

September 18, 2023

Steve Norcini, PE
Radnor Township
301 Iven Avenue
Wayne, PA 19087-5297

**Re: 204 & 228 Strafford Avenue (“Property”)
Hamilton Trust
Response to 8-01-2023 Gilmore Conditional Use Plan Review Memorandum**

Dear Mr. Norcini:

This letter is in response to the review of the above-referenced Conditional Use plan by the Radnor Township Traffic Engineering consultant, Damon Drummond, P.E. of Gilmore & Associates, Inc., as set forth in his memorandum dated August 1, 2023. This memorandum was received by the applicant’s representatives on August 5, 2023. The original comments are copied below in *italics text* with a response following in **bold text**. In addition, revised plans and related materials addressing the applicable comments are being submitted.

C. COMMENTS

1. *§280-135.F.(1) – The following comments are provided as they impact site access, interior circulation, and parking.*
 - a. *§255-27.C.(1) – It is recommended that sidewalks be 5 feet wide to meet the latest ADA standards and be provided on both sides of Road A and Road B for pedestrian circulation.*

Code §255-27.C.(1) is part of the subdivision and land development ordinance provisions for streets. As noted on the conditional use plans an internal driveway is proposed, not a private street. Code §255-40 provides specific regulations for attached-dwelling residential development, such as the townhomes proposed here. Code §255-40.C addresses access and circulation, and Code §255-40.E addresses the required internal driveways. The plans meet the applicable requirements of these provisions. In order to be responsive to the recommendation for a sidewalk along the internal driveway, the conditional use plans have been revised to provide a 5’ wide sidewalk along one side of the internal driveway. It is noted that these sidewalks will interconnect with new sidewalks being proposed along the Property frontages of Strafford Avenue and Eagle Road, where none now exist, further enhancing and improving pedestrian circulation.

- b. *§255-27.C.(2) – Additional right-of-way and/or cartway widths may be required by the Board of Commissioners in order to lessen traffic congestion, to secure safety from fire, panic and other dangers, to facilitate the adequate provision for transportation and other public requirements and to promote the general welfare. Strafford Avenue is classified as a local road with a required 60-foot Right-of-Way width and 28-foot cartway width. The proposed Right-of-Way along the site frontage is 40 feet (20-foot half width) and the cartway width is 24 feet (12-foot half width). A 30-foot Right-of-Way*

half-width and a 14-foot cartway half-width is required along the site frontage in accordance with §255-27.C(1). Eagle Road is classified as a major collector with a required 80-foot Right-of-Way width and 48-foot cartway width. The proposed Right-of-Way along the site frontage is 40 feet (20-foot half width) and the cartway width is 22 feet (11-foot half width). A 40-foot Right-of-Way half-width and a 24-foot cartway half-width is required along the site frontage in accordance with §255-27.C(1).

The conditional use plans now identifies a 40' half right-of-way width along the Eagle Road Property frontage should the Commissioners require it. This is subject to applicant's rights under applicable law regarding just compensation etc. As to widening of the paving (i.e. the cartway) of Strafford Avenue and Eagle Road, the traffic impact study that has been prepared does not indicate that the proposed redevelopment will cause the need to widen the paving (cartway) of Strafford Avenue or Eagle Road.

It is noted that in the approval of the subdivision of the property on the corner of Eagle Road and Strafford Avenue directly across from the Property, the Commissioners did not require widening of either Strafford Avenue or Eagle Road. It is also noted that in the more recent approval of the St. Honore' subdivision which also has frontage on both Strafford Avenue and Eagle Road, and is across from the Property on Strafford Avenue, the Commissioners did not require any widening of Strafford Avenue, and required a minor widening along Eagle Road of approximately 3 feet to approximately a 15 feet half width. As noted above, Applicant is proposing sidewalks along the Property frontage of Strafford Avenue and Eagle Road. Applicant prefers to avoid further paving/impervious coverage along the streetscapes, especially where the proposed redevelopment is not causing a need for road widening. Applicant is willing to discuss these issues further.

- c. §255-27.E.(2) – The private street shall have a right-of-way width and a horizontal and vertical alignment consistent with the requirements for public streets.*

As noted on the conditional use plans an internal driveway is proposed, not a private street. Code §255-40 provides specific regulations for attached-dwelling residential development, such as the townhomes proposed here. Code §255-40.C addresses access and circulation, and Code §255-40.E addresses the required internal driveways. The plans meet the applicable requirements of these provisions.

- d. §255-27.F.(2) – Minimum center-line radii for horizontal curves shall be 150 feet for local streets. Provide stationing and radii labels for the horizontal curves.*

As noted on the conditional use plans an internal driveway is proposed, not a private street. Code §255-40 provides specific regulations for attached-dwelling residential development, such as the townhomes proposed here. Code §255-40.C addresses access and circulation, and Code §255-40.E addresses the required internal

driveways. The conditional use plans meet the applicable requirements of these provisions.

- e. §255-27.H.(5) – Streets entering opposite sides of another street shall be laid out either directly opposite one another or with a minimum offset of 200 feet between their center line. Road B is approximately 175 feet from the intersection of Strafford Avenue and Eagle Road, revise the entrance of Road B to be a minimum of 200 feet from the intersection.*

As noted on the conditional use plans an internal driveway is proposed, not a private street. Code §255-40 provides specific regulations for attached-dwelling residential development, such as the townhomes proposed here. Code §255-40.C addresses access and circulation, and Code §255-40.E addresses the required internal driveways. The conditional use plans meet the applicable requirements of these provisions. Thus, Code §255-27.H.(5) is not applicable.

- f. §255-27.E.(2) – Minimum curb radii at street intersections shall be 25 feet for local streets, provide radii labels.*

As noted on the conditional use plans an internal driveway is proposed, not a private street. Code §255-40 provides specific regulations for attached-dwelling residential development, such as the townhomes proposed here. Code §255-40.C addresses access and circulation, and Code §255-40.E addresses the required internal driveways. The conditional use plans meet the applicable requirements of these provisions. Although the residential development driveway is not subject to 255-27.E(2), the conditional use plans have been revised to increase the radii of the driveway to 25' where it meets the public street as recommended.

- g. §255-27.I.(6) – No common driveways shall be permitted between two or more single-family dwellings (i.e. Unit 1 & 2)*

There is no common driveway located between units 1 & 2. Rather these units are connected to one another as part of a larger townhome building.

Also, as noted above, the proposed vehicular accessways are the required driveways contemplated for attached dwelling townhome development under Code §255-40. Code §255-40.C addresses access and circulation, and Code §255-40.E addresses the required internal driveways. These provisions specifically envision “access to the dwellings and circulation between the buildings.”

- h. §255-28.A – Provide the sight distance measurements on the plan.*

The sight distance measurements are included on the conditional use plans and satisfactorily meets the applicable requirements.

- i. §255-29.A – Provide the parking space dimensions for the on street parallel parking spots, the minimum dimensions shall be 8' x 22'. Driveways should be designed to fit two 9.5' x 20' spaces to allow for two vehicles to be parked in the driveway. The length should be measured to the back of the sidewalk closest to the house, so vehicles are not blocking the pedestrian path.*

Each townhouse has a 2-car garage. Each garage parking space meets the 9'6" x 20' parking space requirement. The driveway apron is providing access to the garage, and is not counted as parking spaces. It is also noted that Code § 255-29.A.(20) addressing attached dwellings, such as the townhomes proposed here, confirms that garages or driveways can be used to meet the parking requirements. This provision also provides that in addition to these parking spaces there shall be one parking space per four dwelling units of "overflow" off-street parking. The conditional use plans show 14, 9'6" x 20' "overflow" parking spaces in compliance with these requirements.

- j. §255-31 – Roadway profiles for Roads A and B will need to be provided.*

As noted above, the proposed vehicular accessways are the required driveways contemplated for attached dwelling townhome development under Code §255-40. Profiles of the internal driveways will be provided. In our view this is a detail for the land development plans.

- k. §255-36.D – Provide ADA compliant curb ramps for crossing Road A and Road B at Stafford Avenue.*

Will comply. In our view this is a detail for the land development plans, or permitting.

- l. §255-37.A – A direct pedestrian connection to the existing path on the shopping center property is recommended.*

The direct pedestrian connection to the existing path to the shopping center is added to the plans.

- m. §255-40.C.(2) – Access and circulation for fire-fighting and other emergency equipment, moving vans, fuel trucks, garbage collection, deliveries and snow removal shall be planned for efficient operation and convenience. Provide truck turning templates.*

Truck turning templates of fire-fighting equipment and a tractor trailer are added to sheet 4.

2. §280-135.G.(1)(c) –

- a. §255-20.B(5) – *The Transportation Impact Study was conducted in accordance with general traffic engineering principals The applicant indicates “the impact of site traffic results in essentially no measurable change in traffic performance and the underlying traffic performance is already acceptable, and with very low delays. Thus, the traffic impact of the proposal on the surrounding community is negligible.”*

Acknowledged.

- b. *In conjunction with the proposed development, the applicant should upgrade the intersection of Eagle Road and Strafford Avenue. ADA-compliant pedestrian facilities should be installed and the flashing stop control signal at the intersection should be updated to comply with the latest PennDOT standards.*

The applicant will provide an ADA ramp at Property frontage on the corner of Eagle and Strafford Roads. As noted above this information would typically be provided on the land development plans, or at the time of permitting. The ramp will align with the existing ramp on the northeast corner of the intersection. The traffic impact study does not indicate that the proposed redevelopment will cause the need for an upgrade to the Township’s flashing stop control signal at the intersection.

I believe these comments satisfactorily address the comments. Should you have any questions and/or comments, please contact me.

Sincerely,



David J. Sanders, P.E.