



February 28, 2019  
Via Blue Streak Courier

Radnor Township  
301 Iven Avenue  
Wayne, PA 19087

Attn: Stephen F. Norcini, P.E., Township Engineer

Re: Proposed Retail Store with Retail Sale of Gas  
Lancaster Avenue & Aberdeen Avenue  
Radnor Township  
Delaware County, PA  
PC181016

Dear Mr. Norcini:

Enclosed please find the following for your review:

- Fourteen (14) full-sized copies of the Preliminary/Final Land Development Plans, last revised 2/28/2019, Sheets 1-21 of 21.
- Four (4) reduced-sized 11" x 17" sets of the Preliminary/Final Land Development Plans, last revised 2/28/2019, Sheets 1-21 of 21.
- Two (2) copies of the revised Post Construction Stormwater Management Report, last revised 2/28/2019.
- Two (2) thumb drives containing the referenced submission materials.

*Please note: copies of the Traffic Impact Study (TIS) have been provided to Radnor Township by Traffic, Planning & Design, Inc. (TPD) under separate cover. Thumb drives containing their resubmission materials will also be provided by TPD separately. Responses to traffic-related comments from Amy Kaminski at Gilmore & Associates, Inc. have been addressed herein.*

We are in receipt of the following review letters for the subject site:

- Gilmore & Associates, Inc., dated September 24, 2018.
- Gannett Fleming, dated September 24, 2018.
- Gilmore & Associates, Inc., dated October 26, 2018.

We provide response to the comments in the above-referenced review letters as listed below in **bold** typeface:

**Gilmore & Associates, Inc., dated September 24, 2018**

**A. BACKGROUND**

*The subject properties are situated in the C-2 Commercial Zoning District operating under the permitted By-Right retail use. The parcels are located along the south side of Lancaster Avenue, east of Aberdeen Avenue at 302 E. Lancaster Avenue and 306 E. Lancaster Avenue. The parcel located at 302 E. Lancaster Avenue currently operates as a retail gasoline station with a full-service motor vehicle repair shop and the parcel located at 306 E. Lancaster Avenue operates as a gas station with a car wash. The Applicant proposes consolidating the two parcels, demolishing the existing structures and constructing a new retail convenience store of 4,736 SF, with 55 parking spaces and retail gasoline station with 12 gas pumps.*

**Response: Acknowledged.**

**B. DOCUMENTS REVIEWED**

1. *Preliminary Land Development plans, prepared for Wayne Property Acquisition Inc., prepared by Bohler Engineering, dated July 13, 2018, last revised August 31, 2018.*

**Response: Acknowledged.**

2. *Response Letter addressed to Mr. Stephen F. Norcini, P.E., Township Engineer, prepared by Bohler Engineering dated August 31, 2018.*

**Response: Acknowledged.**

3. *Waiver Request letter addressed to Mr. Stephen F. Norcini, P.E., Township Engineer, prepared by Bohler Engineering dated August 31, 2018.*

**Response: Acknowledged.**

4. *Subdivision and Land Development Application.*

**Response: Acknowledged.**

**C. TRANSPORTATION COMMENTS**

*We note several traffic and pedestrian generators are located within near proximity of the proposed development: St. Katherines of Siena Parish, St. Mary's Episcopal Church, St. Katherines School (Kindergarten – 8th grade), and Radnor Middle School (6th - 8th grade). We recommend the Applicant address the following comments in the impending Transportation Impact Study. The Applicant has indicated the project Traffic Engineer will respond to these comments; however, "C. Transportation Comments" shall remain until adequately addressed by the Applicant.*

**Response: So noted; will comply.**

1. *§255-26 – In addition to the reviewed information proposed by the Applicant in the Transportation Impact Study Scoping Application and based on the requirements of this section of the Township Ordinance, the Applicant shall also address the following items in the Transportation Impact Study:*

- i) *All traffic counts must be performed while local schools are in session.*

**Response: Will comply. All traffic counts were conducted while schools were in session.**

- ii) *Pedestrian counts must be obtained for all studied intersections.*

**Response: Will comply. Pedestrian counts were conducted at all study area intersections.**

- iii) *Weekday traffic counts must capture the morning arrival and afternoon dismissal for both schools. Please contact the identified schools to ensure the count period is extended to include 30 minutes prior to and after the start of school along with 30 minutes prior to and after the afternoon dismissal.*

**Response: Will comply – Based on further discussions/research, the Radnor Middle School day is 8:00AM to 3:00PM, and the St. Katherine School is 8:15AM to 2:30PM. Therefore, the 7:00-9:00AM time period is still appropriate. However, the 4:00-6:00PM time period was extended to 2:00-6:00PM.**

- iv) *Sunday counts must be obtained; contact both church offices to determine the peak attendance period on Sunday. Obtain vehicular and pedestrian counts 30 minutes prior to and after the noted attendance period.*

**Response: Will comply. Based on coordination with the adjacent churches, TPD counted 9:00-11:30AM on Sunday to capture the busiest service as well as the overlap between that service and 11:30 A.M. service.**

- v) *Expand the study area to include the following additional intersections:*

- *Lancaster Avenue & Wayne Avenue*
- *Lancaster Avenue & Louella Avenue*
- *Lancaster Avenue & St. Davids Road/Chamounix Road*
- *Aberdeen Avenue and Midland Avenue*
- *Midland Avenue & Louella Avenue*

**Response: Will comply. These additional intersections were included in the completed Traffic Study.**

- vi) *Include the 24 hour ADT volumes and speed data for the following roadway segments:*

- *Lancaster Avenue*
- *Aberdeen Avenue*

**Response: Will comply. See Appendix C of the completed Traffic Study.**

- vii) *Verify the size of the proposed building. The scoping application notes the retail building as 4,736 SF in size while the provided concept plan notes the retail building as 5,112 SF in size.*

**Response: Will comply. An updated plan has been provided in the traffic study referencing 4,736 SF retail building that is proposed in the land development plan set.**

- viii) *The Scoping Application indicates the distribution and assignment will be based on the existing traffic patterns, roadways surrounding the site and the proposed site driveway location and configuration. We would prefer the Distribution and Assignment more heavily favor the existing site distribution because we anticipate the traffic associated with future retail use will behave similar to the current retail use.*

**Response: The existing use is technically different from a traffic perspective compared to the proposed use as it contains automobile service and less associated pass-by traffic. The existing access is different than the proposed access as there will be less access points, more turning restrictions, and no cross-access between the two existing sites. Therefore, it is TPD's opinion that the proposed site needs to be treated as a new site based on existing patterns.**

- ix) *Section 17 Other Needed Analyses; left turn signal phasing analysis shall be prepared for all signalized intersections on all approaches.*

**Response: Will comply as feasible at the adjacent intersection of Lancaster/Aberdeen. It should be noted that, based on TPD's recent experience, left-turn phases will not be permitted by PennDOT without separate dedicated left turn lanes, which are difficult to provide along Lancaster Avenue due to a number of physical constraints.**

#### **D. REVIEW OF REQUESTED WAIVERS**

1. *§255-27.1(2) – Access to parking areas on commercial sites shall be controlled and shall be so located as to provide a minimum of 200 feet between points of access. The Applicant is requesting a waiver from this requirement. We do not recommend support of this waiver; minimally, we recommend the Applicant revise the western most driveway to a right-in only and eliminate the right out. We note the eastern full access driveway accommodates all movements, and the right exit movements can be performed at the full access driveway east of the proposed site. Although the Applicant indicates it does not appear feasible to provide a shared access; we continue to recommend the Applicant investigate a shared access with the adjacent property owners as opposed to noting it does not appear feasible.*

**Response: A waiver is no longer being requested as there is now only one access drive proposed per road frontage. The site is currently non-conforming in the number of existing driveways. There exist two (2) driveways on Aberdeen Avenue and four (4) driveways on Lancaster Avenue (six (6) total). The proposal calls for one (1) driveway on Aberdeen Avenue and one (1) driveway on Lancaster Avenue (two (2) total).**

2. *§255-30.A – Off-street loading spaces shall be no less than 14 feet wide, 60 feet long and 17 feet high, exclusive of drives and maneuvering space and located entirely on the lot being served. The Applicant is requesting a waiver from this requirement to provide a loading space with a width of 12.9 feet.*

**Response: A waiver from §255.30A is no longer requested as a 14-foot wide loading space is now proposed as shown on Sheet 3 (Site Plan).**

3. *§255-30.C – The maximum width of driveways measured at the street lot line shall be 35 feet; the minimum width shall be 20 feet. The Applicant is requesting a waiver from this requirement.*

**Response: A waiver from §255-29.A(12)(c) and §255-30.C is no longer being requested as the width of both driveways have been modified to meet §255-29.A(12)(c).**

4. *§255-31.F – The top or bottom edge of slopes shall be a minimum of three feet from property or right-of-way lines of streets or alleys in order to permit the normal rounding of the edge without encroaching on the abutting property. The Applicant is requesting a waiver from this requirement.*

**Response: A waiver is no longer requested from §255-31.F as grades are now proposed to tie into existing grades within three feet from property lines to permit the normal rounding of the edge without encroaching on the abutting property.**

5. *§255-37.G – Sidewalks and pedestrian paths shall be laterally pitched at a slope of not less than ¼ inch per foot to provide for adequate surface drainage. The Applicant is requesting a waiver from this requirement.*

**Response: A waiver is no longer requested from §255-37.G.**

#### **E. SUBDIVISION AND LAND DEVELOPMENT COMMENTS**

1. *§255-20.B(1)(n) – The preliminary plan shall show existing principal buildings, and their respective uses, and driveways on the adjacent peripheral strip and other significant man-made features within 500 feet of and within the site. Revise the plans to include the existing Verizon Wireless/CVS driveway adjacent to the site and any other man-made features within 500 feet of the site.*

**Response: Will comply. Sheet 21 (Aerial Plan) has been added to show existing principal buildings, and their respective uses, and driveways on the adjacent peripheral strip and other significant man-made features within 500 feet of and within the site.**

2. *§255-27.A(8) – Any applicant who encroaches within the legal right-of-way of a state highway is required to obtain a highway occupancy permit from the Pennsylvania Department of Transportation. The Applicant shall copy the Township on all correspondence with PennDOT and extend an invitation to the Township for all meetings. Additionally, in order to facilitate the Township review of the HOP submission, the Applicant shall include Gilmore & Associates as an “Engineering Firm” (BP ID No. 0288) on the permit application within the PennDOT ePermitting System.*

**Response: Will comply.**

3. *§255-27.B(3)(b) – The Township ultimate legal Right-of-Way on Lancaster Avenue (S.R. 0030) is 80 feet. Although the Applicant has stated that the right-of-way width shall be deferred to PennDOT, section §255-27.C(4) states that where a subdivision or land development contains an existing street of inadequate right-of-way width, the Board of Commissioners may require the reservation or dedication of rights-of-way to conform to the above standards. The Township should determine if the right-of-way should be 60 feet (as currently proposed) or 80 feet (30 and 40 foot half-width respectively).*

**Response: The plan complies with respect to Aberdeen Avenue. We respectfully disagree with this comment regarding Lancaster Avenue. Section 255.27.B(3)(b) merely lists Lancaster Avenue as an Arterial Street. Code Section 255-27(C)(1) indicates that Arterial Streets, such as Lancaster Avenue, shall have a Right-of-Way as recommended by the Pennsylvania Department of Transportation (PennDOT). In review, we have found that legal ROW, as recommended by PennDOT and identified on the plans, is conservatively shown to be 60 feet wide. This is based on the most recent available mapping showing the Legal ROW along Lancaster Avenue as either 50 feet (2012 PennDOT signal plan) or 60 feet wide (1993 Subdivision Plan from the subject property’s title commitment report) and based on physical monumentation and surveyor’s experience of nearby properties along Lancaster Avenue.**

4. *§255-27.H(3) – No structure, fence, planting or other structure shall be maintained between a plane two feet above curb level and a plane seven feet above curb level so as to interfere with traffic visibility across the corner within that part of the required front, side or rear yard which is within the clear sight triangle. Revise the landscaping plans to include 30 foot clear sight triangles at each of the site driveways. Numerous trees appear to be proposed within these limits.*

**Response: Will comply with respect to the street intersection as per this section of the code. However, we respectfully disagree with the application of this code section with respect to proposed site driveways. Section 255-6D{9} defines Clear Sight Triangle as “an area within a triangle bounded by two intersecting streetlines and a straight line drawn between points on each such line 30 ft from the intersection of said lines or extension thereof”. §255-27.H(3) refers to Clear Sight Triangle which only pertains to street intersections, not driveways. Specifically, there are no “streetlines” applicable to driveways thus making this requirement non-applicable to driveways. However, the applicant intends to provide clear sight distances in accordance with PennDOT regulations.**

5. *§255-27.H(6) – Minimum curb radii at street intersections shall be 10 feet for driveways. Revise the plans to clearly label all driveway radii and verify compliance with this section.*

**Response: While we respectfully disagree with the application of this code section with respect to proposed site driveways, as this code section is specific to street intersections and does not agree with §255-29.A(12) and §255-30.C of the code, however, should PennDOT or the Township desire larger radii, the Applicant is willing to comply.**

6. *§255-27.I(2) – Access to parking areas on commercial sites shall be controlled and shall be so located as to provide a minimum of 200 feet between points of access. We recommend revising the western-most Lancaster Avenue access from a right in/right out to a right in only; the full access east of this limited access is sufficient for the exiting movements to Lancaster Avenue.*

**Response: Will comply. The plan has been updated accordingly to meet §255-27.I(2) as shown on Sheet 3 (Site Plan).**

7. *§255-27.I(5) & §255-28 – Driveways shall be so located and designed as to provide a reasonable sight distance at street intersections. Revise the plans to include the required and proposed sight distances at each site driveway. Per the Township standards, 275 feet shall be provided along Aberdeen Avenue. However, PennDOT requirements exceed the Township standards along Lancaster Avenue and should therefore be used at this location. Refer to PA Code §441.8 for further guidance.*

**Response: Will comply – See Table 4 of the completed Traffic Study.**

8. *§255-29.A(14) – No less than a five-foot radius of curvature shall be permitted for all curblines in parking areas. Revise the plans to label all radii throughout the site.*

**Response: Will comply. Sheet 3 (Site Plan) has been revised accordingly to label all curbline radii throughout the site.**

9. *§255-30.E – We recommend relocating the loading area to a more optimal onsite location; the current location is too close to both proposed driveways to Lancaster Avenue and will likely disrupt onsite circulation. Although the Applicant’s engineer indicates anticipates a “general off-peak delivery” if the loading area remains at the current proposed location; we recommend a condition to the record plan to ensure deliveries will be made outside the AM, Middy and PM Peak hours.*

**Response: Will comply. In review, given removal of one of the prior driveways, the general off-peak delivery hours anticipated, the large size of the proposed loading area, and that the loading area is buffered from the adjoining residential uses to the south by the Wawa building itself, it is our opinion that the location proposed meets the intent of the Ordinance. General Note #31 has been added to Sheet 2 (Notes) indicating that Wawa will restrict large truck (WB-50) store deliveries (loading area) during the 7-9a and 4-6p peak hours.**

10. *§255-37.F – The grades and paving of sidewalks and pedestrian paths shall be continuous across driveways. Revise the plans to provide a maximum 2% cross slope as an extension of the pedestrian path across all driveways.*

**Response: Will comply. The plans will be revised accordingly in coordination with TPD’s HOP plan set preparation once complete.**

#### **F. GENERAL COMMENTS**

1. *Radnor Township may want to consider prohibiting left turns out of the access to Aberdeen Avenue through the construction of a channelized island. The Applicant has reasoned the left turn exit to Aberdeen Avenue will negatively impact access for patrons from the neighborhoods, churches, businesses and schools and will create an additional burden on Lancaster Avenue. We disagree with this argument and note the restriction may actually reduce the residents’ concerns with increased traffic volumes related to the proposed land development. We recommend further discussion with the Planning Commission and Board of Commissioners.*

**Response: It is TPD’s opinion that, based on existing patterns, only 6% of new trips and 4%-7% of pass-by trips attributable to the Proposed Site will travel to the south via Aberdeen Avenue. Therefore, this restriction will only serve to force these vehicles out to Lancaster Avenue via a left-turn, and a left-turn at the existing traffic signal to travel back to the neighborhood(s). Thus impacting multiple additional intersections. TPD will continue to coordinate with the Township on the potential left turn exit restriction from the Aberdeen Avenue access.**

2. *Given the land development project is located along Aberdeen Avenue and which is included in the Wayne Business Overlay District (WBOD), the Township may want to consider requesting the Applicant include similar site amenities to the standards required in the WBOD, in particular but not limited to street trees, and ornamental lighting. The Applicant has indicated their understanding this site is not within the WBOD which appears to imply an unwillingness to include similar site amenities included in the WBOD standards. We recommend further discussion with the Planning Commission and Board of Commissioners.*

**Response: Acknowledged. The Applicant is willing to work with the Township on this item; however, the Township should clarify that which it desires for consideration.**

3. *The Township is intending on installing a Traffic Adaptive System along Lancaster Avenue that will extend from the Radnor Township municipal line beginning at County Line Road and continuing west and including all signalized intersections to the Radnor Financial Center/St. David's Square Shopping Center intersection on Lancaster Avenue. St. Davids Road/Chamounix Road, Louella Avenue and Wayne Avenue are the next three logical intersections to be included in the Traffic Adaptive System.*

**Response: Acknowledged.**

4. *The Applicant has included a northbound right-turn lane on Aberdeen Avenue; we note the mast arm and the traffic signal cabinet on the southeast corner will need to be replaced.*

**Response: Will comply. This will be incorporated into the HOP plans to be prepared by TPD.**

5. *Revise general Note 12 on Sheet 2, "CONTRACTOR SHALL PROVIDE TRAFFIC CONTROL AND GENERALLY ACCEPTED SAFE PRACTICES IN CONFORMANCE WITH: "PENNDOT PUB 213, TEMPORARY TRAFFIC CONTROL GUIDELINES, THE MANUAL ON UNIFORM TRAFFIC CONTROL," AS WELL AS FEDERAL, STATE, AND LOCAL REGULATIONS WHEN DEMOLITION RELATED ACTIVITIES IMPACT ROADWAYS OR ROADWAY RIGHTS-OF-WAY.*

**Response: Will comply. General Demolition Note 12 on Sheet 2 (Notes) has been revised accordingly.**

6. *The air machine and associated concrete pad located adjacent to the Aberdeen Avenue entrance does not match the detail on Sheet 18 of the plans. Revise the plans and/or detail sheet accordingly.*

**Response: Will comply. Sheet 19 (Details) has been revised to match the air machine shown on Sheet 3 (Site Plan).**

7. *A detectable warning surface should be provided within the channelized island at the Lancaster Avenue western driveway.*

**Response: Will comply, if applicable. The plans will be revised accordingly in coordination of TPD's HOP plan set preparation once complete.**

8. *Install an R3-7R RIGHT LANE MUST TURN RIGHT sign, size 30"x30", along Aberdeen Avenue adjacent to the proposed right-turn auxiliary lane.*

**Response: Will comply, if applicable. The plans will be revised accordingly in coordination of TPD's HOP plan set preparation once complete.**

9. *Revise the plans to clearly indicate the location of all proposed signage. Verify all sign details included on Sheet 18 are required and remove any extraneous details.*

**Response: Will comply. The plans will be revised accordingly in coordination of TPD's HOP plan set preparation once complete in relation to sign location. The 'List of Applicable PADOT Details' on Sheet 17 (Details) denotes Signage Details per PADOT Publication 238 (Latest Edition).**

10. *The Applicant should revise the submission to include 10-scale plans of all proposed ADA facilities or modifications to existing facilities. The 10-scale plans should show the spot elevations and slopes of critical points to verify constructability.*

**Response: Will comply. 10-scale details of the ADA curb ramps in the right of way will be incorporated into the HOP plans to be prepared by TPD. Slopes of ADA areas within the site not detailed on the HOP Plans have been provided on Sheet 5 (Grading Plan) for clarification.**

11. *Revise the plans to include a detail for the proposed mountable curb.*

**Response: Will comply. This will be incorporated into the HOP plans to be prepared by TPD. The Land development plans merely reference the TPD plans for all improvements within the ROW, where the mountable curb is proposed.**

12. *In accordance with PennDOT standards, the sidewalk should be provided with a six (6) inch stone sub-base. Revise the detail accordingly.*

**Response: Will comply. This detail applicable to the frontage sidewalks will be incorporated into the HOP plans to be prepared by TPD. The land development plans merely reference the TPD plans for all improvements within the ROW, where the sidewalk requirement is applicable. The sidewalk detail on Sheet 17 (Details) refers to on-site sidewalk only.**

13. *Revise the turning templates as follows:*

- a. *Truck turning templates must be provided to ensure that the driveway intersection can safely accommodate the WB-62 design vehicle. If the largest permitted vehicle type to utilize the proposed site access is a WB-50 as shown on the plans, a note must be included on the plans indicating the WB-50 will be the largest permitted vehicle.*

**Response: Will comply. General Note 30 on Sheet 2 (Notes) has been added to indicate that “A WB-50 vehicle is the largest vehicle anticipated to access this development for deliveries.”**

- b. *Provide a Turning Template for trucks (fuel tanker, WB-50, and fire trucks) entering the site via a right-turn from eastbound and left-turn from westbound, on Lancaster Avenue.*

**Response: Given the Township driveway width requirements per §255-29.A(12)(c) & §255-30.C a right-turn from eastbound cannot be completed by trucks (fuel tanker, WB-50, and fire truck).**

- c. *Show the fuel tanker exiting the site driveway from the exit lane onto Lancaster Avenue.*

**Response: Given the Township driveway width requirements per §255-29.A(12)(c) and §255-30.C, a fuel tanker cannot exit the site driveway from the exit lane on to Lancaster Avenue.**

#### **Gannett Fleming, dated September 24, 2018**

*Gannett Fleming, Inc. has completed a review of the Preliminary land development plans for compliance with the Radnor Township Code. These Plans was reviewed for conformance with Zoning, Subdivision and Land Development, and other applicable codes of the Township of Radnor.*

*The applicant is proposing to demolish the existing gas station 2,223 SF building and gas canopy, as well as the existing 2,007 SF Gentle Touch Car Wash building and gas canopy and construct a 4,736 SF retail store with the retail sale of gas. The two lots will be consolidated as part of this project. This project is located in the C2 district of the Township.*

#### **Site Development - Preliminary Plans**

*Plans Prepared By: Bohler Engineering*

*Dated: 07/13/2018, and last revised 08/31/2018*

*The applicant has indicated in an August 31, 2018 letter that they are requesting the following waivers:*

1. *§255-27 .1.(2) - To permit less than 200 feet between points of access.*
2. *§255-29.A(12)(c) and §255-30.C- To permit the width of entrance and exit drives greater than 25 feet at the street.*
3. *§255-30.A- To permit a loading space less than 14 feet in width.*
4. *§255-31.F - To permit grading of slopes less than three feet from property or right-of-way lines.*
5. *§255.37.G- To permit sidewalks that are laterally pitched at a slope less than ¼ inch per foot.*

**Response: The waivers listed are no longer being requested as it is our belief that the plan complies with the code as detailed earlier in this comment response letter.**



*Sewage Facilities Planning*

1. *Final plan approval will not be granted until Planning Approval is received from the PA DEP.*

**Response: Acknowledged. Given the anticipated significant decrease in flows anticipated from this site compared to that which exists today, a PADEP sewer planning waiver has been applied for and is anticipated for this site.**

*Zoning*

1. *§280-52.G. - A breakdown of the proposed impervious coverage must be shown on the plans.*

**Response: Will comply. Sheet 3 (Site Plan) has been revised accordingly to provide a breakdown of the impervious coverage for building, pavement and concrete.**

2. *§280-112.C.- Areas of steep slopes containing slopes steeper than 14% shall be outlined as following (1) Areas containing slopes steeper than 14% but less than 20% shall be distinguished from the areas containing slopes of 20% or steeper. (2) Areas containing slopes of 20% and steeper shall be separately identified.*

**Response: Will comply. Sheet 4 (Existing Conditions/Demolition Plan) has been revised to highlight areas of steep slopes as outlined in §280-112.C.**

3. *§280-122 -All signs provided must be in accordance with this section.*

**Response: Acknowledged.**

*Subdivision and Land Development*

1. *§255.20.B(l)(b)- The name and address of the owner/applicant must be shown on the plans.*

**Response: Will comply. The equitable owner/applicant has been added to General Note #1 on Sheet 2 (Notes).**

2. *§255.20.B(l)(n)- Existing principal buildings and their respective uses, and driveways on the adjacent peripheral strip; sewer lines, storm drains, culverts, bridges, utility easements, quarries, railroads and other significant man-made features within 500 feet of and within the site (this includes properties across streets).*

**Response: Will comply. Sheet 21 (Aerial Plan) has been added to show existing principal buildings, and their respective uses, and driveways on the adjacent peripheral strip and other significant man-made features within 500 feet of and within the site.**

3. *§255-20.B(l)(o)[9]- The locations of fire hydrants must be shown on the plans.*

**Response: Will comply. Sheet 3 (Site Plan) and Sheet 6 (Utility Plan) have been updated to include all locations of fire hydrants.**

4. *§255.20.B(5)(a) - A transportation impact study shall be undertaken for all major subdivisions and land developments in the Township.*

**Response: Will comply. The updated study was submitted to the Township on 10/9/18.**

5. *§255-27.(C2)- 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.*

**Response: Acknowledged.**

6. *§255.27.I(2)- Access to parking areas on commercial, institutional, planned business and industrial sites shall be controlled and shall be so located to provide a minimum of 200 feet between points of access. There is less than 200 feet existing between the access points along Lancaster Avenue. The applicant has requested a waiver from this requirement.*

**Response: A waiver is no longer being requested as there is now only one access drive proposed per road frontage. The site is currently non-conforming in the number of existing driveways. There exist two (2) driveways on Aberdeen Avenue and four (4) driveways on Lancaster Avenue (six (6) total). The proposal calls for one (1) driveway on Aberdeen Avenue and one (1) driveway on Lancaster Avenue (two (2) total).**

7. *§255-29.A(12)(c)- The width of entrance and exit drives shall be a maximum of 25 feet at the street line and 35 feet at the curblines. The applicant has requested a waiver from this requirement.*

**Response: A waiver from §255-29.A(12)(c) and §255-30.C is no longer being requested as the width of both driveways have been modified to meet §255-29.A(12)(c).**

8. *§255.29.A(13)- Tire bumpers shall be installed as to prevent vehicle overhang on any sidewalk area.*

**Response: The plan proposes bollards to achieve this requirement around the building and thus it is our opinion that we meet the intent of the code.**

9. *§255.29.A(14)- No less than a five-foot radius of curvature shall be permitted for all curblines in parking areas. The radii of all curb lines must be clearly identified on the plans.*

**Response: Will comply. Sheet 3 (Site Plan) has been revised accordingly to label all curblines radii throughout the site.**

10. *§255.29.A(19)- All artificial lighting used to illuminate any parking space or spaces shall be arranged so that no direct rays from such lighting shall fall upon any neighboring property or streets, nor shall any high brightness surface of the luminaries be visible from neighboring residential properties or from a public street.*

**Response: Will comply. The plan proposes no “direct rays” into the street or neighboring properties and is proposing full cutoff fixtures as is the standard to address visibility of the luminaire surface.**

11. *§255-30.A- Each off street loading space shall be no less than 14 feet wide, 60 feet long and 17 feet high, exclusive of drives and maneuvering spaces, and located entirely on the lot being served. The applicant has requested a waiver from this requirement.*

**Response: A waiver from §255.30A is no longer requested as a 14-foot wide loading space is now proposed as shown on Sheet 3 (Site Plan).**

12. *§255-30.C - The maximum width of driveways and sidewalk openings measured at the street lot line shall be 35 feet; the minimum shall be 20 feet. The applicant has requested a waiver from this requirement.*

**Response: A waiver from §255-29.A(12)(c) and §255-30.C is no longer being requested as the width of both driveways have been modified to meet §255-29.A(12)(c).**

13. *§255-31.F- The top or bottom edge of slopes shall be a minimum of three feet from the property right-of-way lines of street or alleys in order to permit the normal rounding of the edge without encroaching on the abutting property. The applicant has requested a waiver from this requirement.*

**Response: A waiver is no longer requested from §255-31.F as grades are now proposed to tie into existing grades within three feet from property lines to permit the normal rounding of the edge without encroaching on the abutting property.**

14. §255.37.G- Sidewalks and pedestrian paths shall be laterally pitched at a slope of not less than ¼ inch per foot to provide for adequate surface drainage. The applicant has requested a waiver from this requirement.

**Response: A waiver is no longer requested from §255-37.G.**

15. §255.38.B- Street trees 2 ½ inches dbh at intervals of not more than 30 feet along both sides of new streets and along one or both sides of an existing street within the proposed subdivision or land development. The applicant has excluded the driveway width in the street tree calculations on sheet 7. This must be revised, or a waiver requested.

**Response: Will comply. The plan has been revised to identify the total property length in the calculation. The plan will propose an informal arrangement due to conflicts with existing utilities and proposed driveways.**

16. §255.39.H- All trees provided on the plan must be listed in this section of the code. If the applicant in proposing a different species, a waiver from this requirement must be requested.

**Response: Will comply. Sheet 8 (Landscape Plan) has been revised accordingly to comply with §255-39.H.**

17. §255.41.B- Additional width of streets adjacent to areas proposed for nonresidential use may be required as deemed necessary by the Board of Commissioners to assure the free flow of through traffic from vehicles entering or leaving parking and loading areas.

**Response: Acknowledged.**

18. §255-43.1.E(2)- The fee for non-residential subdivisions or land developments shall be \$3,307 per 6,400 square feet of floor area (existing or proposed), or portion thereof, which is based upon the estimated value of the land that would have to be dedicated for that amount of floor area.

**Response: Acknowledged.**

19. §255-49- Where appropriate, the developer shall install or cause to be installed, at the developer's expense, metal or fiberglass pole streetlights serviced by underground conduit in accordance with a plan to be prepared by the developer's engineer and approved by the Board of Commissioners.

**Response: Acknowledged**

20. §255-54.B- The central water system should be designed with adequate capacity and appropriately spaced fire hydrants for fire-fighting purposes pursuant to the specification of the National Fire Protection Association. Review and approval by the Township Engineer and the Township Fire Marshall shall be required in order to ensure that adequate fire protection is provided.

**Response: Acknowledged.**

#### *Stormwater Management*

1. The plans must include a detail of the Slow Release Underground Stormwater Basin. Items that must be shown in the detail include the length, width, and depth of the basin, number of chambers (row~ and columns), and location of outlet orifice.

**Response: Will comply. A site specific managed release concept basin detail has been added to Sheet 16 (Post Construction Management Details) for clarification.**

2. §245-22(C) - Stormwater hotspots. If a site is designated as a hotspot, it has important implications for how stormwater is managed. First and foremost, untreated stormwater runoff from hotspots shall not be allowed to recharge into ground water where it may contaminate water supplies. Therefore, the  $Re_v$  requirement shall NOT be applied to development sites that fit into the hotspot category (the entire  $WQ_v$  must still be treated). Second, a greater level of stormwater treatment shall be considered at hotspot sites to prevent pollutant washoff after construction. The parking area and gas service bays shall be considered stormwater hotspots.

**Response: Will comply. We will work closely with the Township Engineer to address this comment to the satisfaction of the Township Engineer.**

*The proposed Cultec Recharger 280HD has an open bottom design which would permit untreated stormwater to leave the system, which is not permitted for stormwater hotspots. The stormwater system must be redesigned such that no stormwater can infiltrate into the ground. In addition, we note that the geotechnical report in Appendix A found a high water table at the site which inhibits the natural filtration of stormwater. Therefore, no stormwater shall leave the site uncontrolled without first being filtered to remove oil contaminants.*

**Response: Will comply. The design proposes the basin to be lined in an effort to prevent untreated stormwater from leaving the system. We will work closely with the Township Engineer to address this comment to the satisfaction of the Township Engineer.**

3. §245-23(D)(1)- The following calculation formula is to be used to determine the water quality storage volume ( $WQ_v$ ) in acre-feet of storage required by this chapter:

$$WQ_v = [(P)(R_v)(A)]/12, \text{ where:}$$

$WQ_v$  = Water quality volume (acre-feet)  
 $P$  = 1 inch  
 $A$  = Area of the project contributing to the water quality BMP (acres)  
 $R_v = 0.05 + 0.009(I)$  where  $I$  is the percent of the area that is impervious surface  
[ $(\text{impervious area}/A) \times 100$ ]

*Calculations must be provided showing that the water quality storage volume is met.*

**Response: Will comply. The Stormwater Management Report, page 5, provides the calculation showing that the water quality storage volume has been met.**

4. §245-27(J)- Underground stormwater management systems must be designed to store the two- through one-hundred-year storms within a pipe or other open system that will permit the inspection and maintenance of the system. The entire storm must be placed in the pipe (i.e., the stone bedding around the pipe is not to be included in the volume calculations). The Cultec Internal Manifold Optional Inspection Port Detail must be revised to show that the inspection port is required and not optional. Also, please show that the stone bedding around the chambers is not included in the total storage volume.

**Response: Will comply. Sheet 16 (Post-Construction Stormwater Management Details) has been revised to require the inspection port, and the Post Construction Stormwater Management report has been revised accordingly to not include stone storage surrounding the Cultec arches within the stage storage calculations.**

5. Appendix A includes BMP 6.4.11: Slow Release Concept (SRC) which outlines the sizing criteria in Table 1 (page 144 of the PCSM Report). Calculations must be provided to show that the SRC meets the sizing criteria.

**Response: Will comply. The Stormwater Management Report has been revised to account for a MRC (Managed Release Concept) and detailing the criteria has been met as shown on pages 26 and 100-107.**

6. *Stormwater profiles must be provided showing all utility crossings.*

**Response: Will comply. Sheet 7 (Stormwater/Sanitary Profiles) has been added to the plan set.**

7. *Please clarify what manhole MH-01 ties into.*

**Response: Will comply. Sheet 7 (Stormwater/Sanitary Profiles) has been added to the plan which clarifies that MH-01 ties into an existing 18" stormwater pipe within Aberdeen Avenue.**

8. *More information must be provided on the BMP 6.6.4 Water Quality Filters BMP 6.6.4 to be installed at the stormwater inlets. Please clarify if these filters are to be left in place permanently. Please provide manufacturer information for the filters showing that oils will be filtered from the stormwater.*

**Response: Will comply. The Water Quality Filter detail is provided on Sheet 16 (Post Construction Stormwater Management Details). As they are a Post Construction Stormwater BMP they are intended to be left in place permanently and maintained as detailed in the sequence of BMP installation and removal on Sheet 15 (Post Construction Stormwater Management Notes).**

9. *Final approval of the stormwater management plan will be required as part of the Grading Permit process. Any revisions to the size or location of the individual structures or other features will be addressed at that time.*

**Response: Acknowledged.**

#### *Sanitary Sewer*

1. *Grease trap sizing calculations must be provided for the proposed 1,500-gallon grease trap.*

**Response: Will comply. Grease trap sizing calculations will be provided at time of building permit application.**

2. *Commercial lateral must be a minimum of 6" in diameter. The diameter of the 4" lateral must be revised.*

**Response: Will comply. Sheet 6 (Utility Plan) has been revised to label the commercial laterals as 6" diameter instead of 4".**

3. *A profile of the proposed sanitary sewer lateral must be provided.*

**Response: Will comply. Sheet 7 (Stormwater/Sanitary Profiles) has been added to the plan set.**

4. *The manhole frame and cover detail on sheet 17 of 19 must be replaced with the Radnor Township frame and cover detail.*

**Response: Will comply. Sheet 18 (Details) has been revised to replace the previously shown manhole frame and cover detail with the Radnor Township manhole frame and cover detail.**

#### *General*

1. *The Radnor Township tree protection detail must be shown on the plans.*

**Response: Will comply. Sheet 13 (Erosion & Sedimentation Control Details) has been revised to replace the previously shown tree protection detail with the Radnor Township tree protection detail.**

**Gilmore & Associates, Inc., dated October 26, 2018**

**I. BACKGROUND**

*The subject properties are situated in the C-2 Commercial Zoning District operating under the permitted By-Right retail use. The parcels are located along the south side of Lancaster Avenue, east of Aberdeen Avenue at 302 E. Lancaster Avenue and 306 E. Lancaster Avenue. The parcel located at 302 E. Lancaster Avenue currently operates as a retail gasoline station with a full-service motor vehicle repair shop and the parcel located at 306 E. Lancaster Avenue operates as a gas station with a car wash. The Applicant proposes consolidating the two parcels, demolishing the existing structures and constructing a new retail convenience store of 4,736 SF, with 55 parking spaces and retail gasoline station with 12 gas pumps.*

**Response: Acknowledged.**

**II. DOCUMENTS REVIEWED**

1. *Transportation Impact Study prepared for Wawa Lancaster Avenue & Aberdeen Avenue, prepared by Traffic Planning and Design, Inc., dated October 9, 2018.*

**Response: Acknowledged.**

2. *PennDOT Scoping Application Response Letter addressed to Ms. Susan LaPenta, District Traffic Services Division Manager, prepared by Traffic Planning and Design, Inc., dated October 9, 2018.*

**Response: Acknowledged.**

3. *PennDOT TIS Submission Letter addressed to Mr. Fran Hanney, Traffic Services Manager, prepared by Traffic Planning and Design, Inc., dated October 9, 2018.*

**Response: Acknowledged.**

4. *TIS Scoping Response Letter addressed to Mr. Steve F. Norcini, P.E., Township Engineer, prepared by Traffic Planning and Design, Inc., dated October 9, 2018.*

**Response: Acknowledged.**

**III. TRANSPORTATION IMPACT STUDY SUMMARY**

1. *Based on traffic counts included in the study, the existing site generates 130 Total AM Peak Hour Trips, 202 Total PM Peak Hour Trips, 209 Total Saturday Peak Hour Trips and 124 Total Sunday Peak Hour Trips.*

**Response: Acknowledged.**

2. *The proposed Wawa is anticipated to generate 438 AM Peak Hour Trips (104 New AM Peak Hour Trips), 354 PM Peak Hour Trips (84 New PM Peak Hour Trips), 331 Saturday Peak Hour Trips (113 New Saturday Peak Hour Trips), 331 Sunday Peak Hour Trips (113 New Sunday Peak Hour Trips) and a total of 4,282 vehicle trips during an average weekday.*

**Response: Acknowledged.**

3. *Noted Improvements:*

- a. *Northbound right turn lane on Aberdeen Avenue (PennDOT requested this improvement)*

**Response: Acknowledged.**

- b. *Upgrade Pedestrian Facilities at the intersection of Lancaster Avenue and Aberdeen Avenue.*

**Response: Acknowledged.**

- c. *Optimize intersection signal timings and provide traffic adaptive signal equipment at intersection of Lancaster Avenue and Aberdeen Avenue.*

**Response: Acknowledged.**

IV. *SUBDIVISION AND LAND DEVELOPMENT ORDINANCE*

1. *§255-20.B(5) –Based on the requirements of this section of the Township Ordinance, the Applicant shall address the following items in the Transportation Impact Study:*

- a. *Update Table 1 Roadway Characteristics Within Study Area to reflect the collected ADT and 85th percentile speed data for both Lancaster Avenue and Aberdeen Avenue.*

**Response: Will comply.**

- b. *The Applicant's engineer's response to our continued comment indicating the distribution and assignment should be similar to the existing site traffic patterns indicates the Applicant intends on treating the proposed site as a new site based on existing street patterns as opposed to our preferred recommendation to base the distribution and assignment on the existing site traffic patterns. While we agree the existing and proposed uses are not identical, the distribution and assignment appear to shift the majority of the exiting traffic from the Wawa site to exit north on Aberdeen Avenue. Reassess the existing driveway volumes against the existing street patterns and provide a more reasonable distribution and assignment.*

**Response:** The reason for this shift is due to the fact that the entire Proposed Site can exit onto NB Aberdeen Avenue to make a left-turn at the signal rather than an unsignalized left-turn onto Lancaster Avenue. Under existing conditions, this cannot occur because the existing BP is forced to exit onto Lancaster Avenue. In other words, if left-turn movements from the existing BP were able to do so via a NBL at the signal, the patterns on Aberdeen Avenue being referring to, would change significantly in the NB direction. Secondly, using only driveway trips to develop trip assignment percentages, it is difficult to distinguish between the differing patterns between new and pass-by trips. For example, on Aberdeen Avenue, a new trip from the south will appear at the driveway as a NBR and a WBL. Whereas, a pass-by trip on NB Aberdeen Avenue will appear as a NBR and a WBR. If the Existing and Proposed Site were primarily new trips, the requested methodology would be agreeable. However, the existing uses have pass-by trips. Therefore, putting aside the argument that the entirety of the Proposed Site can now utilize the Aberdeen Avenue driveways, putting aside the argument that the Proposed Site has different pass-by characteristics than the Existing Sites, TPD is unsure how to simply take the turning movement counts and extrapolate new and pass-by patterns from them. This fact is extremely important since the Proposed Site is 76% pass-by, which is not easily and accurately assignable based on turning movement patterns. It is TPD's belief that Pass-by trip assignment should be based on thru volume patterns on the main road, which is what was provided for in the analysis. Finally, based on a review of the turning movements at the existing driveways, the resulting percentage differences between methodologies are not significant enough to change the recommendations of this study. However, TPD will reassess the distribution and determine if minor changes should/can occur.

- c. *As requested in the Scoping Application review, the study was to include a left turn signal phase analysis for all signalized intersections on all approaches. No left turn phasing analysis was provided for any intersections in this submission, including approaches with dedicated left turn lanes already constructed but without a left turn arrow phase. Given the anticipated queues and additional delay predicted with the construction of the northbound right turn lane on Aberdeen Avenue at Lancaster Avenue, investigate altering the northbound approach to include a dedicated left turn lane and a combined through/right lane with a mirrored lane assignment on the opposing northern leg of Aberdeen Avenue at Lancaster Avenue. Also, include a left turn analysis for all signalized approaches that currently include a dedicated left turn lane but no left turn arrow phase.*

**Response:** See Appendix L. TPD did provide the requested left-turn phasing for the immediate intersection of Lancaster Avenue and Aberdeen Avenue. This evaluation determined left-turn phasing was not warranted. All other signalized intersections were determined to be off-site and not provided. Again, the Proposed Site will replace two existing sites, and is 76% pass-by. Therefore, very little site related traffic will reach these off-site intersections. Therefore, it is TPD's opinion that the proposed site should not be required to provide left-turn phasing at these off-site intersections where the proposed site does not have impact (See Table I). Furthermore, regarding the provision of a northbound left (NBL), the Applicant is willing to work with Radnor Township to provide a NBL instead of a NBR (that was requested). However, the Applicant does not control the other properties required to provide this improvement.

- d. *The site trip generation (Table 6) does not match the identified equations or the scoping application. The site trips are higher than calculated by the rates/equations. Although this is a more conservative approach, please provide additional justification or an explanation for the noted difference.*

**Response:** To be conservative, TPD utilized the building size (5.112 ksf) instead of the gross floor area (4.736 ksf) for trip generation purposes. However, subsequent traffic studies will be revised to generate traffic for the gross floor area, which will reduce the amount of traffic previously proposed to be generated.

2. *§255-20.B(5)(d)[2][a] – This section of the Township Ordinance requires the transportation impact study include a discussion regarding the internal pedestrian circulation. We note several pedestrian generators are located within near proximity of the proposed development: St. Katharine of Siena Parish, St. Mary's Episcopal Church, St. Katharine School (Kindergarten – 8th grade), and Radnor Middle School (6th - 8th grade). We recommend the Applicant investigate reversing the site layout to locate the Wawa building to the northeast corner of the site. This would inherently reduce the number of pedestrian and vehicle conflicts attributed to pedestrians crossing the gas pump area in order to access the Wawa market. If the layout remains as currently shown, investigate a safe and convenient pedestrian walkway to provide a direct route from the nearby schools for student access to the retail building.*

**Response:** As requested, we investigated a "flipped layout" and presented this alternative as well as an additional alternate plan with the pumps in front and the building in the rear. Both of these plans require zoning relief and waivers. We requested direction on which of the three plans to pursue. Neither the residents nor the board members present would provide a definitive preference as to which plan they preferred and thus we are resubmitting the plan subject to this application (the original plan) that is we feel provides for the best internal site circulation and ideally placed parking from a safety and convenience standpoint. This plan, however, has been further revised to eliminate need for waivers from the SALDO and now also provides an internal sidewalk from Aberdeen Avenue into the parking lot area as requested.



3. *§255-20.B.(5)(d)[4] This section requires calculating the vehicular trip generation utilizing SALDO Attachment 4, Township of Radnor Trip Generation Rates. The Applicant has utilized rates obtained from the industry standard Institute of Transportation Engineers Trip Generation 10th Edition, 2017, which is more appropriate for this development; therefore, we have no objection to a waiver from this requirement.*

**Response: No response necessary.**

V. GENERAL COMMENTS

1. *As was previously noted Radnor Township may want to consider prohibiting left turns out of the access to Aberdeen Avenue through the construction of a channelized island. The Applicant has reasoned the left turn exit to Aberdeen Avenue will negatively impact access for patrons from the neighborhoods, churches, businesses and schools and will create an additional burden on Lancaster Avenue. However, we are more concerned with patrons utilizing Midland Avenue to avoid the congestion on Lancaster Avenue to gain access to and from the proposed Wawa. We recommend continued discussions with Radnor Township regarding the elimination of this movement.*

**Response: It is TPD's opinion that, based on existing patterns, only 6% of new trips and 4%-7% of pass-by trips attributable to the Proposed Site will travel to the south via Aberdeen Avenue. Therefore, this restriction will only serve to force these vehicles out to Lancaster Avenue via a left-turn, and a left-turn at the existing traffic signal to travel back to the neighborhood(s). Thus impacting multiple additional intersections. TPD will continue to coordinate with the Township on the potential left turn exit restriction from the Aberdeen Avenue access.**

2. *The Township is intending on installing a Traffic Adaptive System along Lancaster Avenue that will extend from the Radnor Township municipal line beginning at County Line Road and continuing west and including all signalized intersections to the Radnor Financial Center/St. David's Square Shopping Center intersection on Lancaster Avenue. St. Davids Road/Chamounix Road, Aberdeen Avenue, Louella Avenue and Wayne Avenue are the next logical intersections to be included in the Traffic Adaptive System. The study notes an improvement to include providing traffic adaptive equipment at the intersection of Lancaster Avenue and Aberdeen Avenue; however, the equipment would not provide a benefit without connection to adjacent intersections. We recommend the Applicant continue discussions with the Township on this transportation benefit.*

**Response: Acknowledged. The Applicant has agreed to provide for Traffic Adaptive equipment at the intersection of Lancaster Avenue and Aberdeen Avenue, but feels the addition of Traffic Adaptive equipment at the intersections of Lancaster Avenue and St. Davids Road/Chamounix Road, Lancaster Avenue and Louella Avenue and Lancaster Avenue and Wayne Avenue should not be the responsibility of the Applicant. The Applicant will continue discussions with the Township.**

3. *Revise Tables 11 and 12 to include the seconds of delay for each movement where there is a drop in LOS in order to clearly identify the increase in delay for each movement.*

**Response: Will comply.**

4. *Provide the detailed crash data under separate cover for review directly to the Township Engineer. Provide the safety confidentiality notes recommended by PennDOT as this report is for an engineering safety review only and not for public review.*

**Response: Will comply.**

5. *Revise the report to use the latest HCM 6<sup>th</sup> edition in all capacity analyses, where possible and Identify which signalized intersections are not supported by HCM 6<sup>th</sup> edition.*

**Response: So noted. HCM Methodology will continue to be utilized (with the exception of Comment V.6 below) since this is the methodology that was outlined in the Scoping Application that was reviewed by both Radnor Township and PennDOT.**

6. *Provide the HCM 2000 results for the Lancaster Avenue and Wayne Avenue intersection and revise the LOS tables accordingly.*

**Response: Will comply.**

7. *Add a discussion in the report regarding any modifications to the parking restrictions along Aberdeen Avenue. Consider relocating parking from the northbound approach to the southbound departure of Aberdeen Avenue south of Lancaster Avenue.*

**Response: Will comply.**

8. *As noted in the previous review, the Township is requesting the Applicant fully investigate a shared driveway access with several businesses located along E. Lancaster Avenue to the east (Verizon and CVS). The intent of a shared driveway access is to:*

- a. *To reduce the number of curb cuts along the south side of E. Lancaster Avenue.*

**Response: The Applicant feels that the current application accomplishes this intent, as the existing site(s) currently provide for four (4) curb cuts along the south side of E. Lancaster Avenue, whereas one (1) curb cut is proposed.**

- b. *Shift the left turn movements into and out of the proposed Wawa further away from the signalized intersection (further east) and eliminate the need for the "courtesy gap left turn movement".*

**Response: The proposed driveway has been located at/near the eastern property line, as far away from the signal as possible based on the property(s) controlled.**

- c. *Allow internal retail interaction between the three retail sites. The Applicant has indicated the CVS driveways are configured currently for an entrance only and a separate exit only driveway and approval will be required to share the access. We understand a shared access will likely result in a modification to the existing access located between CVS and Verizon; however, this would be a benefit for all parties for the reasons listed above.*

**Response: So noted.**

9. *We remind the Applicant the above comments are in addition to our Preliminary Land Development review dated September 24, 2018.*

**Response: Acknowledged.**

Should you have any comments, questions or concerns, or require any additional information, please feel free to contact me directly at (215) 996-9100.

Sincerely,

**BOHLER ENGINEERING PA, LLC**



Eric A. Britz, P.E.  
Project Manager

cc: Roger Phillips, Gannett Fleming, Inc.  
Gary Karakelian, Wayne Property Acquisition Inc. (via email)  
Peter Karakelian, Wayne Property Acquisition Inc. (via email)  
Nicholas J. Caniglia, Esq. (via email)  
Matthew Hammond, Traffic, Planning, & Design, Inc. (via email)