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March 21, 2016

MRPL 0131

Joseph Romano, Director of Code Enforcement
Marple Township
227 S. Sproul Road
Broomall, PA 19008

**RE: Woodland Preserve - Paxon Hollow Road and Palmers Mill Road
Continuing Care Retirement Community
Draft Zoning Ordinance Amendment and Preliminary Plan**

Dear Mr. Romano:

As requested, we have reviewed the following documents in connection with the referenced project:

- *Final Draft Ordinance Amendment* to the Zoning Code dated July 11, 2014 to amend the RA- Residential District text.
- *"Preliminary Plan Drawings"* (7 Sheets) dated January 21, 2016, prepared by Herbert E. MacCombie, Jr., P.E. Consulting Engineers and Surveyors, Inc.
- *"Post Construction Stormwater Management Narrative"* dated January 29, 2016, prepared by Herbert E. MacCombie, Jr., P.E. Consulting Engineers and Surveyors, Inc.
- *"Traffic Impact Study for the Woodland Preserve"* dated January 27, 2016, prepared by McMahan Transportation Engineers & Planners.
- "Welcome to Woodland Preserve" site and unit exhibits, prepared by rlps architects.

The applicants, L. Stephen and Dolores Sudhop, propose to amend the Marple Township Zoning Ordinance to include a Continuing Care Retirement Community as a permitted use in the RA-Residential Zoning District. The zoning text amendment is accompanied with a proposed 4-phase development plan for a 559-unit Continuing Care Retirement Community on 46.06 acres, comprised of consolidated single family residential properties. The Preliminary Plan provides an overall conceptual layout for the entire 4-phase development and detailed design for the first phase of the project, which includes 54 independent living units in 4 buildings. Access to the overall development is proposed via two full movement driveways along Palmers Mill Road and one full movement driveway on Paxon Hollow Road. The site is proposed to be served by public water and sewer.

We offer the following comments:

ZONING ORDINANCE AMENDMENT

1. The proposed amendment authorizes a Continuing Care Retirement Community (CCRC) as a permitted use anywhere within the RA-Residential District, provided the tract size is 40 acres or more.
2. The Marple Township Comprehensive Plan's "Proposed Land Use Map" indicates the project area as "Residential Single Family Detached," which is consistent with the current permitted uses in the R-A Residential District. Development in the RA Zoning District currently requires minimum lot sizes of 80,000 square feet or cluster development options, which permits densities of approximately 0.55 units per acre to 0.65 units per developable acre, respectively. The proposed ordinance increases the allowable density to 16 dwelling units per acre for a CCRC, which is inconsistent with the proposed land use characteristics established by the Comprehensive Plan. Additionally, a table is enclosed, providing a comparison of the various existing zoning development standards for the RA and CCRC Zoning Districts to the proposed CCRC amendment.
3. Prior to consideration for approval, the proposed ordinance should be revised to address the following:
 - a. Reasonable minimum distances between buildings and minimum building setbacks from cartways and parking areas should be specified.
 - b. The maximum building height of 60 feet or 7 stories for a multi-use structure (§ 300-21.C.(3)) is to be reduced to be a more suitable height for the RA District. The proposed height is greater than currently permitted building heights in high density residential and commercially zoned districts. In addition, the development standard should provide a specific limitation for the maximum building height of a multi-story structure.
 - c. The minimum Tract Area, maximum density, building coverage and impervious coverage (§ 300-21.C.(4)(a), § 300-21.C.(4)(b) and § 300-21.C.(4)(c)) should be

based on the Developable Acreage of the tract, consistent with the recent amendments to the RHMD District to respect environmentally sensitive areas.

- d. Justification should be provided to permit “buildings housing primary uses” and impervious coverage within areas of steep and very steep slopes; and, the proposed restrictions for steep and very steep slope disturbance should be clarified.
- e. Roadways accessing CCRC developments should be designed in accordance with local road standards and provide adequate buffering from adjacent residential properties (§ 300-21.C.(4)(e)). As proposed, the access driveways can be designed in close proximity to adjacent side lot lines (e.g. proposed road “A-2” at Palmer’s Mill Road is approximately 13 feet from the adjoining Quercetti and Kennedy properties).
- f. More specific/detailed lighting requirements for the various facilities should be specified (§ 300-21.C.(5)(d)).
- g. Buffer requirements from less intense residential uses should be provided.

PRELIMINARY PLAN - ZONING

4. Structures, cuts and fills, roads, driveways and parking lots; other than those associated with Conditional uses in areas of steep and very steep slopes are prohibited (§ 300-62.D.(1), § 300-62.D.(2), and § 300-62.D.(6)).
5. Removal of more than three trees on a lot in an RA Zoning District with a trunk 12 inches or greater in diameter within a primary tree-protection zone or with a trunk 18 inches or greater in diameter within a secondary tree-protection zone without first obtaining a permit is prohibited (§ 300-63.C). If a permit is obtained for tree removal, two new replacement trees with trunks not less than 3 inches in diameter are required to be planted for every tree removed (§ 300-63.F).
6. The plans shall demonstrate compliance with Article XI Off-Street Parking and Loading requirements.
7. Due to the existing steep and very steep slopes on the property, the site plan requires several retaining walls. Engineered designs, appropriate safety features (fences, railings, etc.) and permits are required for retaining walls in excess of 4 feet (§ 300-111.D).

SUBDIVISION AND LAND DEVELOPMENT

8. Preliminary Plan information is provided for Phase 1 of the Woodland Preserve development and limited conceptual information for the future development of Phases 2 through 4. Preliminary Plan requirements (§265-9.B) for Phases 2 through 4 are to be satisfied as a prerequisite to the Final Plan submission.

9. In accordance with §265-9.B.(15), proposed street and building layouts are shown for the entire tract. A note should be added to all site plan sheets indicating that the buildings and street layouts shown outside of Phase 1 are conceptual and are not part of any approvals which may be granted for Phase 1.
10. Zoning District boundaries for the Open Space, RB and CCRC zoned areas on and adjacent to the site shall be indicated on the plans (§265-9.B.(15)).
11. Sufficient engineering design to satisfactorily demonstrate the feasibility of stormwater management structures and erosion and sedimentation control is required (§265-9.B.(19)). Erosion and sediment pollution control plans have not been provided; and, incomplete topographic information has been provided to verify the stormwater management design. Further review of the stormwater management and erosion and sediment pollution control design is necessary upon submission of complete design and plan information.
12. The plans do not depict the riparian buffer required by §257-15.D from perennial or intermittent streams, wetlands and water bodies. Page N-7 of the “Post Construction Stormwater Management Narrative” states that “According to a Wetlands Scientist, there are wetlands on the subject property.” The limits of the wetland areas are not identified. The wetland locations are to be provided and adequate riparian buffers established.
13. The main access drives are designed absent street rights-of-way and with 24-foot cartway widths. A minimum of a 50-foot right-of-way and 27-foot paved cartway (§265-25.A.(1)) should be provided, consistent with the standard for minor streets.

TRAFFIC

14. Discrepancies between the sight distance requirements provided on Table 3 of the report and those in the Pennsylvania Code, Title 67, Transportation, Chapter 441.8.h.1 and Chapter 441.8.h.2.iv are to be corrected.
15. Since the proposed site is a senior living facility, the perception/reaction time for the Safe Stopping Sight Distance (SSSD) calculations and evaluation table should be revised.
16. The trip distribution should be revised with 60% traffic to/from SR 0252 and 40% traffic to/from SR 0320 and Paxon Hollow Road.
17. A Level Of Service/Queue analysis summary table shall be provided for review, also include SimTraffic queues for comparison purposes. All locations that will experience a drop in Level Of Service are to be identified and mitigated.
18. “Synchro” files shall be provided for review.
19. Provide crash data/history for critical intersections and the roadway network.

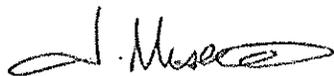
20. The study is to be revised to analyze the “with development” conditions using the same optimized signal timings used in the “without development” conditions.

GENERAL

21. Site landscaping and lighting plans are required.
22. Access to the independent living units is provided by 16-foot wide, two-way driveways to structured parking beneath each building. These driveways are generally very steep with tight turns, limiting maneuverability; a less restrictive design should be provided.
23. Public sanitary sewer service to Phase 1 is proposed to be an extension of the existing system in Bridlebrook Lane. An easement is necessary through private property of James S. Mackey for the sewer extension. Also, the plans do not provide information on how public sanitary sewers will be provided for the remainder of the tract; or, if additional sewer needs are required for nearby residential properties.
24. As proposed, the Phase 1 portion of the property will result in a cul-de-sac length of approximately 1,900 feet. This issue should be reviewed by the Fire Marshal and emergency services providers.
25. The Applicant is reminded that a minimum of the following permits and approvals are required in connection with the proposed development:
- a. Sewage Facilities Planning Module, or an exemption issued by DEP;
 - b. An NPDES and Erosion and Sediment Pollution Control Permit approved by DEP (§257-21.A(4));
 - c. An Operations and Maintenance Agreement with the Township covering all stormwater controls and BMPs in accordance with §257-36;
 - d. Deposit to the Stormwater BMP Fund (§257-37);
 - e. Fee-in-lieu of recreation areas (§265-18);
 - f. Water supply capacity approval letter from Aqua; and,
 - g. Highway Occupancy Permit issued by PennDOT.

If you have any questions or concerns, please feel free to contact the undersigned.

Sincerely,



Joseph A. Mastronardo, PE
Senior Engineer
PENNONI ASSOCIATES INC.
Township Engineers

JAM/LSN

cc: Anthony Hamaday, Township Manager
J. Adam Matlawski, Esq., Township Solicitor
James W. MacCombie, PE, Herbert E. MacCombie, Jr., P.E. Consulting Engs. and
Surveyors, Inc.
L. Stephen & Dolores Sudhop, 896 Palmers Mill Road, Media, PA 19063

**WOODLAND PRESERVE
DEVELOPMENT STANDARD COMPARISON**

STANDARDS	DISTRICTS					
	R-A	R-A CLUSTER			EXISTING CCRC	Proposed R-A using CCRC
		20% O.S.	40% O.S.	60% O.S.		
Minimum lot area (square feet)	80,000					
Maximum building coverage (percent of lot area)	15					
Maximum impervious coverage (percent of lot area)	20					
Maximum height - principal structures (feet)	35	35	35	35	35	60
Maximum height - principal structures (stories)	3.5	3.5	3.5	3.5	3.5	7
Minimum front yard (feet)	50					NONE
Minimum side yards - residential use (aggregate) (feet)	50					NONE
Minimum side yard - residential use (one-side) (feet)	20					NONE
Minimum side yard - nonresidential use (each side) (feet)	30					NONE
Minimum rear yard	30					NONE
Maximum density (units per developable acre)		0.55	0.60	0.65	16	16
Minimum tract area (acres)		10	10	10	20	40
Minimum permanent open space area (percent of tract)		20	40	60		NONE
Maximum building coverage (percent of tract)		15	15	15	30	30
Maximum impervious coverage (percent of tract)		20	20	20	60	60
Minimum setbacks from streets (feet):						
Any building face to arterial street ultimate right-of-way		80	80	80	100	100
Any building face to collector street ultimate right-of-way		40	40	40	100	100
Any building face to local street right-of-way		20	20	20	100	100
Any building face to common parking area		10	10	10		NONE
Surface parking areas to arterial street ultimate right-of-way		25	25	25	25	25
Surface parking areas to collector street ultimate right-of-way		20	20	20	25	25
Surface parking areas to local street ultimate right-of-way		15	15	15	25	25
Minimum building setbacks from tract perimeter (feet):						
From other like-zoned tracts					45	45
From any other residential district boundary line		25	25	25	45	45
From other district boundary lines		50	50	50	45	45
Minimum surface parking areas, driveways, interior roadways setbacks from tract perimeter (feet):						
From other like-zoned tracts					15	15
From any other residential district boundary line		15	15	15	15	15
From other district boundary lines		15	15	15	15	15
Minimum principal building spacing (feet):						
Windowless wall to windowless wall		10	10	10		NONE
Window wall to windowless wall		20	20	20		NONE
Window wall to window wall						NONE
a) Front to front		80	70	60		NONE
b) Rear to rear		50	45	40		NONE
c) End to end		35	30	30		NONE
d) Front to rear		60	50	45		NONE
e) Front to end		60	50	45		NONE
f) Rear to end		45	40	40		NONE
Permitted dwelling types		SFD	SFD	SFD		(1)
Minimum principal structures setback from property lines (feet)		15	10	10	45	

SFD - SINGLE FAMILY DETACHED

(1) Independent Living Units, Personal Care Assisted Living Facility and Skilled Nursing Facility