he has no concerns regarding this project.

- **SSM review dated May 12, 2020.** The Commission will recall that for conditional use applications we do not require a fully engineered stormwater management plan, but the Applicant must demonstrate the feasibility of their proposed approach to the satisfaction of SSM. Comments #16 through #21 review the stormwater management provisions and conclude with the observation that there is some confusion about what is proposed for this project and what is proposed for the adjoining residential project. While it certainly makes sense for these two projects to be considered together, they will ultimately be separate entities and different agencies will be responsible for the maintenance and operation of the facilities. It appears that SSM does not question the overall functionality of the proposed system, but they do have concerns about the impact upon the adjacent creek and the improvements proposed within the riparian buffer areas. The Commission should note that the only activity within the riparian buffer area is associated with the construction of the Couplet. While Staff agrees that impact upon the stream must be mitigated, any significant relocation of the Couplet is not feasible, and we support waivers to the extent necessary to construct this road which is being built in compliance with Township plans and policy. Staff recommends that the Applicant meet with SSM to resolve these concerns.

The remaining comments review the requested waivers (#1 through #3); the conditional use criteria, noting concerns similar to those expressed above by Staff (#4 through #6); points of non-compliance with the Zoning and the Township's Subdivision and Land Development Ordinance (#7 through #15); and general comments (#22 through #25). Comment #15 notes that since the total floor area of the proposed

buildings is smaller than that of the buildings to be removed, there will be no net increase and therefore no requirement to set aside permanent open space.

- **Theurkauf review dated May 12, 2020.** Detailed landscaping plans are not required for conditional use applications, but the application must demonstrate that the project can accommodate all required landscaping. Comments #3 through #10 review the proposed landscaping from this perspective and note a variety of deficiencies, including inadequate buffer widths; insufficient landscaping to satisfy standards for screening, building façade plantings, and the parking area; improper placement of storm facilities within buffer areas; and the need to address our compensatory planting requirements.

Comment #1 reviews the conditional use criteria, expressing concerns about the impact on the neighborhood and the need for more landscaping. Comment #2 provides a detailed analysis of the bicycle and pedestrian accommodations, concluding that the plan does not comply with Township policy on this matter, as specified in Bicycle and Pedestrian Plan element of our Comprehensive Plan.

- **McMahon review dated May 15, 2020.** Comments #1 through #11 address the transportation impact study provided with this application. The Commission will recall that the Township's Transportation Capital Improvements Plan ("TCIP") shows that the impact of new development in this area is to be mitigated by the construction of a new southbound alignment for Ship Rd. This new road segment will divert southbound traffic beginning just south of the Chester Valley Trail, will cross Lincoln Hwy. at a new traffic signal, and will rejoin the existing alignment before passing under the Exton By-Pass and rail line. This Applicant and the developer of the adjoining residential project will be constructing the portion south of Lincoln Hwy. and the Township will construct the shorter segment north of Lincoln Hwy. McMahon notes that the impact study is based upon the assumption that only the southern portion will be built. While we understand the reasons for this assumption and note that it provides a conservative, worst-case forecast of the traffic impact, McMahon advises amending the study to include the north portion of the couplet. While Staff agrees that such revisions would enhance the Study, we note that (a) McMahon agrees that even with only the south leg in place the impact of this project will meet PennDOT's mitigation requirements and (b) the Applicant does not need to justify the placement or configuration of the Couplet, as that has been directed by the Township based upon the analyses in the TCIP. Rather than revise the study at this time, it may be better to wait until the land development review at which time the configuration will be more clearly established and operational details will be more pertinent.

The remaining comments address a wide variety of issues, mostly recommendations for design revisions and requests for additional information. Staff suggests that the most significant of these are comment #19, which echoes our other consultants in noting the lack of the multi-modal trail shown on the Township's Bicycle and Pedestrian Plan, and comment #24, which expresses concern about conflicting turning movements along Road D. Comment #29 notes that the project is subject to payment of a traffic impact fee (estimated to be \$162,213.45), but that the Applicant will be entitled to a credit toward that fee equivalent to the cost of constructing the "Couplet" road segment shown.

- **Finance Director memorandum dated May 6, 2020.** Ms. Jones reviewed the fiscal impact analysis provided by the Applicant with this submission. She confirms the accuracy of the figures in the analysis, but she questions the vacancy factor used to estimate the fiscal impact of this project. A net positive fiscal impact is projected for both the Township and the School District.

- **Public Works Director memorandum dated May 12, 2020.** Mr. Otteni raises concerns about the design and eventual ownership of both the Couplet and Road D. Like our outside consultants, he has concerns about pedestrian accommodations and notes the lack of a multi-modal trail along the Couplet. He also questions the design of the sanitary sewerage provisions.
- **Police Chief memorandum dated May 15, 2020.** Chief Catov expresses concern about the potential for northbound traffic on Ship Rd. being block by drivers turning into the site.

Staff Comment

Staff notes that this application is largely consistent with the design provided in 2019 when we were evaluating the Zoning amendment for this area and that the Applicant is still proposing construction of a significant segment of an important road improvement. However, six of the conditional use criteria have not been met in the opinion of Staff, and our consultants describe numerous concerns. Staff is of the opinion that these should be more fully resolved before the Commission makes any recommendation to the Board of Supervisors. We particularly note SSM's comments about the stormwater management provisions, Theurkauf's comments regarding landscaping and buffers, the Public Works Director's questions about the design and eventual ownership of the Couplet and Road D, and the many comments noting that no multi-modal trail is shown along the Couplet.

While Staff does not advise action at this time, we suggest that the Commission could have productive conversation with the Applicant on the noted concerns. In addition, Staff suggests that the massing, architecture, and exterior finishes of the proposed structures (including the canopy over the gas pumps) is critically important - more than most projects - and that there should be dialogue on this topic as soon as possible. Appropriate architecture that respects the neighborhood in combination with well-designed lighting and landscaping will do much to enhance the character of this busy, prominent area. In addition to the concerns about the relationship to St. Mary's Chapel voiced by several of our consultants (as well as by residents and members of the Commission during the 2019 meetings and hearing on the Zoning amendment), Staff is concerned about how this project will address the new residences on the south side of Road D. It appears that the fronts of the new homes will face the backs of the new commercial buildings, indicating the importance of thoughtful architecture and landscaping. We are aware that new Wawa stores in Media and Wyomissing have been particularly successful in addressing similar concerns in more densely developed areas, so we are hopeful of a satisfactory conclusion here as well.

Attachments

1. SSM review dated May 12, 2020.
2. Theurkauf review dated May 12, 2020.
3. McMahon review dated May 15, 2020.
4. CHG review dated May 12, 2020.
5. Finance Director memo dated May 6, 2020
6. Public Works Director memo dated May 12, 2020.
7. Police Chief memo dated May 15, 2020.
8. Plan set dated April 10, 2020, no revision date.



May 12, 2020

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

RE: 690 E. Lincoln Highway
Laborer's Union –Wawa / Commercial Development
Conditional Use Application
SSM File 101008.0344

Dear Mr. Weller:

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

- Laborer's Union Commercial Development Conditional Use Plans (7 Sheets), prepared by D. L. Howell & Associates Inc., dated April 10, 2020;
- Preliminary Stormwater Management Feasibility Report for Wawa Commercial Development, prepared by D. L. Howell & Associates Inc., dated April 10, 2020, including:
 - Carbonate Geology Overlay District and Subsurface Soil Report, prepared by Ingram Engineering Services, Inc., dated June 8, 2018;
- Utilities Impact Report for Commercial Development, prepared D. L. Howell & Associates Inc., dated April 10, 2020, including:
 - Capacity Request for Sewage Facilities Capacity Acknowledgement Letter, prepared by West Whiteland Township, dated April 17, 2020.
 - AQUA Will-Serve Letter, dated March 25, 2020.
 - PECO Will-Serve Letter, dated March 16, 2020.
- Phase 1 Environmental Site Assessment (ESA) Report, prepared by Groundwater & Environmental Services, Inc., dated January 31, 2019.

Ship Run Developers, LLC and 690 East Lincoln Associates, LLC is proposing to subdivide parcels 41-5-176, 41-5-177.1, and 41-5-177.2 into four (4) parcels which comprise the tract area. Separate parcels for the (1) existing Laborers' District Council / out parcel, (2) Wawa / Commercial Development, (3) a 95 unit single-family detached dwelling development, and (4) a 53 unit townhouse development are proposed. This plan, the Laborer's Union –Wawa / Commercial Development, proposes to install a 5,590 square foot Wawa convenience store with 16 fuel pumps, a 6,900 square foot commercial building, and a 10,540 square foot commercial building. The use of the commercial buildings has yet to be determined; however, the parking provided is for potential Offices / Health Sciences and Clinics.

This project is proposed to be developed concurrently with the Laborer's Union Residential Development. Part of this project includes the installation of a portion of a future couplet road which is in the Township's Transportation Capital Improvement Plan.

The tract is bounded by East Lincoln Highway - Business Route 30 (SR 0030) to the north, Ship Road (SR



1001) to the East, Exton Bypass – Route 30 (SR 6030) to the south, and properties zoned TC – Town Center to the west. The project is located in the O/R – Office Residential zoning district. The proposed use of a convenience store with fuel pumps and commercial office buildings are permitted as a Conditional Use under the Township Zoning Ordinance. We have the following comments.

Issues regarding landscaping and buffering, traffic and pedestrian circulation, and lighting will be addressed by Theurkauf Design and Planning, McMahon Associates, Inc., and Stan Stubbe respectively.

WAIVER REQUESTS

The following waivers been requested:

1. Section 270-20 – A waiver from the infiltration requirements due to karst geology and associated sinkhole risk, and existing groundwater contamination. Bio-Filtration and slow release is proposed in lieu of Infiltration. We do not support the waiver request until further alternatives are explored and found to be infeasible.
2. Section 281-16.B – A waiver to permit 30-inch by 42-inch plans in lieu of the max permitted twenty-four-inch by thirty-six-inch sheets. We have no objection to the requested waiver.
3. Section 270-15.T. – A waiver to permit disturbance, grading, and other associated improvements including the Couplet Road within the Riparian Buffer located along the eastern side of the stream that bisects the site. We do not support the waiver request until further alternatives are explored and other standards are adhered to as noted in several comments below.

COMPLIANCE WITH CONDITIONAL USE STANDARDS

4. The application shall demonstrate the architectural compatibility of the proposed Wawa and Commercial Buildings via the submission of architectural building plans with renderings, Section 325-124.C(1)(h).
5. The applicant must demonstrate to the Board's satisfaction that the size, scope, extent and character of the proposed development is consistent with the plan for future land use in West Whiteland, and with the spirit, purpose and intent of this chapter, Section 325-124.C(1)(b). The West Whiteland Township the Bicycle and Pedestrian Plan dated June 12, 2019 (Amendment to the Comprehensive Plan) should be considered during the development of this tract. This plan indicates a “Requested New Connection” along E. Lincoln Highway along the Laborers Union property frontage and a small pedestrian improvement along S. Ship Road in Map 9 – Requested Connections & Improvements (i.e., PDF Pg. 34). This plan requires sidewalk and lighting be installed along E. Lincoln Highway (SR 0030) under Section 5: Plan Recommendations, Improvement No. 5: titled “Lincoln Hwy. Sidewalk Gaps (Evian to Church Farm School)” (i.e., PDF pgs. 73-74). Per Section 325-15.1.D(3)(g), sidewalks shall be provided on one side of all streets, except that sidewalks shall not be required along Lincoln Highway, if an alternative means of pedestrian access satisfactory to the Township, is provided through the development to connect to existing streets on the perimeter of the tract. A sidewalk along E. Lincoln Highway or an alternative means of pedestrian access shall be provided generally along the perimeter of the tract.

In previous discussions with the developer, the Township has noted that the sidewalk along the west side of the south bound Ship Road couplet shall be a multi-use path and therefore it shall be 10 ft. wide.

6. The Board of Supervisors may impose additional conditions that are reasonably necessary to assure that the intent of the Zoning Ordinance is complied with, Section 325-124.C(2).



COMPLIANCE WITH ZONING ORDINANCE

7. In order to determine if the proposed density of the subdivision is feasible, adequate information shall be provided such that the overall gross and net lot areas can be determined for each proposed parcel, Section 325-15.1.D. The following information shall be provided for each proposed parcel:
 - a. Existing right-of-way widths shall be indicated on the plans for surrounding state roads. It is not clear where the right-of-way is located along Ship Road and E. Lincoln Highway.
 - b. Existing parcel information shall be provided with associated zoning compliance tables to identify any existing non-conformities;
 - c. Each proposed parcel (i.e., Out Parcel, Commercial; Single-Family, and Townhouse) shall be provided with its own Zoning Compliance Table.
8. Off-street loading and unloading spaces shall be at least 15 feet wide, 14 feet vertical clearance, 55 feet deep and shall have an adequate maneuvering apron, Section 325-38.D. The smaller commercial building proposes a 9 foot wide loading space.
9. All proposed signs associated with the Wawa and commercial buildings shall meet the Townships requirements, Section 325-97. We recommend that the applicant indicate if any waivers of this section will be requested.

COMPLIANCE WITH LAND DEVELOPMENT ORDINANCE

10. Letters have been provided from Aqua Pennsylvania, Inc. and West Whiteland Township stating that water and sewer service, respectively, can be provided, Section 281-12.
11. Cartway widths for local roads are to be a minimum width of 28 feet per Appendix A, Typical Street Sections, Section 281-25.B. Road D is proposed to be 26 feet wide.
12. Sidewalks are required for all residential and nonresidential development. Locations of sidewalks shall be approved by the Board, Section 281-31. Sidewalks connecting the Wawa, commercial buildings and residential development should be considered.
13. Curbs are required around all paved areas, Section 281-32.B. The plan does not propose curb at the entrance to the parking lot closest to Saint Mary's Chapel, nor at the parking spaces.
14. There shall be one (1) planting island, a minimum of nine feet wide by 18 feet long, spaced not more than 135 feet apart, or every 15 parking stalls, in single or double bays, Section 281-37.B. The applicant has proposed 20 parking spaces associated with the Wawa and 17 parking spaces associated with the larger commercial building without landscaping islands.
15. Open Space is required at a rate of 500 sf per 1,000 sf of building floor area on the first floor, Section 281-47.C.1; however, where a project proposes redevelopment of a lot, the open space requirement shall be based upon the net increase in development, Section 281-47.C.3. It appears the Commercial Area does not require open space as the proposed project is redevelopment and reduces the building coverage.

COMPLIANCE WITH STORMWATER MANAGEMENT ORDINANCE

16. Section 270-20 identifies the stormwater infiltration requirements; Section 270-20.E states that a waiver from §270-20 shall only be considered by the Township if a minimum of 0.5 inch of runoff from the entire site cannot be physically infiltrated. The stormwater and geological reports note that



conventional infiltration practices cannot be accomplished due to karst geology which is susceptible to sinkhole activity. Further alternatives, such as stream restoration shall be explored.

17. The Township may require additional stormwater control measures for stormwater discharges to special management areas, Section 270-15.P. The proposed site drains to Valley Creek which is identified by PaDEP as both an impaired stream and CWF (Cold Water Fishes). It is recommended that additional water quality BMP's be incorporated into the stormwater design. Pretreatment (i.e. a water quality train) shall be provided, Section 270-19.F.
18. Another option for satisfying Section 270-15.P could be stream restoration. It is our understanding that the applicant had considered stream restoration for this project but thought that it was too costly. Stream restoration can have many benefits, such as groundwater recharge, water quality improvement, rate control, floodplain restoration and in some instances may even create more usable space. Therefore we recommend that the applicant provide a cost benefit analysis of the conventional systems proposed here versus stream restoration.
19. Riparian Buffer Areas (RBA) are required to be provided adjacent to perennial streams, intermittent streams, waterways and wetlands. The RBA shall consist of three zones: Zone 1: a minimum twenty-five-foot setback, plus wetlands, measured from the top of the stream bank where no disturbance of vegetation or soil shall be permitted except for restoration or reforestation activities; Zone 2: a 125 foot area beyond Zone 1 where ground cover may be minimally disrupted but may not be impervious and should consist primarily of woodlands or a dense grass filter strip; and Zone 3: a 25 foot minimum setback from Zone 2 where stormwater discharge and level spreading is permitted (i.e. minimum width for all three zones is equivalent to 175 feet), Section §270-15.T. The following comments shall be addressed:
 - a. Where prohibitive slopes (25% and steeper) are located within 35 feet of the stream bank, Zone 1 shall extend the entire distance of this sloped area, Section 270-15.T(2)(a). The plans suggest that the steep slopes along the stream are man-made. It seems logical that the slopes along the stream are not man-made and therefore the 25' width of Zone 1 shall extend 25' from the steep slopes.
 - b. Portions of the proposed southbound couplet lane of Ship Road will encroach into Zone 1. No disturbance of vegetation or soil shall be permitted except for restoration or reforestation activities, Section 270-15.T(2)(a). Grading and the roadway shall not encroach into Zone 1. We do not recommend a waiver for encroachments into Zone 1.
 - c. The applicant has proposed improvements and level spreaders in Zone 2 (and slightly into Zone 1) where they are not permitted. Within Zone 2, disturbance of natural vegetative cover shall be limited to selective logging (not to exceed 25%) and other activities that minimally disrupt the existing tree and soil cover. The purpose of this limitation is to maximize filtering and overall physical removal of particulate-form pollutants from runoff generated upgradient and to promote subsurface vegetative uptake of nitrogen and other nonparticulate elements from stormwater generated upgradient, Section 270-15.T(2)(b).

Currently, drainage from the east side of the stream drains into the stream via sheet flow over a width of over 1,000 ft. Discharge level spreaders from four detention basins span a width of less than 250'. Level spreaders are required to be located further away from the stream and outside of Zone 2. Each of these level spreaders are immediately upstream of Zone 1. We recommend that these level spreaders be set back a minimum of 25' from Zone 1 and wetlands. Furthermore, we recommend that the release rates at these facilities mimic pre-



existing sheet flows on a flow rate per foot basis. Subject to these two modifications, we would consider recommending a waiver of Section 270-15.T.

- b. The applicant shall submit a Pennsylvania Natural Diversity Inventory (PNDI) in accordance with §270-32.B.8.g for Township review to further identify any other buffer requirements
- 20. Strict application of redevelopment per the ordinance standards of Section 270-23.D and definitions implies that any placement of impervious areas outside the limits of existing impervious areas is considered new development. Therefore, as a matter of Township policy, redevelopment can only be utilized if there is less than a 5% proposed increase in impervious surface. This development therefore does not qualify as redevelopment and the rate control requirements of Section 270-22 shall be calculated based on new development assumptions (i.e., Pre-Development = 100% Meadow).
- 21. This plan has been submitted with the same application as 500 E. Lincoln Highway (Laborer's District Council) Residential development. Ultimately, both developments will need to be their own separate properties. The plans and calculations must clearly indicate which stormwater management facilities will serve and be part of the WAWA/commercial property and which will serve and be part of the Townhouse property. If this is not the plan intent then the plan shall address how operation and maintenance responsibilities will be assigned.

GENERAL

- 22. This plan has been submitted with the same application as the 500 E. Lincoln Highway/Laborer's District Council residential development. Ultimately, they will need to be two separate applications. Whereas the plan will require parcel consolidation and subdivision, we recommend that the plan process proceed as three separate plans. The third plan would be a parcel consolidation and subdivision plan that would be approved and recorded before the other two plans. This would allow the commercial and subdivision plans to proceed independently.
- 23. It is unclear if Road "D" will be public or private. The plans should indicate if the intent is to dedicate this road.
- 24. Consideration should be given to connecting the pedestrian sidewalk to the Chester Valley Trail located west of the modified westernmost Lincoln Highway (i.e., "Laborers Training" entrance) entrance.
- 25. Sidewalk on the townhouse side of the Couplet Road may be more beneficial than what is currently proposed. The Planning Commission should discuss desired pedestrian circulation locations.

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

Sincerely,
Spotts, Stevens and McCoy


Kent D. Morey, P.E.

Senior Engineer

kent.morey@ssmgroup.com

cc: Mark Stabolepszy, P.E.



M E M O R A N D U M

TO: John Weller, AICP, West Whiteland Township Planning Director and Zoning Officer
Justin Smiley, AICP, Township Planner
David W. Gibbons, P.E., D.L. Howell & Associates, Inc.
Patrick J. Stuart, RLA, ASLA, MCRP, Orsatti & Stuart Associates, Inc.

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

DATE: May 12, 2020

SUBJECT: **REVIEW COMMENTS – WAWA 690 EAST LINCOLN HIGHWAY
CONDITIONAL USE PLAN DATED 4-10-20**

Please note our review comments pertaining to the following documents received on 4-21-20, and to a site visit on 4-28-20:

- Conditional Use Plan by D.L. Howell & Associates, Inc. consisting of 19 sheets;
- Conditional Use Application Narrative dated 4-21-20; and
- Recreation Impact Statement dated 4-17-20 by EH Creative Services, LLC.

**REVIEW COMMENTS – WAWA 690 EAST LINCOLN HIGHWAY
CONDITIONAL USE PLAN DATED 4-10-20**

May 12, 2020

1. Conditional Use Requirements – In accordance with section 325-124.A of the zoning ordinance (ZO), conditional use approval is required for a land development of 20,000 square feet or more non-residential floor area. Section 325-124.A (ZO) requires that the conditional use plan demonstrate feasibility of compliance with all pertinent requirements, including buffering, vehicular and pedestrian access, and landscaping. Further, the following specific standards of review apply per section 325-124.C (ZO):
 - a. The proposed use shall be reasonable in terms of public services, including multimodal accommodation. The plan is deficient in terms of sidewalks, trails, and road/highway crossings.
 - b. The natural features of the site shall not suffer unmitigated degradation. There is no evaluation of the feasibility of meeting planting mitigation requirements for woodland clearing.
 - 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. The plan fails to meet Township requirements for screen, perimeter, and site element landscape buffering, most significantly with regard to adjacent residential uses and historic resources.
 - d. The proposal shall mitigate impacts on the Township’s historic resources. The plan does not meet screen buffer requirements for the historic Saint Mary’s Church (Class 1), and the Ship Inn (Class 1, National Register).
2. Pedestrian and Bicycle Accessibility – Section 325-15.1.A.1 (ZO) states that projects within the O/R district shall facilitate multimodal transportation. Section 325-37.A.7.a (ZO) requires development to provide pedestrian facilities that implement the Township Comprehensive Plan.

Section 325-15.1.D.3.g (ZO) requires sidewalks on at least one side of all streets. A Lincoln Highway sidewalk may not be required if a satisfactory connection to the tract perimeter is provided. Section 281-31.A of the subdivision and land development ordinance (SLDO) requires sidewalks at all new developments.

The Township’s 2019 *Bicycle and Pedestrian Plan* amendment to the Township Comprehensive Plan indicates pedestrian accommodations along Lincoln Highway. In addition, a twelve foot wide Bicycle and Pedestrian Loop Trail is proposed to run through the site from Lincoln Highway to Ship Road in coordination with the proposed Ship Road Couplet. Crosswalks and pedestrian signalization are to be provided at the intersection of Lincoln Highway and the Pedestrian/Bicycle Loop Trail. The Loop Trail represents a critical linkage to and between the Chester Valley Trail, Exton Township/County Park, Exton Town Center, communities south of the

**REVIEW COMMENTS – WAWA 690 EAST LINCOLN HIGHWAY
CONDITIONAL USE PLAN DATED 4-10-20**

May 12, 2020

Route 30 By-pass, and the Exton Train Station. The *Bicycle and Pedestrian Plan* states that these multimodal improvements shall be undertaken in the context of land development of affected properties.

The Chester County Planning Commission’s *2013 Central Chester County Bicycle and Pedestrian Circulation Plan* also supports strong pedestrian and bicycle linkages along Lincoln Highway, which is designated as a High Priority Corridor for these improvements.

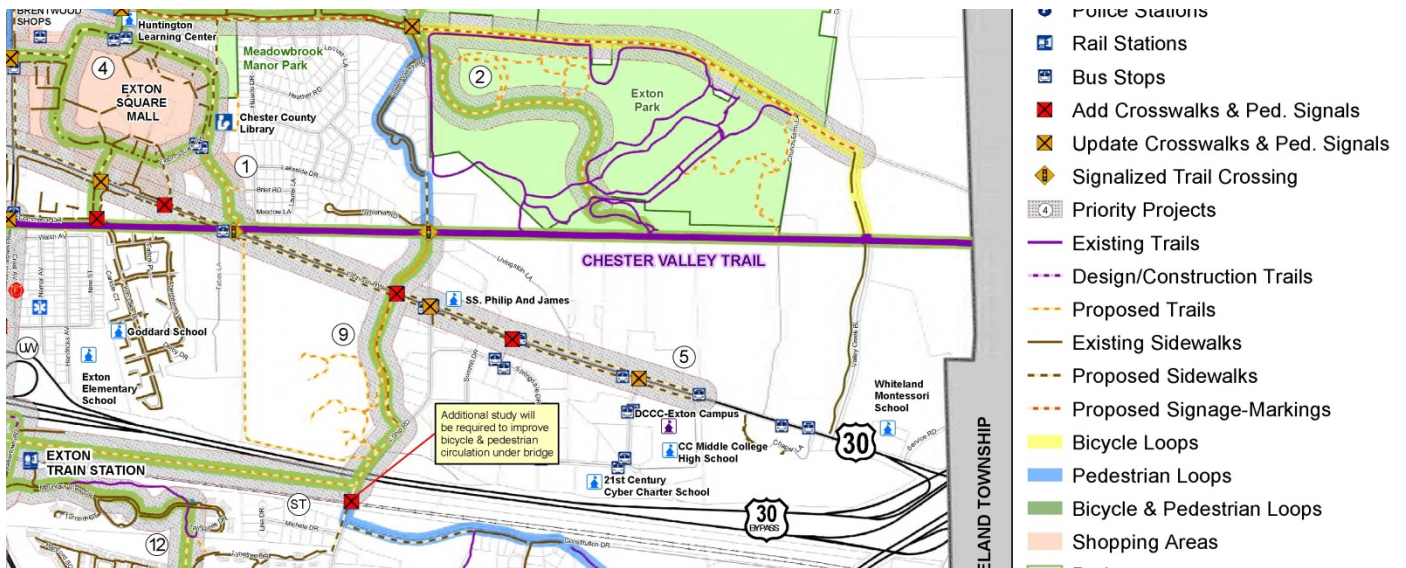


Figure 1 - Excerpt from Township Bicycle and Pedestrian Plan

The plan lacks adequate multimodal accommodations as follows:

- a. Lincoln Highway – The plan includes no sidewalk and no pedestrian crossings along Lincoln Highway. There is no proposed means of pedestrian access from the west end of the site and Chester Valley Trail to the proposed commercial area and Saint Mary’s Church at the east end of the site. The plan shall be revised accordingly.
- b. Bicycle and Pedestrian Loop Trail – The plan indicates a five foot wide sidewalk along the proposed Ship Road Couplet. The sidewalk does not continue to the southern tract boundary along Ship Road, nor is any trail crossing signalization/infrastructure proposed at Lincoln Highway. The trail shall be provided at 12 feet width, extending fully through the property, and with the required Lincoln Highway pedestrian signal and crosswalk.
- c. Ship Road – No sidewalk is proposed along the Ship Road frontage.

**REVIEW COMMENTS – WAWA 690 EAST LINCOLN HIGHWAY
CONDITIONAL USE PLAN DATED 4-10-20**

May 12, 2020

d. Internal Sidewalks – There are no sidewalk connections into the Wawa and other commercial buildings from Lincoln Highway, Ship Road, or the adjacent proposed townhouse community. These connections should be provided.

The plan fails to meet the O/R district purpose of integrating residential and nonresidential uses and providing access by means other than private automobiles per section 325-15.1.A.1 (ZO). The conditional use plan requires revisions to demonstrate feasibility of compliance with pedestrian and bicycle accessibility standards.

3. Screen Buffer – Section 281-35.A (SLDO) requires 50-foot-wide screen buffers for non-compatible uses along the site perimeter. Buffers not meeting the 50 foot required width have non-permitted proposed improvements in the following areas:

- Basin 7 and a parking lot are in the required historic resource buffer from Saint Mary’s Church
- Basin 7, a driveway, and the gas pump canopy are within the required historic resource buffer from Ship Inn

Screen buffer plantings in accordance with section 281-35.D (SLDO) are required and proposed as follows:

<u>Buffer/ Length</u>	<u>Plant Type</u>	<u>Required</u>	<u>Proposed</u>
Saint Mary’s Church / 318 LF	Shade Tree	6	8
	Evergreen Tree	13	12
	Large Shrub	32	32*
Ship Inn / 292 LF	Shade Tree	6	3
	Evergreen Tree	12	9
	Large Shrub	29	17*

* Includes credit for small shrubs for parking lot screen

As configured, the required buffer width is not provided for neighboring historic resources. The conditional use plan shall be revised to demonstrate feasibility of compliance.

4. Perimeter Buffer – Section 281-35.E (SLDO) requires 25-foot-wide perimeter buffers along Lincoln Highway and around stormwater basins. Buffers not meeting the 25 foot required width have non-permitted proposed improvements in the following areas:

- Basin 6 is within the required Lincoln Highway buffer
- There is no buffer from Road 4A along the east side of basin 5
- There is no buffer from Road 4A along the east side of basin 6

**REVIEW COMMENTS – WAWA 690 EAST LINCOLN HIGHWAY
CONDITIONAL USE PLAN DATED 4-10-20**

May 12, 2020

- Parking and Road 6 are within the basin 7 buffer

Perimeter buffer plantings in accordance with section 281-35.E (SLDO) are required and proposed as follows:

<u>Buffer/ Length</u>	<u>Plant Type</u>	<u>Required</u>	<u>Proposed</u>
Lincoln Hwy / 248 LF	Shade Tree	2	1
	Evergreen Tree	5	2
	Large Shrub	12	11
Basin 5/ 465 LF	Shade Tree	5	5
	Evergreen Tree	9	9
	Large Shrub	23	23
Basin 6/ 450 LF	Shade Tree	5	5
	Evergreen Tree	9	13
	Large Shrub	23	24
Basin 7/ 350 LF	Shade Tree	4	4
	Evergreen Tree	7	7
	Large Shrub	18	25

Feasible compliance with perimeter buffer requirements has not been established for conditional use purposes. The plan shall be revised to provide the required 25 foot wide buffers for all basins. As an alternative, basins revised to meet the grading and native planting standards of section 281-35.F.4 (SLDO) are not required to have perimeter buffers.

5. Site Element Screens - Section 281-35.G (SLDO) requires low vegetated screens for parking lots, and high screens for loading areas and dumpsters without decorative enclosures. In addition, section 281-35.B.6 (SLDO) requires that loading areas be fully screened from view from adjacent streets and residences. Screening is required and proposed as follows:

<u>Building</u>	<u>Site Element</u>	<u>Required Screen Type</u>	<u>Proposed</u>
Wawa	Vehicular Use (front)	Low	No
	Dumpster	High	No
	Parking	Low	Yes
Commercial 6,900 SF	Loading	High	Partial
	Dumpster	High	No
	Parking	Low	Yes
Commercial 10,540 SF	Loading	High	No

**REVIEW COMMENTS – WAWA 690 EAST LINCOLN HIGHWAY
CONDITIONAL USE PLAN DATED 4-10-20**

May 12, 2020

Dumpster Parking	High Low	No Yes
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There is inadequate room to provide the required screening for the Wawa and smaller commercial building dumpsters. It is not possible to provide the required loading dock screening from residences and Road 7 for the larger commercial building, and the smaller commercial building has inadequate loading area screening proposed. Feasibility of compliance has not been demonstrated for conditional use purposes.

6. Building Façade Landscaping – Section 281-37.D (SLDO) requires landscaping between building facades and parking to provide a more comfortable pedestrian environment. One shade tree plus five small shrubs or 50 perennials are required per 50 feet of building façade in accordance with section 281-37.D.2 (SLDO). Landscaping is required and proposed as follows:

<u>Bldg./Façade Length</u>	<u>Plant Type</u>	<u>Required Qty.</u>	<u>Proposed Qty.</u>
Wawa/300 LF	Shade Tree	6	0
	Small Shrubs	30	0
Large Commercial/200 LF	Shade Tree	4	3
	Small Shrubs	20	0
Small Commercial/175 LF	Shade Tree	4	3
	Small Shrubs	18	0

There is no space proposed for any landscaping around the Wawa, and insufficient space around the commercial buildings for the required plantings. Feasibility of compliance has not been demonstrated for conditional use purposes.

7. Parking Lot Divider Strip - Section 281-37.C (SLDO) requires 10-foot wide parking lot divider strips placed every other bay of parking. Shade trees with either shrubs, ground covers, or rain garden plantings are required and proposed as follows:

<u>Divider Strip/ Length</u>	<u>Plant Type</u>	<u>Required Qty.</u>	<u>Proposed Qty.</u>
Wawa – Small Commercial/ 118 LF	Shade Tree	2	0
	Shrubs – Ground Cover	Yes	Yes

The proposed divider strip is only eight feet wide, and there is insufficient space for the required trees. The plan requires revision to demonstrate feasible compliance with divider strip landscaping requirements.

8. Parking Lot Landscaping – Section 281-37 (SLDO) requires landscaping for parking lots with five or more spaces, in order to mitigate the heat and aesthetic impacts of parking lots. Section 281-

**REVIEW COMMENTS – WAWA 690 EAST LINCOLN HIGHWAY
CONDITIONAL USE PLAN DATED 4-10-20**

May 12, 2020

34.B.1 (SLDO) requires minimum 9-foot by 18-foot planting islands spaced not more than 135 feet apart and at the ends of parking bays to separate parking from vehicular travel lanes. Further, section 281-34.B.4 (SLDO) states that each island shall contain one shade tree. The plan shall be revised to address the following:

- a. The Wawa lacks required landscape islands at each of its four corners. Thus, there is no physical separation of parked cars from vehicular travel lanes, and there is no possibility of façade landscaping to shade and soften the parking area or enhance the pedestrian walkway in front of the building in accordance with Township requirements.
- b. Small Commercial – The parking lot island near the dumpster is lacking the required shade tree. In addition, the island is insufficiently wide to fit both the tree and the required high screen vegetation (see comment 5).

The plan requires revision to demonstrate feasibility of compliance.

- 9. 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. The site is approximately half wooded, and a significant amount of woodland would be cleared for development.
 - a. The plan should be revised to clearly show the extent of existing wooded areas and trees to demonstrate whether the proposed layout maximizes tree preservation.
 - b. Trees to be removed shall be inventoried by species and size, or removals estimated by sample survey areas applied to areas of clearing, so that feasibility of meeting the compensatory tree planting requirement can be determined.

The conditional use plan requires revision to demonstrate feasibility of compliance with woodland preservation and planting mitigation requirements.

- 10. Street Trees – Section 281-36 (SLDO) requires one street tree within the right-of-way for every 50 feet of road frontage in addition to required buffer plantings. Street trees are required and proposed as follows:

<u>Frontage/Length</u>	<u>Required</u>	<u>Proposed</u>
Lincoln Hwy/ 575 LF	12	9
Ship Road/ 270 LF	5	6
Road 4A/ 975 LF	20	10
Road 6/ 975 LF	10	12
Road 7/ 590 LF	12	12

**REVIEW COMMENTS – WAWA 690 EAST LINCOLN HIGHWAY
CONDITIONAL USE PLAN DATED 4-10-20**

May 12, 2020

We would not object to a waiver to allow some street trees outside of the right-of-way as shown. The additional required trees for Road 4A could be proposed at land development. The plan demonstrates feasibility of compliance for conditional use purposes.

11. Plan Graphics – The landscape plan contains a symbol that is not identified on the legend or plant schedule. It was assumed that the symbol is for an understory tree to meet parking lot and building area planting requirements. Future plan submissions should clarify this omission.
12. Conclusion – The following shall be resolved prior to conditional use approval:
 - Pedestrian and Bicycle Accessibility
 - Screen Buffer Width
 - Perimeter Buffer Width
 - Site Element Screens
 - Building Façade Landscaping Areas
 - Parking Lot Divider Strip Width
 - Parking Lot Islands and Tree Planting
 - Tree Clearing and Compensatory Plantings

Please contact this office with any questions.



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FOUNDER

Joseph W. McMahon, P.E.

May 15, 2020

Ms. Mimi Gleason, Township Manager
West Whiteland Township
101 Commerce Drive
Exton, PA 19341

RE: Traffic Engineering Review
690 East Lincoln Highway Commercial Development
West Whiteland Township, Chester County, PA
McMahon Project No. 820375.11

Dear Ms. Gleason:

McMahon Associates, Inc. completed a traffic engineering review of the proposed mixed-use commercial development located on the southwest corner of the intersection of Lincoln Highway (S.R. 3070) and Ship Road (S.R. 1001). The site proposes a 5,590 square-foot convenience store with 16 fueling positions, and 17,440 square feet of medical office space. The development proposes a new one-way southbound Couplet Road through the site, which will connect between Lincoln Highway and Ship Road, as well as a new road (Road D), which will connect between the Couplet Road and Ship Road. Access to the site is proposed via right-in/right-out access along Lincoln Highway, a full-movement access along Ship Road, a left-in enter-only access along Ship Road, two full-movement accesses along Road D, and a full movement access along the Couplet Road. Our traffic review is based on the following documents.

- *Ship Road Southwest Quadrant & Laborers District Council Property Development Transportation Impact Study*, prepared by Traffic Planning and Design, Inc., dated April 17, 2020.
- *Conditional Use – Commercial Site Plan*, prepared by D.L. Howell & Associates, Inc., dated April 10, 2020.

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

Transportation Impact Study

1. The applicant proposes to build the southern portion of the Township's planned Couplet Road between Lincoln Highway and Ship Road. The TIS provides an analysis scenario whereby only this southern portion of the Couplet Road is constructed. There is no traffic analysis for the full build-

out of the Couplet Road and its associated traffic operational benefits. The traffic study also presents the traffic analysis results in a phased development schedule.

- a. By 2023, with traffic generated by the Wawa and the medical office only, the Lincoln Highway/Ship Road intersection will meet PennDOT's mitigation requirements for the overall intersection.
 - b. By 2028, with the traffic generated by the Wawa and the medical office development, as well as the traffic from the build-out of the 500 Lincoln Highway residential development (single family homes and townhomes), the Lincoln Highway/Ship Road intersection will continue to meet PennDOT's mitigation requirements for the overall intersection; however, several individual movements will operate with increased delay, such as the eastbound Lincoln Highway left-turn movement, the westbound shared through/right-turn movement, and the southbound Ship Road approach, which will all operate with LOS E or F conditions. Presumably, these conditions will be addressed with full completion of the Township's planned Couplet Road project, but this is not included in the traffic study.
2. The TIS indicates the eastbound Road D and westbound Springdale Drive approaches to the intersection with Ship Road will operate at LOS E and F during the weekday afternoon peak hour, which is not uncommon for side street approaches to unsignalized intersections along roadways such as Ship Road. However, this analysis does not assume the diversion of southbound Ship Road traffic, which will occur when the northern portion of the Couplet Road is constructed. It is recommended to complete an analysis of this intersection without the southbound Ship Road traffic to ensure the access will operate with acceptable operations in the final condition with the full Couplet Road.
 3. Similar to the comment above, the design of the southern segment of the Couplet Road and all proposed intersections and accesses serving this development should reflect traffic patterns associated with the eventual full buildout of the Couplet Road.
 4. The TIS should be updated to include an evaluation of the access intersections along the Couplet Road.
 5. Although the full benefit of the Couplet Road is not provided by the construction of only the southern segment, it is reasonable to assume some diversion of traffic to the new roadway. Specifically, it is likely a portion of the eastbound Lincoln Highway right-turn traffic will divert to the new roadway. As such, the traffic study should be revised to assume this diversion.
 6. The nearby proposed development list should be revised, and the traffic study should be updated to include the following nearby developments:
 - a. Exton Knoll – This development is now proposed to include 324 townhomes.
 - b. Exton Mall Apartments – This development consists of 342 apartments which are currently under construction to the north of the existing Whole Foods, and a recent application proposes an additional 354 apartments located immediately to the east of the apartments

currently under construction. These developments should be included in the background traffic growth projections.

7. The traffic study should be revised to include the proposed traffic signal at the Lincoln Highway/Belden Boulevard/Lochiel Lane intersection, as well as the traffic diversions associated with the removal of the existing left-turn restriction along northbound Belden Boulevard.
8. The TIS assumes southbound Ship Road right-turn traffic will enter the site using the proposed driveway along Ship Road just south of Lincoln Highway. However, we question whether right-turn traffic will be able to perform this movement, as the conditional use plan shows this access as left-in only. It may be necessary to revise the TIS.
9. The TIS should be updated to include the detailed internalization calculations used to determine the trip generation for the site.
10. The traffic study assumes 20 percent of the proposed commercial and residential development new site traffic is destined to/from the south along Ship Road towards the intersection with King Road. This intersection should be monitored over time to assess the need for future traffic improvements.
11. The concept plan for the Ship Road Couplet provided in Appendix K of the TIS shows two-way traffic along Ship Road between Springdale Drive and continuing south. The Couplet Road intersection with Ship Road is shown as a T-intersection with presumably yield or stop control for a channelized right-turn movement to continue south on Ship Road. With two-way traffic on Ship Road at this location, traffic exiting the Couplet Road will be required to stop and/or yield to southbound through traffic within Ship Road. We question whether any other design configurations were considered or are necessary to allow more free-flow traffic movements from the Couplet Road onto southbound Ship Road.

Conditional Use Plan

12. The plans should clearly label the existing right-of-way along the Lincoln Highway and Ship Road site frontages. However, the plan appears to show a 60 to 75-foot wide half-width right-of-way along the Lincoln Highway site frontage, which will be sufficient to accommodate a second eastbound Lincoln Highway travel lane, as envisioned in the Township's Act 209 Study.
13. SALDO Section 281-25.A – The plans appear to show a proposed right-of-way of 50 feet along the Couplet Road, as well as along Road D, which meets the Township requirements for a local road. However, in the ultimate condition the Couplet Road will serve as the southbound portion of Ship Road. As such, it may be more appropriate to provide a 60-foot right-of-way for the Couplet Road; however, we will defer to the Township on this based on the Couplet Road planning to date, and realizing the road is one-way only. In addition, the Township should determine the future ownership of both the Couplet Road and Road D.

14. Please provide additional information regarding the design of the Couplet Road as it relates to the intended road classification and the Township's vision for this road and road ownership (private, Township or PennDOT).
15. SALDO Section 281-28.E(3) – The plans should label and dimension the available sight distances for left-turn traffic entering (looking ahead and behind) and exiting all proposed site access intersections. In addition, a PennDOT-style sight distance note should be provided which notes the required sight distances for each access intersection.
16. The plans should show more detail regarding the proposed lane configuration and striping along Lincoln Highway and Ship Road at each of the new intersections, including auxiliary turn lanes as recommended in the TIS. In addition, if the northern portion of the Couplet Road is constructed after the southern segment, then an interim intersection configuration and striping plan should be provided. Furthermore, if this occurs, then there will be a period of time during which there will be southbound traffic flow along Ship Road at the left-in driveway entrance into the commercial site. If this occurs, please confirm whether there will be an interim intersection configuration and striping plan, including the need for a northbound Ship Road left-turn lane.
17. SALDO Section 281-31.A – The West Whiteland Township *Bicycle and Pedestrian Plan, June 12, 2019* envisions sidewalk along both sides of Lincoln Highway in front of this site, and as such, this development should provide a sidewalk along the south side of Lincoln Highway along the site frontage. In addition, the *Bicycle and Pedestrian Plan* also envisions crosswalks and pedestrian signals at both the existing Lincoln Highway/Ship Road signalized intersection and the planned Lincoln Highway/Couplet Road signalized intersection. The applicant should coordinate with the Township as part of the overall Couplet Road plan to confirm the scope of the pedestrian improvements, including all necessary ADA facilities, at both of these signalized intersections.
18. SALDO Section 281-31.A – Pedestrian facilities should be provided along Road D, as well as within the commercial site, with connections between the commercial site, Road D and the townhomes, a connection along the driveway connection to St. Mary's Chapel, and a direct pedestrian connection between Lincoln Highway and the Wawa front door.
19. The concept plan for the Ship Road Couplet provided in Appendix K of the TIS shows a 12-foot wide multi-use trail on the west side of the Couplet Road, which is also consistent with the Township's *Bicycle and Pedestrian Plan*. Therefore, the conditional use plans should show the Township's desired multi-use trail on the west side of the Couplet Road.
20. The proposed pedestrian crossing of the Couplet Road on the south side of the Couplet Road/Road D intersection should be relocated to the center of the curb radius on the southeast quadrant of the intersection. In addition, appropriate advance pedestrian warning signs should be provided along the couplet road in advance of the crossing.

21. During land development, detailed curb ramp designs should be provided for each ramp along Lincoln Highway, the proposed Couplet Road, and along Road D, including a grading plan with spot elevations, and labels for all dimensions (including slopes). The plans should also label all curb ramp types, and provide all of the relevant PennDOT curb ramp details. For all other curb ramps and pedestrian facilities located on private property, the applicant's engineer should ensure these facilities meet current ADA requirements.
22. The plans show an internal connection between the proposed commercial development and the existing Saint Mary's Chapel, which is desirable for access management as it would allow for better access to serve the Chapel. The Chapel is not a high traffic volume generator; however, we question whether there have been any discussions with the Church to close any of the existing Chapel driveways since they are substandard by current design guidelines and since they are located so close to the intersection of Lincoln Highway and Ship Road.
23. SALDO Section 281-28.C – The eastern Road D site access intersects Road D approximately 58 feet west of the eastern townhouse access along Road D. If possible, it is recommended to align these accesses opposite each other through relocation of the townhouse access.
24. This access configuration along Road D, whereby the 30-foot wide access, the 18-foot wide access, and the townhome access are all located in close proximity, introduces the potential for turning movement conflicts. In addition, the 18-foot wide access creates an awkward internal intersection within the site at the parking aisle on the north side of the 10,540 square-foot medical office building. As such, we recommend the 18-foot wide access should be modified or eliminated, and alternate access should be provided to the loading area for the 10,540 square-foot medical office building.
25. Please provide additional detail regarding the Wawa operations of the trash trucks serving the site. Because the Wawa dumpsters are located so close to the Couplet Road, there is concern that trash operations may impact traffic flow into and out of the site.
26. The truck turning templates on sheet 6 should be revised to show fire truck and the largest delivery truck which will access the two medical office buildings.
27. SALDO Section 281-29 – During land development, stop signs, stop bars, and all other necessary signs and striping should be provided at all proposed driveways.
28. Access to both Lincoln Highway (S.R. 3070) and Ship Road (S.R. 1001) will require a Highway Occupancy Permit (HOP) from PennDOT. The applicant should copy the Township on all PennDOT submissions.
29. Chapter 295-12 – This development is located within the Township's Act 209 Service Area, and is therefore subject to the Township's Transportation Impact Fee, which is equal to \$1,219.65 per new weekday afternoon peak hour trip. Based on the TIS, the site will generate approximately 133 new weekday afternoon peak trips, and the resultant Transportation Impact Fee for the site is

\$162,213.45. However, in this case, we understand the applicant proposes to construct the southern portion of the Ship Road Couplet between Lincoln Highway and Ship Road, which is contained in the Township's Act 209 Capital Improvements Plan.

30. Upon resubmission, the applicant's engineer should compose a response letter that describes how each comment has been addressed and where any plan and/or report revisions are located.
31. Additional comments regarding the traffic improvements and/or land development plans may follow upon receipt of future submissions.

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

Sincerely,



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



ANDREW J. WEIR, PRESIDENT
ajweir@chg-inc.com

PENNSYLVANIA OFFICE
20 Hagerty Boulevard, Suite 3
West Chester, PA 19382
P: (610) 436-9000

May 12, 2020
WC-409

Mr. John Weller, AICP
Director of Planning and Zoning, and
West Whiteland Township Historical Commission
222 North Pottstown Pike
Exton, PA 19341

**Re: Conditional Use Application
Wawa 690 East Lincoln Highway
690 East Lincoln Highway
Exton PA., 19341**

Dear Mr. Weller,

On behalf of 690 East Lincoln Associates, LLC, a Conditional Use Application has been submitted by Buckley, Brion, McGuire & Morris, LLP for construction of a new Wawa store and additional commercial development at 690 East Lincoln Highway. The 5.299-acre property is in the eastern section of the township, bounded by the Lincoln Highway (Route 30) on the north, The Laborer's Union Property on the west and south, and the St. Mary's Chapel on the east. The property is the former site of the Entenmann's Bakery distribution facility. The project site is located within West Whiteland Township's Office/Residential (O/R) zoning district.

The applicant for the 690 East Lincoln Highway, 690 East Lincoln Associates, LLC is also a partner with Ship Run Developers on the adjacent Ship Run residential development at 500 East Lincoln Highway. However, it should be noted this project is separate from the Ship Run residential development. Although the design of the two projects is being jointly coordinated, the projects have been submitted separately for Conditional Use Approval.

In accordance with the West Whiteland Township Zoning Ordinance, Article XVI: Historic Preservation, Commonwealth Heritage Group (hereinafter Commonwealth) has reviewed the proposed undertaking for potential impacts to the Township's designated historic resources. For this review Commonwealth utilized the following submission documents:

- The Conditional Use Application Narrative, dated April 21, 2020
- Conditional Use Plans, Drawings 1 thru 7, by D.L. Howell Associates, Inc., dated April 10, 2020
- Preliminary Stormwater Management Report, by D.L. Howell Associates, Inc., dated April 10, 2020
- Utilities Impact Report, by D.L. Howell Associates, Inc., dated April 10, 2020
- Recreation Impact Statement, by D.L. Howell Associates, Inc., dated April 17, 2020

OTHER LOCATIONS

Alexandria, VA (703) 354-9737 Columbus, OH (614) 549-6190 Dexter, MI (517) 788-3550 Littleton, MA (978) 793-2579
Minneapolis, MN (612) 597-1589 Minneapolis, MN (612) 597-1589 Ogden, UT (801) 394-0013 Tarboro, NC (252) 641-1444
Traverse City, MI (517) 262-3376

- Phase I Environmental Site Assessment, by GES, dated January 31, 2018

No current architectural plans, building elevations or renderings of the proposed structures were provided for Commonwealth's review. Therefore, other than overall site arrangement and building lot sizes, this review cannot accurately comment on the impact the final architectural design may have on the historic resources.

Historic Resources Impacted by the Proposed Project

In accordance with Section 325-92.A of the Township Zoning Ordinance, Class I, II, or III historic resources listed on the West Whiteland Township inventory that are located within the boundary of a proposed project site or within 300-feet of the boundary of a proposed project site shall be reviewed for potential adverse effect. Commonwealth's review has determined the following historic resources are subject to review.

Listed Historic Resources located within the boundary of the proposed Project Site:

None

Listed Adjacent Historic Resources within 300 feet of the proposed Project Site:

- **Site #032**– Ship Road and E. Lincoln Highway. St. Mary's Chapel. Built 1873 as mission church from St. Joseph's parish in Downingtown.
 - Class I Historic Resource, Eligible for listing on the National Register of Historic Places.
- **Site #311**– 100 North Ship Road. Ship Inn. Built in 1796 by John Bowen innkeeper, for the new Lancaster Turnpike coach trade.
 - Class I Historic Resource, Listed on the National Register of Historic Places.
- **Site #343**– 701 E. Lincoln Highway. Rectory, Saints Philip and James. Contains a 1726 datestone in the fireplace.
 - Class III Historic Resource, Listed on Historical Resource Inventory.

Description of the Proposed Undertaking:

The proposed commercial development at 690 East Lincoln Highway consists of a new Wawa convenience store with a gas island facing Route 30, and two commercial buildings at the south (rear) portion of the property. To reduce Ship Road traffic, the 5.299-acre parcel will be bounded on the west by a new north-south couplet road. The road will create a new traffic intersection at the northwest corner of the Wawa site. The two commercial buildings will have areas of 10,540 square feet and 6,900 square feet. They are assumed to be one story buildings. Two existing commercial buildings currently on the site will be removed. A total of 168 parking spaces will be provided to serve the three commercial buildings. A new entrance drive will be located at south (rear) side of the commercial site. This new roadway will serve the office buildings and the proposed townhouses on the south side of the entrance drive.

A large detention basin is proposed at the northeast corner for the site, immediately west of St. Mary's Chapel. The landscaped area at the basin appears to provide a 110-foot-wide east-to-west buffer between the Wawa parking lot curb and the existing property boundary at St. Mary's Chapel. The chapel is approximately 30 feet from the property line, so the total distance to the chapel is approximately 140 feet. The overall area around the basin is approximately 300 feet deep north-to-south along the west side of the chapel site. The basin area is indicated to be heavily landscaped. That will help mitigate the obvious visual impact of the Wawa parking lot

on St. Mary's Chapel. The landscaped basin area will also mitigate the impact on the Ship Inn which is directly North of St. Mary's Chapel at the Route 30 and Ship Road intersection. Similarly, the Rectory at Saints Philip and James will be screened.

Review of the Potential Effects on Historic Resources:

Commonwealth's review is limited to the potential for effect on the above-mentioned historic resources. Commonwealth conducted a field review at the site of the historic resources to evaluate the potential effect of the proposed project. Our comments are limited to the potential for adverse effect, and recommendations for treatment and/or mitigation.

Three existing historic resources are located within 300 feet of the proposed Wawa convenience store and associated commercial buildings. They are the St. Mary's Chapel (Site #032), Ship Inn (Site # 311) and The Rectory of Saints Philip and James (Site # 343) Together, these buildings form one of the historic village intersections in West Whiteland Township. The irony is that these early commercial centers still provide a logical location for community commerce, although the scale and visibility of our modern commercial structures do pose a threat to the visual character of these historic settings. Other than prohibiting new development, the key is to find ways to mitigate the negative effects.

No renderings were provided to Commonwealth; therefore, our comments are not on the specific architectural design, but rather the visual impact of a typical "Super Wawa". There is no doubt the new Wawa convenience store, with highly visible signage and a brightly lit parking lot and fueling station, will be a visual intrusion on this sleepy intersection. It should be noted there is already some intensive daytime commercial activity in this area, such as the fuel tank facility on the north side of Route 30. The Wawa will be a more intensive use. Our review shows there will be an adverse effect on the three referenced historic resources. However, the proposed design has been developed to minimize the impact on the three historic resources clustered at the Route 30 and Ship Road intersection. The location of the detention basin open space and associated landscaping have the potential to provide adequate screening.

Conclusion: The proposed commercial development at 690 East Lincoln Highway will have an adverse effect on the referenced historic resources, but the project design as presented provides reasonable mitigation. Because the mitigation depends on vegetative screening, the specified plantings should provide year-round coverage. Approvals should also require plant maintenance and replacement in perpetuity. The final architectural design of the Wawa and other commercial buildings should be in character of West Whiteland Township, and submitted for final review and comment by the Historical Commission.

Should you have any questions or comments please do not hesitate to contact me by cell at 610-350-9564 or e-mail at pyocum@chg-inc.com.

Regards,



Philip Yocum, RA, LEED AP
Preservation Architect

cc: Justin Smiley – WWT
Candice Strawley- CHG

MEMORANDUM



TO: Justin Smiley, Planning & Zoning
FROM: Beth Jones, Finance Director
SUBJECT: Review of Fiscal Impact Analysis – Retail and Office, Laborer’s District Council
DATE: May 6, 2020

Summary

I have reviewed the Fiscal Impact Analysis (FIA) report completed by EH Creative Services LLC for the proposed retail and office development at Laborer’s District Council. Overall, the numbers used and calculations provided appear accurate to the best of my ability to confirm. There is one typo in the chart on page 5 – final row of the bottom chart - \$92,450,000 should be \$7,159,550. The error does not impact the total calculated in the chart.

The valuation of the project (pg. 5) uses a 5% vacancy factor. Given the abundance of office/medical space available for lease in West Whiteland and the surrounding Townships coupled with the uncertainty related to the Covid-19 pandemic, this may be an overly optimistic value for the medical/professional building.

The FIA provides a projected positive net fiscal impact for both the Township and the West Chester Area School District. Not mentioned in the report, but of considerable positive financial impact to the Township is the addition of the southern leg of the Ship Road couplet at the expense of the developer of this project and that of the planned residential project on adjacent parcels.

As a reminder for readers:

1. The Township is not permitted to approve or deny a developer’s proposal due to the financial impact on the Township.
2. The Fiscal Impact Analysis is forward-looking and provides projections that are estimates based on factors known or projected at the time of the report.

MEMORANDUM

DATE: May 12, 2020

TO: John Weller, Director of Planning and Zoning

FROM: Theodore D. Otteni, P.E.
Director of Public Works

**SUBJECT: Wawa (690 E. Lincoln Highway)
Conditional Use Plan Review**



I have reviewed the plans (7 sheets) for the proposed Wawa (690 E. Lincoln Highway) dated April 10, 2020 and offer the following comments:

1. At Lincoln Highway, provide a pedestrian crossing across the new couplet road to the southeast quadrant and extend sidewalk across the property frontage.
2. Show the proposed north leg of the couplet (to be designed and constructed by the Township) on the plans and label "By Others".
3. The sidewalk presently shown along the west side of the couplet road shall be a 10 to 12 ft. wide multi-use path.
4. As the plan is developed, consideration for pedestrian circulation and connectivity will need to be evaluated.
5. More detail is needed for the intended function of the existing Ship Road as well as the intended intersection of Springdale Drive.
6. Who will ultimately own and maintain the new couplet road?
7. Who will ultimately own and maintain the new Road D?
8. Context for the roadway design of the new couplet road should be disused. Will the design characteristics be for a "major collector" per the existing Ship Road classification or will an approach using local road standards be used?
9. Contact the Department of Public Works to discuss proposed sewer design and intended direction of sewer flows. The base mapping is not completely accurate as shown.

It is recognized that many of the above comments overlap with comments provided for the 500 E. Lincoln Highway (Ship Run) project. Please coordinate with Township representative to discuss development of the new roadway and pedestrian infrastructure.



101 Commerce Drive
Exton, Pennsylvania 19341

Tel: (610) 363-0200
Fax: (610) 363-6671
www.westwhiteland.org

M E M O R A N D U M

To: Justin Smiley
From: Joseph M. Catov, Jr. Chief of Police
Date: May 15, 2020
Re: Conditional Use – Wawa Market and Ship Run

Having reviewed the plans as submitted, I have concerns with northbound traffic on South Ship Road turning left into the new development. Depending on traffic volume, this could cause northbound traffic to backup waiting for an opportunity to turn left into the development.

I have no other concerns for this project.

A handwritten signature in blue ink, appearing to read "J. M. Catov, Jr.", is positioned above the printed name.

Joseph M. Catov, Jr.

Chief of Police



MEMORANDUM

DATE: June 5, 2020
TO: Planning Commission
FROM: John R. Weller, AICP
Director of Planning and Zoning
SUBJECT: Ship Run
Conditional use application

APPLICANTS: Ship Run Developers, LLC
c/o Joseph Behrle
1 Overlook Cir.
Media, PA 19063

690 East Lincoln Associates, LLC
c/o E. Kahn Development Corp.
120 Pennsylvania Ave.
Malvern, PA 19355

SITE ADDRESSES: 500 E. Lincoln Hwy.
Exton, PA 19341

112 S. Ship Rd.
Exton, PA 19341

TAX PARCELS: 41-5-176 (part), 41-5-177.1, and 41-5-177.2 (part)

ZONING: O/R, Office/Residential

DESCRIPTION: Construction of 95 single-family detached dwellings and 53 townhouse dwellings on a 67-acre lot. Conditional use review is required pursuant to §325-124.A of the West Whiteland Township Zoning Ordinance (“Zoning”) for the construction more than twenty dwelling units.

Background

Portions of three different properties comprise the subject tract, the largest of which is the southern portion of the Laborers’ Training (“Laborers”) campus at 500 E. Lincoln Hwy. The application proposes subdivision of that parcel such that 23.76 acres along Lincoln Hwy. will be retained by Laborers’ for their existing building and the remaining portion will be combined with the lot at 112 S. Ship Rd. and a portion of the former Entenmann’s bakery property to create a new lot with a gross area of 66.92 acres (50.85 developable acres). This new lot has approximately 400 feet of frontage along E. Lincoln Hwy. and three separate frontages along S. Ship Rd. totaling about 800 feet. The only existing structures on the lot are what appears to be a vacant warehouse on the portion formerly owned by Entenmann’s

and a variety of sheds and storage areas on the Laborers' portion. Overall, the site is moderately to gently sloping, although there are scattered areas of steep slopes, most of which are man-made. The high point of the lot is along the Exton By-Pass at its southern edge, from which it slopes downward to the east and north to its low point at the access drive to E. Lincoln Hwy. Ship Road Run stream, a tributary of Valley Ck., crosses the eastern side of the tract; as shown on the drawing, there are extensive wetlands and FEMA-designated flood hazard areas - much of them wooded - associated with this stream.

This property was affected by a Zoning amendment adopted in May 2019 that established the "high-density single family" option for residential development in addition to the higher density multi-family and townhouse options allowed previously. The Zoning Officer advises that while the proposed design appears to generally in compliance with the applicable Zoning provisions, a clear determination cannot be made since the dimensions and areas of the proposed single-family lots are not labeled. The Zoning Officer further notes that the townhouse units #11 and #12 are 25 feet apart, which violates the minimum separation distance of 30 feet required by §325-15.1.D(3)(e)[3] of the Zoning.

The Applicant is proposing to develop the tract for residential use. The Laborers' portion west of Ship Road Run features 95 single-family detached dwellings on lots as small as 7,000 sq.ft. (0.16 acre). The existing driveways for the Laborers' facility from E. Lincoln Hwy. and S. Ship Rd. will be expanded and improved to street standards to provide access to the new community. The portion of the tract east of Ship Road Run will be developed with 53 townhouse dwellings. This section includes a new road segment (labelled "Couplet" on the drawing) consistent with the Township's Transportation Capital Improvements Plan. There is no street connection between the two parts of the project. The plan also provides for reconfiguration of the existing lot lines and subdivision of new lots to accommodate the single-family dwellings.

The Township received this submission at the same time as the conditional use application of 690 East Lincoln Associations for the commercial development on the adjoining site at 690 E. Lincoln Hwy. While these projects have different developers, they have been working cooperatively; this arrangement is noted in several of the consultant reviews.

Tonight is the first presentation of the conditional use application to the Planning Commission.

Criteria for approval of a Conditional Use

The criteria for Conditional Use approval are found in §325-124.C(1) of the Zoning:

- (a) The proposed use shall meet all of the specific standards and regulations for eligibility which appear in the section of the Zoning Ordinance authorizing the proposed conditional use.

The project requires conditional use review pursuant to §325-124.A of the Zoning for the construction of more than 20 residential units. There are no additional standards required for such development, so the project need only comply with the area and bulk standards for the high-density single-family option in the O/R zoning district, as per §325-15.1.D(3) of the Zoning. The Zoning Officer has determined that the zoning data provided on Sheet 1 of the plan set are correct, but, as described above, the drawing lacks sufficient information to determine compliance, and it appears that townhouse units #11

and #12 violate the minimum building separation requirement as stated in Zoning §325-15.1.D(3)(e)[3].

This criterion has not been met.

- (b) The size, scope, extent, and character of the exception desired is consistent with the plan for future land use in West Whiteland, and with the spirit, purpose, and intent of the Zoning Ordinance.

The project site was part of the study area for the “Lincoln Highway and Whitford Road Corridors Plan,” which was adopted as an amendment to the Township Comprehensive Plan in March 2015. The “Future Land Use Recommendations” map in the Plan shows this property in the “MU1” category, which is to include office and residential uses. This area was subsequently re-zoned O/R Office/Residential to be consistent with that Plan, and the area around the Ship Rd. intersection was later made subject to an overlay provision to accommodate commercial uses at the historically commercial crossroads.

In June 2019, the Township again amended the Comprehensive Plan to incorporate the Bicycle and Pedestrian Plan. This Plan element shows a new multi-modal trail connecting the Chester Valley Trail and the County’s proposed extension to that Trail along the former Norfolk Southern rail line along the south side of the Exton By-Pass. That connecting trail passes through this tract in general alignment with the “Couplet” road. The Applicant’s plan shows what appears to be a sidewalk at this location, but not a multi-modal trail, which would be wider.

Lacking the multi-modal trail, Staff is of the opinion that this criterion has not been fully met.

- (c) The suitability of the property for the use desired and the new or expanded use, if approved, will be susceptible of regulation or restriction by appropriate conditions and safeguards.

The Board of Supervisors has the right to attach reasonable conditions to any conditional use application and to make provisions for the enforcement of those conditions. This criterion has been met.

- (d) The public interest in, or the need for, the proposed use or change, and the proposal will serve the best interest of the Township, the convenience of the community (where applicable), and the public health, safety, morals, and general welfare.

The Township’s Comprehensive Plan establishes what is meant by “the best interest of the Township;” §325-2.A of the Zoning states that its overall purpose is to promote, protect, and facilitate the public health, safety, morals, and general welfare. Based upon our conclusion above in (b), Staff is of the opinion that this criterion has not been fully met.

- (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.

Our most critical concern among these criteria is road congestion. As noted above, the single-family area will access the road network at points where there are already driveways to the Laborers’ site. Staff is satisfied with both the number and location of accesses. The plan includes a portion of a road project known as the Ship Road Couplet, which is intended to accommodate

more traffic at the Lincoln Hwy./Ship Rd. intersection without worsening the existing congestion. Access to the townhouse portion will be provided by 5 driveways from the Couplet and 2 from the new "Road D" that also serves the adjoining proposed commercial project. Note that comment #23 of the attached review from McMahon Associates questions whether so many access points from the Couplet is needed; Staff concurs, and the Commission may wish to discuss this point.

The question of the number of access drives to the townhouse area from the Couplet should be resolved before concluding whether these criteria have all been satisfied.

- (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.

This project will not require any extension of the existing public sewer or water supply network. Neither the Fire Marshal nor the Chief of Police express any concern in their reviews (attached) regarding anticipated additional demand for the services of their respective departments. As noted above, the project includes a planned extension of the road network, so Staff supports this element of the proposed road system. We expect that these homes will be attractive to families with school-aged children, so there will be some impact on the public school system albeit one that we consider "reasonable" as stated in the condition. The Commission may recall that there is a legal requirement for the Township to advise the School District when we approve a residential project. Staff will, of course, make sure that such notice is provided.

Staff is satisfied that 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.

Although there are no permanent structures on the Laborers' portion, this area was once used for hands-on instruction in operating earthmoving equipment, and the plan shows that there are a number of sheds and outdoor storage areas there now. The northeastern portion of the site was part of Entenmann's bakery and delivery operation. As a result, these areas are not now in a "natural" condition. It appears that the only meaningful natural area is the Ship Road Run stream corridor, and this is to be retained as permanent open space. However, as described in the attached review by Theurkauf Design and Planning ("Theurkauf"), portions of the site are now heavily wooded, and the plan does not address the compensatory planting requirement.

For conditional use applications, it is our practice to require that applicants demonstrate the feasibility of their stormwater management strategy, although final design is not required until the land development phase. Comments #15 through #22 of the attached review by Spotts, Stevens and McCoy ("SSM") describe concerns on this matter, but we find no questioning of the overall functionality of the system.

The Applicant should meet with Theurkauf and SSM to resolve these outstanding issues and thereby satisfy these criteria.

- (h) The character and type of development in the area surrounding the location for which the request is made and the proposed change or modification, if permitted, will constitute an appropriate use in the area and will not substantially injure or detract from the use of surrounding property or from the character of the neighborhood.

The single-family portion of the project is set back and screened from the existing roads such that it will not be visible to passers-by. Also, given the current condition of this land, Staff is of the opinion that the project will be an improvement. During the 2019 discussions about the Zoning amendment, the owners of the existing businesses along Ship Rd. expressed concern about the impact of residential areas adjacent to their operations. Staff suggests that this concern works both ways: we do not want to create a situation where a long-standing Township business may find their operations restricted due to complaints from new residents, particularly since there was no expectation or residential development here until the 2019 amendment. Conversely, we do not want new residents' quality of life adversely affected by the legal and normal operations of existing businesses. For this reason, we are particularly concerned that the required landscaped buffer between the businesses and the proposed houses does not satisfy our minimum requirements, as further described in comment #6 of the attached Theurkauf review.

While Staff finds the design of the single-family area to be consistent with this criterion, the buffer between the townhouses and the existing businesses must be improved before we are satisfied that this criterion has 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.

As noted above, the existing driveway accesses from Lincoln Hwy. and Ship Rd. will be enhanced to serve the single-family portion of the development. Access to the townhouse portion will be restricted to proposed new roads. As a result, the project will not result in any new access points on any existing road. There will be no on-street parking. It appears that 13 of the townhouse units will have frontage on Ship Rd., but they do not have driveway access to Ship Rd.

Staff is of the opinion that these criteria have been met.

- (j) The probable effects of proposed development on highway congestion have been considered, and adequate access arrangements are provided in order to protect major highways from undue congestion and hazard.

The Applicant's traffic impact study has been reviewed for the Township by McMahan Associates ("McMahan"); there is a more detailed analysis of their findings in the "Consultant Reviews" section below. While they have a number of concerns, we note that McMahan's review considers the impacts of both the additional development and the proposed new road segments and concludes that the issue of congestion has been satisfactorily addressed, which is the focus of this criterion.

Staff is satisfied that this criterion has been met.

- (k) The impact upon on-site and adjacent historic resources of the Township has been mitigated.

There are three identified historic resources within three hundred feet of this property:

- House at Turnpike Station (John W. Bunker & Son antique store), 431 E. Lincoln Hwy. - Class I, Township Site #308
- Exton Hotel apartments, 439 E. Lincoln Hwy. - Class I, Township Site #309
- Williams Cabins, 513 E. Lincoln Hwy. - Class I, Township Site #348

As of this writing, the Township Historical Commission has yet to review this project, but they are scheduled to do so at their meeting on June 8, 2020; Staff will advise the Planning Commission of their comments verbally at tonight's meeting. CHG (the Township's historic preservation consultant) reviewed this application in the attached letter dated May 12, 2020, concluding that because the area proposed for development "...is generally isolated from the historic resources..." there would be no adverse effect by this project upon the historic resources.

Staff is satisfied that this criterion has been met.

- (l) Where the property or a portion of the property that is the subject of the application is improved at the time of the conditional use application, the Township may require that any existing development and/or uses on the property comply with all previous conditions of approval of a land development, subdivision, conditional use, special exception, zoning variance, or waiver of any provision of Chapter 281, Subdivision and Land Development, previously granted for the property.

There are no such conditions relative to the existing development on the subject property; this is a moot issue.

Consultant Reviews

Since no lighting plan was provided with this application there is no review from Stubbe Consulting, our lighting consultant. The Commission will also note that our usual traffic engineering consultant, Traffic Planning and Design, is the Applicant's traffic engineer. For this reason, McMahon is the Township consultant for this project.

- **SSM review dated May 12, 2020.** Conditional use applications need not include a fully engineered stormwater management plan, but Applicants must demonstrate the feasibility of what they propose to the satisfaction of SSM. Comments #15 through #22 review the stormwater management provisions and include many concerns similar to those raised for the adjoining commercial project, such as comment #21, which questions what facilities are intended to serve this project and what is proposed for the adjoining commercial project. Comment #22 expresses concern about the impact of existing features on the Laborers' site and the impact of the project upon the existing Laborers' facility; SSM recommends a meeting with DEP representatives early in the process to be sure that they are agreeable to what is being proposed. The Commission may wish to discuss the possibility of stream restoration with the Applicant in response to comments #15 through #17. Comment #18 describes concerns about development within the riparian buffer areas, but we note that the only proposed construction there is the Couplet road. While we agree that impact upon the stream must be mitigated, Staff advises that any significant relocation of the Couplet is not feasible, and we support waivers to the extent necessary to construct this road which is being built in compliance with Township plans and policy.

Comments #1 through #3 review the requested waivers, and comments #4 through #6 address the conditional use standards. The Commission may wish to discuss the issues of road width and curbs with the Applicant as per comments #13 and #14.

Comments #7 through #11 list concerns related to Zoning compliance. We agree that more information about the individual proposed lots should be shown to confirm Zoning compliance, but it appears that the proposed lots do comply. Regarding the question of steep slopes (comment #10), we note that excluding man-made slopes from the steep slope calculation is not a by-right exclusion as suggested both here and by the Applicant, but must be approved as a conditional use, pursuant to Zoning §§325-70.A(1)(b) and -70.A(2)(b). The Zoning Officer has determined that most of the indicated slopes are in fact man-made and were created during the development of the Laborers' campus, construction of the Exton By-Pass, or by activity during the time that Laborers' offered instruction in the operation earthmoving equipment. The only natural steep slopes appear to be two small areas near the stream, which are on the portion of the tract that will be retained by Laborers'.

Comments #23 through #28 describe other concerns. The question of road ownership is to be resolved between the Applicant and the Township. Regarding the comments about pedestrian connections, the Commission may recall agreeing that no sidewalk should be required along the south side of Lincoln Hwy. due to concerns about both pedestrian safety and environmental impact. For this reason, §325-15.1(D)(3)(g) of the Zoning encourages developers to provide an alternate pedestrian route. Even so, Staff agrees that a short sidewalk connection from the project's Lincoln Hwy. entrance to the stub on the adjacent CubeSmart lot should be provided as well as a pedestrian connection between the two sections of this project (comments #25 and #26).

- **Theurkauf review dated May 8, 2020.** Detailed landscaping plans are not required for conditional use applications, but the application must demonstrate that the project can accommodate all required landscaping. Comments #5 through #8 review the proposed landscaping from this perspective and cite a variety of deficiencies, including lack of information about the trees to be removed and what compensatory planting would be required, insufficient buffer widths, and insufficient street trees. Regarding this last, comment #8 lists trees to be provided along the Lincoln Hwy. frontage. Given the extent of existing mature vegetation in this area and the environmental sensitivity suggested by the presence of floodplains along much of the frontage, Staff would support waiving the street tree requirement for Lincoln Hwy.

Comment #3 expresses concern about the lack of active recreation areas, especially given the expectation that this community will likely be popular with families with children. Staff concurs with Theurkauf's points and recommends that the Commission discuss this with the Applicant. Staff also shares Theurkauf's concerns regarding pedestrian and bicycle accommodations (comment #4), which was also noted in the review of the adjoining commercial project.

Finally, comment #2 raises concerns about the overall layout of the project. Staff also has concerns on this point. In addition to the items listed in this comment, we find the overall design unimaginative and lacking in useful recreational space as previously noted. Lots 1 through 6 are isolated from the rest of the community, awkwardly sandwiched between Lincoln Hwy., the access drive, and the Laborers' building. Lots 7 through 12 all back up to a new above-ground pipeline facility, and, given our recent experience with pipeline-related activities, we question the wisdom of placing Lots 13 through 23 directly adjacent to a pipeline easement. We expect that the Applicant has considered these issues, and we recommend that the Commission discuss these points with them.

- **McMahon review dated May 15, 2020.** Comments #1 through #10 address the transportation impact study provided with this application. The Commission will recall that the Township’s Transportation Capital Improvements Plan (“TCIP”) shows that the impact of new development in this area is to be mitigated by the construction of a new southbound alignment for Ship Rd. This new road segment will divert southbound traffic beginning just south of the Chester Valley Trail, will cross Lincoln Hwy. at a new traffic signal, and will rejoin the existing alignment before passing under the Exton By-Pass and rail line. This Applicant and the developer of the adjoining commercial project will be constructing the portion south of Lincoln Hwy. and the Township will construct the shorter segment north of Lincoln Hwy. McMahon notes that the impact study is based upon the assumption that only the southern portion will be built. While we understand the reasons for this assumption and note that it provides a conservative, worst-case forecast of the traffic impact, McMahon advises amending the study to include the north portion of the couplet and a variety of other changes. While Staff agrees that such revisions would enhance the Study, we note that (a) McMahon agrees that even with only the south leg in place the impact of this project will meet PennDOT’s mitigation requirements and (b) the Applicant does not need to justify the placement or configuration of the Couplet, as that has been directed by the Township based upon the analyses in the TCIP. Rather than revise the study at this time, it may be better to wait until the land development review at which time the configuration will be more clearly established and operational details will be more pertinent.

The remaining comments address a wide variety of issues, mostly recommendations for design revisions and requests for additional information. Staff finds the following to be the most important.

- Comment #16, which echoes our other consultants in noting the lack of the multi-modal trail shown on the Township’s Bicycle and Pedestrian Plan;
 - Comments #19 and 20, which address the pedestrian crossings of the Couplet;
 - Comment #23 about the number of driveway accesses to the townhouse area from the Couplet;
 - Comment #27, which observes that the configuration of Road A may facilitate cut-through traffic and recommends either reconfiguration or use of traffic calming measures; and
 - Comment #33, stating that the project is subject to payment of a traffic impact fee estimated to be \$153,675.90, adding that the Applicant will be entitled to a credit toward that fee equivalent to the cost of constructing their portion of the Couplet. Staff expects that the construction cost will be well in excess of the fee amount, resulting in no cash payment to the Township.
- **Finance Director memorandum dated May 8, 2020.** Ms. Jones reviewed the fiscal impact analysis provided by the Applicant with this submission, and she confirms that the figures in the analysis are correct to the best of her knowledge. A net positive fiscal impact is projected for the Township and a negative impact is projected for the School District.
 - **Public Works Director memorandum dated May 12, 2020.** Mr. Otteni raises concerns about the design and eventual ownership of both the Couplet and Road D. Like our outside consultants, he has concerns about pedestrian accommodations and notes the lack of a multi-modal trail along the Couplet. He also questions the design of the sanitary sewerage provisions and notes that his comments should be addressed in cooperation with the developer of the adjacent commercial project.

- **Fire Marshal memorandum dated June 5, 2020.** Mr. Moses has no concerns about the proposed design, but notes the need for signage of fire lanes and consideration of fire hydrant locations during the land development review phase.
- **Police Chief memorandum dated May 15, 2020.** Chief Catov expresses concern about the potential for northbound traffic on Ship Rd. being block by drivers turning into the site.

Staff Comment

Staff notes that this application is largely consistent with the design provided in 2019 when we were evaluating the Zoning amendment for this area and that the Applicant is still proposing construction of a significant segment of an important road improvement. However, six of the conditional use criteria have not been met in the opinion of Staff, and our consultants describe numerous concerns. Staff recommends that these should be more fully resolved before the Commission makes any recommendation to the Board of Supervisors. We particularly note SSM's comments about the stormwater management provisions; Theurkauf's comments on open space, compensatory plantings, buffers, and overall design; McMahon's comments on road configuration and accesses from the Couplet; the Public Works Director's questions about the design and eventual ownership of the Couplet and Road D; and the many comments noting that no multi-modal trail is shown along the Couplet.

While Staff does not advise action at this time, we suggest that the Commission could have productive conversation with the Applicant on the noted concerns.

Attachments

1. SSM review dated May 12, 2020.
2. Theurkauf review dated May 8, 2020.
3. McMahon review dated May 15, 2020.
4. CHG review dated May 12, 2020.
5. Finance Director memo dated May 8, 2020
6. Public Works Director memo dated May 12, 2020.
7. Fire Marshal memo dated June 5, 2020.
8. Police Chief memo dated May 15, 2020.
9. Plan set dated April 10, 2020, no revision date.

Plans\RST\Ship Run\PC memo - 200605.doc



May 12, 2020

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

RE: 500 E. Lincoln Highway
Laborer's Union Residential Development
Conditional Use Application
SSM File 101008.0343

Dear Mr. Weller:

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

- Laborer's Union Residential Development Conditional Use Plans (19 Sheets), prepared by D. L. Howell & Associates Inc., dated April 10, 2020;
- Preliminary Stormwater Management Feasibility Report for Laborer's Union Residential Development, prepared by D. L. Howell & Associates Inc., dated April 10, 2020, including:
 - Carbonate Geology Overlay District and Subsurface Soil Report, prepared by Ingram Engineering Services, Inc., dated June 8, 2018;
- Utilities Impact Report for Laborer's Union Residential Development, prepared D. L. Howell & Associates Inc., dated April 10, 2020, including:
 - Capacity Request for Sewage Facilities Capacity Acknowledgement Letter, prepared by West Whiteland Township, dated April 17, 2020.
 - AQUA Will-Serve Letter, dated March 25, 2020.
 - PECO Will-Serve Letter, dated March 16, 2020.
- Recreation Impact Statement, prepared by D. L. Howell & Associates Inc., dated April 17, 2020;
- Environmental Site Assessment (ESA) Phase 1 Report, prepared by Geo-Technology Associates, Inc. (GTA), dated September 27, 2019.

Ship Run Developers, LLC and 690 East Lincoln Associates, LLC are proposing to subdivide parcels 41-5-176, 41-5-177.1, and 41-5-177.2 into four (4) parcels which comprise the tract area. Separate parcels for the (1) existing Laborers' District Council out parcel, (2) Wawa / Commercial Development, (3) a 95 unit single-family detached dwelling development, and (4) a 53 unit townhouse development are proposed. This plan, the Laborer's Union Residential Development [parcels (3) and (4)], is proposed to be built in two phases with the single-family detached dwelling development being Phase 1 and the townhouse development being Phase 2.

This project is proposed to be developed concurrently with the proposed Wawa / Commercial Development at the intersection of E. Lincoln Highway (SR 0030) and Ship Road (SR 1001). Part of this project includes the



installation of a portion of a future couplet road which is in the Township's Transportation Capital Improvement Plan.

The tract is bounded by East Lincoln Highway - Business Route 30 (SR 0030) to the north, Ship Road (SR 1001) to the East, Exton Bypass - Route 30 (SR 6030) to the south, and properties zoned TC - Town Center to the west. The project is located in the O/R - Office Residential zoning district. The proposed use of single-family detached dwellings and multi-family dwellings are permitted as a Conditional Use under the Township Zoning Ordinance. We have the following comments.

Issues regarding landscaping and buffering, traffic and pedestrian circulation, and lighting will be addressed by Theurkauf Design and Planning, McMahan Associates, Inc., and Stan Stubbe respectively.

WAIVER REQUESTS

The following waivers have been requested:

1. Section 270-20 - A waiver from the infiltration requirements due to karst geology and associated sinkhole risk, and existing groundwater contamination. Bio-Filtration and slow release is proposed in lieu of Infiltration. We do not support the waiver request until further alternatives are explored and found to be infeasible.
2. Section 281-16.B - A waiver to permit 30-inch by 42-inch plans in lieu of the max permitted twenty-four-inch by thirty-six-inch sheets. We have no objection to the requested waiver.
3. Section 270-15.T - A waiver to permit disturbance, grading, and other associated improvements including the Couplet Road, within the Riparian Buffer located along the eastern side of the stream that bisects the site. We do not support the waiver request until further alternatives are explored and other standards are adhered to as noted in several comments below.

COMPLIANCE WITH CONDITIONAL USE STANDARDS

4. The application shall demonstrate the architectural compatibility of the proposed residential units via the submission of architectural building plans with renderings of the single-family detached dwellings and townhouses, Section 325-124.C(1)(h).
5. The applicant must demonstrate to the Board's satisfaction that the size, scope, extent and character of the proposed development is consistent with the plan for future land use in West Whiteland, and with the spirit, purpose and intent of this chapter, Section 325-124.C(1)(b). The West Whiteland Township Bicycle and Pedestrian Plan dated June 12, 2019 (Amendment to the Comprehensive Plan) should be considered during the development of this tract. This plan indicates a "Requested New Connection" along E. Lincoln Highway along the Laborers Union property frontage and a small pedestrian improvement along S. Ship Road in Map 9 - Requested Connections & Improvements (i.e., PDF Pg. 34). This plan requires sidewalk and lighting be installed along E. Lincoln Highway under Section 5: Plan Recommendations, Improvement No. 5: titled "Lincoln Hwy. Sidewalk Gaps (Evian to Church Farm School)" (i.e., PDF pgs. 73-74). Per Section 325-15.1.D(3)(g), sidewalks shall be provided on one side of all streets, except that sidewalks shall not be required along Lincoln Highway, if an alternative means of pedestrian access satisfactory to the Township, is provided through the development to connect to existing streets on the perimeter of the tract. A sidewalk along E. Lincoln Highway or an alternative means of pedestrian access shall be provided generally along the perimeter of the tract.



In previous discussions with the developer, the Township has noted that the sidewalk along the west side of the southbound Ship Road couplet shall be a multi-use path and therefore it shall be 10 ft. wide.

6. The Board of Supervisors may impose additional conditions that are reasonably necessary to assure that the intent of the Zoning Ordinance is complied with, Section 325-124.C(2).

COMPLIANCE WITH ZONING ORDINANCE

7. In order to determine if the proposed density of the subdivision is feasible, adequate information shall be provided such that the overall gross and net lot areas can be determined for each proposed parcel, Section 325-15.1.D. The following information shall be provided for each proposed parcel:
 - a. Existing right-of-way widths shall be indicated on the plans for surrounding state roads. It is not clear where the right-of-way is located along Ship Road and E. Lincoln Highway.
 - b. Existing parcel information shall be provided with associated zoning compliance tables to identify any existing non-conformities;
 - c. Each proposed parcel (i.e., Out Parcel, Commercial; Single-Family, and Townhouse) shall be provided with its own Zoning Compliance Table.
8. For all townhouse buildings the minimum permitted building separation is 30 ft, Section 325-15.1.D(3)(e)[3]. The building separation between Units 11 and 12 is less than 30 ft. The plans should be revised accordingly.
9. Two-way interior drives and access ways for townhouses are required to be a minimum of 24 ft. wide and one-way access drives shall be a minimum of 12 ft. wide for multifamily cartways, Section 325-37.A(4). The plan proposes 16 ft. wide access drives throughout the townhouse development. The plans shall provide clarity for the proposed circulation throughout the townhouse development (i.e., identify if any areas are one-way). It is noted that the provided truck turning templates require the Township's Fire Truck to significantly impact areas outside of the cartway to maneuver through the development. We recommend that the Fire Marshal review the plans.
10. The applicant has indicated that all existing steep slopes (i.e., Prohibitive / Greater than 25% and Precautionary / 15%-25%) on site are man-made and therefore they have not been removed from the developable lot area, Section 325-70. It seems logical that the slopes along the stream are not man-made. The Zoning Officer should confirm which slopes will be considered man made.
11. The applicant shall clarify if three (3) bedroom homes or four (4) bedroom homes are proposed. If four (4) bedroom homes are proposed, the parking calculations shall be updated accordingly to require 2.5 off-street parking spaces per dwelling unit, Section 325-39.G. The Conditional Use Plans indicate three (3) bedroom single-family detached dwellings are proposed; however, the Recreational Impact Statement indicates four (4) bedroom homes are proposed.

COMPLIANCE WITH SUBDIVISION AND LAND DEVELOPMENT ORDINANCE

12. Letters have been provided from Aqua Pennsylvania, Inc. and West Whiteland Township stating that water and sewer service, respectively, can be provided, Section 281-12.
13. Cartway widths for local roads are to be a minimum width of 28 feet wide per Appendix A, Typical Street Sections, Section 281-25.B. Road D is proposed to be 26 feet wide.



14. Curbs are required around all paved areas, Section 281-32.B. The applicant has not proposed curb along the townhouse interior drives.

COMPLIANCE WITH STORMWATER MANAGEMENT ORDINANCE

15. Section 270-20 identifies the stormwater infiltration requirements; Section 270-20.E states that a waiver from §270-20 shall only be considered by the Township if a minimum of 0.5 inch of runoff from the entire site cannot be physically infiltrated. The stormwater and geological reports note that conventional infiltration practices cannot be accomplished due to karst geology which is susceptible to sinkhole activity. Further alternatives, such as stream restoration shall be explored.
16. The Township may require additional stormwater control measures for stormwater discharges to special management areas, Section 270-15.P. The proposed site drains to Valley Creek which is identified by PaDEP as both an impaired stream and CWF (Cold Water Fishes). It is recommended that additional water quality BMP's be incorporated into the stormwater design. Pretreatment (i.e. a water quality train) shall be provided, Section 270-19.F.
17. Another option for satisfying Section 270-15.P could be stream restoration. It is our understanding that the applicant had considered stream restoration for this project but thought that it was too costly. Stream restoration can have many benefits, such as groundwater recharge, water quality improvement, rate control, floodplain restoration and in some instances may even create more usable space. Therefore we recommend that the applicant provide a cost benefit analysis of the conventional systems proposed here versus stream restoration.
18. Riparian Buffer Areas (RBA) are required to be provided adjacent to perennial streams, intermittent streams, waterways and wetlands. The RBA shall consist of three zones: Zone 1: a minimum twenty-five-foot setback, plus wetlands, measured from the top of the stream bank, where no disturbance of vegetation or soil shall be permitted except for restoration or reforestation activities; Zone 2: a 125-foot area beyond Zone 1 where ground cover may be minimally disrupted but may not be impervious and should consist primarily of woodlands or a dense grass filter strip; and Zone 3: a 25-foot minimum setback from Zone 2 where stormwater discharge and level spreading is permitted (i.e. the total minimum width for all three zones is 175 feet), Section §270-15.T. The following comments shall be addressed:
 - a. Where prohibitive slopes (25% and steeper) are located within 35 feet of the stream bank, Zone 1 shall extend the entire distance of this sloped area, Section 270-15.T(2)(a). The plans suggest that the steep slopes along the stream are man-made. It seems logical that the slopes along the stream are not man-made and therefore the 25' width of Zone 1 shall extend 25' from the steep slopes.
 - b. Portions of the proposed southbound couplet portion of Ship Road will encroach into Zone 1. No disturbance of vegetation or soil shall be permitted except for restoration or reforestation activities, Section 270-15.T(2)(a). Grading and the roadway shall not encroach into Zone 1. We do not recommend a waiver for encroachments into Zone 1.
 - c. The applicant has proposed improvements and level spreaders in Zone 2 (and slightly into Zone 1) where they are not permitted. Within Zone 2, disturbance of natural vegetative cover shall be limited to selective logging (not to exceed 25%) and other activities that minimally disrupt the existing tree and soil cover. The purpose of this limitation is to maximize filtering and overall physical removal of particulate-form pollutants from runoff generated upgradient and to promote subsurface vegetative uptake of nitrogen and other nonparticulate elements from stormwater generated upgradient, Section 270-15.T(2)(b).



Currently, drainage from the east side of the stream drains into the stream via sheet flow over a width of over 1,000 ft. Discharge level spreaders from four detention basins span a width of less than 250'. Level spreaders are required to be located further away from the stream and outside of Zone 2. Each of these level spreaders are immediately upstream of Zone 1. We recommend that these level spreaders be set back a minimum of 25' from Zone 1. Furthermore, we recommend that the release rates at these facilities mimic pre-existing sheet flows on a flow rate per foot basis. Subject to these two modifications, we would consider recommending a waiver of Section 270-15.T.

- b. The applicant shall submit a Pennsylvania Natural Diversity Inventory (PNDI) in accordance with §270-32.B.8.g for Township review to further identify any other buffer requirements.
- 19. We recommend that additional water quality BMP's be incorporated into the stormwater design addressing runoff to Points of Interest North and West. Pretreatment (i.e. a water quality train) shall be provided, Section 270-19.F.
- 20. Strict application of redevelopment per the ordinance standards of Section 270-23.D and definitions implies that any placement of impervious areas outside the limits of existing impervious areas is considered new development. Therefore, as a matter of Township policy, redevelopment can only be utilized if there is less than a 5% proposed increase in impervious surface. This development therefore does not qualify as redevelopment and the rate control requirements of Section 270-22 shall be calculated based on new development assumptions (i.e., Pre-Development = 100% Meadow).
- 21. This plan has been submitted with the same application as the 690 E. Lincoln Highway WAWA/commercial development. Ultimately, both developments will need to be their own separate properties. The plans and calculations must clearly indicate which stormwater management facilities will serve and be part of the WAWA/commercial property and which will serve and be part of the Townhouse property. If this is not the plan intent then the plan shall address how operation and maintenance responsibilities will be assigned.
- 22. There are several features within the single family residential portion (phase 1) of the site that appear to be either detention basins, or in one instance, an abandoned quarry. These consist of two larger areas directly behind the Laborer's District Council Building (contour 352) and four smaller areas further south (contour 362). Wetlands and waters (ponds, lakes, streams, rivers and their floodways) in PA are regulated by PaDEP under Pa Code 25 Chapter 105 and may also be regulated by the Army Corps under Section 404. We recommend that the applicant requests that the Corps conduct a Jurisdictional Determination (JD). However, sometimes PaDEP and ACOE have differing determinations, therefore we also recommend that the applicant to request a pre-application meeting with PaDEP. We recommend that we be invited to this meeting(s).

In addition, we suspect that a one or more of these may be stormwater facilities that serve the existing Laborer's District Council building and parking lot. If they do, eliminating them must be considered in the stormwater management design.

GENERAL

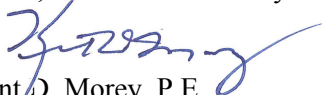
- 23. This plan has been submitted with the same application as the 690 E. Lincoln Highway/WAWA commercial development. Ultimately, they will need to be two separate applications. Whereas the plan will require parcel consolidation and subdivision, we recommend that the plan process proceed as three separate plans. The third plan would be a parcel consolidation and subdivision plan that would be approved and recorded before the other two plans. This would allow the commercial and subdivision plans to proceed independently.



24. It is unclear if Road "D" between the couplet will be public or private. The plans should indicate if the intent is to dedicate this road.
25. Consideration should be given to connecting the pedestrian sidewalk to the Chester Valley Trail located west of the modified westernmost Lincoln Highway (i.e., "Laborers Training") entrance.
26. It is recommended that a pedestrian connection between the single-family detached dwellings and townhouses be established in some form.
27. The applicant has proposed the majority of the proposed townhouse units with driveway lengths less than a typical car length which eliminates the potential of vehicles from parking in individual driveways. Thus, most of the required parking spaces are inside the garages. Consideration should be given to increased driveway lengths. The current driveway dimensions could lead to the undesirable situation of people parking in their driveways essentially parallel to the adjacent access road.
28. Dwelling units 33-53 (i.e., 21 dwelling units) are in close proximity to a total of only 6 off-street shared parking spaces. Consideration should be given to providing additional or relocated parking such that each townhouse building has proximity to a similar number of shared parking spaces.

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

Sincerely,
Spotts, Stevens and McCoy


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

cc: Mark Stabolepszy, P.E.



M E M O R A N D U M

TO: John Weller, AICP, West Whiteland Township Planning Director and Zoning Officer
Justin Smiley, AICP, Township Planner
David W. Gibbons, P.E., D.L. Howell & Associates, Inc.
Patrick J. Stuart, RLA, Orsatti & Stuart

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

DATE: May 8, 2020

SUBJECT: **REVIEW COMMENTS – SHIP RUN
CONDITIONAL USE PLAN DATED 4-10-20**

Please note our review comments pertaining to the following documents received on 4-21-20, and to a site visit on 4-28-20:

- Conditional Use Plan by D.L. Howell & Associates, Inc. consisting of 19 sheets;
- Conditional Use Application Narrative dated 4-21-20; and
- Recreation Impact Statement dated 4-17-20 by EH Creative Services, LLC.

**REVIEW COMMENTS – SHIP RUN
CONDITIONAL USE PLAN DATED 4-10-20**

May 8, 2020

1. Conditional Use Requirements – In accordance with section 325-124.A of the zoning ordinance (ZO), conditional use approval is required for a land development of (15) or more residential dwelling units. Section 325-124.A (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 public services, including recreation and multimodal accommodation. The plan is deficient in terms of sidewalks, trails, road/highway crossings, and recreational access and facilities.
 - b. The natural features of the site shall not suffer unmitigated degradation. The plan fails to protect surface water resources and woodland areas. Further, there is no evaluation of the feasibility of meeting planting mitigation requirements.
 - 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. The plan fails to meet Township requirements for perimeter and screen landscape buffering.

2. Plan Layout – The proposed layout conflicts with natural resource protection on site and Township plans for trail and bicycle accessibility. The following shall be addressed prior to conditional use approval:
 - a. Ponds/Wetlands – There are five ponded areas on site that are not indicated on the plan. It is unclear whether these are quarries, sinkholes, or other artificial impoundments, but historical aerial imagery indicates that these features have been present since at least 1937. At least four of these are in conflict with residential development on lots 42, 43, 44, 45, 88, 90, 91, and 92. The lot configuration should be adjusted so that these features remain in undisturbed open space.
 - b. Woodlands – Open space is configured in accordance with a road and lot layout that is not responsive to protection of the wooded areas on site. Historical aerial imagery shows that patches of woodlands around the ponded areas have existed since at least 1937, and the remaining forest, which occupies approximately half of the property, has grown in since abandonment of agriculture in the 1970s. Much of the proposed open space is in areas that are not wooded, and as a result woodland preservation is not maximized. The lot and road layout should be revised accordingly.
 - c. Pedestrian and Bicycle Accessibility – The proposed layout is unresponsive to the 2019 Township Bicycle and Pedestrian Plan, and in particular a proposed High Priority

**REVIEW COMMENTS – SHIP RUN
CONDITIONAL USE PLAN DATED 4-10-20**

May 8, 2020

bicycle/pedestrian loop trail through the eastern side of the tract. The plan shall be revised to accommodate these important planned connections.

3. Open Space/Recreation Amenities – Section 281-47.D of the subdivision and land development ordinance (SLDO) requires that open space and recreation areas meet the needs of the community. The plan indicates about 34 acres of open space, largely comprised of narrow buffer strips around the perimeter and between units, and unbuildable wetland areas associated with the Ship Run tributary to Valley Creek. Proposed active recreation consists of a 4,400 linear foot trail around the detached single family lots, with no off site connections and no accessibility to the proposed townhouse community on site. No playgrounds, playfields, courts, or other built recreational features are proposed.

The Recreation Impact Statement (RIS) projects that the proposed townhouse and single family development will house (450) residents, including (40) preschoolers and (108) school age children. Although the RIS inventories the Township's existing park facilities, it fails to acknowledge that not one of these is accessible by foot or bicycle. Further, while describing the overall municipal compliance with the County's Recreational Park Standards, the RIS glosses over the critical finding that there is no walkable neighborhood or community park to serve this new residential community of 450 residents.

At minimum, the conditional use plan should include walkable on-site play facilities for families with children.

4. Pedestrian and Bicycle Accessibility – Section 325-15.1.A.1 (ZO) states that projects within the O/R district shall facilitate multimodal transportation. Section 325-37.A.7.a (ZO) requires development to provide pedestrian facilities that implement the Township Comprehensive Plan.

Section 325-15.1.D.3.g (ZO) requires sidewalks on at least one side of all streets. A Lincoln Highway sidewalk may not be required if a satisfactory connection to the tract perimeter is provided. Section 281-31.A (SLDO) requires sidewalks at all new developments.

The Township's 2019 *Bicycle and Pedestrian Plan* amendment to the Township Comprehensive Plan indicates pedestrian accommodations along Lincoln Highway. In addition, a twelve foot wide Bicycle and Pedestrian Loop Trail is proposed to run through the site from Lincoln Highway to Ship Road in coordination with the proposed Ship Road Couplet, with other trails circumnavigating and extending into the site. Crosswalks and pedestrian signalization are to be provided at the intersection of Lincoln Highway and the Pedestrian/Bicycle Loop Trail. The Loop Trail represents a critical linkage to and between the Chester Valley Trail, Exton Township/County Park, Exton Town Center, communities south of the Route 30 By-pass, and the Exton Train Station. The perimeter trail provides a connection from the Loop Trail to the

**REVIEW COMMENTS – SHIP RUN
CONDITIONAL USE PLAN DATED 4-10-20**

May 8, 2020

Chester Valley Trail and another Pedestrian/Bicycle Loop Trail accessing Exton Square Mall. The *Bicycle and Pedestrian Plan* states that these multimodal improvements shall be undertaken in the context of land development of affected properties.

The Chester County Planning Commission’s *2013 Central Chester County Bicycle and Pedestrian Circulation Plan* also supports strong pedestrian and bicycle linkages along Lincoln Highway, which is designated as a High Priority Corridor for these improvements.

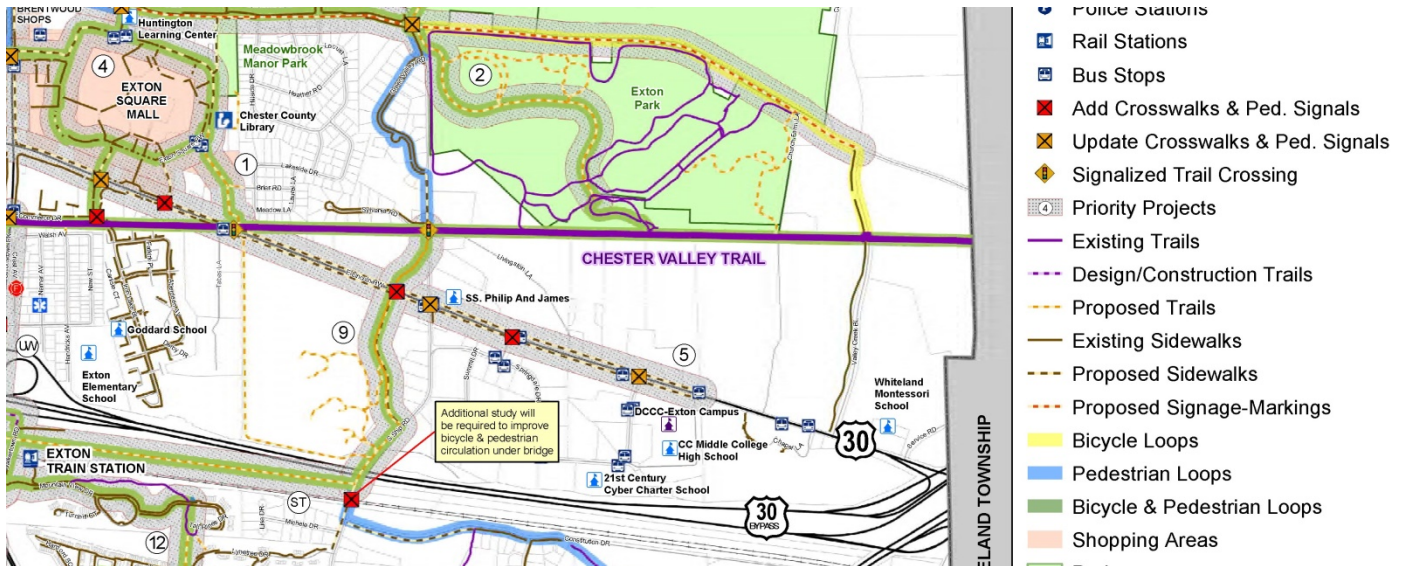


Figure 1 - Excerpt from Township Bicycle and Pedestrian Plan

The plan lacks adequate multimodal accommodations as follows:

- a. Lincoln Highway – The plan includes no sidewalk and no pedestrian crossings along Lincoln Highway. There is no proposed means of pedestrian access from the west end of the site and Chester Valley Trail to the proposed commercial area and Saint Mary’s Church at the east end of the site. The plan shall be revised accordingly.
- b. Bicycle and Pedestrian Loop Trail – The plan indicates a five foot wide sidewalk along the proposed Ship Road Couplet. The sidewalk does not continue to the southern tract boundary along Ship Road, nor is any trail crossing signalization/infrastructure proposed at Lincoln Highway. The trail shall be provided at 12 feet width, extending fully through the property, and with the required Lincoln Highway pedestrian signal and crosswalk.
- c. Perimeter and Interior Trails – The perimeter trail does not extend through the site from Lincoln Highway to Ship Road as indicated in the Township *Plan*. In addition, the interior

**REVIEW COMMENTS – SHIP RUN
CONDITIONAL USE PLAN DATED 4-10-20**

May 8, 2020

connections do not serve the 53 proposed townhouse units. The plan shall be revised to extend the perimeter trail to the property boundaries as required. In addition, the Ship Road and Couplet Loop Trail is needed to provide the required access for the townhouse component of the development.

The conditional use plan requires revisions to demonstrate feasibility of compliance with pedestrian and bicycle accessibility standards.

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. The site is approximately half wooded, and a significant amount of woodland would be cleared for development.
 - a. The plan should be revised to clearly show the extent of existing wooded areas and trees to demonstrate whether the proposed layout maximizes tree preservation.
 - b. Trees to be removed shall be inventoried by species and size, or removals estimated by sample survey areas applied to areas of clearing, so that feasibility of meeting the compensatory tree planting requirement can be determined.

The conditional use plan requires revision to demonstrate feasibility of compliance with woodland preservation and planting mitigation requirements.

6. Screen Buffer – Section 281-35.A (SLDO) requires 50-foot-wide screen buffers non-compatible uses along the site perimeter. Buffers not meeting the 50 foot required width have non-permitted proposed improvements in the following areas:
 - Along the pipeline utility behind lots 13-23
 - Road 1 encroachment along the Laborer’s Union at lots 7-9
 - At the commercial/industrial outparcels on Ship Road, 7 townhouses, 18 parking spaces, alleys serving 25 townhouses, and stormwater basin 4
 - Road D serving 20 townhouses

Screen buffer plantings in accordance with section 281-35.D (SLDO) are required and proposed as follows:

<u>Buffer/ Length</u>	<u>Plant Type</u>	<u>Required</u>	<u>Proposed</u>
Ship Road, Springdale House / 75 LF	Shade Tree	2	2
	Evergreen Tree	3	3
	Large Shrub	8	6

**REVIEW COMMENTS – SHIP RUN
CONDITIONAL USE PLAN DATED 4-10-20**

May 8, 2020

<u>Buffer/ Length</u>	<u>Plant Type</u>	<u>Required</u>	<u>Proposed</u>
Townhouse Boundary 3 / 245 LF	Shade Tree	5	5
	Evergreen Tree	10	10
	Large Shrub	25	25
Townhouse Boundary 2 / 440 LF	Shade Tree	9	7
	Evergreen Tree	18	20
	Large Shrub	49	38
Townhouse Boundary 1 / 296 LF	Shade Tree	6	5
	Evergreen Tree	12	12
	Large Shrub	30	30
West Boundary / 2,444 LF	Shade Tree	49	49
	Evergreen Tree	98	98
	Large Shrub	244	244
Laborer's Boundary West / 1,010 LF	Shade Tree	20	3
	Evergreen Tree	40	3
	Large Shrub	101	9
Laborer's Boundary South / 592 LF	Shade Tree	12	12
	Evergreen Tree	24	24
	Large Shrub	59	59

As configured, the required buffer width is not provided in four different areas, and the required vegetation could not be provided along the west boundary of the Laborer's District Council. The conditional use plan shall be revised to demonstrate feasibility of compliance.

7. Perimeter Buffer – Section 281-35.E (SLDO) requires 25-foot-wide perimeter buffers along Lincoln Highway and around stormwater basins. Buffers not meeting the 25 foot required width have non-permitted proposed improvements in the following areas:
- Basin 1, along Lincoln Highway, Lot 1, and Road A
 - The existing basin, along Road A
 - Basin 2, behind Lots 76-89
 - Basin 3, behind Lots 73-76
 - Basin 4, along the Ship Road Couplet and alleys
 - Basin 5, along the Couplet

**REVIEW COMMENTS – SHIP RUN
CONDITIONAL USE PLAN DATED 4-10-20**

May 8, 2020

- Basin 6, along the Couplet and Lincoln Highway

Perimeter buffer plantings in accordance with section 281-35.E (SLDO) are required and proposed as follows:

<u>Buffer/ Length</u>	<u>Plant Type</u>	<u>Required</u>	<u>Proposed</u>
Lincoln Hwy West/ 185 LF	Shade Tree	2	1
	Evergreen Tree	4	5
	Large Shrub	9	9
Lincoln Hwy East/ 200 LF	Shade Tree	2	0
	Evergreen Tree	4	0
	Large Shrub	10	0
South Exton Bypass/ 1,460 LF	Shade Tree	15	23
	Evergreen Tree	29	46
	Large Shrub	73	118
Existing Basin/ 125 LF	Shade Tree	1	0
	Evergreen Tree	3	0
	Large Shrub	6	0
Basin 1/ 400 LF	Shade Tree	4	4
	Evergreen Tree	8	7
	Large Shrub	20	20
Basin 2/ 1,450 LF	Shade Tree	15	15
	Evergreen Tree	29	29
	Large Shrub	73	72
Basin 3/ 900 LF	Shade Tree	9	9
	Evergreen Tree	18	21
	Large Shrub	45	45
Basin 4/ 200 LF	Shade Tree	2	1
	Evergreen Tree	4	6
	Large Shrub	10	11
Basin 5/ 450 LF	Shade Tree	5	0
	Evergreen Tree	9	0
	Large Shrub	23	0
Basin 6/ 575 LF	Shade Tree	6	0
	Evergreen Tree	12	0
	Large Shrub	29	0

**REVIEW COMMENTS – SHIP RUN
CONDITIONAL USE PLAN DATED 4-10-20**

May 8, 2020

Feasible compliance with perimeter buffer requirements has not been established for conditional use purposes. The plan shall be revised to provide the required 25 foot wide buffers for all basins.

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 are required and proposed as follows:

<u>Frontage/Length</u>	<u>Required</u>	<u>Proposed</u>
Lincoln Hwy/ 1,800 LF	36	0
Ship Road/ 525 LF	11	11
Road 1/ 7,025 LF	141	71
Road 2/ 2,980 LF	60	32
Road 3/ 1,200 LF	24	14
Road 4B/ 2,200 LF	44	23
Road 5B/ 288 LF	6	4
Road 7/ 600 LF	12	7
Road 8/ 1,760 LF	35	27
Road 9/ 525 LF	11	6
Road 10/ 965 LF	19	11

The plan incorrectly measures the frontage length of many of the roads, instead describing the center line length. Thus, the number of street trees proposed is in most cases well under the requirement. In the Townhouse area, it is questionable whether the required quantity of street trees would fit given the proposed layout. The plan fails to demonstrate feasibility of compliance for conditional use purposes

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

- Plan Layout Issues
- Recreation Adequacy
- Pedestrian and Bicycle Accessibility
- Tree Clearing and Compensatory Plantings
- Screen Buffer Width
- Perimeter Buffer Width
- Street Trees

Please contact this office with any questions.



McMAHON ASSOCIATES, INC.
835 Springdale Drive, Suite 200
Exton, PA 19341
p 610-594-9995 | f 610-594-9565

PRINCIPALS

Joseph J. DeSantis, P.E., PTOE
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Dean A. Carr, P.E.
Jason T. Adams, P.E., PTOE
Christopher K. Bauer, P.E., PTOE

FOUNDER

Joseph W. McMahon, P.E.

May 15, 2020

Ms. Mimi Gleason, Township Manager
West Whiteland Township
101 Commerce Drive
Exton, PA 19341

RE: Traffic Engineering Review
500 East Lincoln Highway Residential Development
West Whiteland Township, Chester County, PA
McMahon Project No. 920374.11

Dear Ms. Gleason:

McMahon Associates, Inc. completed a traffic engineering review of the proposed residential development located on the southwest corner of the intersection of Lincoln Highway (S.R. 3070) and Ship Road (S.R. 1001). The site proposes a residential community, consisting of 93 single-family homes and 53 townhomes. The development proposes a new one-way southbound Couplet Road through the site, which will connect between Lincoln Highway and Ship Road, as well as a new road (Road D), which will connect between the Couplet Road and Ship Road. Access to the townhomes will be provided via several access roads located along the Couplet Road and along Road D. Access to the single-family home portion of the site will be provided via a full-movement access along Lincoln Highway and a full-movement access along Ship Road. Our traffic review is based on the following documents.

- *Ship Road Southwest Quadrant & Laborers District Council Property Development Transportation Impact Study*, prepared by Traffic Planning and Design, Inc., dated April 17, 2020.
- *Conditional Use – Residential Site Plan*, prepared by D.L. Howell & Associates, Inc., dated April 10, 2020.

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

Transportation Impact Study

1. The applicant proposes to build the southern portion of the Township's planned Couplet Road between Lincoln Highway and Ship Road. The TIS provides an analysis scenario whereby only this southern portion of the Couplet Road is constructed. There is no traffic analysis for the full build-

out of the Couplet Road and its associated traffic operational benefits. The traffic study also presents the traffic analysis results in a phased development schedule.

- a. By 2023, with traffic generated by only the single-family homes, the Lincoln Highway/Ship Road intersection will meet PennDOT's mitigation requirements for the overall intersection.
 - b. By 2028, with the traffic generated by the proposed townhouse and single family home communities, as well as the 690 Lincoln Highway commercial development, the Lincoln Highway/Ship Road intersection will continue to meet PennDOT's mitigation requirements for the overall intersection; however, several individual movements will operate with increased delay, such as the eastbound Lincoln Highway left-turn movement, the westbound shared through/right-turn movement, and the southbound Ship Road approach, which will all operate with LOS E or F conditions. Presumably, these conditions will be addressed with full completion of the Township's planned Couplet Road project, but this is not included in the traffic study.
2. The TIS indicates the eastbound Road D and westbound Springdale Drive approaches to the intersection with Ship Road will operate at LOS E and F during the weekday afternoon peak hour, which is not uncommon for side street approaches to unsignalized intersections along roadways such as Ship Road. However, this analysis does not assume the diversion of southbound Ship Road traffic, which will occur when the northern portion of the Couplet Road is constructed. It is recommended to complete an analysis of this intersection without the southbound Ship Road traffic to ensure the access will operate with acceptable operations in the final condition with the full Couplet Road.
 3. Similar to the comment above, the design of the southern segment of the Couplet Road and all proposed intersections and accesses serving this development should reflect traffic patterns associated with the eventual full buildout of the Couplet Road.
 4. The TIS should be updated to include an evaluation of the access intersections along the Couplet Road.
 5. Although the full benefit of the Couplet Road is not provided by the construction of only the southern segment, it is reasonable to assume some diversion of traffic to the new roadway. Specifically, it is likely a portion of the eastbound Lincoln Highway right-turn traffic will divert to the new roadway. As such, the traffic study should be revised to assume this diversion.
 6. The nearby proposed development list should be updated should be revised, and the traffic study should be updated to include the following developments:
 - a. Exton Knoll – This development is now proposed to include 324 townhomes.
 - b. Exton Mall Apartments – This development consists of 342 apartments which are currently under construction to the north of the existing Whole Foods, and a recent application proposes an additional 354 apartments located immediately to the east of the apartments currently under construction. These developments should be included in the background traffic growth projections.

7. The traffic study should be revised to include the proposed traffic signal at the Lincoln Highway/Belden Boulevard/Lochiel Lane intersection, as well as the traffic diversions associated with the removal of the existing left-turn restriction along northbound Belden Boulevard.
8. The TIS should be updated to include the detailed internalization calculations used to determine the trip generation for the site.
9. The traffic study assumes 20 percent of the proposed commercial and residential development new site traffic is destined to/from the south along Ship Road towards the intersection with King Road. This intersection should be monitored over time to assess the need for future traffic improvements.
10. The concept plan for the Ship Road Couplet provided in Appendix K of the TIS shows two-way traffic along Ship Road between Springdale Drive and continuing south. The Couplet Road intersection with Ship Road is shown as a T-intersection with presumably yield or stop control for a channelized right-turn movement to continue south on Ship Road. With two-way traffic on Ship Road at this location, traffic exiting the Couplet Road will be required to stop and/or yield to southbound through traffic within Ship Road. We question whether any other design configurations were considered or are necessary to allow more free-flow traffic movements from the Couplet Road onto southbound Ship Road.

Conditional Use Plan

11. The plans should clearly label the existing right-of-way along the Lincoln Highway and Ship Road site frontages. However, the plan appears to show a 75 to 85-foot wide half-width right-of-way along the Lincoln Highway site frontage, which will be sufficient to accommodate a second eastbound Lincoln Highway travel lane, as envisioned in the Township's Act 209 Study.
12. Please provide additional information regarding the design of the Couplet Road as it relates to the intended road classification and the Township's vision for this road and road ownership (private, Township or PennDOT).
13. SALDO Section 281-25.A – The plans appear to show a proposed right-of-way of 50 feet along Roads A, B, and C, which meets the Township requirements for a local road. The Township should determine whether these roads will be public or private roads.
14. SALDO Section 281-28.E(3) – The plans should label and dimension the available sight distances for left-turn traffic entering (looking ahead and behind) and exiting all proposed site access intersections. In addition, a PennDOT-style sight distance note should be provided which notes the required sight distances for each access intersection.

15. The plans should show more detail regarding the proposed lane configuration and striping along Lincoln Highway and Ship Road at each of the new intersections, including auxiliary turn lanes as recommended in the TIS. In addition, if the northern portion of the Couplet Road is constructed after the southern segment, then an interim intersection configuration and striping plan should be provided.
16. SALDO Section 281-31.A – The West Whiteland Township *Bicycle and Pedestrian Plan, June 12, 2019* envisions sidewalk along both sides of Lincoln Highway in front of this site, and as such, this development should provide a sidewalk along the south side of Lincoln Highway along the site frontage. In addition, the *Bicycle and Pedestrian Plan* also envisions crosswalks and pedestrian signals at both the existing Lincoln Highway/Ship Road signalized intersection and the planned Lincoln Highway/Couplet Road signalized intersection. The applicant should coordinate with the Township as part of the overall Couplet Road plan to confirm the scope of the pedestrian improvements, including all necessary ADA facilities, at both of these signalized intersections.
17. SALDO Section 281-31.A – Pedestrian facilities should be provided along Road D, as well as connections between the commercial site, Road D and the townhomes.
18. The concept plan for the Ship Road Couplet provided in Appendix K of the TIS shows a 12-foot wide multi-use trail on the west side of the Couplet Road, which is also consistent with the Township's *Bicycle and Pedestrian Plan*. Therefore, the conditional use plans should show the Township's desired multi-use trail on the west side of the Couplet Road.
19. The proposed pedestrian crossing of the Couplet Road on the south side of the Couplet Road/Road D intersection should be relocated to the center of the curb radius on the southeast quadrant of the intersection. In addition, appropriate advance pedestrian warning signs should be provided along the couplet road in advance of the crossing.
20. The proposed pedestrian crossings of the Couplet Road at the two townhome driveways, as well as along Road A at the mid-block trail crossing should provide appropriate advance pedestrian warning signs in advance of the crossing. Also, please consult with the Township for their input regarding the location of these pedestrian crossings.
21. During land development, detailed curb ramp designs should be provided for each ramp along Lincoln Highway, the proposed Couplet Road, and along Road D, including a grading plan with spot elevations, and labels for all dimensions (including slopes). The plans should also label all curb ramp types, and provide all of the relevant PennDOT curb ramp details. For all other curb ramps and pedestrian facilities located on private property, the applicant's engineer should ensure these facilities meet current ADA requirements.
22. SALDO Section 281-28.C – The eastern Road D site access intersects Road D approximately 58 feet west of the eastern townhouse access along Road D. If possible, it is recommended to align these accesses opposite each other through relocation of the townhouse access.

23. There are a total of five driveways proposed to serve the townhouse portion of the community along the Couplet Road, which is more than is needed for traffic operations purposes. Please review the townhouse community design concept with the Township, and verify whether five driveways are appropriate to serve the site. Normally there would be greater concern regarding the number, location and spacing of the driveways if the main road served two-way traffic, but in this case, the Couplet Road is one-way only.
24. ZO Section 325-39 – The Township requires 2.4 parking spaces per unit for three-bedroom townhomes, and the plans indicate adequate parking is provided for the townhomes. In order to meet the parking requirements, the plans note that each townhome provides two parking spaces within the proposed garages. However, the driveways for each unit are only 18 feet wide, and we question whether two vehicles will be able to comfortably access the garages. Furthermore, the driveways for many of the units do not appear long enough to accommodate storage of additional parked cars in the driveways. As such, we recommend additional parking should be provided for the townhomes in order to meet the Township’s parking requirements.
25. SALDO Section 281-25.C – The streets within the townhome portion of the site appear to be proposed as private streets, since no right-of-way is shown. This should be clarified. Regardless of the ownership of the streets, the proposed width of all streets within the townhome portion of the development are between 16 and 24 feet, which does not meet the requirement for a 28-foot wide road. Furthermore, the proposed internal street widths are not sufficient to accommodate 90-degree perpendicular parking.
26. SALDO Section 281-26.B – There are several locations along Roads B and C where the proposed centerline curve radii are less than 150 feet, as required on local roadways. These curve radii should be revised to 150 feet, unless this site satisfies the high-density single-family option, and in which case the radii are appropriate as shown.
27. Road A provides a new direct connection between Lincoln Highway and Ship Road. It is our opinion that cut-through traffic could be a concern for future residents of the community, especially since direct residential access is proposed to Road A. As such, the applicant should explore the feasibility of a more circuitous internal roadway layout, and/or consider the need for traffic calming along Road A to deter cut-through traffic between Lincoln Highway and Ship Road.
28. Please explore the feasibility of modifying the design of the Laborer’s Union driveways to intersect at 90 degrees with Road A.
29. The plans should show the eastbound Lincoln Highway auxiliary right-turn lane and the westbound Lincoln Highway left-turn lane at the Lincoln Highway/Road A access intersection, as recommended in the TIS.

30. The truck turning templates on sheet 14 should show the largest delivery truck turning templates at the access intersections serving the residential communities.
31. SALDO Section 281-29 – During land development, stop signs, stop bars, and all other necessary signs and striping should be provided at all proposed driveways.
32. Access to both Lincoln Highway (S.R. 3070) and Ship Road (S.R. 1001) will require a Highway Occupancy Permit (HOP) from PennDOT. The applicant should copy the Township on all PennDOT submissions.
33. Chapter 295-12 – This development is located within the Township’s Act 209 Service Area, and is therefore subject to the Township’s Transportation Impact Fee, which is equal to \$1,219.65 per new weekday afternoon peak hour trip. Based on the TIS, the site will generate approximately 126 new weekday afternoon peak trips, and the resultant Transportation Impact Fee for the site is **\$153,675.90**. However, in this case, we understand the applicant proposes to construct the southern portion of the Ship Road Couplet between Lincoln Highway and Ship Road, which is contained in the Township’s Act 209 Capital Improvements Plan.
34. Upon resubmission, the applicant's engineer should compose a response letter that describes how each comment has been addressed and where any plan and/or report revisions are located.
35. Additional comments regarding the traffic improvements and/or land development plans may follow upon receipt of future submissions.

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

Sincerely,



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



ANDREW J. WEIR, PRESIDENT
ajweir@chg-inc.com

PENNSYLVANIA OFFICE
20 Hagerty Boulevard, Suite 3
West Chester, PA 19382
P: (610) 436-9000

May 12, 2020
WC-409

Mr. John Weller, AICP
Director of Planning and Zoning, and
West Whiteland Township Historical Commission
222 North Pottstown Pike
Exton, PA 19341

**Re: Conditional Use Application
Ship Run Residential Development
500 East Lincoln Highway
Exton PA., 19341**

Dear Mr. Weller,

A Conditional Use Application has been submitted by Ship Run Developers, LLC for construction of a residential development at the Laborer's Union Property, at 500 East Lincoln Highway. The 66.9-acre property is in the eastern section of the township, bounded by the Lincoln Highway (Route 30) on the north, the Route 30 By-Pass on the south, and Ship Road to the east. The project site is located within West Whiteland Township's Office/Residential (O/R) zoning district.

It should be noted this project is being developed jointly with 690 East Lincoln Associates, LLC, which is also developing the adjacent Wawa convenience store and commercial buildings on a separate parcel northeast of the 500 East Lincoln Highway site. Although the design of the two projects is being jointly coordinated, the projects have been submitted separately for Conditional Use Approval.

In accordance with the West Whiteland Township Zoning Ordinance, Article XVI: Historic Preservation, Commonwealth Heritage Group (hereinafter Commonwealth) has reviewed the proposed undertaking for potential impacts to the Township's designated historic resources. For this review Commonwealth utilized the following submission documents:

- The Conditional Use Application Narrative, dated April 21, 2020
- Conditional Use Plans, Drawings 1 thru 19, by D.L. Howell Associates, Inc., dated April 10, 2020
- Transportation Impact Study, by Traffic Planning Design, dated April 17, 2020
- Preliminary Stormwater Management Report, by D.L. Howell Associates, Inc., dated April 10, 2020
- Utilities Impact Report, by D.L. Howell Associates, Inc., dated April 10, 2020
- Recreation Impact Statement, by D.L. Howell Associates, Inc., dated April 17, 2020
- Environmental Phase I Report Checklist, by Neo-Technology Associates Inc., September 27, 2019

OTHER LOCATIONS

Alexandria, VA (703) 354-9737 Columbus, OH (614) 549-6190 Dexter, MI (517) 788-3550 Littleton, MA (978) 793-2579
Minneapolis, MN (612) 597-1589 Minneapolis, MN (612) 597-1589 Ogden, UT (801) 394-0013 Tarboro, NC (252) 641-1444
Traverse City, MI (517) 262-3376

No current architectural plans, building elevations or renderings of the proposed residential units were provided for Commonwealth's review. Therefore, other than overall site arrangement and building lot sizes, this review cannot accurately comment on the impact the final architectural design may have on the historic resources.

Historic Resources Impacted by the Proposed Project

In accordance with Section 325-92.A of the Township Zoning Ordinance, Class I, II, or III historic resources listed on the West Whiteland Township inventory that are located within the boundary of a proposed project site or within 300-feet of the boundary of a proposed project site shall be reviewed for potential adverse effect. Commonwealth's review has determined the following historic resources are subject to review.

Listed Historic Resources located within the boundary of the proposed Project Site:

None

Listed Adjacent Historic Resources within 300 feet of the proposed Project Site:

- **Site #309**– 423 E. Lincoln Highway. Exton Hotel/ Exton House/ Ship Station. Built in 1859 by James Beale. Italianate style architecture. Only resource in Township from Chester Valley Railroad.
 - Class I Historic Resource, Listed on the National Register of Historic Places.
- **Site #348**– 511 E. Lincoln Highway. Williams Deluxe Cabins. Motor inn complex built in a mix of Tudor and Spanish Colonial style. Consists of offices, cabins, and a residence.
 - Class I Historic Resource, Listed on the National Register of Historic Places.

Description of the Proposed Undertaking:

The proposed Ship Run residential development is located on a 66.9-acre section of the Laborer's Union Property. The Laborer's Union office building and associated parking will remain at the center of the property, directly adjacent to Route 30 on the north boundary. The proposed residential development will wrap around the Laborer's Union facility on the west, south and east sides. The residential development's site is currently a mix of open and wooded space, extending along the north side of the Route 30 By-Pass. The west portion of the side is adjacent to an industrial warehouse complex. The east border of the site is Ship Road.

Ship Run Developers, LLC proposes to construct a combination of single-family residences and townhomes in two distinct communities. The roadways for the single family and townhouse developments are not interconnected. 95 single family residences are proposed at the western portion of the property on 7,000 square foot lots. 53 townhomes in groups of 3, 4 and 5 units are proposed at the east section of the site, south of the proposed Wawa. The townhouses wrap in a U-shaped configuration around three existing commercial buildings on Ship Road. To reduce Ship Road traffic, A new north-south couplet road is proposed to run on the west side of the townhouses and the Wawa. The two new housing developments are separated by the couplet road, as well as an open space area at the new road's west side. The drawings indicate the project will retain approximately 51% of the overall 66.9-acre site as open space.

The drawings indicate new vegetative buffering along the western and southern boundaries of the single-family housing development. A new U-shaped vegetation barrier will separate the townhouses from the three adjacent commercial buildings. The townhouses are not substantially screened from the Wawa to the north, or Ship Road to the east.

Review of the Potential Effects on Historic Resources:

Commonwealth's review is limited to the potential for effect on the above-mentioned historic resources. Commonwealth conducted a field review at the site of the historic resources to evaluate the potential effect of the proposed project. Our comments are limited to the potential for adverse effect, and recommendations for treatment and/or mitigation.

Two existing historic resources are located within 300 feet of the proposed Ship Run property. They are the Exton Hotel (Site # 309) and The William's Deluxe Cabins (Site #348). The Exton Hotel underwent a very complete and appropriate renovation a few years ago as apartments. The Williams Deluxe Cabins are currently being renovated in a manner sympathetic to their original character. The proposed Ship Run residential development site and the existing Laborer's Union facility are directly across Route 30 from the two historic resources. However, only 5 to 10 new single-family homes at the far west section of the Ship Run property will be visible from the historic sites. They will not be an objectionable intrusion. It may be advisable to provide additional vegetative screening at the rear of the five new residences closest to Route 30. This would screen these houses from the highway and historic resources, a benefit both the new residences and the historic resources.

The east townhouse development is not within 300 feet of the historic resources at the Ship Road and Route 30 intersection. Therefore, no impact is found from the Townhouse development.

Conclusion: The proposed Ship Run residential development is generally isolated from the historic resources in the area. There is only a very minor impact on the Exton Hotel and William's Deluxe Cabin's sites. Commonwealth concludes there is no adverse effect for the Ship Run development.

Should you have any questions or comments please do not hesitate to contact me by cell at 610-350-9564 or e-mail at pyocum@chg-inc.com.

Regards,



Philip Yocum, RA, LEED AP
Preservation Architect

cc: Justin Smiley – WWT
Candice Strawley- CHG

MEMORANDUM



TO: Justin Smiley, Planning & Zoning
FROM: Beth Jones, Finance Director
SUBJECT: Review of Fiscal Impact Analysis – Residential, Laborer’s District Council
DATE: May 8, 2020

Summary

I have reviewed the Fiscal Impact Analysis (FIA) completed by EH Creative Services LLC for the proposed residential development at Laborer’s District Council. Overall, the numbers used and calculations provided appear accurate to the best of my ability to confirm. There are typos in the chart on page 6 – the values do not mirror those in the narrative (p. 6) or the summary (p.12). The values in the narrative and summary are correct and use a \$775,000 single-family estimated market value per unit.

The FIA does not discuss potential impacts related to the Covid-19 pandemic. While outcomes are certainly unknown at the time the FIA was written, it should be noted that the economic uncertainty brought about by the pandemic could play a role in project commencement, progression, and completion, and their related fiscal impacts.

The FIA provides a projected positive net fiscal impact for the Township and a negative net fiscal impact as of project completion for the West Chester Area School District. Not mentioned in the report, but of considerable positive financial impact to the Township is the addition of the southern leg of the Ship Road couplet at the expense of the developer of this project and that of the planned retail/office project on adjacent parcels.

As a reminder for readers:

1. The Township is not permitted to approve or deny a developer’s proposal due to the financial impact on the Township.
2. The Fiscal Impact Analysis is forward-looking and provides projections that are estimates based on factors known or projected at the time of the report.

MEMORANDUM

DATE: May 12, 2020
TO: John Weller, Director of Planning and Zoning
FROM: Theodore D. Otteni, P.E.
Director of Public Works
**SUBJECT: Ship Run (500 E. Lincoln Highway)
Conditional Use Plan Review**



I have reviewed the plans (19 sheets) for the proposed Ship Run (500 E. Lincoln Highway) dated April 10, 2020 and offer the following comments:

1. Show the proposed north leg of the couplet (to be designed and constructed by the Township) on the plans and label "By Others".
2. Context for the roadway design of the new couplet road should be disused. Will the design characteristics be for a "major collector" per the existing Ship Road classification or will an approach using local road standards be used?
3. More detail is needed for the intended function of the existing Ship Road as well as the intended intersection of Springdale Drive.
4. The transition of the new couplet road back to the existing Ship Road alignment at the southern end shall be improved to promote a more efficient flow of traffic as this is intended to be the primary traffic movement for southbound vehicles.
5. The sidewalk presently shown along the west side of the couplet road shall be a 10 to 12 ft. wide multi-use path.
6. As the plan is developed, consideration for pedestrian circulation and connectivity will need to be evaluated.
7. Who will ultimately own and maintain the new couplet road?
8. Who will ultimately own and maintain the new Road D?
9. Who will ultimately own and maintain the new Road A? It is noted that Road A will continue to serve the existing parcel presently owned/operated for the Laborer's Training facility. An easement for the driveway access will need to be provided.
10. Provide a sidewalk along property frontage with Lincoln Highway.
11. Provide a sidewalk or extension of multi-use path along frontage with Ship Road.
12. Contact the Department of Public Works to discuss proposed sewer design and intended direction of sewer flows. The base mapping is not completely accurate as shown.

It is recognized that many of the above comments overlap with comments provided for the 690 E. Lincoln Highway (Wawa) project. Please coordinate with Township representative to discuss development of the new roadway and pedestrian infrastructure.

101 Commerce Drive
Exton, Pennsylvania 19341



Tel: (610) 363-9525
www.westwhiteland.org

Memorandum

DATE: June 5, 2020

TO: John Weller/Director of Planning and Zoning
Justin Smiley/Township Planner

FROM: Mark Moses/Code Administration Officer/Fire Marshal/Assistant
Zoning Officer

RE: Ship Run CU Fire Marshal Review

I have reviewed the above plan and have the follow requirements:

1. Available fire flow provided by Aqua PA will be accepted.
2. Fire Hydrants will be located during the Land Development review process in conjunction with the developer and Aqua PA. Maximum lineal distance for hose deployment from a hydrant shall not exceed 600 feet.
3. Street names shall be provided to the Township for Township and County addressing review.
4. All streets with a width between 24-26 feet shall be posted as fire lanes on both sides. Street at or above 26 feet in width shall be posted as fire lanes on at least one side. Signs shall the international type, double sided, mounted perpendicular to the cartway and shall be spaced a maximum of 150 on center.

Please see me with any questions.



101 Commerce Drive
Exton, Pennsylvania 19341

Tel: (610) 363-0200
Fax: (610) 363-6671
www.westwhiteland.org

M E M O R A N D U M

To: Justin Smiley
From: Joseph M. Catov, Jr. Chief of Police
Date: May 15, 2020
Re: Conditional Use – Wawa Market and Ship Run

Having reviewed the plans as submitted, I have concerns with northbound traffic on South Ship Road turning left into the new development. Depending on traffic volume, this could cause northbound traffic to backup waiting for an opportunity to turn left into the development.

I have no other concerns for this project.

A handwritten signature in blue ink, appearing to read "J. M. Catov, Jr.", is positioned above the printed name.

Joseph M. Catov, Jr.

Chief of Police