



14 April 2021

Judy Lizza
Thornbury Township
800 East Street Road
West Chester, PA 19382

VIA EMAIL ONLY

**RE: Toll Brothers' Crebilly Farm site,
Thornbury Township, Chester County**
FTA Job #217-010

Dear Ms. Lizza:

F. Tavani and Associates, Inc. (FTA) has conducted a review of various exhibits as well as transcripts relative to the ongoing Crebilly Farm conditional use application in Westtown Township. The review was conducted with a focus on the proposed Crebilly Farm access to be located along Route 926.

EVIDENCE REVIEW

The Crebilly site has evolved over the years. The first traffic study prepared for the applicant by McMahan Associates, Inc. (McMahan) is dated 13 October 2016. With regard to same, that traffic study:

- 1) was based on 3 different potential site configurations¹;
- 2) determined overall site AM peak hour trip generation of 210 to 223 vph; PM of 266 to 280 vph²;
- 3) depicted Route 926 site access as not being aligned opposite Bridlewood Boulevard³;
- 4) contained site plans having non-linear site roadways, most of which featured homes on both sides of each roadway⁴;
- 5) determined that the proposed Rt 926 “non-aligned” access would satisfy at least 2 signal warrants⁵;
- 6) included a distribution model which featured 0% of site traffic utilizing Bridlewood Boulevard⁶;
- 7) featured 0% of non-site “connector road” traffic utilizing Bridlewood Boulevard⁷; and
- 8) concluded that the studied intersections can accommodate the projected site-generated traffic⁸.

¹ Toll PA XVIII, L.P. exhibit A-29, page 1 (unless noted otherwise, page #s given in these citations are the actual printed page # at bottom of the document, not the page number of the PDF)

² *ibid*, page 2

³ *ibid*, Figures 1A and 1B

⁴ *ibid*

⁵ *ibid*, page 2 (n.b., this conclusion is reached with reduced site traffic at the Route 926 access vis-à-vis 20% of site traffic depicted as entering/exiting directly to Route 202)

⁶ *ibid*, Figures 4A and 4B

⁷ *ibid* (n.b. A-29 is an incomplete document – the PDF totals 60 pages and includes no appendix items. *Appendix H* is entitled “*Traffic Diversions*” and while this was not provided and thus not reviewed, it is also true that there is no mention in the exhibit’s text, figures, or tables regarding reliance on non-site “connector road” traffic utilizing Bridlewood Boulevard.

Subsequent to the publication of the 13 October 2016 traffic study, a scoping meeting was held with PennDOT and Westtown Township on 2 December 2016. Minutes were produced; per those minutes:

- 1) PennDOT mentioned the applicant could take credit for certain planned improvements at the intersection of Rt 202/Rt 926 for mitigation of the site's traffic impact⁹;
- 2) PennDOT mentioned that it wants a connector road through the site; Toll Brothers expressed a concern, calling the connector road "undesirable"¹⁰;
- 3) PennDOT's consultant inquired about aligning the site's access to Rt 926 to be opposite Bridlewood Boulevard; PennDOT added it strongly favors this alignment/location¹¹; and
- 4) PennDOT stated it had serious concerns regarding the viability of signaling the applicant's driveway unless it was located opposite Bridlewood Boulevard, though the minutes do not identify any reasons for the serious concerns regarding said viability¹².

Another traffic study prepared was prepared for the applicant by McMahon, this one dated 20 January 2017. In this traffic study, it is mentioned that:

- 1) the applicant is considering foregoing its proposed access to Rt 202, at the request of the Westtown Township Traffic Engineer (WTTE)¹³;
- 2) the applicant will relocate its proposed signalized access on Rt 926 to be opposite Bridlewood Boulevard, pending concurrence with Westtown Township, Thornbury Township, and PennDOT¹⁴;
- 3) site trip generation is the same as the October 2016 traffic study¹⁵;
- 4) the site is still depicted as having non-linear site roadways, similar to the October 2016 study¹⁶;
- 5) despite now having its proposed access on Rt 926 relocated to be opposite Bridlewood Boulevard, the site trip distribution model continues to feature 0% of site traffic utilizing Bridlewood Boulevard¹⁷, and...;
- 6) ...similarly, 0% of non-site "connector road" traffic utilizing Bridlewood Boulevard¹⁸; and, yet
- 7) still concludes that the studied intersections can accommodate the projected site-generated traffic¹⁹.

Yet another traffic study prepared was prepared by McMahon, this one dated 13 August 2019. Note the name of the site has now changed to the Robinson Tract. In this study, it is mentioned that:

⁸ *ibid*, page 20

⁹ Toll PA XVIII, L.P. exhibit A-36, page 1

¹⁰ *ibid*, page 2

¹¹ *ibid*, page 2

¹² *ibid*, page 2

¹³ Toll PA XVIII, L.P. exhibit A-33, page 2

¹⁴ *ibid*, page 3

¹⁵ *ibid*, page 2

¹⁶ *ibid*, Figures 1A and 1B

¹⁷ *ibid*, Figures 4A and 4B

¹⁸ *ibid* (n.b. A-33 is an incomplete document – the PDF totals 77 pages and includes no appendix items. *Appendix K* is entitled "Traffic Diversions" and while this was not provided and thus not reviewed, it is also true that there is no mention in the exhibit's text, figures, or tables regarding reliance on non-site "connector road" traffic utilizing Bridlewood Boulevard.

¹⁹ *ibid*, page 23

- 1) the site is reconfigured and trip generation is reduced, resulting in fewer trips during both AM & PM peak hours²⁰;
- 2) a new intra-site connector road concept is depicted in the site plan, it is located near the eastern border of the site and thus features virtually no homes on the east side of the new roadway²¹;
- 3) the proposed Rt 926 access continues to be located opposite Bridlewood Boulevard²²;
- 4) the site trip distribution model now relies upon 10% of site traffic utilizing Bridlewood Boulevard²³;
- 5) a significant number of non-site “connector road” trips now utilize Bridlewood Boulevard²⁴;
- 6) the studied intersections can accommodate the projected site-generated traffic²⁵.

A few months after later in October 2019 PennDOT issued a review of the aforementioned study. In that review, PennDOT made no mention of a concern regarding neither the 10% of site traffic nor the 250 vehicles per hour of Route 202 SB cut-through trips assumed to utilize Bridlewood Boulevard. There was one concern raised regarding diverted trips, but this regarded trips a different diversion path and percentage. Given the absence of comments to the contrary, PennDOT was agreeable with the assumed cut-through traffic utilizing Bridlewood Boulevard²⁶.

Another few months later in February 2020 another meeting took place at PennDOT, one which you attended. Per the minutes of that meeting, PennDOT again mentioned its willingness to allow the applicant to utilize its planned improvements at the intersection of Rt 202/Rt 926 for mitigation of the site’s traffic impact. The applicant’s traffic engineer stated the application does not need to rely upon these improvements to mitigate site impact²⁷ (note that this statement was echoed by the applicant’s traffic engineer later during the 3rd conditional use hearing in August 2020²⁸).

During this same meeting, PennDOT presented a different view regarding utilization of Bridlewood Boulevard. PennDOT mentioned that it found utilizing Bridlewood Boulevard “does not get you much further south of US 202 than PA 926” and that there was not “significant concern regarding cut-through traffic”²⁹.

The applicant’s traffic engineer stated additional travel time investigations would be done to confirm the Collector Road diversions utilized in the study³⁰.

²⁰ Toll PA XVIII, L.P. exhibit A-42, page 1

²¹ *ibid*, Figure 2 (n.b., of the 319 homes proposed only about 7% are on the east side of the proposed connector roadway)

²² *ibid*, Figure 2

²³ *ibid*, Figure 4A

²⁴ *ibid* (n.b. A-42 is a complete document – the PDF totals 697 pages and includes several appendix items. *Appendix K* is entitled “Traffic Diversions” and was reviewed. In that appendix, page 380 **of the PDF** [appendix items are, for whatever reason, not page numbered] reveals that 250 vehicles per hour are assumed to divert from Route 202 SB at Skiles Blvd and cut through both the Crebilly Site and the Bridlewood at Thornbury site during the weekday PM peak hour only [zero (0) cut through trips were assumed during the weekday AM peak hour, even though both hours have essentially the same amount of Route 202 SB traffic]; there are about 1500 SB-T trips at 202/926 during the PM future no-build condition, so essentially 16% of SB Route 202 traffic is assumed to cut through Bridlewood at Thornbury – a significant percentage)

²⁵ *ibid*, page 23

²⁶ Toll PA XVIII, L.P. exhibit A-44A, page 5 **of the PDF**

²⁷ Westtown Township Planning Commission. exhibit PC-28, page 1

²⁸ Conditional Use Hearing transcript, Volume 3: 08/31/20, page 258, line 20 (and others)

²⁹ Westtown Township Planning Commission. exhibit PC-28, page 1

³⁰ *ibid*, page 5

During the meeting, you noted that existing Bridlewood at Thornbury residents are very concerned about cut-through traffic and will pursue either restricting certain turning movements or closing access to and from the intersection entirely. PennDOT recommended utilizing non-permanent restriction methods, should the opinion of the residents change in the future. Toll's team committed to working with Thornbury Township during the intersection design process³¹. To my knowledge, Toll has not yet contacted Thornbury Township to begin the mentioned intersection design process as it offered to do over one year ago.

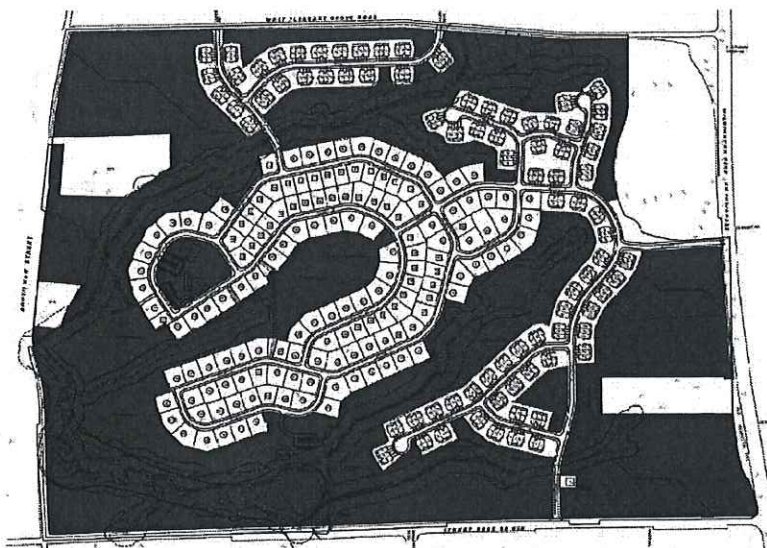
Subsequent to this meeting, the latest traffic study was prepared by McMahon, and is dated 15 May 2020. This is entered in the record as Toll PA XVIII, L.P. exhibit A-46-B. Its fundamental assumptions regarding trip generation, site trip distribution, cut-through traffic diversion rates, and overall findings are essentially no different than the August 2019 study. One of the key conclusions which continues to be upheld is that the application does not rely on PennDOT's planned improvements at Rt 202/Rt 926. These improvements are not insignificant and include adding a new SB right turn lane on Route 202 and a new (2nd) exclusive left turn on EB Route 926, among other improvements.

CONCLUSIONS

Numerous traffic investigations have been prepared for the Crebilly site. Early studies utilized a greater number of homes and commensurate higher trip generation estimates than what is found in the latest study. They also incorporated either no connector road at all and/or no assignment of site traffic / cut through traffic utilizing Bridlewood Boulevard and ultimately concluded that studied intersections can accommodate the projected site-generated traffic. Not only have the applicant's earlier traffic studies not relied on Bridlewood Boulevard, PennDOT itself has even questioned the benefit of using Bridlewood Boulevard as an ad-hoc Route 202 bypass.

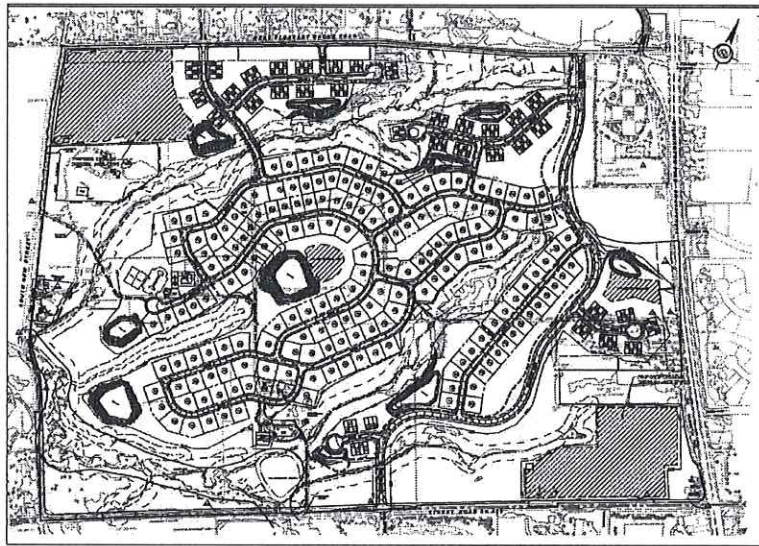
It is at this time that I should emphasize the stark difference between *completed* Bridlewood at Thornbury residential community vs. the *proposed-and-unbuilt* Crebilly site.

As you can see in this early Crebilly plan:



versus this later plan:

³¹ Westtown Township Planning Commission. exhibit PC-28, page 2



The applicant took deliberate measures to place the connector road in such a way that very few residents are likely to cross the road, with nearly 95% of the proposed housing and all of the site's amenities placed on the west side of the connector road. Contrast the applicant's proposed plan with the already-existing Bridlewood at Thornbury community:




Here, the existing housing is distributed much more evenly on both sides of Bridlewood Boulevard. In addition, on the *west* side of Bridlewood Boulevard there are open fields which are used by residents' children. There is also a community pool on this side of the road. On the *east* side of Bridlewood Boulevard, there are community tennis courts as well as an on-site daycare facility. It is even possible to walk from the *west* side to the *east* side, through the site, on to the CVS and, ultimately, to two nearby shopping centers utilizing existing pedestrian crossings on Routes 202 and 926. All of this means that pedestrian crossing activity at various spots along Bridlewood Boulevard takes place frequently, all of which is in stark contrast with Toll's plans, given the placement and design of its connector road.

In short, Bridlewood Boulevard was never designed as an ad-hoc Route 202 bypass, and it should not be expected to function that way today.

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PennDOT recognized Thornbury's Township desire for turning movement restrictions at the intersection of Route 926 and Bridlewood Boulevard and did not object to it nor did it state the requested restrictions could not be built. In fact, they offered an opinion that the Township might consider using non-permanent methods to effect the requested restrictions, all of which has been documented in PennDOT-accepted meeting minutes from early 2020. Toll's team committed to working with Thornbury Township during the intersection design process both at that meeting and in earlier traffic studies. Toll should follow through with this offer and direct its engineers to create sketch plans of alternative restriction schemes for Thornbury Township's (and Bridlewood at Thornbury's) review and consideration first, followed by coordination with PennDOT and/or Westtown Township after acceptable scheme(s) are identified.

I hope this has been helpful. Please let me know if I can answer any questions.³²

Thank you,
F. TAVANI AND ASSOCIATES, INC.

FRANK TAVANI, P.E., PTOE
Principal

cc: Kathy Labrum, Esq.

³² Please note that as of this writing, all exhibits referenced herein may be found at: www.westtownpa.org/planning-commission/