

August 19, 2014

Mr. William J. Bolla, Esquire
McNamara, Bolla, and Panzer
116 East Court Street
Doylestown, PA 18901-4321

RE: Villanova CICD Conditional Use Development Impact Statement
Review No. 1
RETTEW Project No. 101442003

Dear Bill:

At your request, we have completed our review of the above referenced document as prepared by Voith & Mactavish Architects LLP. Our review was of the following information received on July 15, 2014:

1. Thirteen (13) plan sheets dated May 2, 2014;
2. Development Impact Statement dated May 2, 2014;
3. Traffic Impact Statement dated May 2, 2014; and,
4. Miscellaneous Township ordinances and related documents.

Project Overview:

<u>Applicant:</u>	Villanova University
<u>Requested Action/Use:</u>	CICD Conditional Use – Development Impact Statement Review
<u>Zoning District:</u>	PI – Planned Institutional; CO – Commercial Office
<u>Location and Size:</u>	CICD Conditional Use Property is located between Lancaster Avenue and the SEPTA R-100 tracks, and between Pike Field and Moriarty Hall on the Villanova campus, a gross site area of approximately 13.81 acres.
<u>Existing Use:</u>	Surface parking lots
<u>Proposed Use:</u>	Student dormitories, Performing Arts Center, Parking Structure, and student-centered retail.

We have performed a general review of the Development Impact Statement supported by conditional use plans and related documents, and have included comments on the Impact Statement at this point. We may have additional comments as the Conditional Use application moves through the review process and will when more detailed land development plans are submitted.



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Our comments below are in the same order as the contents for a Development Impact Statement are listed in the CICD Use in the Planned Institutional zoning district.

COMPREHENSIVE PLAN CONSISTENCY REVIEW – ENVIRONMENTAL & NATURAL RESOURCES

1. Objectives 1 – 3: No comments.
2. Objective 4: In addition to the University’s response, the proposed 13-acre development provides for 2 acres of preserved land in the Aldwyn Triangle, which has been designated, at least partially, as a “core reserve wooded area.” The Comprehensive Plan strongly recommends that the Township protects and preserves these existing natural areas to the maximum extent (2-40). Preservation by the University of the remainder of the Aldwyn Triangle would help to protect the environmental integrity of the sensitive natural features in the dedicated 2-acre portion and be an indication of the University’s intent for the Triangle property to remain a quiet part of the neighborhood.
3. Objectives 5 – 7: No comments.

COMPREHENSIVE PLAN CONSISTENCY REVIEW – HOUSING, DEMOGRAPHICS, AND SOCIOECONOMICS

4. Objectives 1 – 4: No comments.
5. Objective 5: In addition to the University’s response, the new on-campus housing provided for over 1,100 off-campus resident students may consequently increase the availability of housing in Radnor Township, especially of rental units. Current demand for housing in Radnor is high, and the Township Comprehensive Plan indicates that another downside of this “more demand than supply” market condition above and beyond rapid increases in price is that households wanting to move into Radnor in the future... will not be able to move in and will be forced to seek alternative locations. This factor may be more significant for certain types of households, certain age groups, or ethnic and racial groups which are more income-constrained, all of which can have implications for future Radnor community building (3-14).
6. Objectives 6 – 10: No comments.

COMPREHENSIVE PLAN CONSISTENCY REVIEW – BUSINESS AND ECONOMIC DEVELOPMENT

7. Objectives 1 – 6: No comments.
8. Objective 7: The University indicates that it pays applicable taxes on unrelated business generating activities. It does not, however, pay business privilege taxes on those business activities it conducts which it considers part of its core mission. The University also does not pay property taxes.

COMPREHENSIVE PLAN CONSISTENCY REVIEW – TRANSPORTATION AND CIRCULATION PLAN

9. One of the goals of Section 5 – Transportation and Circulation Plan of the Comprehensive Plan is to develop traffic calming strategies for implementation, as appropriate, to help preserve neighborhoods. The Development Impact Statement on page 11, however, indicates that no traffic calming is proposed as a method to “reduce the likelihood of cut-through traffic.” Instead, proposed traffic improvements to Lancaster Avenue are cited as improving the performance of that key arterial roadway and in doing so will reduce cut-through traffic. Until the University submits its Special Events Management Plan for the post-development condition, and it reworks its Traffic Impact Study to comply with all PennDOT requirements for such studies (see comment under Transportation Impact below), the ability of Lancaster Avenue improvements to reduce cut-through traffic cannot be confirmed. The University has indicated a willingness to install a raised crosswalk and Rapid Reaction Flashing Beacon at Aldwyn and at the two-way access/egress to the Parking Garage on Ithan for pedestrian safety, both of which will help calm traffic speeds. Similar consideration will be needed for traffic calming on Aldwyn Lane, particularly for special event traffic.
10. Section 5 – Transportation and Circulation Plan of the Comprehensive Plan outlines an Access Management Program that “should apply to all roads in the Township, as practical. Reducing the amount of unnecessary curb cuts and access points can also help to reduce delays in traffic flow, accident levels, and pedestrian conflicts” (5-29). The University’s plan includes the elimination of eight (8) existing ‘unrestricted’ driveways along Lancaster Avenue between State Route 320 and Church Walk at the West Lancaster Parking area properties.
11. Section 5 – Transportation and Circulation Plan of the Comprehensive Plan also states that the Township should encourage access management methods along U.S. Route 30 and provide access easements through adjoining parcels (5-32). The proposed development contains offered/suggested traffic improvements that include side accesses, deceleration lanes and a reverse frontage road.

COMPREHENSIVE PLAN CONSISTENCY REVIEW – OPEN SPACE AND RECREATION

12. Objective 1: No comments.
13. Objective 2: The proposed development includes the open space dedication of 87,120 square feet (2 acres) in the Aldwyn Triangle in order to meet the CICD ordinance requirement for exceeding 30% building coverage, consistent with the Comprehensive Plan’s strong recommendation that such an existing natural area be preserved to the maximum extent (2-40). Preservation by the University of the remainder of the Aldwyn Triangle would help to protect the environmental integrity of the sensitive natural features in the dedicated 2-acre portion and be an indication of the University’s intent for the Triangle property to remain a quiet part of the neighborhood.
14. Objectives 3 – 9: No comments.

COMPREHENSIVE PLAN CONSISTENCY REVIEW – HISTORICAL AND ARCHAEOLOGICAL RESOURCES

15. The goal in this plan is not applicable to this development.

COMPREHENSIVE PLAN CONSISTENCY REVIEW – INSTITUTIONAL USE

(Institutional Use is not explicitly listed in CICD Ordinance as a required subject for review but is certainly applicable and comes under the heading of “including, but not limited to” in the text of the CICD Ordinance Development Impact Statement requirement.)

16. The Development Impact Statement does not include any analysis of consistency with Section 8 – Institutional Use of the Comprehensive Plan. As noted above, the project needs to be consistent with the goals and objectives stated in Section 8. Our comments on Section 8 consistency are provided below.
17. The Comprehensive Plan lays out some general principles to be kept in mind when dealing with Institutional land use. For example, the expansion of institutions is to be limited to the areas within the present boundaries of the campus zoned for Institutional use. The University’s CICD plan does not expand the current limits of the campus, although the proposed development activity does extend beyond the PI – Planned Institutional zoning district in the form of the ‘West Lancaster Parking’ area proposed for University property in the CO – Commercial Office zoning district.
18. Further, the Comprehensive Plan asks that existing institutions be harmonized with adjacent land uses by promoting physical buffering. Villanova’s plans include the installation of deciduous trees, evergreens, shrubs, and ground cover along most of the CICD district boundaries. To properly buffer adjoining properties (along both the R-100 line and those on Barley Cone Lane), existing buffer vegetation needs to be retained to the fullest applicable extent along with the addition of new vegetation and landscaping. Strategic placement of berms along University property boundaries are needed to help with visual and noise impacts. Section and elevation views of proposed buffering need to be provided to demonstrate the sufficiency of the proposed buffering plan that the University presently suggests will include safety fence and could include modest, sound-dampening masonry walls as appropriate.
19. Section 8 – Institutional Use of the Comprehensive Plan, which was last updated in 2003, states that Villanova University has prioritized a number of plans and projects moving forward. The Comprehensive Plan acknowledges the University’s intention of implementing several major building projects, most of which will be in the form of student housing, while maintaining the status quo enrollment figures. Reducing the need for off-campus housing, improving the quality of student life, and minimizing community issues occurring due to a large number of students living off campus are presented as key reasons for the need to build additional residential facilities.
20. Section 8 – Institutional Use of the Comprehensive Plan specifically recognizes that an important issue to the community relates to Villanova’s long range plans for its land holdings south of Lancaster Avenue that contain the Main and Pike surface parking lots. The Plan notes that the University has considered the development of a major convocation center there, including a

bookstore plus structured parking with related facilities, very similar to that proposed under the CICD Conditional Use. Features of such a development were to include possible application of traffic calming, gateway enhancements, and other appearance improvements (8-6).

COMPREHENSIVE PLAN CONSISTENCY REVIEW – COMMUNITY SERVICES AND FACILITIES

21. No comments.

COMPREHENSIVE PLAN CONSISTENCY REVIEW – EXISTING LAND USE & LAND USE PLAN

22. Objectives 1 – 4: No comments.
23. Objective 5: The proposed development includes the open space dedication of 87,120 square feet (2 acres) in the Aldwyn Triangle in order to meet the CICD ordinance requirement for exceeding 30% building coverage. Consistent with the Comprehensive Plan's strong recommendation that such existing natural features be preserved to the maximum extent (2-40), preservation by the University of the remainder of the Aldwyn Triangle would help to protect the environmental integrity of the sensitive natural features in the dedicated 2-acre portion and be an indication of the University's intent for the Triangle property to remain a quiet part of the neighborhood.
24. Objective 6: In addition to the University's response, to properly buffer adjoining properties (along both the R-100 line and those on Barley Cone Lane), existing buffer vegetation needs to be retained to the fullest applicable extent along with the addition of new vegetation and landscaping. Strategic placement of berms along University property boundaries are needed to help with visual and noise impacts. Section and elevation views of proposed buffering need to be provided to demonstrate the sufficiency of the proposed buffering plan that the University presently suggests will include safety fence and could include modest, sound-dampening masonry walls as appropriate.

REVIEW OF IMPACT ON SENSITIVE NATURAL FEATURES

25. In addition to the University's response, the proposed 13-acre development provides for 2 acres of preserved land in the adjacent Aldwyn Triangle, which has been designated, at least partially, as a "core reserve wooded area" (2-41). Preservation by the University of the remainder of the Aldwyn Triangle would help to protect the environmental integrity of the sensitive natural features in the dedicated 2-acre portion and be an indication of the University's intent for the Triangle property to remain a quiet part of the neighborhood.
26. On page 2, the Development Impact Statement states it is anticipated that redevelopment of the parking lots will increase potential habitat for local wildlife. However, the statement fails to describe the ramifications of increasing wildlife habitat, such as wildlife interactions with humans, motorized vehicles, etc.
27. Page 4 of the report states the proposed development will locate more students within easy walking distance of university related activities, thereby reducing the need to drive to campus and improve air quality in the area. The report further addresses the carbon footprint of moving 1,160

students from off-campus housing to new LEED certified residence halls on campus. This would equate to a reduction of 2,100 car trips per day and would equate to a reduction of 1,162,000 pounds of CO-2 emission every year; however, the reports further states the vacated rental units would be filled with commuter students thereby eliminating all the indicated carbon footprint gains.

REVIEW OF IMPACT ON THE TOWNSHIP AND REGIONAL TRANSPORTATION SYSTEM AND THE ABILITY OF ADJACENT STREETS AND INTERSECTIONS TO EFFICIENTLY AND SAFELY HANDLE THE TRAFFIC GENERATED BY THE PROPOSED DEVELOPMENT

The University's Development Impact Statement indicates that compliance with this section is by virtue of the Traffic Impact Study (TIS) submitted for the development proposal. Therefore, our review of transportation impact focuses on a review of the TIS.

28. As indicated in the Gilmore Review as well as the recent PennDOT review, the TIS must be prepared in accordance with Section 280-135G(1)(c) which indicates it must follow PennDOT's guidelines as contained in PennDOT SOL 470-09-4. Therefore the TIS should be revised to include queue analyses, turn lane needs analyses, and the HCM 2010 methodology. In addition, all SYNCHRO analyses should be revised to incorporate the PennDOT approved default factors and to also include the actual pedestrian calls per hour at the signalized intersections. The level of service tables should be expanded to include the seconds of delay for any unsatisfactory levels of service. A 95th percentile queue table should also be provided. Any recommended turn lane length should be the maximum length as determined from the turn lane needs analysis and/or the queue analysis. These significant revisions to the TIS need to be prepared and reviewed by the Township before any conditional use decision-making occurs in order that the Township can know that the general set of transportation improvements laid out in the plan will efficiently and safely handle the traffic generated by the proposed development.
29. Trip generation for the commercial uses fronting on Lancaster Avenue should be developed from the ITE Trip Generation manual unless specific justification can be provided that would indicate no new trips would be generated from these uses.
30. The analysis in the TIS assumes 4-way STOP control at the intersection of the garage and parking lot along Ithan Avenue. Always stopping traffic flow on South Ithan is not desirable. The analysis of this intersection should assume two-way STOP control of the side streets approaches only. Consideration by the University of a raised crosswalk and Rapid Reaction Flashing Beacon (RRFB) with the 'intersection' designed to accommodate a 4-way stop if determined appropriate in the future is a welcome approach.
31. There is discussion in the TIS that a detailed Special Events Plan for the future development condition is to be prepared by a different consultant. A copy of this plan should be provided for review and comment prior to any decision-making on the conditional use.
32. Capacity and Queue analyses should be provided for the "special event" conditions, particularly along Ithan Avenue and at its intersection with Lancaster Avenue. The TIS 'projects' 176

Eastbound right turns and 220 Westbound left turns onto Ithan Avenue for the peak hour of a special event.

33. The addition of a dedicated Eastbound Lancaster Avenue right-turn lane at Ithan Avenue needs to be investigated for both day-to-day operation as well as special events. Trying to send event traffic further to the east past Ithan to the proposed Lancaster Avenue entrance to the parking garage will still have event traffic out on the mainline of Lancaster Avenue, waiting to make entrance into the garage through a narrow, single lane driveway, while blocking through traffic.
34. There has been discussion by the University of sending special event visitors to the new parking garage via a new entrance into the West Lancaster Parking area, through the West Lancaster Parking area, across Church Walk, and through the parking lot behind the new dorms to Ithan Avenue. No analysis or plan has been submitted to illustrate how this would function.
35. Pedestrian crossings at the intersection of Lancaster Avenue and Ithan Avenue should be reviewed and revised such that they are more perpendicular to the sidewalks. This will provide a shorter distance and less WALK time at the intersection.
36. The TIS indicates the driveway to the east of the Performing Arts Center (PAC) would prohibit left turns out of the driveway, however the submitted plans indicate full egress movement. The plans should be revised to indicate a left turn-out restriction. In addition, information should be provided relating to truck access in and around the PAC.
37. Aldwyn Lane Access: Restricting the traffic flow to a permanent one-way flow would alleviate "cut-through" traffic. This or some other traffic management approach on Aldwyn would require agreement from the residents along this street.

REVIEW OF IMPACT ON RADNOR SCHOOL DISTRICT

38. On Page 20, the report states the addition of student housing will not materially affect the rental housing market in the Township because vacated off-campus student rental housing will be filled by another student living farther away. This statement is contrary to how the report addresses Housing Objectives on Page 5, which states many houses previously rented to Villanova students could be brought back onto the open rental market or potentially sold for re-conversion back to single family residences.
39. There are 125 licensed off-campus student rental units in Radnor Township all within several miles of three colleges and two universities. The report concludes that the quality of these dwelling units is such that they are unlikely to appeal to families, especially families with school age children, and that should any of these units become available they will likely be occupied by another student and not by a family with children. Based on this conclusion, it is estimated that only three new school age students will be generated as a result of this development.

There is a trend in the housing market away from home ownership. The report should explore this trend and the impact of these rental units not being filled by other students. The age and quality of these units may generate rental prices on the open market that make them affordable

for young families and single-parent households, which will impact student enrollment in the school district.

REVIEW OF IMPACT ON COMMERCIAL FACILITIES WITHIN THE TOWNSHIP AND OTHER MUNICIPALITIES

40. The Development Impact Statement indicates on page 26 that the project includes between 20,000 and 25,000 square feet of retail and restaurant space. However, the development plans submitted with the Impact Statement show a total of 17,000 square feet of bookstore, bistro, and convenience store space. The amount of square feet of the retail/personal service spaces needs to be clarified.
41. Overall, it appears that the proposed development will have a marginal effect on commercial businesses within the Township and other municipalities. More students on campus might increase patronage for Garrett Hill and Wayne businesses. However, the presence of the bistro and convenience store on campus might make it less likely for students to go off campus for those needs. Students already have favorite retail and restaurant establishments and established patronage patterns as a result. It is not likely that there will be significant changes in those patterns.

REVIEW OF IMPACT ON PUBLIC UTILITIES

42. The University's Conceptual Stormwater Management Narrative highlights the 2-year volume difference in runoff as the key objective for the project. However, the University must provide infiltration for one (1) inch of runoff from all proposed impervious surfaces of the project, regardless of the 2-year volume difference. This is a requirement of the Darby/Cobbs Creeks Act 167 Plan and the Township Stormwater Management Ordinance. The infiltration of one (1) inch of runoff was generated as a standard by PADEP and is also a requirement of the City of Philadelphia. Some jurisdictions in other areas require infiltration of 1.5 inches.
43. Section 245.18.B of the Township Stormwater Management Ordinance states that applicants are required to find practicable alternatives to surface discharge of stormwater runoff. Such alternatives would include reuse, ponds, and underground storage. As a minimum to address downstream residents' identified issues the University needs to provide no surface discharge for up to a 10-year storm, but the most environmentally conscious thing they could do would be providing no surface discharge for up to a 100-year storm. This would assist in offsetting flood-causing runoff from the remainder of the Villanova facilities in the drainage area and would be consistent with Villanova's nationwide reputation for stormwater management research and for having been labeled by the Princeton Review as one of the 322 most environmentally responsible universities in the nation.
44. It does not appear that the infiltration/detention facilities under the western end of the West Lancaster Parking area will be feasible due to the substantial slope of the land and existing trees present. The University has indicated that infiltration/detention facilities are no longer being proposed for the land west of Farrell Hall, the Public Safety Building.

REVIEW OF IMPACT ON POLICE AND FIRE PROTECTION

(Reviewed under Fiscal Impact Analysis Overview)

REVIEW OF IMPACT ON OPEN SPACE AND RECREATION FACILITIES

45. The Development Impact Statement does not provide an analysis of the number of students currently using the Township's recreation facilities, nor what facilities they use, and it concludes that all students will utilize on-campus open space and recreation facilities.

To accurately determine the impact this project has on the Township's open space and recreation facilities, the Impact Statement needs to identify Township open space and recreation facilities that are reasonably accessible, estimate the number of students currently utilizing the Township's open space and recreation facilities, and determine the impact moving more students on campus will have on student usage of Township open space and recreation facilities.

In addition, Section 255-43.1.B(2) of the Township Code requires non-residential developments to dedicate open space/recreational lands or pay a fee in lieu of.

REVIEW OF IMPACT ON CHARACTER OF SURROUNDING NEIGHBORHOOD

46. The West Lancaster Avenue Parking area, while located outside of the CICD and the Planning Institutional zoning district, is a key element of the proposed development. It is the first project component to be constructed since replacement parking must be provided before spaces in the Pike Lot are lost during parking garage construction and spaces are lost in the Mail Lot during dormitory construction. The West Lancaster Avenue Parking area is separated from nearby residences only by the R-100 Trolley line. Evidence of sufficient noise and light buffering along the proposed parking area in the form of section and elevation drawings need to be provided showing the anticipated results of buffer plantings, gap filling, and retention of existing trees and shrubs. Similarly, buffering elevations for the property behind the parking garage and Performing Arts Center need to be provided.
47. The Development Impact Statement states on page 28 that "the new buildings will create a new audio and visual buffer between Lancaster Avenue and the residential neighborhoods at the South side of the development." However, the presence of approximately 1160 students in the new dorms, plus other proposed traffic generators (parking garage, Performing Arts Center, retail businesses, surface parking), will create new audio and light sources for the neighborhood. In addition, the construction of the new buildings will close off the view of the Chapel and fronting lawn and introduce a new visual – the parking garage and dorms. Thus, buffering section and elevations drawings including combinations of new trees and shrubs, berming, safety fence, modest masonry walls as appropriate to different locations need to be provided.

FISCAL IMPACT ANALYSIS OVERVIEW

48. On page 29, the report indicates that "many of the students who will be living in the proposed development will be moving in from outside of the Township" and "these new residents will now

be more likely to patronize Township establishments more often,” leading to more sales and increased gross receipts tax revenues (Business Privilege Tax) for the Township. However, in item #6 on page 6, the report states that “the retail incorporated into the development will also provide ready access to many of the needs of daily student life,” suggesting that students will have less need to go off campus as a result of the development. Further, some of the students moving into the new dorms will be those currently occupying West Campus dorms and are already on campus. Students, whether currently living on or off campus have favorite places inside and outside of the Township and their patronage patterns are not likely to change much. It is unclear which direction gross receipts tax revenues (Business Privilege Tax) will head.

49. The report notes that the University is not subject to property taxes nor is it expected that the retail uses that are part of the project and the University’s core mission will pay any business taxes. The report goes on to say that roughly \$5.6 million dollars in one-time permit fees and gross receipts taxes will be paid by the University and its contractors as a result of the construction of the proposed development. These one-time fees are not a windfall for the Township. They are fees to cover the costs of Township services provided during the development process including construction code plans review and inspections. Further, most all development in the Township must pay building permit fees and their contractors pay gross receipts taxes. The key distinction is that the University pays no property taxes. Private sector development at a value similar to the \$269 million cited for the proposed development would generate approximately \$1,009,000 annually in property taxes to the Township (at the 2014 property tax rate), plus roughly \$750,000 in Business Privilege taxes could be generated on gross receipts each year.
50. On page 30, the report indicates that “the project will not cause any additional burden on Township administration” or the Community Development budget. The administration, coordination, and execution of review of the project and enabling zoning ordinance amendment has actually caused quite a burden on Township administration and Community Development.
51. The report on page 32 states that the potential increase in police calls (estimated to be 55) attributable to the project is small compared to the total number of calls handled by the Police Department. The report needs to state the total number of calls, calculate what percent of total calls is represented by the 55 additional calls, and apply that percentage to the Police Department’s budget of roughly \$8 million to calculate the approximate cost of those 55 additional calls and to determine the need for additional resources by the Police.
52. On Page 33 under Public Works, the report states that it is possible that the Township will see a decline in roadway maintenance expenditures due to fewer students driving. This contradicts the statement earlier in the Development Impact Statement that it is anticipated that the vacated off-campus student housing is expected to be filled with students, requiring them to drive, or rented on the open market. Those occupants will have similar driving patterns as those who currently live in those units such that there would be an overall increase in driving activity and wear and tear on area streets.
53. The report also notes on page 33 that “the University will maintain the sidewalks along Lancaster Avenue, further decreasing possible Township expenses.” Section 250-9 of the Township Code requires property owners to maintain the sidewalk along their property such that this

maintenance of the sidewalks by the University is a current duty and does not represent a shift in responsibility and a decrease in possible Township expenses.

54. On page 34, the report notes that the proposed development's township-compliant stormwater management system will help reduce stormwater runoff from the site, potentially lowering costs borne by Township Public Works. It should also be noted that there has been a burden on the Township for many years of stormwater runoff discharge from the surface parking lots where there has been little or no stormwater management in place.

Should you have any questions or require any additional information, please do not hesitate to contact us at any time.

Sincerely,



Stephen R. Gabriel, PP
Township Planning Consultant

copy: Robert Zienkowski, Township Manager
Steve Norcini, Public Works Director
Roger Phillips, Township Engineer
Amy Kaminski, Township Traffic Engineer
Nicholas Caniglia, Esq.
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