



**WEST WHITELAND TOWNSHIP
Planning Commission
Agenda
Tuesday, February, 15, 2022
7:00 P.M.**

[Etiquette for
hybrid meetings](#)

Meeting will be held in-person and via Zoom

[Register for Zoom Meeting](#)

Call by Phone: 1-646-558-8656

Meeting Packets can be found on Township website

Reminder to meeting participants: Please speak clearly into the microphone

CALL TO ORDER

PLEDGE OF ALLEGIANCE

REVIEW OF MEETING MINUTES

1. Approval of Meeting Minutes: January 18, 2022

PUBLIC COMMENT/CONCERNS/QUESTIONS

PLANS

1. Commerce Pursuit Capital
Address: 50-60 W. Boot Rd.
First Review: Sketch Plan
Request: Construction of a 57,620 sf Personal Care Facility.

NEW BUSINESS

ANNOUNCEMENTS

ADJOURNMENT

Next Meeting: March 1, 2022



MEMORANDUM

DATE: February 11, 2022
TO: Planning Commission
FROM: John R. Weller, AICP
Director of Planning and Zoning

SUBJECT: Proposed Personal Care Living Facility
Sketch plan

APPLICANT: Commerce Pursuit Capital, LP
1300 Virginia Dr., Ste. 215
Fort Washington, PA 19034

SITE ADDRESS: 50-70 W. Boot Rd.
West Chester, PA 19380

TAX PARCELS: 41-5-264, 41-5-265, and 41-5-266

ZONING: NC, Neighborhood Commercial

DESCRIPTION: Construction of a 148-unit personal care facility on a tract comprising three lots totalling 6.59 acres.

Background

The subject tract comprises three lots covering a total of 6.59 acres along the south side of W. Boot Rd. abutting both Boot Road Park and the Banbury Shops shopping center; the rear of the tract abuts a PECO transmission corridor. Two of the lots are developed: 60 W. Boot Rd. is the site of the historic Greenway Cottage (Township Site #156), which has been adaptively re-used as a multi-tenant office building, along with several non-historic outbuildings; there is another multi-tenant office building on the adjacent lot at 50 W. Boot Rd. 70 W. Boot Rd. is a wooded flag lot, the bulk of which lies behind 60 W. Boot and west of 50 W. Boot.

The tract has unusual topography. Along the Boot Rd. frontage, it slopes moderately down from west to east. Moving south, the downward slope to the east becomes more pronounced before rising steeply to a ridge that crests and slopes down again at the southern boundary of the property. As indicated on the drawing, an area near the middle of the tract has slopes between 15% and 25%, which qualify as "precautionary slopes." There are no streams or FEMA-designated floodplains on the tract.

On February 22, 2012, the Board of Supervisors ("Board") approved a conditional use application for 60 W. Boot Rd. to allow construction of additions to Greenway Cottage to expand the existing office use and for placement of a new sanitary sewer line through areas of precautionary and prohibitive slopes. This project never advanced beyond conditional use approval and remains unbuilt today. The Commission will recall that conditional use

approvals run with the land and do not expire, although they may be superseded by a subsequent action of the Board - such as a new conditional use approval.

The Applicant is proposing the construction of a “personal care facility” as defined in §325-8 of the West Whiteland Township Zoning Ordinance (“Zoning”). Since the tract is in the Neighborhood Commercial (“NC”) zoning district, it is eligible for development under the provisions of the Institutional (“IN”) overlay district pursuant to Article X of the Zoning; personal care facilities are permitted in the IN overlay district by §325-45.B(13). Where a use is allowed under the IN provisions, the area and bulk requirements of §325-45.C supersede those of the underlying district. The “Zoning Tabulation” section on Sheet 1 includes the IN district requirements along with references to a “Bonus Menu,” which we adopted in 2015 to encourage specific improvements in certain zoning districts. As noted on the Bonus Menu, its provisions may only be applied to those zoning districts where it is specifically cited. Since the Bonus Menu is not cited in either the NC or the IN districts, the Zoning Officer has determined that this project is not eligible for these incentives. The area and bulk requirements shown are otherwise correct.

The proposed facility will occupy a single building with a footprint of 57,616 sq.ft. We define a personal care facility as one that accommodates individuals who are not able to live independently and may require a degree of assistance with tasks such as bathing and dressing, but do not require ongoing nursing or medical care. Such facilities may include ancillary uses such as group dining, fitness, personal care, retail sales and services, and similar activities. The drawing notes that it will contain 148 units, but it is not clear how many residents this may accommodate, nor is there any indication of what other services and facilities are to be provided. The proposed building height is shown as 41.6 ft., so this is to be a multi-story building, but the number of stories is not stated. It appears that parking will be provided at the basement level (note the entrance on the east side of the building), an arrangement facilitated by the topography of the site. Staff is pleased to note that the plan will preserve Greenway Cottage (but not the non-historic additions) along with the small office building at the northeast corner of the site. The design eliminates all the existing access points along Boot Rd. in favor of a new driveway from Darlington Dr., which has a traffic signal at the Boot Rd. intersection. Staff finds this a significant improvement over the existing condition, and we note that the 2012 plan for 60 W. Boot. Rd. featured a similar design.

As noted above, the proposed use is allowed by right at this location pursuant to §325-45.B(13) of the Zoning and must comply with the area and bulk provisions for the IN overlay district found in §325-45.C: the NC district standards as well as the Bonus Menu references on Sheet 1 should be removed to avoid confusion. The IN overlay specifies a limit on impervious coverage but not on building coverage, so we do not consider building coverage separately for uses subject to the IN provisions. Based upon the information provided on the drawing, the Zoning Officer has calculated that the total proposed impervious cover is approximately 110,673 sq.ft., or 38.6%, which is well within the 50% limit imposed by §325-45.C(2). The plan indicates that the height of the proposed building will be 41.6 ft., which exceeds the limit of 35 ft. established in §325-45.C(3) of the Zoning. The Zoning Officer has further determined that at the northwestern corner of the proposed building the design violates §325-45.C(5), which requires buildings to be set back at least 15 ft. from parking lots. Finally, while the Zoning allows access drives within the 50 ft. property line setback, this violates §281-35 of the Subdivision and Land Development Ordinance, as described in more detail in the attached review from Theurkauf Design and Planning.

The project as shown requires conditional use review under the following sections of the Zoning:

- §325-71.B(2)(a) to allow the placement of a sanitary sewer line within an area of prohibitive slopes (the 2012 conditional use Decision & Order included approval of a similar design);
- §325-71.C(2)(a) to allow construction of an otherwise allowed structure on precautionary slopes; and
- §325-124.A(1) to allow construction of a non-residential building¹ with more than 20,000 sq.ft. of floor area.

Tonight is the first presentation of this Sketch Plan to the Planning Commission.

Consultant Reviews

Sketch plans are not a required step in the development process, so Applicants have the option of having one or more of our consultants review the plan or proceeding with just a Staff review. This Applicant has requested reviews by our landscaping and planning consultant, Theurkauf Design and Planning (“Theurkauf”), and by our historic preservation consultant, Commonwealth Heritage Group (“CHG”).

- **Theurkauf review dated February 2, 2022.** Comments #1 and #2 observe that the design shown does not provide the required buffer width along the perimeter of the tract, note that the project will require the removal of many mature trees (and therefor require extensive compensatory planting), and question how well the historic structure has been incorporated into the design. The remaining comments discuss these concerns in greater detail, describe additional landscaping deficiencies (around the stormwater basin, along the building façade, and in the parking lot), and note the need to accommodate pedestrians better.
- **CHG review dated January 28, 2022.** CHG appears generally favorable, noting that the H-shaped footprint of the proposed building provides an opportunity to minimize its visual mass, particularly in relation to the historic structure. CHG commends the elimination of the existing parking areas along the Boot Rd. frontage as well as the removal of the non-historic additions to Greenway Cottage; Staff concurs on both points. CHG notes that the Applicant did not provide any façade renderings or architectural description of the proposed building. Such information should be provided as early as possible in the review process, as these factors are critical in determining the impact upon the historic building and the neighborhood generally. CHG describes the proposed landscaping as “minimal” and recommends more substantial buffers and screens, consistent with the Theurkauf review.

Staff Comment

Staff is of the opinion that the proposed use is suitable for this location, and this design promotes several Township policies:

- Existing access points along Boot Rd. - a collector street - will all be eliminated in favor of a new, unified access to Darlington Dr., which provides access to Boot Rd. at an existing traffic signal.

¹ Although the occupants of this facility may be considered “residents,” the individual units are not independent dwellings. Also, the nature of the operation results in an impact on the community different from a true residential use, such that we deem it non-residential for the purposes of applying the provisions of the Zoning.

- There will be a new sidewalk segment connecting Boot Road Park to the Banbury Shops.
- The Applicant will preserve the historic Greenway Cottage and remove more recent, non-historic additions, thereby highlighting the historic core.

While we acknowledge these positive aspects, we also have some concerns that the Commission may wish to discuss with the Applicant before moving forward:

- The intrusion of access drives into required buffer areas and the Zoning violations (parking setback and building height) suggest that this building footprint and the project generally may be too large for this site. The Commission may wish to discuss with the Applicant the feasibility of reducing the scale of the project.
- The Applicant should clarify the maximum number of residents that may be accommodated: the plan states that there will be 148 “residential units” without indicating the number of residents per unit.
- The Commission will recall that the impact upon emergency service providers - particularly the local ambulance company - is always a concern when facilities of this type are proposed. The Applicant should address how they will minimize this impact.
- The Theurkauf review identifies numerous landscaping concerns. The Applicant should advise how they intend to resolve these and their commitment to comply with our landscaping requirements.
- While it is unlikely that the Applicant has completed the architectural plans at this time, they should provide concept sketches of the proposed building as early as possible. Architectural details and finishes will be critical to designing a building that will be aesthetically pleasing and compatible with Greenway Cottage and the neighborhood generally.

As a sketch plan, it is not appropriate for the Commission to make an official motion regarding this submission; however, you may wish to summarize your principal concerns and suggestions in the interest of providing useful feedback to the Applicant.

Attachments

1. “Proposed Personal Care Living Facility: Site Layout for Sketch Plan” dated December 10, 2021, most recently revised January 17, 2022.
2. Theurkauf review dated February 2, 2022.
3. CHG review dated January 28, 2022.

Plans\123\50-70 Boot\PC memo - 220211



MEMORANDUM

TO: John Weller, AICP, West Whiteland Township Director of Planning and Zoning
Justin Smiley, AICP, West Whiteland Township Planner
John A. Jaros, Esq., Riley, Riper, Hollin & Colagreco

FROM: Edward A. Theurkauf, RLA, ASLA, APA
Kelsey Stanton Murphy, ASLA

DATE: February 2, 2022

SUBJECT: **REVIEW COMMENTS – COMMERCE PURSUIT CAPITAL SKETCH PLAN DATED 1-17-22**

Please note our review comments pertaining to the following documents that we received on 1-18-22 and to a site visit on 1-24-22:

- Sketch Plan consisting of 3 sheets by Edward B. Walsh & Associates, Inc.; and
- Sketch Plan Application dated 1-18-22.

**REVIEW COMMENTS – COMMERCE PURSUIT CAPITAL
SKETCH PLAN DATED 1-17-22**

February 2, 2022

1. Neighborhood Compatibility – Section 325-3.A of the zoning ordinance (ZO) requires that the development shall clearly reflect the relative suitability of areas for such development. Section 325-44 (ZO) lists design standards that development should follow, including natural resource protection, maximizing harmonious visual relationships with surroundings, and historic preservation. The proposed layout presents the following issues of ordinance noncompliance and functional concerns that shall be addressed:
 - A personal care facility is proposed directly adjacent to the Banbury Shoppes service area without the required screen buffer. Thus, unscreened dumpsters, loading operations, and parking in the rear of the shopping center would be prominently visible to residents of the proposed facility.
 - The plan proposes extensive disturbance of existing trees and wooded areas. The proposal shall demonstrate compliance with the compensatory planting requirements of section 281-34 of the subdivision and land development ordinance (SLDO).
 - The plan proposes a large institutional building, stormwater basin, and parking immediately adjacent to a Class II historic resource without required buffers. There is inadequate room for landscaping that would soften views of the development from the historic building, and existing large trees that provide context for the historic resource would be removed.

2. Screen Buffers – Section 281-35.D (SLDO) requires 50-foot-wide vegetated screen buffers between incompatible land uses as identified in section 281-35.A (SLDO). Per section 281-35.C (SLDO), buildings, drive aisles, and other structures that diminish visual screening are not permitted in screen buffers. The plan indicates screen buffers not meeting the 50-foot width requirement and shall be revised as follows:
 - a. East (Commercial Use) – A drive aisle, fire lane, and underground stormwater basin are proposed in the screen buffer required between the site and the adjacent shopping center. Proposed improvements including a drive aisle, loading area, and emergency access road limit the effective buffer width to 16.3 feet. The existing State Farm office building has a nonconforming buffer of 10 feet.

The plan shall be revised to remove improvements from the required 50-foot wide screen buffer between the proposed personal care facility and Banbury Shoppes. Plantings shall provide a high level of visual screening as required.

The State Farm office building is an existing nonconformity that should also have effective screening proposed from the shopping center.

**REVIEW COMMENTS – COMMERCE PURSUIT CAPITAL
SKETCH PLAN DATED 1-17-22**

February 2, 2022

- b. Historic Use – Parking, a stormwater basin, and drive aisles are proposed in the screen buffer required between the onsite historic resource and the proposed institutional use. Proposed improvements would reduce the effective buffer width to 20 feet.

The plan shall be revised to increase the buffer area between the historic resource and adjacent incompatible uses and related improvements. The Township could consider a waiver on the 50-foot screen buffer width requirement if the personal care facility is designed with compatible architecture, and if effective buffering is provided through vegetative or architectural means.

3. Basin Perimeter Buffer – Section 281-35.E (SLDO) requires 25-foot-wide vegetated perimeter buffers around stormwater management basins. The plan indicates a stormwater basin directly adjacent to Boot Road, the two existing office buildings, drive aisles, and parking. No perimeter buffer is proposed.

Per sections 281-35.E.2 and 281-35.F.4 (SLDO), stormwater basins that are designed as naturalistic basins with 100% native plantings and side slopes with maximum 4:1 slope are not required to have perimeter buffers.

Either the plan shall be revised to redesign the basin as naturalistic, or a 25-foot perimeter buffer shall be provided with plantings as required.

4. Tree Protection and Compensatory Plantings – Section 325-44.A (ZO) states that the landscape shall be preserved in its natural state insofar as practical by minimizing tree removal. Section 281-34.A (SLDO) requires that every effort be made to preserve mature trees and significant existing vegetation and to incorporate them into an overall planting design. Section 281-34.G (SLDO) requires compensatory plantings for mature trees that are removed.

Approximately 3.5 acres of the 6.59 acre tract is wooded. The southern half of the site consists of fairly healthy and diverse woodland with mature Walnut, Tulip Poplar, Oak, and Ash trees. A hedgerow in the middle of the site includes mature White Pine and Tulip Poplar trees. Also, a number of large Maple, Horse Chestnut, and Spruce trees surround the historic building. The plan indicates grading and improvements that would remove about 85% of the site's tree cover, including all mature trees around the historic building. The plan does not quantify tree removal or nor does it demonstrate whether there is room on site for the required mitigation plantings.

The land development plan shall comply with compensatory planting requirements.

**REVIEW COMMENTS – COMMERCE PURSUIT CAPITAL
SKETCH PLAN DATED 1-17-22**

February 2, 2022

5. Pedestrian Accessibility – Section 325-37.A.7.a.1 (ZO) requires developments to provide pedestrian connections consistent with the Township Comprehensive Plan. Section 325-37.A.7.a.2 (ZO) requires pedestrian access to public parks. The Township’s 2019 addendum to the Comprehensive Plan, the *Bicycle and Pedestrian Plan*, proposes sidewalks along the south side of Boot Road from Whiteland Drive to Pottstown Pike. The following shall be addressed:
 - a. There is no pedestrian access from the site buildings to the Boot Road sidewalk. The plan shall indicate walkways that connect the proposed personal care facility and existing office buildings to the proposed Boot Road sidewalk.
 - b. The plan proposes pedestrian access to the site from Darlington Drive, requiring pedestrians to cross Darlington Drive to access Boot Road Park trails. The plan shall include a crosswalk where the entrance drive meets Darlington Drive.
 - c. The plan lacks a sidewalk connection between proposed parking and the State Farm office. A sidewalk shall be provided to the office entrance.
6. Historic Resource Protection – Sections 325-44.F and 325-87.A (ZO) require development to preserve the integrity of the setting of Historic Resources, specifically outbuildings, significant site features, and immediate yard areas.

The site contains a Class II Historic Resource that is used as a small office building. The plan proposes a 57,616 square foot institutional building, parking, and a stormwater basin directly adjacent to the historic building without required screen buffer area, and all of the mature trees around the resource would be removed.

The plan shall be revised to preserve the historic building’s setting and provide appropriate visual buffering from the proposed development.

7. Building Façade Landscaping – Section 281-37.D (SLDO) requires plantings between parking lots and buildings facades.

There is a maximum of 7 feet of unpaved area between the personal care facility’s west façade and parking, which is inadequate for required landscaping. The plan shall be revised to increase the planting area along the west façade to accommodate required plantings.
8. Parking Lot Landscaping – In accordance with section 281-37.B.4 (SLDO), each parking lot landscape island shall contain one shade tree.



**REVIEW COMMENTS – COMMERCE PURSUIT CAPITAL
SKETCH PLAN DATED 1-17-22**

February 2, 2022

A proposed sidewalk would not allow sufficient planting area for the required tree in one of the parking lot planting islands. The plan shall reconfigure the parking or realign the sidewalk so that the required tree can be planted.

9. Conclusion – There are significant issues of noncompliance that should be addressed prior to submission of a land development plan.

Please call if there are further questions.



ANDREW J. WEIR, PRESIDENT
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PENNSYLVANIA OFFICE
20 Hagerty Boulevard, Suite 3
West Chester, PA 19382
P: (610) 436-9000

January 28, 2022
WC-494

Mr. John Weller, AICP
Director of Planning and Zoning, and
West Whiteland Township Historical Commission
222 North Pottstown Pike
Exton, PA 19341

**Re: Sketch Plan Review
Personal Care Facility
50-60 W. Boot Road
Exton PA., 19341**

Dear Mr. Weller,

On behalf of Commerce Pursuit Capital, L.P., an Application for Sketch Plan Review has been submitted by Riley, Riper, Hollin, & Colagrecio for construction of a Personal Care Facility, at 50-60 W. Boot Road. The project area consists of 6.59 net acres along the southern side of Boot Road, east of the Township's Boot Road Park-South. The applicant proposes to construct a Personal Care Facility with parking to accommodate 111 vehicles. The site contains two existing structures that will remain, one of which is a designated historic resource. The project site is located within West Whiteland Township's NC-Neighborhood Commercial Zoning District w/ IN Institutional District as an overlay. The tax parcel numbers are 41-5-264, 265, and 266.

In accordance with the West Whiteland Township Zoning Ordinance, Article XVI: Historic Preservation, including paragraphs 325-84 D., 325-90 A., 325-90 B., and 325-92 A.(3), the Historical Commission is required to review and comment on projects at or within 300 feet of a site listed in Township's Historic Resource Inventory. The Historical Commission's preservation consultant, Commonwealth Heritage Group (hereinafter Commonwealth), has reviewed the proposed undertaking for potential impacts to the Township's designated historic resources.

For this review Commonwealth utilized the following submission documents:

- Application for Sketch Plan Review, by Riley, Riper, Hollin, & Colagrecio, dated 1/15/2022.
- Site Sketch Plans for Layout, Grading & Landscaping, Drawings 1 thru 3, by E.B. Walsh & Associates, Inc., dated 12/10/2021.

No building elevations or renderings of the proposed structure were provided for Commonwealth's review. Therefore, other than overall site arrangement and building lot sizes, this review cannot accurately comment on the impact the final architectural design may have on the historic resources.

OTHER LOCATIONS

Alexandria, VA (703) 354-9737 Columbus, OH (614) 549-6190 Dexter, MI (517) 788-3550 Littleton, MA (978) 793-2579
Minneapolis, MN (612) 597-1589 Minneapolis, MN (612) 597-1589 Ogden, UT (801) 394-0013 Tarboro, NC (252) 641-1444
Traverse City, MI (517) 262-3376

Historic Resources Impacted by the Proposed Project

In accordance with Section 325-92.A of the Township Zoning Ordinance, Class I, II, or III historic resources listed on the West Whiteland Township inventory that are located within the boundary of a proposed project site, or within 300-feet of the property boundary of a proposed project site shall be reviewed for potential adverse effect. Commonwealth's review has determined the following listed historic resources as potentially affected by the proposed project:

Historic Resources located within the boundary of the proposed Project Site – Structures located on the subject property that are listed on the Township's Inventory of Historic Sites:

- **Site #156**– 60 W. Boot Road. Greenway. Federal style stone house.
 - Class II Historic Resource, Historical Architectural Significance.

Adjacent Historic Resources within 300 feet of the proposed Project Site – Structures located within 300 feet of the subject property that are listed on the Township's Inventory of Historic Sites:

- **None**

Description of the Proposed Undertaking:

The proposed Personal Care Facility at 50-60 W. Boot Road is comprised of a single H-shaped building located at the rear, south, portion of the 6.59-acre property. The building's overall dimensions are approximately 328 feet (north to south) x 250 feet (east to west). The building area at the first floor is 57,616 SF. The building's height is indicated to be 41.6 feet, in compliance with the allowable height requirements. No architectural plans or elevations are provided, but the building is assumed to be three (3) stories tall. This calculates to a total potential floor area of 172,548 SF. The ground floor contains a 51-vehicle parking garage and presumably the entrance lobby, support facilities, and possibly residential rooms. It is assumed the upper two floors contain residential units, with support and communal areas.

Two existing structures are located at the north side of the property, directly adjacent to Boot Road. Both are former single-family residences; both have been converted to office use. The structure at the northwest corner of the property is Historic Resource #156, 60 W. Boot Road, Greenway, a distinguished three-story Federal style stone house. Greenway retains much of its original exterior character. Overall, the building has been maintained in good condition. An existing rear addition is sympathetic to the original structure. However, two adjacent one-story structures, a freestanding frame structure east of Greenway and an attached masonry addition west of Greenway, are both contemporary and insensitive. The Sketch Plan documents indicate both one-story structures will be demolished. A new surface parking lot is proposed at the west side of Greenway.

The second existing structure is located at the northwest corner of the property, 50 W. Boot Road. This building appears to be a mid-twentieth century, Cape Cod style masonry house with later modern additions. The building is in good condition. No changes are proposed for the building in the Sketch Plan documents.

A common asphalt parking lot spans between the two existing structures, access to the lot is from a single entrance on Boot Road. The proposed design eliminates the existing shared parking lot and entrance from Boot Road. The parking lot is to be replaced with a stormwater detention basin and landscaping. The new site entrance to the Personal Care Facility and the two existing office structures is now from the west side of the property via the adjacent Darlington Drive, the entrance to the Township's Boot Road Park-South. The

property's new entrance connects to a new internal driveway located between the two existing buildings and the new Personal Care Facility, at the rear (south) side of Historic Resource #156. The internal driveway provides access to the new parking lots, a main lobby drop off loop, and the parking garage entrance at the east side of the new Personal Care Facility building.

Review of the Potential Effects on Historic Resources:

Commonwealth's review is limited to the potential for effect on the above-mentioned historic resources. Commonwealth conducted a field review at the site of the historic resources to evaluate the potential effect of the proposed project. Our comments are limited to the potential for adverse effect, and recommendations for treatment and/or mitigation.

Overall, the proposed design appears to be well considered and appropriate to the site. Although the proposed Personal Care Facility is a large building, the H-shaped configuration should have the desired effect of reducing the structure's scale and mass. Additionally, the existing site has a rolling topography which drops approximately 10 feet toward the rear of the property, where the Personal Care Facility building is to be constructed. This should help to minimize the height and visual impact of the building from Boot Road and the Historic Resource #156, Greenway. Our preliminary calculations indicate the top of the new 41.6-foot-tall Personal Care Facility building will be approximately equal to, or below the top of the roof of the historic Greenway building.

Elimination of the existing front parking lot and the two inappropriate one-story structures flanking Greenway will improve the appearance and the integrity of Greenway. Careful attention to the design of the parking lot, detention basin, and landscaping adjacent to Greenway is important to enhance the visual character of the historic resource. The Sketch Plan drawings indicate minimal new landscaping along the west side of the property. More extensive plantings should be considered along the property's west side to screen Personal Care Facility building from Darlington Drive and the adjacent Township Park.

Conclusion: The proposed Personal Care Facility at 50-60 W. Boot Road is a large structure. However, the proposed design, takes advantage of the site topography to reduce its impact. At the site's existing Historic Resource, #156, Greenway, the selective building demolition and landscape alterations serve to improve the integrity of the resource. The landscaping design should be developed to enhance Greenway and provide adequate screening of the Personal Care Facility building. Commonwealth concludes there is no adverse effect for the proposed Personal Care Facility at 50-60 W. Boot Road.

Should you have any questions or comments please do not hesitate to contact me by cell at 610-350-9564 or e-mail at pyocum@chg-inc.com.

Regards,



Philip Yocum, AIA, LEED AP
Preservation Architect

cc: Justin Smiley – WWT
Candice Strawley- CHG