

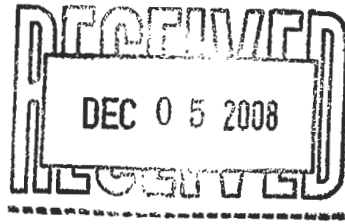


MONTGOMERY COUNTY PLANNING COMMISSION

box 311 • norristown • pennsylvania • 19404-0311 • (610) 278-3722
office location: suite 201 • one montgomery plaza • swede & airy streets • norristown pa
FAX (610) 278-3941 • Website www.montcopa.org/plancom

December 3, 2008

Mr. Daniel Kerr, Manager
Limerick Township
646 West Ridge Pike
Limerick, Pennsylvania 19468



Re: MCPC #08-0271-001
Plan Name: Sanatoga Spring, LP
(4 Lots/197,550 sq. ft. Comprising 70.70 Acres)
Situate: Evergreen Road (E)/Pottstown Expressway
(US-422) (S)
Limerick Township

Applicant's Name and Address
Sanatoga Interchange Associates
2701 Renaissance Boulevard
Fourth Floor
King of Prussia, PA 19406

Contact: Jerry Castafiero
Phone: 610-491-4460

Dear Mr. Kerr:

We have reviewed the above referenced land development application in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as requested by the township in a letter received October 22, 2008. We forward this letter as a report of our review and recommendations.

Background, Site Description and Surroundings

The application requests preliminary plan approval for the development of a new retail commercial center with six buildings totaling 197,500 square feet of space located on a 70.7 acre development site (66.44 acres- net after ROW; Tax Parcel # 37-00-00664-001). The largest of the proposed six buildings is a 148,000 sq. ft. building with 651 parking spaces and a proposed fueling facility on the lot. The applicant's development site is bisected by the Lightcap Road extension with a 42.24 acre portion of the proposed development site located on a vacant lot south of the retail commercial development. This area is proposed to contain a 3.60 acre detention basin to manage the stormwater runoff generated on the development core located on the north side of Lightcap Rd. The plan shows a significant area set aside for earthen soil/fill generated by the re-grading for the commercial pads sites that will be temporarily stored on the vacant parcel. The 28.46 acre portion of the parcel located immediately north of Lightcap Rd. and east of Evergreen Road contains the core area of the site's retail center development.

The proposed retail/commercial development core area is bordered on the east by the 605,000 sq. ft. Philadelphia Premium Outlet Center (Chelsea Property Group, a subsidiary of Simon Property Group) situated on a 78-acre parcel. The site is bordered on the northwest by the US-422 Freeway and right-of-way and to the west by Evergreen Road (Township Line). The parcel is located in the LLI—Limited Light Industrial Zoning District and is being developed in accordance with the *Interchange Overlay District* development option with the development and dimensional standards of §184-224.B Mixed Use Provisions - which apply when three or more non-residential uses are proposed. The Interchange Overlay District requirements, dimensional standards and criteria for qualifying for this development option were amended and approved by the township on April 11, 2008. We reviewed the proposal in a letter to the township dated April 7, 2008, in which we did not support the adoption of

the new requirements. Our reasoning was that with a new comprehensive planning process underway we believed the township should defer action pending its adoption of a comprehensive plan and utilize its recommendations for the interchange area to assist in its future land use planning for the interchange area.

It appears from our reading of the Overall Site Plan notes (Sheet 4 of 65) that no waivers are requested to develop the site as proposed. In summary, the applicant, Sanatoga Interchange Associates, L.P. King of Prussia, is seeking approval for the following:

- A site plan which proposes a mixed-use development with various uses in six (6) separate buildings, including a fueling facility. The construction of approximately 197,500 square feet of retail commercial space includes a large 148,000 sq. ft. Building "A" with approximately 651 parking spaces.
- The construction of a 3.6 acre bio-retention pond on the 42.248 acre tract immediately southwest of the retail complex- separated by the Lightcap Road Extension.
- The re-alignment and construction of a new Sun Pipeline for L.P. high pressure petroleum products with no building pad sites lying within the 40 ft. wide pipeline easement area.

Plan Review Comments

1. Conditional use approval:

The development of this parcel as proposed is permitted by "Conditional Use" as outlined by §184-163.1 *Interchange Overlay Option* (amended by the township on April 10, 2008). It is not clear if or when conditional use approval for this development plan was granted and if there are any conditions to be considered in reviewing the development at preliminary plan stage review. We request that a copy of the conditional use decision and any required "conditions of approval" be forwarded to this office for inclusion in our records.

2. Internal traffic circulation and the arrangement of parking and intersections:

a. Conflicts with the arrangement of parking spaces along the access drive.

We have concerns about the arrangement of the primary access drive where in some areas parking stalls are directly next to the roadway. The primary roadway is arranged so that it serves several large parking bays and serves to connect and distribute vehicles within the retail center. We are concerned about the safety and added congestion that may result from this arrangement. The arrangement of parking stalls next to the roadway sets up an inevitable conflict with vehicles backing out into the access road, causing more vehicular conflicts and congestion near areas where the aisles intersect. In addition this arrangement of back-out parking spaces into the access drive, next to Building "A" increases the potential un-safe vehicular movements and congestion issues along the access driveway. We recommend a rearrangement of the parking lot spaces and limiting the parking aisles from intersecting the access drive so close to the principle entry areas in order to create a more congestion free traffic flow. We believe these spaces should be removed in order to facilitate a more efficient vehicular flow within the retail center. We have enclosed a graphic which highlight two areas of concern in which vehicles back out into a principal access drive which helps to efficiently distribute vehicles to various parking bays. (Attachment: Areas of concern drawn on the "Signage and Stripping Plan Sheet #30.01). One of these is – near the eastern property boundary with Philadelphia Premium Outlets.

b. Intersections

The access drive in front of Building "A" has a "T" intersection with the entry roadway that has signalized intersection with Lightcap Road near the property boundary with the Philadelphia Premium Outlets. The proposed arrangement with a wide cartway near the signalized intersection at Lightcap Road which then narrows down to 30 ft. wide roadway near the building may cause unnecessary congestion near Building "A" where a hard left turn is needed. We recommend the applicant examine an alternative roadway arrangement with a more "sweeping curve" at this intersection rather than the proposed turning lane.

3. Transportation Issues

a. Traffic Management Issues:

It is our understanding that the township is currently studying the Sanatoga Interchange Area in an effort to determine the long term roadway network improvement needs and to create funding partnership opportunities. We continue to support a more comprehensive approach to the land use and transportation issues at the Sanatoga Interchange and urge the township to jointly address common roadway and land use issues at the interchange with Lower Pottsgrove Township. We recommend that Limerick Township meet and work with Lower Pottsgrove Township to insure that the future development at the interchange is an asset for both townships.

b. Traffic study: Final Traffic Study and Trip Distribution:

We have not received a final traffic impact study and request that when completed it be forwarded to this office for review.

c. Public Transit Stop:

The Township should insure the availability of public transit by SEPTA bus service to this center and insure that an appropriate bus stop/shelter area is provided with this development. The proposed development will generate a high number of non-skilled labor jobs. A significant portion of the labor pool for these jobs may lack access to a personal automobile and be required to travel to and from these jobs using public transit. It is not apparent where a public bus shelter and drop-off area will be located within the retail center. We recommend the township and applicant consider where and how public transportation facilities will be accommodated within the site's development. We recommend the applicant modify the plan to include a transit stop on-site and coordinate this plan with SEPTA to insure that an appropriate transit location is included in the development site plan.

3. Pedestrian accommodation:

a. Sidewalks:

The applicant's site plan does not propose sidewalks along the parcel's Lightcap Road frontage as required by §155-15.C. & D. of the township's Subdivision and Land Development code. It appears the applicant' site plan has omitted a waiver request for these requirements. We strongly support the provision of sidewalks and pedestrian improvements along Lightcap Road in order to connect with the existing sidewalks constructed along the front of the Philadelphia Premium Outlets development. We recommend the township insure that sidewalks are constructed and connected to the existing sidewalks along the frontage of the Philadelphia Premium Outlets in order to facilitate safe pedestrian movements in this area. We anticipate that some workers will utilize public transit and the provision of sidewalks along the roadway will assist in their safety along Lightcap Road.

b. Pedestrian Circulation:

The applicant should provide additional measures to enhance and promote safe pedestrian movements from the various parking lot areas to the building entry areas. Several parking lot islands and buffer areas could be utilized to create more of a pedestrian network within the center rather than be planted with grass. We recommend the township insure that the applicant addresses the requirements that the parking areas be connected with a "pedestrian walkway system" as required by §184-224.M.8. of the Township's Zoning Code.

5. Architectural Design standards:

Several of the buildings are arranged within the development site with their rear facades/side structural walls facing visually prominent and highly traveled roadways. The township should insure that the architectural facades facing US 422 Freeway, Evergreen Road and Lightcap Road address the intent of its architectural requirements and guidelines which are part of the Interchange Overlay Option. We

recommend the township insures that the applicant's submittal and supporting preliminary plan documentation fully addresses the requirements of §184-224.M. Architectural Design standards.

6. Coordination with Lower Pottsgrove Township:

As mentioned above in our transportation comments the township should closely cooperate with Lower Pottsgrove Township to jointly address common land use, traffic, and planning issues at the Sanatoga interchange area. We recommend that Limerick Township meet and work with Lower Pottsgrove Township to insure that the potential multiplier effects of this development are fully captured as an asset for both townships with respect to future land development plans.

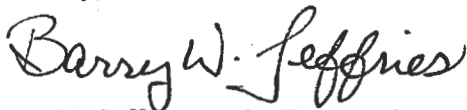
Recommendation

We recommend preliminary plan approval of this proposal provided that the above mentioned review comments are fully addressed to the satisfaction of the township and the proposal complies with your local municipal land use regulations and all other appropriate regulations.

Please note that the review comments and recommendations contained in this report are advisory to the municipality and the final disposition for the approval of any proposal will be made by the municipality.

Should the governing body approve a final plat of this proposal, the applicant must present the plan to our office for stamp and signature prior to recording with the Recorder of Deeds office. A paper copy bearing the municipal seal and signature of approval must be supplied for our files.

Sincerely,



Barry W. Jeffries, Senior Design Planner, ASLA
610-278-3444 – bjeffrie@mail.montcopa.org

c: Sanatoga Interchange Assoc., LP, Applicant
Langan Engineering, Applicant's Engineer
All Twp. Planning Commission Members
Joseph J. McGrory, Jr., Esq., Twp Solicitor
Khaled Hassan, Twp Engineer
Rodney P. Hawthorne, Mgr. Lower Pottsgrove Twp

Attachments: Reduced Copy of Applicant's Plan
Reduced Copy – MCPC Areas of concern for parking conflicts
- Signage and Stripping Plan Sheet #30.01

BOUNDARY PROPERTY LINE
PARKING RETRACTION LINE
DRIVEWAY RETRACTION LINE
PROPOSED CURB
PROPOSED SIDEWALK
PROPOSED BIKE-RETENTION WALL
PROPOSED BIKE-RETENTION BASK
PROPOSED SIGN
PEDESTRIAN CONCERN
ACCESSIBLE WAY
TRASH ENCLOSURE
GRADE PALE
10'-18" FLOODPLAIN LIMITS
10'-18" FLOODPLAIN LIMITS
RETAINMENT/RETENTION BOUNDARY
PROPOSED LIGHTING
EXISTING LIGHTING

PAVEMENT LEGEND	
	CONCRETE PAVEMENT
	HEAVY DUTY PAVEMENT
	STANDARD DUTY PAVEMENT

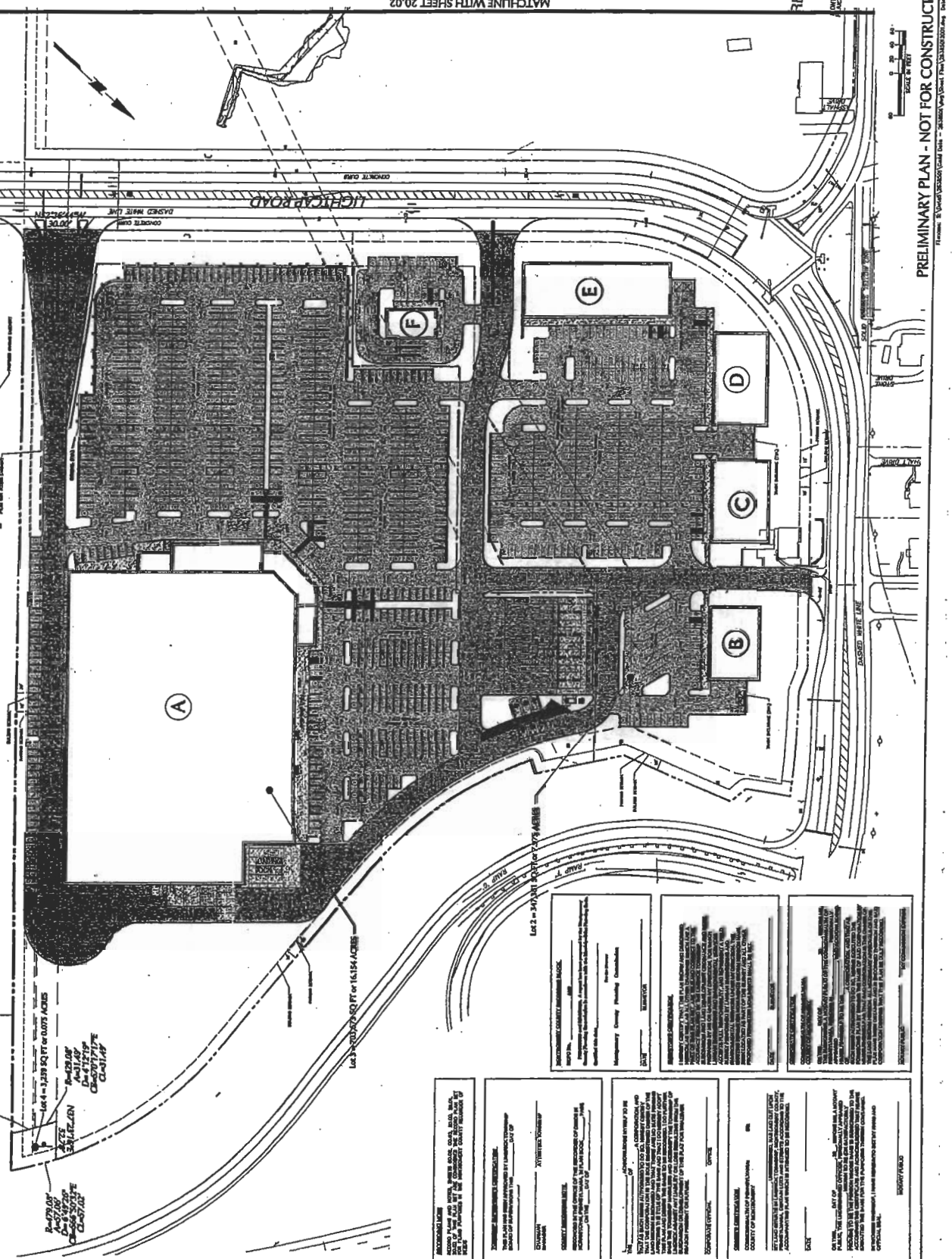
CHRISTOPHER M. HAGER
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SANATOGA SPRINGS
LANCASTER TOWNSHIP
PENNSYLVANIA
MANTONVILLE COUNTY
Drawing Title

RECORD PLAN

Project No.	200001
Date	28 OCTOBER 2008
Scale	1"=40'
Drawn By	DKA
Last Revised	X
Sheet No.	20.01
Sheet Count	8 OF 42



MATCHLINE WITH SHEET 20.02

RECEIVED
OCT 28 2008
MANTONVILLE COUNTY

PRELIMINARY PLAN - NOT FOR CONSTRUCTION

Part of
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ACKNOWLEDGMENT
I, the undersigned, being duly qualified and licensed as a Professional Engineer in the State of Pennsylvania, do hereby certify that the above is a true and correct copy of the plan as shown to me by the applicant and that I am not aware of any fraud or deception in connection therewith.

COMMISSIONER OF REVENUE
I, the undersigned, being duly qualified and licensed as a Commissioner of Revenue in the State of Pennsylvania, do hereby certify that the above is a true and correct copy of the plan as shown to me by the applicant and that I am not aware of any fraud or deception in connection therewith.

PLANNING COMMISSION
I, the undersigned, being duly qualified and licensed as a member of the Planning Commission in the State of Pennsylvania, do hereby certify that the above is a true and correct copy of the plan as shown to me by the applicant and that I am not aware of any fraud or deception in connection therewith.

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MANAGEMENT PLAN
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MANAGEMENT PLAN
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Scale of Plot
0 10 20 30 40

LEGEND

DRIVEWAY
ACCESSIBLE PARKING SPACES
LOADING DOCK

SIGN LEGEND

SYMBOL	DESCRIPTION
①	12" x 18" SIGN
②	12" x 24" SIGN
③	12" x 36" SIGN
④	12" x 48" SIGN
⑤	12" x 60" SIGN
⑥	12" x 72" SIGN
⑦	12" x 84" SIGN
⑧	12" x 96" SIGN
⑨	12" x 108" SIGN
⑩	12" x 120" SIGN

LEGEND

PARKING AREAS
OF CONCERN:
VEHICLES BACK INTO
THE CENTER'S ACCESS
DRIVE

MCPC 08-271-01
DEC. 2008
BJEFFRIES

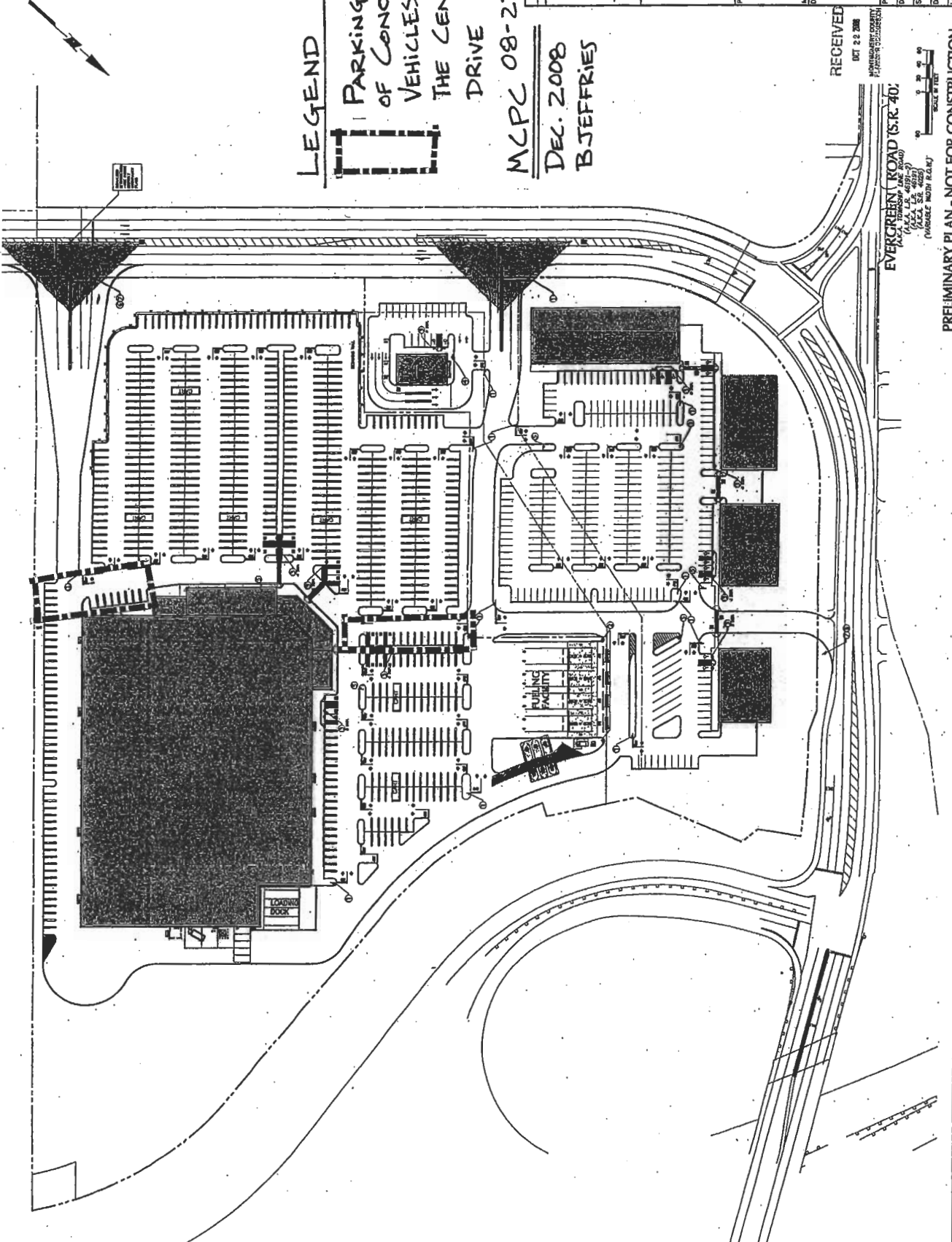


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SANATOGA SPRINGS
UNINCORPORATED
MONROE COUNTY
PENNSYLVANIA

SIGNAGE AND STRIPING PLAN

Project No.	2008001	Drawing No.	30.01
Date	20 OCTOBER 2008	Scale	1"=40'
Drawn By	BJEFFRIES	Check By	BJEFFRIES
Level	Final	Sheet	30 OF 42



RECEIVED
DET 22 2008
MONROE COUNTY
PENNSYLVANIA

EVERGREEN ROAD (S.R. 740)
(A.K.A. BROADWAY) (A.K.A. 740)
(W/ADJACENT NORTH R.O.W.)
SCALE OF 1"=40'

PRELIMINARY PLAN - NOT FOR CONSTRUCTION

Drawn by: BJEFFRIES, Date: 10/20/08, Title: 30.01, Scale: 1"=40', Sheet: 30 OF 42