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September 28, 2015

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Mr. Jason Bobst, Township Manager
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RE: Westover Sporting Complex - VRJ Associates, L.P.
South Schuylkill Avenue and Port Indian Road
West Norriton Township, Montgomery County, PA
McMahon Project No. 812073.12

Dear Mr. Bobst:

This letter is in response to the traffic review comments issued by Heinrich & Klein Associates, Inc. on behalf of the Township in a letter dated April 20, 2015 with regard to the above-referenced project. We offer the following responses to the Traffic Impact Study comments.

Traffic Impact Study Comments

Comment #1: Per PennDOT Pub. 46: The TIS is unchanged from its completion date of July 12, 2012. The TIS should be updated based on new traffic counts, and the analysis revised using updated software in compliance with various default values including saturation flow, peak hour factors, lost time adjustment at signalized intersections, and critical and follow-up headways at unsignalized intersections.

Response: The Transportation Impact Study, dated September 28, 2015, has been updated, including new 2015 traffic counts and updated traffic analyses.

Comment #2: As stated previously, "The TIS focuses on the weekday PM peak hour and a Saturday midday peak hour. During the discussion of the scope for the TIS, it was requested that clarification be provided to support that there would be no more than negligible use of the facilities during the weekday AM time period. A discussion to this affect, with supporting documentation, should be included in the report." The response is lacking in any supporting documentation as was requested in response to a scoping request from McMahon Associates, Inc. prior to the preparation of the TIS.

Response: The weekday morning peak period is not a focus of this study, because the new uses within the proposed outdoor recreation facility will not typically host significant sporting events that would result in peak site traffic during the

weekday morning commuter period. As further verification, our office completed site observations of the three other studied sites during the weekday morning peak period, and we found very little traffic use during the weekday morning peak period, and no obvious traffic associated with the organized sporting events.

Comment #3: As stated previously, "Also during the discussion of the scope for the TIS, it was requested that a separate analysis be provided whereby Hemlock Road is not used for full access, but pedestrian/emergency access only. This alternative access analysis should be included in the report." The alternative access analysis was requested in response to a scoping request from McMahon Associates, Inc. prior to the preparation of the TIS.

Response: The updated Transportation Impact Study includes evaluation of traffic conditions with the Hemlock Road connection as an emergency access only. The current plan does not include a full access connection to Hemlock Road.

Comment #4: As stated previously, "Also during the discussion of the scope for the TIS, it was requested that the TIS include a review of the parking supply needs, and a review of the internal circulation including intersection alignment and parking aisles that intersect the main roads through horizontal curves, etc. The TIS should be revised to include this discussion." Many of the uses do not fit exact definitions of land uses relative to parking supply needs and may require additional analysis using data collected locally at similar facilities. Activities for most of the proposed facilities will be affected by time-of-day, day-of-week or seasonal fluctuations to the benefit of other facilities. Some uses are not conveniently situated relative to available parking. The review of parking supply needs was requested in response to a scoping request from McMahon Associates, Inc. prior to the preparation of the TIS. Further, many of the comments relative to internal circulation, provided in the review of the Preliminary Land Development Plan, deal with more than road widths and will benefit from the review of the Applicant's Traffic Engineer, which was also requested in response to a scoping request from McMahon Associates, Inc. prior to the preparation of the TIS.

Response: The updated Transportation Impact Study includes a detailed parking evaluation based on a methodology which was reviewed with and accepted by the Township Traffic Engineer prior to commencing the parking evaluation. It is based on a conservative assessment of every on-site amenity, accounting for all anticipated users (athletes, coaches, spectators, etc.), and assuming an equal number of parked vehicles. Furthermore, this assessment assumes an unlikely highest demand scenario with all facilities in use at the same time. Although this is a conservative parking assessment, it reveals there is sufficient parking supply to serve the site, and there will be extra unused parking spaces available. The

Transportation Impact Study does not include an evaluation of the internal circulation, as this has been addressed by the Site Civil Engineer. Furthermore, it is our understanding that review comments were offered from other Township consultants as well, which related to internal circulation, and these have also been addressed by the Site Civil Engineer.

Comment #5: As stated previously, "It is not clear that use of the existing and the proposed clubhouses are properly considered in the estimation of trip generation. There also needs to be some discussion on special events such as tournament/championship soccer, football games, banquets, etc., time of day and day of the week that special events might be expected to occur, the amount of traffic these events might generate, and what type of special provisions might be required to accommodate special events in conjunction with ongoing activities at the other uses in the complex." The TIS provides no information relative to what is contained within or what is the current usage of the existing clubhouse, and how that relates to existing trip generation at the site. Nor is there any information on what will be contained in the existing clubhouse and in the proposed new clubhouse after development and how that relates to future trip generation and parking supply needs at the site. The TIS must provide a breakdown of each on-site facility and how that facility is modeled in the trip generation calculation to assure that each land use component has been accounted for. It should be noted that at least two of the three sites used to model trip generation do not have clubhouse facilities, while the third site provides indoor facilities, but the nature of the indoor facilities is not clear. The TIS must also provide discussion/analysis of traffic and parking for special events to assure that procedures are in place to safely and efficiently manage traffic and parking during special events. It will be helpful to provide a schedule or calendar of events to provide an indication of the frequency, magnitude and duration of special events.

Response: The breakdown of the on-site uses and the anticipated trip generation was reviewed with and accepted by the Township Traffic Engineer prior to completing the study. As described in the updated Transportation Impact Study, the existing clubhouse currently houses a restaurant, a pro shop, locker room facilities, and a banquet facility. Other than reducing the golf course from 18 holes to 9 holes, the existing clubhouse facility will remain unchanged and will continue to house the existing facilities. Since there are no new activities or uses proposed for the existing clubhouse, the existing clubhouse is not the subject of this study as it relates to assessing traffic impacts. Also as described in the study, the proposed new building will contain amenities that are ancillary and supportive to the outdoor recreation use, including offices for the facility staff, training rooms, locker rooms, and an area to provide short-term child care for individuals using the other outdoor recreation facilities. The parking evaluation contained in the Transportation Impact Study assumes a highest demand

scenario with all facilities in use at the same time, which is an approach endorsed by the Township Traffic Engineer.

Comment #6: As stated previously, "A description of the number of fields/courts/venues for the three trip generation sites should be provided and compared with the proposed development in terms of total number of fields/courts/venues and in terms of number of fields/courts/venues per acre." Without these descriptions, the magnitude of the trip generation for the proposed development cannot be verified.

Response: The requested information regarding the three trip generation sites, as well as a comparison to the proposed development is contained in the updated Transportation Impact Study, and this information was reviewed with and accepted by the Township Traffic Engineer prior to completing the study.

Comment #7: As stated previously, "The acreage used for parking was subtracted from the total site acreage in calculating the trip generation rate per acre for the three trip generation sites; and, the acreage used for parking at the existing clubhouse and the remaining five golf holes was subtracted from the total site acreage in calculating the trip generation per acre for the proposed development. The rationale for deducting these site areas is not clear since parking is an integral part of each site. Clarification, including an alternative calculation for comparison purposes, should be provided." The response provides no further documentation/analysis to provide clarification for these assumptions. Not enough is known of the other three sites.

Response: Our office prepared further justification regarding the trip generation based on the acreage of land area devoted to the recreation and sporting uses, and we also evaluated several alternative approaches to calculating the site trip generation. This information was reviewed with the Township Traffic Engineer prior to completing the study, and the trip generation methodology contained in the study has been accepted by the Township Traffic Engineer.

Comment #8: As stated previously, "The TIS should include a detailed discussion of the potential future uses of the existing clubhouse, restaurant, and banquet/meeting facility and the proposed new clubhouse including calculation of trip generation for the uses proposed within each building (only for any change in use for the existing building), time of day and day of the week for peak usage of the two buildings, and whether the usage of these two buildings should be surcharged on the trip generation of the outdoor facilities since at least two of the three trip generation locations used to model trip generation for the proposed development do not have comparable indoor facilities. A discussion relative to the continued use of the existing clubhouse, restaurant, and banquet/meeting facility and golf course, in identical fashion to the current usage, should also be provided." The response

provides no further documentation/analysis to provide clarification of the proposed usage of the existing and proposed new clubhouses. The proposed future usage of both buildings is required to be known to verify trip generation estimates.

Response: Please see the response to Comment 5.

Comment #9: *Satisfied, subject to verification of the weekday PM peak hour trip generation.*

Response: No response necessary.

Comment #10: *Satisfied, subject to verification of the weekday PM peak hour trip generation. As stated previously, "Based on the estimated trip generation included in the TIS, but subject to resolution of comments relative to the calculation of the total new trip generation, the proposed development is preliminarily anticipated to generate a total of 358 new PM peak hour trips. The resultant Traffic Impact Fee calculation is preliminarily estimated to be \$262,929.52 (i.e., 358 new PM peak hour trips X \$734.44 per PM peak hour trip= \$262,929.52)."*

Response: No response necessary.

Comment #11: *As stated previously, "The Applicant must agree to conduct an after-study of the proposed development, potentially at more than one time of the year and perhaps during a special event, and abide by the findings of the after-study as agreed to after full review by Township staff." It is agreed that there may be no legal basis to require an after-study. Due to the many outstanding questions relative to potential trip generation for the proposed facility, it is not unusual in these circumstances to require an after-study to verify/adjust to correct for that which is unknown at the time of the TIS.*

Response: An after-study of the proposed development can be completed, if needed, based on concurrence of the scope by the applicant and Township prior to completing the study.

Comment #12: *As stated previously, "Figure 7 should be corrected relative to the total distribution percentages applied to West Main Street and to School Lane." Any corrections/revisions/updates to the TIS must be completed by a qualified/licensed Engineer.*

Response: This has been addressed as part of the updated Transportation Impact Study.

Comment #13: *As stated previously, "A discussion should be added to the TIS relative to the area of influence of the proposed facility (i.e., is the proposed facility intended to primarily serve the residents of West Norriton Township or will there be efforts to*

attract users from areas outside the Township?). The distribution percentage of 35% assigned to Egypt Road suggests a significant attraction of users outside the Township." To the extent the proposed facility will have a significant attraction of users from outside West Norriton Township suggests additional intersections may be impacted by new trips generated by the proposed facility. This also raises questions relative to the validity of the Upper Uwchlan Township and Limerick Township sites as valid comparison sites since these appear to be primarily for the benefit of local Township residents except when used for certain special events.

Response: The trip distributions were reviewed with and accepted by the Township Traffic Engineer prior to completing the study. The trip distributions contained in the updated Transportation Impact Study are based on the existing area traffic patterns along the study area roadways, and the orientation of traffic to and from the site is emphasized along the major area roadways, as would be expected for a facility with both a local and regional draw.

Comment #14: *As stated previously, "Be aware that West Norriton Township has been planning for the closure of School Lane at West Main Street. This, together with the alternative access plan for the extension of Hemlock Road for pedestrian/emergency access only will result in a diversion of traffic through the intersection of West Main Street with Egypt Road/Jefferson Avenue/Orchard Lane. The intersection of West Main Street and Egypt Road/Jefferson Avenue/Orchard Lane should be added to the study area, particularly in the case for the alternative access analysis with pedestrian/emergency access only via Hemlock Road." The response is non-responsive to the comment. The study area should be expanded as noted.*

Response: As requested, the intersection of West Main Street and Egypt Road/Jefferson Avenue/Orchard Lane is included in the updated Transportation Impact Study.

Comment #15: *As stated previously, "It is proposed to widen Port Indian Road for a separate left turn lane into the north access driveway. The plans indicate widening of the entire frontage along Port Indian Road." No further response required, however, refer to comments #23 and #24 relative to the Roadway Design Evaluation for Port Indian Road.*

Response: No response necessary.

Comment #16: *As stated previously, "The Sight Distance Analysis recommends that landscaping along the property frontage and vegetation/tree removal along Port Indian Road is required to provide adequate safe sight distances; and, is subject to verification during the detailed engineering of the site access design." The posted speed limit along Port Indian Road is 25 miles per hour. The TIS uses an assumed speed of 35 miles per hour, which is probably a better indicator of travel speeds along Port*

Indian Road. A Speed Study should be completed to determine the 85th% vehicle operating speeds to assure adequate safe sight distances are provide for access along Port Indian Road. It should be noted that the required and available sight distances need to be added to the plans for the south access to Port Indian Road.

Response: The Port Indian Road speed study results are contained in the updated Transportation Impact Study, and the sight distance evaluation has been revised based on those results.

Comment #17: *As stated previously, "The development of hourly traffic volumes for the Traffic Signal Warrant Analysis at the intersection of Egypt Road and Port Indian Road, and in particular for the Port Indian Road approach, should be explained. A Spot Speed study should be completed along Egypt Road to determine the 85th% vehicle operating speeds for use in evaluating signal warrants. The Traffic Signal Warrant Analysis should be completed with and without provision of access via Hemlock Road. While not affecting the requirements for the side street approach, the Four-Hour and Peak Hour warrants appear to have been evaluated with the assumption of two lanes per direction along Egypt Road. If after re-analysis of the Traffic Signal Warrants for this intersection continue to indicate that installation of a new traffic control signal is still not warranted, it is questionable that safe and efficient access can be provided to/from the proposed development via Port Indian Road. If access via Port Indian Road is to remain as part of the development, traffic monitoring of this intersection must be made a condition of approval, and funds escrowed to install a new traffic control signal in the event actual traffic volume satisfies warrants for installation of a new traffic control signal." The provision of safe and convenient access for the proposed development will be dependent on the safe and efficient operation of the intersection of Egypt Road and Port Indian Road. The existing Stop-sign controlled approach of Port Indian Road is indicated to operate at LOS F during the existing weekday afternoon and existing Saturday midday peak hours. The TIS must provide an accurate analysis of traffic signal warrants for this intersection.*

Response: The updated Transportation Impact Study contains a Peak Hour Volume Warrant and a Four Hour Volume Warrant evaluation as discussed with the Township Traffic Engineer. The results show that a traffic signal is warranted at the intersection of Egypt Road and Port Indian Road. We believe the information provided at this time is sufficient for preliminary land development plan submission and approval. Furthermore, as needed, the additional studies and work necessary to obtain a signal permit prior to final land development approval will be completed at the appropriate time for Township and PennDOT review.

Comment #18: *Satisfied, subject to receipt of a Level of Service matrix included in an updated TIS.*

- Response: The matrices are included in the updated Transportation Impact Study.
- Comment #19: *As stated previously, "The results of the level of service analysis indicate a need to widen Egypt Road at School Lane for a separate eastbound left turn lane with optimized traffic signal timings. If full access via Hemlock Road remains an integral part of the proposed development, these improvements should be implemented by the Applicant." The response is non-responsive to the comment.*
- Response: The full access connection to Hemlock Road is not proposed, and the results of the traffic analysis show the impact of the development is mitigated at the intersection of Egypt Road and School Lane, and therefore, no improvements are necessary or proposed at this intersection.
- Comment #20: *As stated previously, "The Level of Service figures should be corrected to illustrate a separate left turn lane and a shared through/right turn lane for the northbound approach of South Schuylkill Avenue. The length of the northbound left turn lane should be increased to 100 feet as a condition of approval for the proposed development." The response is non-responsive to the comment.*
- Response: The figures have been corrected within the updated Transportation Impact Study. As recommended, it is proposed to provide the off-site improvement to lengthen the northbound Schuylkill Avenue left-turn lane if feasible, or pay the Act 209 Traffic Impact Fee.
- Comment #21: *As stated previously, "One or more Highway Occupancy Permits may be required for improvements within the state highway right-of-way along West Main Street and/or Egypt Road. New or revised Traffic Signal Permits may also be required. All correspondence to/from PennDOT should be copied to the Township." No further comment is required except to reiterate the all correspondence to/from PennDOT should be copied to the Township.*
- Response: The Township will be copied on all correspondence with PennDOT.
- Comment #22: *As stated previously, "A Parking Study should be provided to support the parking tabulation provided on the plans. The Parking Study must address parking requirements to accommodate special events in addition to the continued use of other facilities to the extent applicable. The results of the Parking Study must show that all parking needs, including the convenience of parking, can be accommodated on-site so there is no overflow parking into the surrounding neighborhoods. Indeed, special provision for on-site overflow parking may have to be considered for special events." There is not sufficient information to document peak parking demand for many, if not all, of the facilities proposed for the development. Documentation must be provided*

to assure that there will be an adequate parking supply even during special events so that there will be no spillover into surrounding neighborhoods. The removal of the bleacher seating at the championship soccer field raises concern that there is not adequate planning for special event parking.

Response: The updated Transportation Impact Study includes a detailed parking evaluation based on a methodology which was reviewed with and accepted by the Township Traffic Engineer prior to commencing the parking evaluation. It is based on a conservative assessment of every on-site amenity, accounting for all anticipated users (athletes, coaches, spectators, etc.), and assuming an equal number of parked vehicles. Furthermore, this assessment assumes an unlikely highest demand scenario with all facilities in use at the same time. Although this is a conservative parking assessment, it reveals there is sufficient parking supply to serve the site, and there will be extra unused parking spaces available. Based on the conservative nature of this parking evaluation, assuming all facilities are in use at one time, and assuming no carpooling between spectators and athletes, for example, and considering there remains available, unused parking spaces, it is our opinion the proposed parking supply is sufficient not only for normal operations, but also for special events.

Comment #23: *The Roadway Design Evaluation recommends the Township consider implementation of a number of low cost safety improvement measures along Port Indian Road and along Schuylkill Avenue. Replacement of worn signage and pavement markings along both roads should be implemented by the Township as part of normal maintenance activities. The remaining recommendations should be implemented by the Applicant in conjunction with access improvements to either roadway.*

Response: It is proposed to implement feasible, low-cost safety improvement measures along Port Indian Road and South Schuylkill Avenue in connection with this development. We believe the information provided at this time is sufficient for preliminary land development plan submission and approval; however, during final land development review we agree to confirm the scope of the improvements with the Township.

Comment #24: *The Roadway Design Evaluation also suggests that additional measures may be identified upon completion of a more detailed roadway design evaluation or safety audit. These more detailed evaluations should be completed by the Applicant and any recommendations be implemented in conjunction with access improvements at the Applicant's expense.*

Response: It is proposed to implement feasible, low-cost safety improvement measures along Port Indian Road and South Schuylkill Avenue in connection with this

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development. We believe the information provided at this time is sufficient for preliminary land development plan submission and approval; however, during final land development review we agree to confirm the scope of the improvements with the Township.

If you have any questions or comments regarding this letter or the updated Transportation Impact Study, please contact me.

Sincerely,



Christopher J. Williams, P.E.
Vice President & General Manager - Exton

CJW/JDG/ab

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