



Comments and Responses
through October 10, 2018

On-Line Comments:

7/7/2017 – Corey’s Comment: Please push for the Devault Trail via the old NS railway. This path would link downtown Phoenixville, the SRT, and other areas to the Chester County Trail. This would help with public health, safety and congestion on our roadways. The more trails the better and this one would be a key connector to public areas.

CCPC Response: Thank you so much for sharing your concerns and suggestions. Please feel free to contact our offices for information or to leave other comments.

2/2/2018 – Karen’s Comment: Please keep open space! Chester County’s beauty is in the environment! DO not overbuild. When in doubt-leave it open!

CCPC Response: Thank you for your comment.

2/2/2018 – Karen’s Comment: Make Haines Mill Road in Kennett two way. It was one way due to the bridge but not necessary anymore

CCPC Response: Thank you for your comment. This issue is best addressed with the local municipality.

2/2/2018 – Ms. Boyle’s Comment: Open space and historic preservation to preserve the heart and soul of chesco. Main street programs and town centric responsible, scaled, development with emphasis on adaptive re use.

CCPC Response: Thank you for your comment.

2/22/2018 – Rich Phifer’s Comment: Looks great so far – please keep me notified! Look forward to attending the public workshop.

CCPC Response: Thanks for your support as we work to develop Landscapes3.

2/23/2018 – Anthony Vieri’s Comment: Wonderful to have been a small part of this, and see it coming to fruition. Thank you for inviting public comment.

We respectfully request that highly sensitive areas legally identified as members of the Agricultural Security District, and the Conservation Easements, please be noted on your maps for New Garden Township.

These areas are places that our community has specifically decided are important to us. The key point of such designations and contracts is to ensure future agricultural use. As these maps represent our community’s future, such areas of importance should rightly be included.

CCPC Response: Thanks for your comment. We agree that agricultural areas and land under conservation easement are important considerations when mapping the county, and that supporting the continuation of agriculture in the county is vital. Landscapes3 will include

mapping beyond the Landscapes map currently out for public comment – please look for that mapping as part of plan recommendations later this year.

2/26/2018 – Ted Trevorrow’s Comment: Excellent process. Please consider light pollution as you develop goals, standards and plans. <http://www.darksky.org/> is an excellent source of information for communities trying to minimize the environmental impact of light pollution.

CCPC Response: Thanks for your comment. We agree that <http://www.darksky.org> is a great resource for communities as they seek to minimize light pollution.

2/26/2018 – Diane LeBold’s Comment: Thanks for the opportunity to comment. A few thoughts: In the “Live” section: While I appreciate the county’s goal to ensure diverse housing, I’d like to know how we plan to go about achieving that goal in a real estate market driven by significant profit opportunities. Same with the goal for improved mass transit: How does the county anticipate achieving this, when PennDOT and SEPTA have the final say? And, finally, in the “Prosper” section, exactly how does the county plan to support workforce development? Like the others, it’s a great goal, but doesn’t mean much without a concrete plan for making it happen.

CCPC Response: Thanks for your comments. You correctly identify that the county does not fully control all aspects of these areas, but by working with partners and supporting our municipalities we can have a positive impact. Setting our vision through the comprehensive plan is a first step in ensuring that our partners and municipalities understand our priorities, and in advancing new programs or refocusing existing programs to achieve that vision. We are currently working to develop recommendations, which will address the details of how to implement the vision. Those recommendations will be available for public and municipal review and comment later this year. The Chester County Workforce Development Board is the local entity responsible for the strategic planning and promotion of an effective workforce development system in the county, and you can find more information on their programs here: <http://www.chesco.org/159/Workforce-Development-Board>.

3/8/2018 – Jo Ann Kelton’s Comment: I would very much like to hear a discussion concerning efforts to restore rail service to West Chester take place at the Malvern meeting.

CCPC Response: Thanks for your comment – we’ll look to address the status of rail service to West Chester at that meeting. SEPTA is working to complete a feasibility study on this.

3/12/2018 – Jo Ann Kelton’s Comment: I was gratified to see that expanding transit is second in importance only to safe drinking water as listed in a public survey. The County’s backing is very much needed to convince SEPTA that it should not neglect our project to restore rail service to West Chester. Without the County’s help I fear that the King of Prussia extension will use up all the bandwidth. Both projects could proceed simultaneously, especially since the West Chester route is less complex. Jo Ann Kelton, Chair, Committee to restore rail service to WC

CCPC Response: Thanks for your comment and support of public transportation. SEPTA is working to complete a feasibility study on expansion of regional rail to West Chester.

3/14/2018 – Aus Marburger’s Comment: Having attended the public meeting on March 6th and having reviewed your work product, I believe there is much to gain with a higher priority and greater emphasis on sustainable agriculture in the plan and on the map.

The reasons are almost infinite. Nothing is more fundamental to quality of life and preservation of character of place than sustainable agriculture. Health is at the core of quality of life and is best supported by local nutrient rich dietary options. Farm land, productive open space, is less prone to future development. Farm land is the epitome of preservation. It is open space that is both beneficially employed and economically viable, while providing food security in a symbiotic community with town centers.

The big picture, CHESTER COUNTY, a health conscious food mecca! It may be Napa for wine, but when it comes to unparalleled farm to table, it is Chester County, hands down. This vision, as a primary goal, is spirited enough to be the branding that cohesively unifies the comprehensive plan.

Things to consider:

Supportive soils and climate

Heritage:

Rodale, to the North, the home of the US organic movement

Waldorf and Camphill, biodynamic farming and homeopathy centers

Lundale Farm, experimental land use and preservation

King-Ranch, grass fed

Longwood Gardens, nationally cherished arboretum

Opportunity: Chester County has the assets, the proximity to urban centers, and the educated consumers to support this vision

Talking Points, Objectives:

Town/Urban centers include markets; access, help local farmers thrive

Policies that assist incubator, smaller family, farms without subdivision

Bring emphasis to farming careers through education and promotion

Community based Agri’culture’ in difference to Agri’business’

Less mono-cropping, non GMO, pesticide, herbicide, hormone and antibiotic free

Soil health paramount as a living biome; preserving watersheds

Penn’s Woods and the Brandywine Valley at its Best!

CCPC Response: Thanks for taking the time to comment, and for your attendance at our public meeting on March 6th. We agree that Chester County is very fortunate with respect to our soils and existing farms and related businesses. Agriculture will be addressed throughout our plan, as it has implications across a variety of areas – land use, economic development, cultural heritage, and more.

3/14/2018 – Tony Buck’s Comment: The future of farming is the small multi-crop, multi-product family farm between 5 – 10 acres. The hardest entry into this is land cost. Please find ways to help our county facilitate young farmers to get use of the land they need to relocalize our food system. Let’s ask the question: Can Chester County feed itself? What an economic development tool this would be for our region, not to mention some farm to table food security and fresher food locally. We have the soil, climate, knowledge and water to do it.

CCPC Response: Thanks for commenting. We’ve heard repeatedly throughout our process regarding the challenge of land access for agriculture, and are considering ways to tackle this issue. Information on an existing statewide program to connect farmers to land can be found at <http://www.pafarmlink.org>.

3/21/2018 – Mark Cassel’s Comment: Not sure that I understand all the decisions made on the various map changes. For example, there were portions of West Goshen that were taken out of the Urban area, even though the density is greater than portions of Phoenixville in the “thumb” that hardly meet the definitions of urban but remain in the Urban area.

CCPC Response: Thanks for your review of the maps and comment. As with Landscapes2, it is a policy decision to include all of our boroughs and the city of Coatesville within the Urban designation. This designation is tied to various county programs that we feel are important to open to the entirety of the boroughs and city. On the draft Landscapes3 map there are areas proposed to be designated as Suburban Center in the townships that may have been designated as Urban in Landscapes2. This is typically reflective of a more auto-oriented landscape that lacks a grid system of streets. Transportation options within both the Urban and Suburban Center designations are a priority. Population density is one consideration for the map designations, along with other considerations such as the type of uses, mix of uses, intensity of development, transportation infrastructure, preserved lands, and local plans and ordinances.

3/25/2018 – Hugh Purnell Jr.’s Comment: Having lived thru the expansion of the County from 175,000 population to the current 500,000+,

I feel more emphasis should be placed on preservation of the historical nature and buildings of the County. That includes historical vistas, buildings, and assistance to the individual municipalities in doing that by grants (state and County) and by education of developers and township authorities.

Too many 1700/1800 buildings have been allowed to be torn down or just neglected until they fall down, destroying our heritage.

CCPC Response: Thanks for sharing your thoughts. We’ve heard repeatedly during our process about the value of the county’s historic buildings and landscapes, and agree that action is needed in multiple areas. Historic resources are addressed most prominently in the Appreciate goal area, but also touched on elsewhere.

4/11/2018 – Thomas Shar’s Comment: I attended the April 10, 2018 meeting, and I think it was a success. Turning to water resources, in 2002 the County issued a study “ Watersheds. ” Has the County evaluated whether it met the objectives in “ Watersheds ” ? If objectives were not achieved, how can improvements be made? Also, will this study be updated and used to guide the planning process for Landscapes3?

CCPC Response: Thanks for attending the meeting and we’re glad to hear you felt it was a success. We were pleased with the attendance and level of engagement. Regarding Watersheds, we are currently discussing including a recommendation in Landscapes3 to update the existing Watersheds plan. Watersheds has 7 goals and 40 objectives. Progress has been made, although there is always more to be done. On water quality, the county tracks a stream health metric that over the past several years has been showing overall improvement across the county’s streams, even with increased water quality challenges from various widespread pollutant sources. An update to Watersheds would provide an opportunity to update the science on which the plan is based, update the plan for current conditions and growth trends, and include opportunities for public involvement.

4/18/2018 – Dr. Suzanne Webster Roberson’s Comment: One crucial thing that should be thought about throughout this planning process is the immense amount of light pollution that could be engendered by all the new development. Light pollution is on a par with the destruction of waterways and viewsheds, etc., and it should be curtailed through considered planning and strict regulation. (A sad example of the consequences of not considering this matter has been unfolding in Downingtown and Exton for the past decade.) Children should not have to grow up without ever being able to properly see the moon and stars.

CCPC Response: We agree that light pollution is both an environmental and safety issue, and will continue to encourage municipalities and developers to address lighting in a manner that provides the needed illumination without creating glare, light trespass, or unnecessary energy use. As previously noted, <http://www.darksky.org> is a great resource for communities as they seek to minimize light pollution.

4/18/2018 – Ans’s Comment: Wish there was a small 55+ community housing development in our area for independent living!! We have been living in East Whiteland township for over 35 years and love it here! As we are seniors now we need to move to one level smaller houses! Any plans in near future for this type of housing developments here!?

CCPC Response: Since 2010, the Act 247 Plan Review section of the Chester County Planning Commission has been tracking plan submissions, which include age-restricted housing units. While none are located in East Whiteland, there are other units in the region: <https://www.chesco.org/DocumentCenter/View/45027>

ANS reply to CCPC: Hi, Sorry for the late reply! Thank you for your reply! Living in Frazer was a wonderful experience! Wish to live here as long as we can! Lot of housing developments are coming! some already built! But this town will be one congested town once all the constructions

finished! Wish they had built a 55+ community here! Would have been sold all the houses in a zip!! So many people who lived here are looking for 55+ community homes!! Too many apartments would create too much traffic! Plus schools will be crowded! Peace of this small town will be gone!! Hope there is still a chance they will consider building 55+ independent living homes! Thank you!"

4/30/2018 – David Habig’s Comment: As a Pennsylvanian, I have the right to clean air, water and overall a healthy environment. If the Bishop Tube site is not cleaned up 100%, the powers to be that would allow this to happen will have violated my constitutional right and should be prosecuted, fined and or go to jail.

Chesterbrook was named one of the best places to live in all of the USA, too bad they can only look at Valley Creek which runs right through the middle of this community. Cant touch because it is polluted.

CCPC Response: Thank you for your comment. Landscapes3 will continue a focus on preserving, protecting, and restoring our natural resources and open spaces, while calling for managed growth to be located in appropriate areas. A county comprehensive plan does not have regulatory controls, but does provide guidelines for programs and services and help direct county resources. Site cleanup is guided by the state, and regulatory control over the use and development of specific sites is controlled by the local municipality.

4/30/2018 – David Worst’s Comment: I am writing to beg you to please consider Bishop Tube property to be used as open space, for you see I grew up next to Bishops starting as a young boy in 1958. I then worked there for almost 18 years. 1972-1989. I have lost most of my friends and coworkers to cancer that had worked their. I myself am a cancer patient. I also have seen many neighbors that lived next to or downstream of Bishops also die of cancer. Please I have spent almost 20 years trying to identify toxic waste located at Bishops to help the DEP with their cleanup. It is too late to help people like myself that have already been exposed to the TCE their, but may be we can make a difference by having this toxic land turned over for open space so others will never have to go through the horrors that we have. Over the last 20 years most of the people that helped me identify areas of waste have now died off. Please in honor of all my brother and sister Steelworkers that have already died during this fight consider making this a Nature Preserve until someday when most the the TCE is removed then their could be a nice well needed park their. On behalf of the workers of The United Steelworkers of America that worked at Bishops I thank you.

David A Worst
Former President of The United Steelworkers of America Local 7566

CCPC Response: Thank you for sharing your story. We share your concern regarding the appropriate cleanup of contaminated sites in Chester County and recognize the impacts on personal and public health. The Landscapes3 plan will not address specific sites, but does provide broader guidelines for re-use of properties, public parks, and community health. The Chester County Planning Commission has met with various entities regarding this site and will continue to advocate for a use that is consistent with adopted county policies.

5/7/2018 – Joe Sullivan’s Comment: I’m a resident of Elverson, and plan on attending on May 16th, Thank you, Joseph F. Sullivan, Jr.

CCPC Response: Thank you for your participation.

5/8/2018 – Suzanne Roth’s Comment: It would behove the county to keep the Bishop Tube site as open space. This contaminated area might be able to heal itself with a little help from the county. Disturbing it would only release the toxins downstream and create more problems. Let’s give Mother Nature a helping hand and keep this site Open Space!! Thank you!

CCPC Response: Thank you for your comment. The Landscapes3 plan will not address specific sites and does not have regulatory controls, but will continue a focus on preserving, protecting, and restoring our natural resources and open spaces, while calling for managed growth to be located in appropriate areas. Site cleanup is guided by the state, and regulatory control over the use and development of specific sites is controlled by the local municipality. The Chester County Planning Commission has met with various entities regarding this site and will continue to advocate for a use that is consistent with adopted county policies.

5/8/2018 – John Bush’s Comment: The Bishop Tube site includes woodlands, wildlife, wetlands, and Little Valley Creek. We want the county to prioritize efforts to secure preservation of the Bishop Tube site as natural open space for the benefit of our community and for the protection of all who live downstream.

CCPC Response: Thank you for your comment. The Landscapes3 plan will not address specific sites and does not have regulatory controls, but will continue a focus on preserving, protecting, and restoring our natural resources and open spaces, while calling for managed growth to be located in appropriate areas. Site cleanup is guided by the state, and regulatory control over the use and development of specific sites is controlled by the local municipality. The Chester County Planning Commission has met with various entities regarding this site and will continue to advocate for a use that is consistent with adopted county policies.

5/10/2018 – Frances DeMillion’s Comment: We have too much industrial pollution. Let’s protect our communities and rural areas in beautiful Chester County!

CCPC Response: Thank you for commenting. We recognize the importance of public health on overall community well-being, and have made public health a focus within the Live goal area of Landscapes3, as well as noting its interactions with parks and other components of our built and natural landscapes. Landscapes3 will address protection of open space within the Preserve goal area and protection of natural resources within the Protect goal area.

5/11/2018 – Kevin Comber’s Comment: Please use the Bishop Tube site in East Whiteland for preservation of open space. It can be a great example for Chester County to use something terrible and turn it into valuable, protected open space.

CCPC Response: Thank you for your comment. The Landscapes3 plan will not address specific sites and does not have regulatory controls, but will continue a focus on preserving, protecting, and restoring our natural resources and open spaces, while calling for managed growth to be located in appropriate areas. Site cleanup is guided by the state, and regulatory control over the use and development of specific sites is controlled by the local municipality. The Chester County Planning Commission has met with various entities regarding this site and will continue to advocate for a use that is consistent with adopted county policies.

5/11/2018 – Abby Rapp’s Comment: Please preserve the Bishop Tube site as open space. It’s so important for the responsible parties to clean up this area and let the land recover. Don’t let this toxic site keep contaminating our beautiful town!

CCPC Response: Thank you for your comment. The Landscapes3 plan will not address specific sites and does not have regulatory controls, but will continue a focus on preserving, protecting, and restoring our natural resources and open spaces, while calling for managed growth to be located in appropriate areas. Site cleanup is guided by the state, and regulatory control over the use and development of specific sites is controlled by the local municipality. The Chester County Planning Commission has met with various entities regarding this site and will continue to advocate for a use that is consistent with adopted county policies.

5/11/2018 – Kelly Richards’ Comment: We would love to have a green space that we can enjoy with our daughter. This area has become very populated and we need to preserve the nature around us that we still have.

CCPC Response: Thank you for your comment. Protecting our open spaces and natural resources will remain a focus in Landscapes3, which also addresses having recreation options for all ages.

5/11/2018 – Kathleen Stauffer’s Comment: Thank you for your work on Landscapes 3 and being so open to hear public comments and input.

I also want to acknowledge the 3 recommendations you made to East Whiteland Township to not have the zoning of Bishop Tube site change from industrial to residential. I just wish our township listened!!!

In your goals to; preserve open space and natural features, to realize ecological and quality of life benefits, and to protect and restore critical natural resources to ensure an environment that supports healthy communities, I request that the natural resources at the Bishop Tube site – woodlands, wetlands and Little Valley Creek (an exceptional value stream) be protected as a high priority goal of the CCPC!

The Bishop Tube site is an important opportunity to protect a valuable piece of nature for the benefit of our whole Chester County community. East Whiteland and those who live downstream have suffered mightily as a result of the high levels of contamination at this site, including TCE and heavy metal contamination, and they deserve preservation of the site as open space.

The Bishop Tube site includes woodlands, wildlife, wetlands, and Little Valley Creek. We want the county to prioritize efforts to secure preservation of the Bishop Tube site as natural open space for the benefit of our community and for the protection of all who live downstream.

Thank you for your stewardship!

CCPC Response: Thank you for your comment. The Landscapes3 plan will not address specific sites and does not have regulatory controls, but will continue a focus on preserving, protecting, and restoring our natural resources and open spaces, while calling for managed growth to be located in appropriate areas. Site cleanup is guided by the state, and regulatory control over the use and development of specific sites is controlled by the local municipality. The Chester County Planning Commission has met with various entities regarding this site and will continue to advocate for a use that is consistent with adopted county policies.

5/14/2018 – Sherry McCormack’s Comment: Please preserve the Bishop Tube site..it is the historic valley of Duffys Cut where 57 Irishmen gave their lives for building the railroad in Great Valley. Many of their bodies still lie across the tracks of this site. The site is well known both in Ireland and in our area, but because a home owners association across the tracks has blocked the knowledge of this site, many who travel here to find long lost relatives have no place to go. The Bishops Tube site is the deep valley from which the rail supports were built with solid earth to fill in Duffys Cut. It also provides a vantage point from which the Duffys Cut graves can be seen in a safe and non-intrusive way for those in the Sugar Ridge Home Owners Association. It futhermore provides easy access from Rt 30 for visitors. Bishops Tube is a priceless asset to East Whiteland and to the history of the Malvern Valley. Please do not repeat history by destroying this sacred place where so many lives were lost to give us a better future. We are better than that! For more information on Duffys Cut, contact Professor William E Eatson of Immaculata University who wrote “The Ghosts of Duffys Cut..The Irishmen who Died Building America’s Most Dangerous Stretch of Railroad”

CCPC Response: Thank you for your comment. The Landscapes3 plan will not address specific sites and does not have regulatory controls, but will continue a focus on preserving, protecting, and restoring our natural resources and open spaces, while calling for managed growth to be located in appropriate areas. Site cleanup is guided by the state, and regulatory control over the use and development of specific sites is controlled by the local municipality. The Chester County Planning Commission has met with various entities regarding this site and will continue to advocate for a use that is consistent with adopted county policies.

5/15/2018 – Craig Hoffman’s Comment: Dear Chester County Planning Commission, Among the Chester County Planning Commission’s 2018 draft goals are to preserve open space and natural features to realize ecological and quality of life benefits, and to protect and restore critical natural resources to ensure an environment that supports healthy communities.

The natural resources at the Bishop Tube site – woodlands, wetlands and Little Valley Creek (an exceptional value stream) should be protected as part of this program.

East Whiteland has very little public open space, and particularly little natural green public spaces where we can benefit from and enjoy the beauty of nature.

The Bishop Tube site is an important opportunity to protect a valuable piece of nature for the benefit of our whole Chester County community. East Whiteland and those who live downstream have suffered mightily as a result of the high levels of contamination at this site, including TCE and heavy metal contamination, and they deserve preservation of the site as open space.

The Bishop Tube site includes woodlands, wildlife, wetlands, and Little Valley Creek. We want the county to prioritize efforts to secure preservation of the Bishop Tube site as natural open space for the benefit of our community and for the protection of all who live downstream.

Respectfully,
Craig Hoffman

CCPC Response: Thank you for your comment. The Landscapes3 plan will not address specific sites and does not have regulatory controls, but will continue a focus on preserving, protecting, and restoring our natural resources and open spaces, while calling for managed growth to be located in appropriate areas. Site cleanup is guided by the state, and regulatory control over the use and development of specific sites is controlled by the local municipality. The Chester County Planning Commission has met with various entities regarding this site and will continue to advocate for a use that is consistent with adopted county policies.

5/17/2018 – Les & Stephanie Town’s Comment: Dear CC Planning: I would like to request the Landscapes3 Map to reflect the contiguous Agricultural area consisting of 1,000+ acres in London Britain Township. You identified smaller Agricultural areas in West Nottingham, West Sadsbury, Sadsbury, and West Caln. A portion of the White Clay Creek Preserve in LBT is farmed. Please recognize and reflect the recently expanded 1,000+ acre Agricultural area in London Britain Township on the Landscapes3 Map as you did in the other townships.

CCPC Response: Thank you for your review of the map and your comment. We will review the mapping in this area. Regarding our landscapes types, agricultural uses can be found in any of the landscapes. Within Chester County our agricultural operations come in a diversity of sizes and business models, ranging from farmers markets or specialized operations within our growth areas to operations on large expanses of land in our rural resource areas. The specific Agriculture Landscape is intended to encompass large areas where agriculture is dominant and other uses, including residential uses, are very limited. The Rural Landscape can certainly include agricultural uses, within a more diverse mix of woodlands, stream corridors, and lower density residential uses.

Les & Stephanie Towns’ reply: Thank you for your reply. However, I stand by my request to please adjust the Landscapes 3 map to reflect the significant agricultural resource area in London Britain Twp. The London Britain Twp agricultural resource area consists of 1000+ acres of contiguous conserved and preserved farmland with PA Act 319 and the London Britain

Agricultural Security Area. In addition, a large portion of the White Clay Creek Preserve is farmed.

Case in Point: Your Landscapes3 map recognizes the very tiny agricultural resource area in Sadsbury Township, which is dominated by suburban development including a significant urban center. The agricultural resource area in Sadsbury Township is very insignificant and does not dominate the landscape of that township compared to what should be displayed in London Britain Township.

Please consider giving London Britain Township the courtesy of reflecting a significant agricultural resource area which consists of over 1,000 acres of contiguous conserved and preserved farmland. I don't know how you can ignore my request for consideration for London Britain Twp when you placed a tiny agricultural overlay on Sadsbury Twp. I am only asking for you to correct a misconception reflected by the Landscapes3 map regarding London Britain Twp. Thank you in advance for your kind consideration for my request to correct a Landscapes 3 mapping misconception on behalf of London Britain Twp.

CCPC's reply: Thank you for your comment. Please see our detailed response to this topic under the comment by Aileen Parrish. We look forward to speaking with London Britain Township in more detail regarding this matter.

5/17/2018 – Tamar Miller's Comment: I urge you to preserve a Clean & Green Bishop Tube site as natural open space

CCPC Response: Thank you for your comment. The Landscapes3 plan will not address specific sites and does not have regulatory controls, but will continue a focus on preserving, protecting, and restoring our natural resources and open spaces, while calling for managed growth to be located in appropriate areas. Site cleanup is guided by the state, and regulatory control over the use and development of specific sites is controlled by the local municipality. The Chester County Planning Commission has met with various entities regarding this site and will continue to advocate for a use that is consistent with adopted county policies.

5/23/2018- Margaret Hudgings' Comment: Chester County is a community concerned about the environment. I have been disappointed at the lack of focus on environmental and open space issues from county leaders. Our beautiful county needs protection. We need clean air and streams and open space for our physical and mental health.

CCPC Response: Thank you for providing your comment. Landscapes3, Chester County's next comprehensive plan, is proposed to include six core goal areas: Preserve, Protect, Appreciate, Live, Prosper, and Connect. While there are intersections between all of these areas, the Protect goal area focuses specifically on environmental resources and how those can best be protected, whether through regulation or technical assistance. The Preserve goal area is focused on the areas of the county that are permanently protected (which is currently 28% of our land area), and how to grow our network of protected open space and best steward those places. Both the

Preserve and Protect goal areas address the need to continue to educate on the value of environmental and open space resources, and the methods to best care for those resources. The Live goal area addresses community health in various ways, including fostering access to recreation opportunities, whether passive or active recreation.

6/12/2018- B Soltis' Comment: Dear Chester County Planning Commission,

Among the Chester County Planning Commission's 2018 draft goals are to preserve open space and natural features to realize ecological and quality of life benefits, and to protect and restore critical natural resources to ensure an environment that supports healthy communities.

The natural resources at the Bishop Tube site – woodlands, wetlands and Little Valley Creek (an exceptional value stream) should be protected as part of this program.

East Whiteland has very little public open space, and particularly little natural green public spaces where we can benefit from and enjoy the beauty of nature.

The Bishop Tube site is an important opportunity to protect a valuable piece of nature for the benefit of our whole Chester County community. East Whiteland and those who live downstream have suffered mightily as a result of the high levels of contamination at this site, including TCE and heavy metal contamination, and they deserve preservation of the site as open space.

The Bishop Tube site includes woodlands, wildlife, wetlands, and Little Valley Creek. We want the county to prioritize efforts to secure preservation of the Bishop Tube site as natural open space for the benefit of our community and for the protection of all who live downstream.

Respectfully,

CCPC Response: Thank you for your comment. The Landscapes3 plan will not address specific sites and does not have regulatory controls, but will continue a focus on preserving, protecting, and restoring our natural resources and open spaces, while calling for managed growth to be located in appropriate areas. Site cleanup is guided by the state, and regulatory control over the use and development of specific sites is controlled by the local municipality. The Chester County Planning Commission has met with various entities regarding this site and will continue to advocate for a use that is consistent with adopted county policies.

6/12/2018 – Chuck Carroll's Comment: I agree with others who have made note of your not showing an agricultural overlay for London Britain Township and request that you do so. The 1000+ acres is significant enough to make note of.

CCPC Response: Thank you for your comment. Please see our detailed response to this topic under the comment by Aileen Parrish. We look forward to speaking with London Britain Township in more detail regarding this matter.

6/13/2018 – Carolyn Matalon’s Comment: Please adjust the Landscapes 3 map to reflect the significant agricultural resource area in London Britain Twp. As shown in the Chester County Records, London Britain Twp. agricultural resource area consists of 1000+ acres of contiguous conserved and preserved farmland with PA Act 319, the London Britain Agricultural Security Area and Agricultural Easements.. In addition, a large portion of the White Clay Creek Preserve is farmed.

Please consider giving London Britain Township the courtesy of reflecting a significant agricultural resource area which consists of over 1,000 acres of contiguous conserved and preserved farmland. I am asking for you to correct a misconception reflected by the Landscapes3 map regarding London Britain Twp.

London Britain Township appreciates your efforts in correcting the Landscapes 3 mapping misconception. The most accurate true information should be reflected on the maps. The Township appreciates CCPC efforts to allow corrections to this Landscapes 3 Draft prior to the final draft.

CCPC Response: Thank you for your comment. Please see our detailed response to this topic under the comment by Aileen Parrish. We look forward to speaking with London Britain Township in more detail regarding this matter.

6/19/2018 – Aileen Parrish’s Comment: Dear Members of the Chester County Planning Commission,

I was fortunate to be able to attend your Landscapes III presentation in New Garden Township on May 10, 2018. The session was excellent and the comment stations with maps were very helpful. I was able to express my thoughts regarding your draft map for London Britain Township and am pleased to say that my concerns were heard and reflected in your draft map. I would very much like to request that you consider showing our extensive Agricultural Security Area on the Landscapes III map for London Britain Township. We currently have approximately 1100 acres in ag security and much of this land is contiguous. In addition, a number of our landowners have preserved their lands with grants and donations, so this agricultural land will be preserved in perpetuity. We also are blessed with having preserved agricultural lands in the White Clay Creek Preserve, also located in London Britain Township. In 2017 alone, landowners placed 308.58 additional acres into London Britain’s Ag Security Area. Please consider reflecting this incredibly valuable resource on the Landscapes III map representing London Britain Township.

Respectfully submitted,
Aileen H. Parrish, Supervisor
London Britain Township

CCPC Response: Thank you for your comment. We’d be happy to come out to London Britain Township to discuss the mapping categories – please contact us at 610-344-6285 to set up a time.

Regarding the recent comments, to clarify, the Agricultural Landscape is not an overlay. As with Landscapes2, the updated Landscapes map has six landscape categories, which are intended to reflect the dominant character of an area and its appropriateness for different intensities and

varieties of development. The six landscapes categories are: Urban Center, Suburban Center, Rural Center, Suburban, Agricultural, and Rural. The categories are further classified into two separate core areas: Growth Areas (consisting of all three centers and Suburban) and Rural Resource Areas (consisting of Agricultural and Rural). As with Landscapes2, there will be overlays that address more specific historic and natural features across all six landscapes.

It is important to note that any land use – such as agricultural land uses – can be found in any of the landscapes, but the mix and intensity of land uses will be different to preserve the character of each landscape. The Agricultural Landscape is dominated by a concentration of active farms, and intended to include a critical mass of farmland necessary to maintain agriculture as the principal industry, with supportive services that farm operations need, and limited land uses that are unrelated to agriculture. The extent of agricultural uses in each landscape category varies. Countywide, the Agricultural Landscape is 66% active agricultural land, while the Rural Landscape is 32% active agricultural land. The proposed Rural Landscape in London Britain is 26% active agricultural land. This percentage of active agricultural land is one reason the areas in London Britain have been shown as Rural rather than Agricultural.

Given that only six categories are reflected on the county map, it is expected that individual municipalities will have additional classifications for their own comprehensive planning and regulatory purposes that provide more specific and refined information.

6/29/2018 – Paul Davison’s Comment: Hello! I recently stumbled upon the Landscapes3 initiative and have been fascinated by the mission of the program. One thing that stood out to me from the public survey results was that out of the 3,580 that provided their age, 22% identified in the age bracket of 26-40 and only 2.7 identified in the age bracket of 25 and younger.

As someone who identifies in the former age bracket, this stat is alarming to me. Have there been efforts or campaigns to reach these demographics about the Landscapes3 initiative in hopes to make them more aware and encourage involvement? I understand its ultimately up to the individual whether or not they want to participate and to think critically about this subject but having this information where these demographics traditionally frequent could boost these numbers.

Personally I regret not knowing about this sooner and I think its extremely important to understand the impacts of this plan and what it means for the future of Chester County.

Thanks for the great content on this subject!

CCPC Response: Thanks for your comment, and interest in our public survey responses. You are correct that there was limited participation from those aged 25 and younger in that specific public engagement tool. For that reason, and many others, we have used a range of public engagement methods across the development of Landscapes3. In addition to the public survey, we have facilitated a stakeholder process that included more than 200 people, conducted topic specific surveys that were completed by more than 1,000 participants, used a variety of social media platforms, held five public meetings, developed four videos to share our message, had

multiple articles appear in local newspapers, presented to many groups (such as watershed organizations, chambers of commerce, West Chester University classes, etc.) and attended more than 30 public events (such as Super Sunday, Caln Community Day, First Friday, etc.). We have also shared information with various organizations (such as libraries, recreation clubs, schools, service groups, etc.) to broaden the audience who is aware of the plan. If you have a specific group you'd like us to engage with or platform you think we should be using, feel free to give us a call at 610-344-6285 and we can talk about ways to grow the number of people who are engaging in the plan for Chester County's future. There is certainly still time left to engage in the process. Also, let us know how you found us – we're always interested in what methods work best!

7/2/2018 – Dave Bashore's Comment: Thanks for forwarding the draft of Landscapes3. As a former township manager and current borough planning commission member who has gone through this process a couple of times, I wasn't sure what to expect. After having reviewed the draft, however, I can tell you that all expectations have been exceeded. What wonderful work has been done on the plan. Surprised to say, I have no observations or suggestions. Landscapes3 looks to be a fantastic planning tool for our communities' futures. Thanks so much for your great work!

CCPC Response: Thanks for your comment and support of the plan.

7/10/2018 – Mary Kay Owen's Comment: Based on projections, the county's 28% population increase between now and 2045 should be more specific in terms of the projected demographics and overall impacts—Right now the county is app. 80% white, 6% black, 6% Asian and 8% Hispanic—those demographic changes will impact every category and goal—for example, all official Chesco and municipal websites should already have easily translated pages to at least Spanish and anything travel-related should be multi-lingual for residents and tourists. Printed publications should already offer translated versions as well. The bus photo in a garage—on the cover—there must be a bus photo in a brighter locale....the school facilities (p. 31) needs to be more specific as it ignores the already current and vast lack of facilities and offerings in CASD vs. nearby DASD and WCASD....what will the revised 2045 demographic forecast really mean for county education offerings and balance? Page 24—from Chesco's Community Development to the UWCC...what other "non profit" needs to be established....there needs to be a review of the current non profit community to be sure that dollars are going where needed without duplicity and where needed in real time. Is there a database that shows current funding sources for all Chesco non profits—\$ are awarded routinely from umbrella groups to many of the same groups—do those with the \$ know what has already been received in a calendar year by a designated recipient...and are they the truly deserving in terms of real time missions and need. Overall, the energy, diversity, offerings and pride in current Chester County and its future could be presented more emphatically throughout the plan in text and photos. Thank you for this opportunity.

CCPC Response: Thank you for detailed review and comments. We'll be taking these, and all other comments, into consideration as we take the materials currently out for review and turn them into a full draft plan. We anticipate that the full draft plan will be available for public

review and comment in late summer, and it will have significant additions with respect to graphic elements and photos.

7/25/2018 – Harry Weaver’s Comment: I am the Zoning Officer for East Coventry Township. I reviewed the proposed Landscapes 3 map and I see the Northernmost section of East Coventry Township (along the Schuylkill River) has been proposed to be changed from a suburban area to a rural area. I believe this should be reviewed more closely. The affected area is currently includes existing residential, warehousing, commercial, and industrial uses which does not fit the character of a rural area. Furthermore, the existing Township zoning districts impacted includes a limited industrial and commercial zoning districts. It might not be appropriate to change all of these areas from suburban to rural.

CCPC Response: Thank you for your comment and review of the draft map. We are currently reviewing the mapping for East Coventry Township based on various comments that have been received, and will be coordinating with Township officials regarding any changes.

CCPC Follow-up Response: Thank you for your comment on the draft materials. In the full draft of Landscapes3 we included map edits along the Rural/Suburban boundary in the northeastern portion of East Coventry Township, with consideration of existing land uses and zoning. We’ll be providing an updated map to the Township by mail.

7/27/2018 – Rich Phifer’s, Director of Property and Recreation, Comment: Draft Metrics to Measure Success Comment: In terms of measuring the goal to restore critical natural resources, there might also be other ways we can measure this, such as by tracking the number of trees planted along riparian buffers on an annual basis and through other efforts to restore habitat, such as conversion of agricultural field acreage to native meadow management.

Draft Landscapes Map Comment: The revisions look good!

Draft Goals, Objectives, and Recommendations Comment: Page 8 – the map showing Conservation Clusters and Corridors – a few of the labels, such as for the Stroud Preserve and the ChesLen Preserve, appear as though they might be hovering over the wrong general locations. The map representing Recreational Access on Page 30, can Harmony Hill Nature Area in East Bradford Township be added to this map, particularly because of its important role in serving the local area’s need for public mountain biking trails. East Bradford’s Shaw’s Bridge Park would be another good one to add, particularly because it serves a diverse set of rec. users such as road cyclists, dog walkers, kayakers, fisherpeople, and wildlife enthusiasts.

CCPC Response: Thank you for your comments. We have considered various metrics for each of our goal areas, keeping in mind the impact the County and its partners can have, the ability to obtain data, the relevance of the data to the related goal, and the ability to track the information consistently over the next decade. We’ll consider your suggestions within these parameters. We’ll also review the map of Conservation Corridors and Clusters and the map of Recreational Access for accuracy and relevance. We are fortunate in Chester County for the

many recreation resources residents and visitors enjoy, although work remains to ensure access for all community members.

7/27/2018 – Joe Izykowski’s Comment: I live at 107 Shallow Springs Ct in Exton Pa. The SUNOCO PIPELINE (ENERGY TRANSFER) pipeline runs behind my house. What is running through this line, and how old is the pipeline?

CCPC Response: Thank you for your question – we have responded with specifics for your parcel directly to your email address.

More generally regarding pipelines in Chester County, the Planning Commission has compiled available information including an interactive map that utilizes the National Pipeline Mapping System, information on projects currently active in Chester County, contact information on the companies operating in Chester County, and local news articles to better inform residents of pipeline activity on this website: <http://www.chescoplanning.org/pic/Introduction.cfm>.

7/27/2018 – Ann Marie Barr’s Comment: Under the CONNECT comments please note there is presently no uniform fare (Bus A, SEPTA tokens, cash for SCOOT) in the county, and the rate for a family to take public transportation is cost (and stroller) prohibitive. The transportation routes need to consider work shift schedules and help connect those in Oxford, Parkesburg, West Grove, and other remote areas with employment that sustains a family.

Reimagining child care for workers at hospitals and factories after 6:00PM is a suggestion, too.

Have you thought of promoting redevelopment of abandoned retail space into child care, family centers, housing, or adult day centers? Underserved population include people experiencing life changes (divorced parents re-entering the workforce, recent retirees, empty nesters, immigrants whose children are moving to different school systems, widows, and people needing life and employment skills after major surgery for example).

CCPC Response: Thanks for your input regarding transportation connections in Chester County. We recognize the importance of the employment/housing/services connection, and in addition to specific transportation recommendations also tackle this from the angle of where housing, jobs, and services are located. We agree that underutilized retail space is an opportunity for various new uses – we have recently tackled this in our Commercial Landscapes series, discussing how to bring new uses into retail areas specifically in the Transforming Greyfields document. We’ve talked with municipalities, developers, and others on this issue, and expect to retain a focus on how demographic and market changes are creating opportunities for our communities to better serve residents and businesses. The Commercial Landscapes series is available here: <http://www.chescoplanning.org/Resources/PubsEconDev.cfm>.

7/31/2018 – Sandra Neufeld’s Comment: PRESERVE-Make every effort to obtain Crebilly Farm and assure the residents of CC that it will not be developed! (Crebilly should be preserved & hopefully provide much needed open space & recreational opportunities.)

PROTECT-Water quality esp for the Brandywine should be a priority — encourage townships/municipalities to increase wetlands & runoff areas as well as increasing stream buffers & building set-backs— encourage better on-lot sewage disposal practices

APPRECIATE-Provide more education to residents (& our school children) re: county historic resources & promote more participation— support efforts to preserve & restore Washington Memorial Chapel at Valley Forge Nat'l Park

LIVE-Make high quality education a higher priority

PROSPER-Increase efforts to realize Coatesville

CONNECT-Make rail service to West Chester & Phoenixville a high priority—In Many cases, the condition of our roads is not only poor – but sadly, unsafe! The intersection at RT 202 & 926 is rated F with no improvement in sight and more development scheduled to feed onto those roads!! It will only get worse! How will emergency vehicles be able to get to residents if the highways are blocked?? Improve this intersection! Pot hole repair & sight-line improvement is Not Good! What happened to funding for Rainbow Cab? Seniors need this service which is being discontinued?

Thank you for all the work done to develop Landscapes 3 and for the opportunity to comment.

CCPC Response: Thanks for your review of the draft materials and your comments. We are in the process of performing a review of all recent comments for potential revision to the draft materials, as we pull together the full draft of the plan. We hope to be sharing the full draft in late summer/early fall.

7/31/2018 – Sandra Neufeld's Comment: PROTECT- Please make every effort to protect the health, safety and welfare of residents who are dealing with pipeline issues Now and in the future!

CCPC Response: Thank you for your comment. The County will continue to advocate for minimization of impacts associated with pipelines. To keep up to date on pipeline news, you can visit the Pipeline Information Center website: <http://www.chescoplanning.org/pic/introduction.cfm> . The County Commissioners' June 2018 letter regarding Sunoco's Mariner East Pipeline is available here: <https://stateimpact.npr.org/pennsylvania/2018/06/05/chester-county-commissioners-slam-sunoco-for-appalling-lack-of-pipeline-information/> .

7/31/2018 – Bob George's Comment: I didn't get a chance to post my comment. It seemed to want my address. My comment was the changes in demographics of an aging in place community with relatively few people able to afford the retirement communities seems to be lost. 2 of 3 people in nursing homes are on Medicaid and bankrupt because of their inability to age in place. Fewer and fewer people have pensions and social security is under attack and probably not sustainable. The county needs transportation and services to serve this population. We may have six senior centers while New Castle County has 16. Do we have enough Senior Day care centers etc.. This is a subject that needs to be addressed as in a short period of time we should have 1 in 5 citizens over 65.

CCPC Response: Our apologies if you had problems with posting a comment – this one came through. You are correct in pointing out that Chester County has an aging population that will require adjustments in housing, community facilities, and various services. Projections show that the senior population will double in number between 2015 and 2045. Recommendations related to housing, transportation options, and community facilities and services are some of the recommendation we have drafted to address this evolving need. These recommendations will require strong leadership and sustained collaboration between the county, municipalities, social service organizations, and various other partners to appropriately serve the senior population in the coming decades.

8/3/2018 – Laura Markley’s Comment: I can tell there has been a lot of good thought going into this plan and appreciate the request for comments. My main comment is a generic comment. Please emphasize native plantings , green (non pesticide) methods of maintenance, connection/expansion of the current walking/biking trail system and open spaces, and reaching out to entities such as Natural Lands and Audubon for their valuable input. In addition, I feel a rail system in Phoenixville should be prioritized high.

CCPC Response: Thanks for your review of the plan materials. We’ll keep your comments regarding native plants, green maintenance, trails, and rail to Phoenixville in mind as we pull together the full draft of the plan.

Cristin Ehrgott replied to Laura Markley: I second this.

8/7/2018 – Vicki’s Comment: Very comprehensive. In addition to Exceptional Value drainage areas on the Natural Resource Priority Protection Areas map, the county’s High Quality drainage areas should also be mapped! Our water quality adds to our quality of life in the county.

CCPC Response: Thanks for your comment regarding the plan mapping, and support of our waterways. Chester County is fortunate to have great water quality in our streams and groundwater. We’ll be reviewing all comments related to the plan mapping for potential revisions for the full plan draft.

CCPC Follow-up Response: Thank you for your comment on the draft materials. In the full draft of Landscapes3 we have incorporated your suggestions on the Natural Resource Priority Protection Areas map (page 67) by adding High Quality drainage areas.

8/8/2018 – Candace Miller’s, Sec/Treas – West Nottingham Township Comment: West Nottingham hosts one of the 9 rural centers. During our July 24 Board meeting we agreed to request that the Planning Principles for Rural Center be revised so that the Growth Outlook is some version of Limited growth to meet the modest development needs of surrounding rural and agricultural landscapes, maintain economic viability and accommodate any fair share housing requirements.

CCPC Response: Thanks for your review of the Rural Center materials, and suggested revisions, which do reflect our intent for these areas. We are currently reviewing comments to date in

preparation of the full draft, and will take the suggested language into consideration in that process.

CCPC Follow-up Response: Thank you for your comment on the draft materials. In the full draft of Landscapes3 we have incorporated your suggestions in the Growth Outlook for Rural Centers as follows:

- Limited future growth*
- Growth maintains economic vitality and meets fair share housing requirements*
- Growth serves surrounding rural and agricultural landscapes*

8/13/2018 – Cristin Ehr Gott’s Comment: I’m very excited by the proposed public transit expansions. Please make sure to include pedestrian-crosswalks along the routes. I currently take the bus as my primary transportation to work and have a rather unsafe road-walk to the nearest bus stop. It’s recently been made more unwalkable with the addition of two traffic lights, both with all-way-no-pedestrian-crossing signs, right at the bus stop. This further discourages those who wish to use public transit.

CCPC Response: Thank you for your comments. Improved pedestrian connections to bus and rail options and expanded public transit service are a focus within Landscapes3. Creating a safe multimodal transportation network and encouraging its use has multiple benefits, such as decreased auto emissions and improved public health and safety.

8/21/2018 – Sandy Neufeld’s Comment: Where is the site to read public comments?

CCPC Response: All comments provided via the online system (and the responses) can be viewed on the same page that comments are submitted: <http://news.chescoplanning.org/landscapes3-draft-plan-elements/%20>. You will need to scroll down and click the “Show All Comments” tab to display those. Comments that were submitted on the June 15th materials by email or hard copy are currently being reviewed and addressed and those comments and responses will be posted online in the coming month. A link to those will be provided on the main comprehensive plan webpage: <http://www.chescoplanning.org/CompPlan.cfm>. Future comments will continue to be tracked and posted in a similar manner.

9/27/2018 – Eunice Alexander’s Comment: Do we need to register?

CCPC Response: Registration for the public meeting is not necessary – please join us! The meeting will start at 5:30 p.m.

10/3/2018 – Abbie Kessler’s Comment: Last night the plan was approved without changes, but the public comment period is still open. This seems to need to be shut down rather than let people think their comments are being heard and potentially have an impact on the plan. What happens if someone’s comment is valid? Can changes still be made? Also, the map page here online is great to explain the categories and then show how they changed between Landscapes2 and 3. The percentage change table though says the suburban center changed by 99%. This isn’t a new category so I believe this is a typo.

Overall the plan is nicely done and I like how the categories were done this time. Thank you for the continued focus on sense of place via protection and smart growth. Also thank you for captioning so many of the photos! On pg 56, can we identify the trail? It looks so pretty, but I don't recognize where it could be with the water adjacent and it doesn't say.

CCPC Response: Thanks for your support. We're glad to hear the plan and its goal areas are resonating with the public.

On October 2nd, the draft Landscapes3 plan was recommended for adoption to the County Commissioners by the Chester County Planning Commission Board, with one change (the priority level on one recommendation). The Chester County Commissioners will hold a public hearing on November 29th at the Uptown! Performing Arts Center in West Chester to consider the draft Landscapes3 plan for adoption. Our comment feature will remain open online until the public hearing, and comments received will be provided to the County Commissioners for consideration.

We are following the state mandated process for development and adoption of a comprehensive plan, which includes multiple steps. We have been seeking comment and input during plan development over the past two years through a variety of means, and will next distribute the plan to all Chester County municipalities and school districts, as well as surrounding municipalities and school districts, as part of a review period required prior to the public hearing and consideration of adoption. The revised draft will also be posted to our website. The steps to adopt a comprehensive plan in Pennsylvania are outlined in the PA Municipalities Planning Code, also referred to as Act 247.

Regarding the map, the Suburban Center landscape did increase by 99% between Landscapes2 and Landscapes3, representing an increase of just under 8,000 acres. (Chester County has over 485,000 acres total.) Most of the land area added to the Suburban Center designation was designated in Landscapes2 as Suburban, with some of the land area designated as Urban Center. The additional Suburban Center areas reflect places where a traditional town pattern is unlikely, but where municipalities are seeking to accommodate significant growth and mixed uses, as well as provide transportation options. Examples include Great Valley, Exton, and the area to the east of West Chester.

We will check with the resident who submitted the photo on page 56 for the specific location – it was one of the award winners in our first photo contest, but did not have a specific location identified.

Email/Letter Correspondence:

9/16/2016 – Victoria McDonald emailed:

My husband, Jim, and I are long-time residents of Chester County, and would like to volunteer to assist with committee work regarding Landscapes3.

My husband is a prior U.S. Naval Officer, has worked for OSHA, and is now working in risk management as a Certified Safety Professional. Jim worked for many years at Wyeth Pharmaceuticals in West Chester as its Safety Manager, until its close of business. I am a Licensed Master's Level Social Worker, currently employed at a social services agency in Chester County. I have worked in social services for nearly 20 years, assisting Chester County neighbors in need.

Jim is an avid cyclist who rides with the West Chester Cycling Club. We are both interested in helping Chester County remain the vibrant community that it is, and sustain and grow its beautiful areas that are available to Chester Countians in which to work and play.

Please let us know how we can be of assistance.

CCPC Response:

Thank you for your interest in the Landscapes3 process and its role in maintaining Chester County as a wonderful community in which to live and work.

We are very early in our process, and our greatest need at this point is raising awareness of and participation in the process. We are currently in our first phase, the #TellUsL3 phase, which focuses on understanding the issues. I've attached a project timeline for your reference.

Given your backgrounds, and our desire to engage many in this process, I have a few specific responses:

- Our stakeholder process is focused around distinctive topics - preservation, agriculture, housing, utilities and infrastructure, transportation, economic development, and community health. Individuals have already been selected by the County Commissioners to participate in the formal stakeholder team, but the meetings themselves are open to the public and we are facilitating public participation in those meetings. Our community health group, which will meet on December 6th, seems to match both of your backgrounds. That group broadly focuses on safety, wellness, and recreation, and at the stakeholder meeting we will have focused discussion on components of those areas. As I noted, it is our goal to integrate any public who attend these meetings into the activities and discussion. If you are interested in any of the other meetings you are welcome to attend those as well (transportation is November 2nd). I've attached a pdf of the meeting dates and location, and the information is available on our website as well.

- We are encouraging any interested individual to view the trend reports for topics as they are posted, and participate in the specific topic surveys as they are posted. This information is

released on the meeting date typically. The preservation trend report and survey are currently available here: <http://www.chescoplanning.org/CompPlan/Topics.cfm> Agriculture will be posted next week.

- We plan to open a photo contest in the coming weeks, asking people to share their favorite Chester County place. We consider this a different method to understand places valued by residents of Chester County. Please look for information in the coming weeks, and share the contest information with others who may be interested in participating.

- Are you on our listserve currently? We send out a monthly email with news and information from the Planning Commission, and expect to share information on the Landscapes3 process through that monthly email. If you would like I can have your email added to the database. And, of course, we also share through the various social media outlets – the easiest way to connect with us in those manners is to go to our website and click in the upper right corner – www.chescoplanning.org

- Check back on our process as it evolves! As I noted, we are very early in the development of Landscapes3 and we'll have more to share as we go along. We are planning on attending community events and distributing a broad public survey in 2017. Mark Gallant, who I have copied on this email, is coordinating our outreach process. Development of the plan itself will occur in the second half of 2017, and there will be a variety of ways to comment on draft plan policies and actions.

Please let me know of any questions or comments you have at this time, and thanks again for your interest in the development of Landscapes3.

10/25/2017 – Elaine Scott emailed:

I am unable to attend the meeting Thursday evening, but I would like to express my concern for the following things:

Development of property for multiple residents on smaller spaces.

Traffic growth.

Building new buildings for commercial use while vacant ones sit idle.

Overcrowding of everything.

Residents not shopping at local retailers, including Exton Mall.

I am a mom who does a lot of shuttling of my family. I resent the amount of time I sit in traffic and at lights. In addition, I witness many drivers who get frustrated and often drive unsafely to make up for lost time.

My kids are probably sick of me lamenting every time I see a new development (usually crammed under power lines or in rather undesirable locations) or commenting on "Oh another business has gone".

We moved to East Goshen 27 years ago from Wayne and felt like we were moving to the country and loved that quality of the area. I wish it were still under developed and full of free space. I guess people may have felt the same way when our neighborhood was built!

Thank you for reading. I hope to be available for the next meeting. I hope someone is able to publish notes from the discussion.

CCPC Response:

I am sorry to hear that you are unable to attend this evening, but appreciate you taking the time to email me your concerns. I will include them in our collection of comments from the public meeting.

We are hopeful for press coverage at the meeting this evening, so perhaps that will be one method of hearing about how the meeting went, and what other comments were provided. We are not counting on that though, and will be sharing brief takeaways through our social media outlets, and then also a more complete summary of the event and public input through our website, web news blog, and monthly newsletter, available through www.chescoplanning.org. Please check those sources for a summary of the discussion, and please feel free to contact me with any questions on accessing that information.

We will again be holding public meetings in the spring, in different areas of the county. The closest location to East Goshen will be at Penn State Great Valley on May 1st, from 5:30 – 7:30. We will also be out at Hankin Library on March 6th (snow date March 20th), New Garden Township Building on April 10th, and the Chester County Public Safety Training Campus in Coatesville on May 15th. There will also be meetings to consider the full draft plan in fall of 2018, dates and locations to be determined.

Thank you again for your thoughtful comments, and please feel free to contact me in the future with any comments or questions regarding the future of Chester County and the development of Landscapes3.

2/6/2018 – Randy Waltermyer emailed:

Passing along a suggested edit in E. Fallowfield.

It is a small edit—I realize... but this area has no plans for becoming 'urban'.



CCPC Response:

Thanks for the comment. The designation of Urban in this area is a carryover from L2, and also reflects East Fallowfield's 2013 Comprehensive Plan, which identified the area as Mixed Use Growth. It may be better depicted as a Suburban Center, but the Mixed Use Growth, and the description in the township comprehensive plan related to that, make Suburban seem a less likely fit.

We are certainly hoping all of the municipalities review the map and provide comments (and are targeting some outreach specifically to generate that review), but you may want to prompt the township as a resident to consider this area specifically and provide comment.

Let me know of any other comments.

3/6/2018 – Anthony Vietri and family emailed:

Thank you for the information and the note. We spoke on the phone last week with Ms Hillary, and I thank you for taking the time to do so, and for the information contained in your note here.

On having the opportunity to view how the maps are drawn for individual townships in CC, I have a better understanding of the purpose and intent with which they were produced. In comparing the maps from Landscapes 2 and 3, it appears that the intent of L3 was to update the previous L2 maps as needed, and it is noted that most areas of the county show little if any change. While I still feel that it is becoming increasingly important that areas of Ag Security and Land Easement should in fact be part of those renderings in order to identify areas of sensitivity to development and to strategically guide future decision making, I do however now have a better understanding that such concerns were not

considered to be a priority in the original intent of this project, going back to L1 or L2. I would respectfully contend that it is time to make adjustments to that approach.

At any rate, I thank you greatly for the opportunity to ask questions, and for your taking the time to provide answers. Please know that it is very much appreciated.

CCPC Response:

Thanks for taking the time to review the information and provide your further thoughts. We are still working not only on the overall map for Landscapes3, but other supporting maps throughout the plan. We'll keep your thoughts in mind as we advance on those efforts, and certainly feel free to come out to the April 10th meeting at the New Garden Township Building.

3/16/2018 – Susan Drummond emailed:

I intend to come to one of your public meetings, but am unlikely make the one tonight.

I looked carefully at the maps and find that you have not identified the western end of Rt. 30 in East Whiteland as a growth area. There is substantial development already underway there, and more is likely to occur.

The County has focused on the Rt. 29/Rt. 30 area, understandably. But I would suggest that the County give some acknowledgement of our efforts to revitalize the western edge of our township as well. Our plan is well underway and will be completed by June. If you need any information, please give me a call or email.

CCPC Response:

Thanks for your comments and sorry that you missed the meeting. We will be at Penn State Great Valley with a public meeting on May 1st.

Regarding your specific comment, we'll take a second look at that area. That area of East Whiteland is depicted as Suburban, which is a growth area, although not intended to be as intense/dense as areas depicted as Urban or Suburban Center. It is difficult at times to get all of the different areas of the county adequately addressed within our six categories. We are having some internal discussions on how offer more specific guidance and support for these types of areas throughout the plan.

We can certainly talk more regarding this over the next couple of months, and could come out to the township for a discussion if that is helpful.

5/1/2018 – Deirdre Fleming, ADC Board Member, emailed:

Subject: L3 Comments from ADC Board Members

The Agricultural Development Council board members had a chance to review the Landscapes 3 recommendations, which has led to some great discussions about how agriculture will be represented in

the plan. As you know, we have a diverse group on the council, with each of us bringing a unique perspective on issues that face agriculture. Although we come from different backgrounds, we have found that we share many common concerns about current/future issues that effect agriculture of all kinds throughout the county.

Below is a summary that I wanted to share with you that reflects some of our concerns/questions. Time limits how much I'm able to share in front of the committee, so I wanted to make sure that I had the chance to share the perspectives of fellow ag. producers when it comes to the L3 recommendations.

Under "Preserve":

Recommendation #1: Increase Protected Farmland

- Conservation Easements do preserve prime farmland soil, but do not guarantee that a farm will stay in active farm production. Traditional conservation easements actually make it more likely that the land will fall out of active production because of land sales to non agricultural buyers (rural estates very common in Chesco.), landowners lacking successors, no new generation to take up farming role, and easement protected properties selling at prices too high for farmers to purchase. Farmers need affordable land so easements serve their long-term purpose.
- A clear distinction needs to be made between the different kinds of land preservation, and to acknowledge that not all are beneficial to agriculture. The language is blurred between Ag Easements and Conservation Easements. Innovative Land Trusts utilize easement enhancement tools like conservation easements with affirmative production language and OPAV's (Option to Purchase at Agricultural Value) or similar affordability protections to keep farms in active production. This is critically important for the transition to the next generation of farmers, as 2/3 of farmland in the U.S. will change hands in the next decade. There may be a need to challenge how we preserve land (smaller parcels, less clustered) to adapt to trends we see in agriculture (diversity of ag operations on less acreage, increased demand for access to healthy, local food). If preservation efforts aren't the best vehicle for this, we want to explore alternatives to supporting these types of operations. Even larger farms are experiencing challenges, and will need public and municipal support as farmers may need to adjust their business models to remain viable. (The current dairy crisis comes to mind here).
- The preservation goals for the county are great, but in order for agriculture to thrive, recommendations need to include plans on how to keep farming a viable industry. Ag land preservation through county easement purchases is a huge step towards that goal, but only the beginning. Ag producers need the infrastructure and rural communities to support their active farming, and not just passive farm ownership. Farms need to operate in an environment where people are willing to accept it closer to them and to see the value/benefit of it to their daily lives. Thriving farms add to the municipal or county tax base, so it's in the county's best interest to keep agriculture the #1 industry. How can we incentivize agricultural development other than just through preservation efforts? How do we keep farming viable?
- If Chester County stakes a claim to be a pioneering leader in land preservation, than we need to become the pioneering leader in farm sustainability, profitability, and generational succession within metropolitan regions. You can't preserve farm land if you do nothing to preserve the farmer. Let's be the vibrant, active farming community that we say we are!

Comments about supporting graphic "How We Preserve" Policy Map:

- We need more accurate representation of the breadth and scope of the Ag. industry in each community, as this will help future planners in important decision making that will effect the industry. This would also serve as future reference points as to the gain or loss of lands in Ag and

in Open Space when the time for Landscapes 4 approaches. (See suggestion below for how this could fit into proposed "Prosper" map.

- Issues with identifying potential opportunities for future agricultural easements by parcel size and proximity to existing easements: this approach overlooks the evolution of ag. business models, and the future potential of diversified, smaller operations closer to urban settings that may be worth protecting. Smaller farms interwoven with cities (rather than just on the outskirts), could accommodate more population growth in the future. Farms closer to urban/suburban centers generate more profit per acre because they have greater opportunities for direct marketing sales to neighbors. Interwoven farms have ecological benefits as well. Diversified farms double as wildlife habitat and help decrease urban heat island effect and improve water runoff management. In this way, we work in tandem with the goals of many of the land trusts.
- Increasing open space connectivity is important in the context of ecological functions and value of overall network, but careful attention should be made to acknowledge that fragmented valuable ag parcels can function to better integrate farms into our communities. (See preceding comment on the benefits of fragmentation when it comes to agriculture). Many of the counties with the highest rugosity urban interfaces are in the top agricultural producing counties in the U.S. because the infrastructure and support is there for these businesses to thrive.

Under "Preserve":

Recommendation #7: Expand Open Space Education:

- This recommendation does not mention the use of farms, farmers or agriculture. Education initiatives should include cooperation with ag producers to show the value of open space preservation as it relates to public access to locally produced products. Direct to consumer interactions on permanently protected farms are a very effective tool in educating the public. It's important that the public knows the connection between viable farms and protected lands. If farming doesn't stay viable, what happens to the preserved land when there are not farmers willing to farm it?

Under "Preserve":

Recommendation #8: Establish an Open Space Council:

- There needs to be a clear line between privately owned protected open space (agriculture), and public access protected open space. Who or what equivalent organization will represent agriculture if the Open Space Council will focus on nonprofits and government agencies? LPAG's are well prepared and organized, and funded to work more effectively with municipalities and influence narratives towards their own mission statements. These resources are not available to the private sector (agriculture), therefore creating an imbalance to affordable land access/land acquisition/land affordability. The funding imbalance here makes it extremely difficult for farmers to compete. This puts the future of agriculture at risk, and emphasizes the need for a solid Ag Economic Development Plan so farms can remain viable with limited resources and reduced access to affordable land. Support for the Ag industry through services like Extension services and CCEDC are critical, as they help farmers to remain competitive. We need more congruency between agriculture and LPAG's if we are going to effectively improve long-term land preservation goals.

Under "Protect":

Recommendation #1: Target Policy and Ordinance Assistance.

- Why doesn't the plan provide the same assistance to municipalities for updating agricultural protection policies and regulations? Is Agrihood planning going to be included? Agriculture is the County's #1 industry, so it would make sense to put effort into the very activity that keeps the county rural and not over developed.

Under "Protect":

Recommendation #2: Promote benefits of natural resource protection

- Can prime agricultural soil be added as a natural resource that the public and municipalities can be educated about? The local agricultural products that help to develop a sense of place all have a foundation and future dependent on prime agricultural soils.

Under "Prosper":

Recommendation #8 Support agricultural Economic Development

- Regarding a Supporting Graphic: We would like to see a map showing currently active Ag operations. Could this be a part of the supporting graphics so interface between farms/urban areas can be clearly seen? They could include the ASA's and Ag Easements (all of them county-wide, regardless of "Landscape"). An example of why this would be useful: New Garden Township has the highest concentration of mushroom farms in the US, as well as operating vineyards and orchards, yet the hundreds of acres in production are not obvious L3 maps. How do we reconcile the proposed Prosper Map with the L3 Map? The New Garden Township example highlights the incongruence between the different maps, because the L3 Map will show that township as a suburban growth area, and the proposed Prosper Map will show a heavy ag component in the township. Which map is carrying forth the policy for recommendations? Which map holds more weight?

Thank you for taking the time to review the input from the ADC board members.

CCPC Response:

Preserve

- *We are referring to agricultural conservation easements and then conservation easements, as appropriate, throughout the document and have added definitions for both. Land access is one of the issues to be further addressed through Prosper recommendation #10, agricultural economic development.*
- *We are referring to agricultural conservation easements and then conservation easements, as appropriate, throughout the document and have added definitions for both. More generally, we address farm viability and farmland preservation separately from easements for other purposes.*
- *Prosper recommendation #10 addresses this issue.*
- *No response required*
- *An agricultural collage was added with Prosper recommendation #10 to address this. We have also added a metric to track farmland preservation specifically.*
- *The map with Preserve recommendation #2 is not intended to map every remaining opportunity (as programmatic policy determines this and is more specific), but to depict the general extent of remaining opportunities, as noted in the map caption.*
- *No change proposed*

- *The text in the open space education recommendation (#1) has been revised to address farms generally, and the agricultural community has been added as an implementing party in Chapter 10.*
- *Language in the open space summit recommendation (#9) has been revised to address farms generally, and the agricultural community has been added as an implementing party in Chapter 10.*
- *A recommendation was added within the Preserve goal area to address regulatory means to protect open space, including farmland (#8).*
- *Change made.*
- *An agricultural collage was added with Prosper recommendation #10 to address this. We have also added a metric to track farmland preservation specifically. Landscapes descriptions in Chapter 3 support agricultural uses in the Suburban, Rural Center, Rural, and Agricultural landscapes.*

6/8/2018 – Pennsbury Planning Commission mailed:

The Pennsbury Township Planning Commission has awaited the Landscapes 3 public presentations since members attended a Vista 2025 Chester County Economic Development Council meeting at Herrs' headquarters in January, 2015. County Commissioner Terence Farrell, a member of the Vista 2025 Steering Committee, introduced the Route 1 Development Plan speaker. At the time, Pennsbury was not a supporter of more Route 1 development, especially east of Kennett Square, where traffic has doubled since the 1990's.

After viewing online information and attending the Landscapes 3 public meeting at the Penn State Great Valley Campus, PC members discussed the future County goals and population growth forecasts. In the interests of its residents, the Township Planning Commission believes it must respectfully express its concerns regarding the impact of Chester County economic development along U.S. Route 1, which Landscapes 3 predicts and Vista 2025 supports. Even if nothing changes during the next decade along Route 1 in our Township, Commission members cannot help being apprehensive about the increases in traffic and activities that Pennsbury residents will experience due to development in other municipalities.

Pennsbury's PC appreciates the efforts and value provided by the County and community leaders in the Landscapes 3 planning process, especially the opportunity for public meetings and input. However, the new plan's projections threaten the preservation of open space, agriculture, and rural character, items Pennsbury residents ranked as most valued in their Township Comprehensive Plan Survey. Notably, County residents also ranked preservation of open space and protection of the environment as highly important in the Landscapes 3 Survey.

Keeping its residents' priorities in mind, the Supervisors and Planning Commission have followed development guidelines along the Baltimore Pike outlined in Pennsbury's Comprehensive Plan (2006) and Township Zoning Ordinance (2012), particularly the Brandywine Battlefield and Route 1 Corridor Overlays. Supervisors have been able to buy development rights and arrange property easements along Route 1, Hillendale Road, and the Kennett Pike. They have also purchased outright 23 acres threatened by high density development adjacent to the Baltimore Pike Municipal Building. These parcels will be added to the already preserved Township park land. The open space preservation efforts have been funded by passage of a 2009 Pennsbury voter referendum, which imposed a dedicated real estate tax, demonstrating Township residents' resolve.

The Pennsbury PC believes Landscapes 3 must emphasize specific actions which encourage open space and natural resource preservation, agricultural growth, and historic property protection. County planners and leaders need to endorse citizens' priorities and provide guidance that helps municipalities control and direct development. Otherwise, Chester County will lose the very attributes that have made it such a desirable place to live.

6/13/2018 – Wendell Fenton, Pennsbury Township Board of Supervisors, Chairman mailed:

The vast majority of the residents of Pennsbury Township highly value open space preservation, agricultural activities and protection of the environment. We, the Supervisors of the Township, believe that economic development in the County should be focused on the boroughs - Coatesville, Downingtown, Kennett Square - not on the Route 1 corridor.

The Township has worked hard to preserve the semi-rural character of the Township. Our Comprehensive Plan and zoning ordinances are in support of the residents' vision. We are in an historically important region where the biggest battle of the Revolutionary War was waged. Our goal has been to protect this heritage for posterity, not to encumber the battlefields with commercial development.

Please focus development on areas where the infrastructure to support it already exists. Do not encourage the taking of prime agricultural lands.

CCPC Response:

We agree, and Landscapes3 supports the position, that future development in Chester County should be focused around our Urban Centers, which includes all of our boroughs and the City of Coatesville. Landscapes3 also supports growth within our Suburban Centers, which have the infrastructure to support development.

With respect to the Route 1 corridor, the Landscapes3 map designates the boroughs as Urban Centers, and designates Suburban Center landscapes around existing development such as the Longwood area in East Marlborough, Jennersville in Penn Township, and along a portion of Old Baltimore Pike in London Grove Township. Landscapes3 also designates a Suburban Center landscape for the Toughkenamon area, as New Garden Township is seeking to create more of a town center around this existing village and its current mix of uses. The Urban Center and Suburban Center designations are interspersed with areas of Suburban and Rural landscapes, reflecting the intent to focus growth in specific areas in the Route 1 corridor.

Landscapes3 seeks to continue a balance of preservation and growth as we embrace places, enhance choices, and engage communities. The plan is a recommitment to protecting the county's open spaces, farms, natural areas, and historic landscapes. We look forward to collaborating with Pennsbury Township in the coming years to preserve our resources as we create a strong and more resilient community for all of our residents.

6/25/2018 – Kim Moretti, East Pikeland Township, Township Manager emailed:

The East Pikeland Township Planning Commission has reviewed the draft materials for the Landscapes3 plan.

I believe our township planner, Ed Theurkauf, may have already relayed this information, but just in case he did not, the Planning Commission comments are attached.

Thank you for this opportunity.

Landscapes 3 Draft Comprehensive Plan and Land Use Map Update

The draft updates to the Chester County Comprehensive Plan, known as Landscapes 3 is available for review on the county's website. Open forums for municipalities and the public are ongoing. A comparison of the Landscapes 2 land use map and projected growth areas on the Landscapes 3 map prompted recommending the entire Route 724 corridor be designated as a "suburban center", and the Kimberton Village historic district be designated a "rural center". The PRPC consistency review letter from Ed Theurkauf recommends the northern part of the township be changed from "rural" to "suburban" because of the new housing development by Toll Brothers (Kimberton Glen).

MOTION MADE BY JOHN SCHOTT RECOMMENDING THE FOLLOWING REVISIONS TO THE LANDSCAPES 3 DRAFT LAND USE MAP:

1. EXPAND "SUBURBAN CENTER" TO INCLUDE THE ENTIRE ROUTE 724 CORRIDOR;
2. DESIGNATE KIMBERTON VILLAGE HISTORIC DISTRICT AS A "RURAL CENTER"; AND
3. CHANGE THE SECTION OF THE NORTHERN AREA EAST OF SNYDER AVENUE AND SOUTH OF SPRING CITY ROAD FROM "RURAL" TO "SUBURBAN" BECAUSE OF NEW RESIDENTIAL DEVELOPMENT.

CCPC Response:

- *The mapping has been revised to extend the growth area landscapes (Suburban Center and Suburban) in the Rt 724 corridor and to the north (the Snyder Avenue area). There remains an area of Rural landscape designated in the northern portion of the Township, where there remains larger undeveloped parcels, frontage along the Schuylkill River, and two larger protected open space parcels that connect into an area of Rural landscape in adjacent East Vincent Township.*
- *Overall policy for the Rural Centers landscape category is to designate these areas within the Rural and Agricultural landscapes. Kimberton Village is identified on the Significant Historic Landscapes overlay map as a village (Chapter 2). The Chapter 3 description for Suburban landscapes includes a Preservation Focus for villages and hamlets.*

6/29/2018 – John Horstmann emailed:

I am providing feedback on the proposed Landscapes 3 classifications. I attended the session you held at PSUGV this spring. I appreciate your efforts to provide orderly growth in the County. At the meeting, I provided these comments to one of your staff, but have not heard back. I received via email the updated map and plan and wanted to encourage a small but significant change to the Landscapes3 map. The attachment shows the area in question around Buckwalter Road and includes area in both Schuylkill and Charlestown Townships. The properties in the area shown have all the characteristics of adjacent Landscapes3 Rural classifications but have been designated Suburban which can allow for higher density growth.

The county plan can help to preserve the rural nature of this area with adopting the suggested change. Just this spring, the nearby Tech School has proposed selling its playing fields to a developer who fortunately was denied a zoning change to accommodate 148 townhouses by Schuylkill Township. We need the map to reflect the current rural landscape of the area to help to try to preserve this beautiful piece of Chester County. The area is small, but is comprised of single family homes generally between 2 and 65 acres with numerous natural springs that feed the Pickering Creek. Several of the larger properties have conservation easements.

Please consider this change to the plan before it becomes final. Either you or your staff are welcome to contact me with any questions or if I can provide any additional information. The map provided was from Chescoviews.org.

CCPC Response:

With respect to your email of June 29th and after coordination with the elected bodies of Schuylkill Township and Charlestown Township regarding this area, modifications were made to the mapping, extending the Rural landscapes across some of the area noted. Some of the area was already designated as a Rural landscape. A limited area in the northernmost portion of the area you identified remains designated as a Suburban landscape. We have attached a map of this area, depicting the current designations.

7/2/2018 – Jason Duckworth emailed:

I took a quick look at the materials for Landscapes 3 and wanted to pass along a couple comments:

1. I am concerned that the metric of affordability is affordable housing units built with county subsidies. Historically, affordable housing in Chester County has been produced by private developers without subsidy. As an example, our Sadsbury Park project is the most affordable new home community in Chester County. Having an economy and land use regime that supplies sufficient housing for low-income families should be the goal. Here are a few metrics that I think would be superior: (1) % of Chester County households that can afford the median house at 30% of income to rent/payments, (2) some metric for young people and housing affordability, (3) some measure of inherently affordable housing types such as mobile home parks, accessory dwelling units, conversion of singles into multi-family. The public production or subsidy of housing will never be a substitute for private production.
2. The metric for prosperity -- square footage of non-residential development -- may also be problematic. Office density is going up (therefore we'll need fewer new office buildings per unit population growth) and online retail has growing market share. I think a simpler metric of jobs and median wages would be better.
3. I think there needs to be more attention to the overall tax burden, especially property taxes. Pa municipalities such as Coatesville, Chester and Norristown cannot attract businesses without subsidies and they do not attract residents who have options. The entire state of New Jersey is putting itself at risk for similar reasons. I think it would be interesting to track a simple metric that we use all the time in

our business: total property taxes as % of market value. Once that gets above 3%, it's gets very very hard to produce new housing or commercial development. I'm surprised there is isn't more attention to this in general.

4. I really like the travel time metric. Very good. Correlates highly with measures of subjective well being.

CCPC Response:

- 1. Within Landscapes3 the general criteria for a metric included the nexus of the metric to the goal area, the ability to impact the metric, the reliability of the data, and the ability to consistently obtain the data moving forward. For these reasons we are staying with the metric related to county subsidized housing units. However, the annual progress reports for Landscapes3 will also include qualitative information, where we can add relevant information for the goal areas, such as new affordable housing units not related to the county program. We have also begun to develop and share more information on housing affordability more broadly, through our website, newsletter, and social media outlets, using the 30% of household income for housing as a measure of affordability. We agree that private production of affordable housing is a critical need within the county.*
- 2. For reasons related to our general criteria for metrics, we will be retaining the measure on the square footage of non-residential development, recognizing that office density and online retail may have a significant impact on this metric. Jobs and wages are tracked on a broader level by the county for various reasons.*
- 3. We will investigate the metric of total property taxes as a percent of market value as a potential data point for our municipalities moving forward, separate from Landscapes3 specifically.*
- 4. No response necessary.*

7/12/2018 – Hillary Krummrich, Ag Development Council Director emailed:

Here are the comments from the Ag Task Force that you can share with Brian and David. They have seen this write-up and agree that it accurately reflects the discussion at our June 26th meeting and the subsequent comments received in response.

I really tried to break it out for digestibility but please let me know if you have any questions. I realize this is quite a bit, but they had a lot to say!

- 1. Donna asked about the percentage of preserved farmland v total farmland acres.** That is difficult to calculate for two reasons, one, we do not know exactly how much of the land trust easements are ag land preservation (versus other conservation easements), AND two, it would depend on how you define and “count” farmland county-wide in order to establish a base number of total farmland acres.

But here is what we do know: at the end of 2017 28% (136,015 acres) of the total county acres (485,845) are preserved, but that includes ALL preservation, municipal parks, trails, etc. it's not just ag land preservation.

We are not able to determine exactly how much of that 136,015 acres is farmland preservation because of what I mentioned above about not knowing exactly how much ag the conservancies preserved as ag, but we do know that at least 38,430 acres is preserved farmland because it was protected through the County's farmland preservation program. **So at a minimum, 8% of total County acreage is preserved ag land (38,430/485,845) or just over 28% of the preserved land is preserved ag land (38,430/136015).** [Note: this is NOT the same 28% the numbers are just the same.]

2. **Preserve recommendation 1** – increase protected farmlands. Geoff suggested to change the language to read **“The protection of farmland through agricultural conservation easements...”** (and anywhere else that language is used). The concern is that straight conservation easements are not necessarily the best tool to protect farmland. They can allow for ag production but not necessarily. In addition at both the state and federal level they use the term agricultural conservation easements so the plan should be consistent. Hillary mentioned that the Ag Council had the same concern and wanted the language clarified as well. Cheryl F. agreed. Adam agreed.
3. **Prosper recommendation 8** – Donna had a question as to why the paragraph starts “A leading industry” as opposed to “The number one industry”. Jodi suggested that it is because most people use the North American Industry Classification System (NAICS) codes, which is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. Unfortunately, the NAICS codes do not aggregate or capture the reality of the agricultural industry and so people do not realize agriculture's full impact. For example, trucking food is captured under transportation, not ag, even though the movement of agricultural goods is a significant aspect of the supply chain. Food processing is captured under manufacturing, etc.

The Task Force – was really excited about the possibility of an **agricultural economic development plan**. One reason specifically was because in light of the conversation directly above, the group felt a study would demonstrate the impact of the industry in this county, and help others who do not really understand better see the economic (and other) benefits. In addition, technical assistance to municipalities was supported as was land access efforts, but the group recognizes that this is an incredibly difficult issue to deal with and we discussed that it should be woven into the economic development study as a starting point.

4. **L3 map** – Stephanie had concern that **New Garden Township is identified as primarily Suburban when so much of the mushroom industry is concentrated there**. A discussion on land use control followed, with the recognition that while it is ultimately the local municipality's decision, **it would be concerning for the County's policy map (L3 map) to not identify, support or encourage the industry in significant concentrations (e.g. mushrooms in New Garden)**. The task force wondered how to address this. Hillary mentioned that **the**

Ag Council had the same concern and in addition to the comment below, **the Planning Commission suggested that perhaps agricultural uses would be incorporated into the landscape descriptions so that while the map, for example, would show New Garden as Suburban, the descriptions would include the growing of mushrooms.** [Note: This is why, in part, we went through the descriptions in as much detail as we did.] **However, no agricultural use, including growing mushrooms, was included in the draft Suburban landscape description (see also #6 below).**

5. **Chris A. had concern that none of the ancillary materials depict the dynamic aspects of the industry, only the land aspect is represented.** How do we address this? Hillary mentioned that the Ag Council had shared this concern when they met with Planning and that they feel the agricultural industry is not represented really in any of the materials. the Planning Commission had some trepidation about doing an “inventory” map showing where ag businesses are located for a few reasons. One being that it would be difficult to figure out where all the ag operations are in the county, and that generally they are trying to focus on policy maps, maps that show a particular geographic element or trend. **This continues to be an outstanding issue.**
6. **There was concern that the landscape descriptions do not include agricultural uses (except for the rural and ag landscapes).** This does not represent the reality of the industry. To more accurately reflect and support the industry, additional uses should be added to various landscapes.
 - a. Include farmers’ markets in the urban center and suburban landscapes.
 - b. Include ag technology (e.g. research and development and food processing), and support for local food supply distribution and food incubators in the suburban a suburban center designations.
 - c. Add growing mushrooms/indoor ag in suburban landscape
 - d. Add farm stands to the rural center and rural landscapes, and
 - e. farm-related businesses to rural.
7. **The rendering for the ag landscape needs to be reworked.** Awaiting specific suggestions. Can one of you please call me so we can talk this through?
8. In the **Ag description** (pages 16-17), there several issues:

The group was not sure why under the **Growth Outlook** it only identifies residential development (low density). Why isn’t the commercial growth of the ag industry identified as a preference?

 - Under **Land Use** it does identify “Agricultural uses” and “Supplemental farm businesses and farm stands” but this does not seem capture the commercial scale that is modern ag. Is there a way to qualify it somehow e.g. “Agricultural uses at all scales/scopes/intensities”?
 - Under **Infrastructure** it should read “Roads and bridges...”
Under **Infrastructure** there is no mention of soils, only water quality.

- Under **Infrastructure** the wording of the regional trails is concerning. It should be clarified that this does not suggest trails through ag properties.
- Under **Design Elements** Building Character. This does not reflect the reality of modern farming. The word “traditional” suggests a “quaintness” that would actually be prohibitive of modern technology/structures (scale/scope, etc.)
- Under **Design Elements** Site Amenities – not sure exactly what that means? If you are going to talk about water quality, soil quality should also be included.
- Under **Design Elements** Transportation – it seems to all go back to appearance (“agricultural character”) rather than utility. Roads/bridges need to accommodate farm equipment and heavy truck use.

CCPC Response:

1. *No response required*
2. *References to easements on farmland have been changed throughout the document to “agricultural conservation easements”, and a definition has been added to the glossary for this phrase (tied to the PA Department of Agriculture language).*
3. *Throughout the plan agriculture is identified as a leading industry. It is our intent to address the several leading industries in the county due to their significance to the county overall; it is not our intent to get into the details of which industry is the number one industry, as that specific measure can be argued based on which measure is being used.*
4. *The description of land use patterns for the Suburban Landscape now includes “diverse agricultural activities”. A photo collage was added to the agricultural economic development recommendation (Prosper, #10) to help illustrate the diversity of agriculture in Chester County.*
5. *The photo collage that was added to the agricultural economic development recommendation (Prosper, #10) helps illustrate the diversity of agriculture in Chester County. Prosper recommendation #10 directly addresses aspects of agriculture beyond land use.*
6. *Agricultural uses are noted for the Suburban, Rural Center, Rural, and Agricultural landscapes. Descriptions for the landscapes categories are typically broad and do not seek to address subsets of industries or sectors. In the Urban Center and Suburban Center descriptions there are descriptions of “mix of uses”, “new or expanded institutions and community services”, “central greens”, “community gathering places”, “research and development”, and “community focal points” – these descriptions would cover farmers’ markets and opportunities for agricultural technology, while providing flexibility for municipalities to more specifically determine what fits their community.*
7. *This rendering was revised based on specific feedback provided.*
8. *As follows:*
 - *The language was revised to note growth related to agricultural uses*

- *Land use patterns include the phrases “diverse agricultural uses” and “supplemental farm businesses and farm stands”.*
- *Revised*
- *Revised*
- *References to trails have been removed from the Agricultural Landscape.*
- *Language was revised.*
- *Revised*
- *Language was revised.*

7/16/2018 – Jean Krack, Phoenixville Borough Manager, emailed:

We are in receipt of Brian’s letter of June 22, 2018 regarding review of the landscapes map for the Borough of Phoenixville. After reviewing the packet of information, it appears that the PC has correctly identified the Borough’s growth area on the Landscapes Map. The Goals, Objectives and Draft Recommendations also appear to be consistent with the direction the Borough is headed in its own revitalization.

As such, we would not have any further comments at this time.

Thanks for all the hard work your team has done thus far in moving Landscapes3 forward.

CCPC Response:

No changes requested

7/24/2018 – John Weller emailed:

Thanks very much for providing the materials regarding Landscapes3 and asking for our comments. Ever since the original Landscapes, I’ve liked the approach of identifying the character of the development rather than specific land uses, and I’m glad to see that will continue to be the philosophy.

Overall, breaking the plan – or the “vision,” I guess it is – along the lines of preserve/protect/appreciate/live/prosper/connect is a TERRIFIC idea. At first I thought you were just being clever by re-naming the more traditional subject areas, but the more I considered it the more I liked what you did as it kind of tells WHY these things are important. For some reason, “connect” especially resonates with me seeing as how you tied transportation with infrastructure. Maybe because we’re working on a bike/ped plan for the Township.

Regarding the bits specific to us, we don’t have any objection to our classification of being Suburban and Suburban Center. I specifically note that the Suburban Center area encompasses our “Town Center” area, the light industrial areas to the west of it, and both of our train stations, which I think is appropriate. If you make any changes to this Suburban Center area, I ask that you at least keep these

features within that designation. While some may argue that the Suburban Center area should be larger, I'm fine with the limits as you show them, as it emphasizes a higher-density center distinct from the surrounding development. Which is consistent with Township policy.

The only thing that bothers me a little is the "protected open space" areas shown on the Landscapes map. I understand that you're keeping count of protected acres, but some of these spaces don't feel particularly open – especially the HOA lands included with high density residential areas – even if the designation is technically correct. Not that I have any suggestions about how to resolve that...

I think that's it. Thanks again for the opportunity to comment, and let me know if you need anything further from us.

CCPC Response:

- *No response required*
- *No response required*
- *The protected open space was shown only on the maps sent to the municipalities for review. It will not be an element of the overall Landscapes map, nor an element of the overlays. The online version of the Landscapes3 maps may include the option to turn on protected open space as a layer, once zoomed into a subset of the county.*

7/25/2018 – Upper Oxford, Charles Fleischmann, Township Supervisor shared with staff:

Notes on Landscapes3 Goals, Objectives, and Recommendations:

Generally:

A glossary of terms and definitions would be useful.

"Open space" is used a lot. Is it meant to be a catch all phrase for agricultural, park and recreational land as well as the "open space" required in development plans?

A lot of the thought process seems to be oriented towards horizontal multi use proposals as opposed to vertical multi use proposals.

Smart Growth and Keystone principals that featured prominently in L2 are not mentioned here.

Is there a, recognized principal and body of work guiding this document and if so, what is it and where can it be found?

Preserve:

Objectives:

A "Protect a significant portion of Chester County as preserved farms, open space, forests, public parks or nature preserves" - While "preserved farms", public parks and nature preserves are generally legally protected by easements or other contracts, what protection is contemplated for privately held open space and forests? Should a mechanism or concept be specified?

D "Promote stewardship of water resources, natural habitats, woodlands, historic landscapes, scenic vistas, recreational resources, and farms on protected open spaces" - Seems to specify that the stewardship will not apply to areas not protected as open space.

Recommendations:

1 "Increase the acreage and clustering of protected economically viable and active farmland" - qualifying the type of farmland to be protected could be problematic. Is a farm in the CRP program active? If prime farmland is left fallow, should it be excluded from protection under this recommendation? Should a farm that is not economically viable under current management or practice be excluded from consideration? Perhaps the recommendation should be to "Increase the acreage and clustering of protected agricultural lands."

4 "Enhance protection of historic resources, cultural resources, and scenic viewsheds through open space preservation techniques" - Suggest deleting "open space" for this recommendation. Historic and cultural resources can be found in developed areas (mills, houses, etc) where open space doesn't really apply. Facade and other historic preservation easements can also be effective here.

8" These stakeholders should convene on a biennial basis to coordinate efforts and best achieve broader goals" - "and best achieve ..." syntax needs to be clarified. "to better achieve"?

Live:

Recommendations:

8 You may want to capitalize "Universal Design" to indicate that it is a recognized policy akin to "Smart Growth".

Prosper

Recommendations:

1 "Create a countywide redevelopment program to revitalize underutilized properties" - What is an underutilized property? If this is synonymous with "highest and best use" then it could be construed to be indicating that all agricultural land should be targeted for redevelopment (agricultural land has been and is being developed for agriculture - it doesn't just happen and it isn't cheap to do).

Under "How We Prosper", change the word "unidentified" in "The Inventory of unidentified sites ..." to either underutilized or identified.

2 How We Prosper: There is no mention of residential in the mix of" office and retail uses" which are a part of a "Smart Growth" principles called for in L2.

"Zoning that provides an adequate land area to create a sustainable tax base is a necessary step"

- what does this mean and how would the "adequate land area" be calculated? If the COGS for a particular use exceeds the taxable income from the land zoned for that use, is the solution to expand the zone and if so, at what uses expense in regards to fair share analysis? This needs to be rethought perhaps in terms of vertical as opposed to horizontal.

10 "Ensure economic development strategies remain responsive to changing conditions through periodic re-assessments of and updates to VISTA 2025" - the County was responsible for the development of "a county-wide economic development strategy" under Landscapes2.

Arguably VISTA 2025 is not that strategy since it was created without the input of the "county departments" and has elements that promote sprawl, i.e. Goal S's "Corridors of Opportunity". I would suggest that for consistency with Landscapes2 that the "Commonwealth of Pennsylvania Keystone Principles for Growth, Investment & Resource Conservation" be cited until the county can come up with a coherent economic development strategy.

Under How We Prosper, in 2014 the VISTA 2025 Economic Development Strategy was not adopted but was endorsed by the commissioners.

Connect:

Recommendation:

1 "Based on the existing Transportation Improvements Inventory (TII), the inventory will cover all surface transportation modes, including major corridors, public transportation, bicycle/pedestrian, bridges, and roadways and operations" -Add horse drawn and slow moving to the mode list.

2 Same additions needed as 1 to first sentence, especially in relation to getting fresh food into urban areas and food deserts. A lot of the younger Plain Sect (and English) people are going into produce farming which allows for smaller plots and can be closer to end users and markets.

10 the Coordinate and Integrate Water, Sewer, and Land Use Planning" map has a piece of Upper Oxford near Lincoln University defined as part of a growth area for water and sewer. Do we agree with this?

CCPC Response:

General

- *A glossary has been added, as the Appendix C.*
- *Definitions for open space and protected open space have been added. These definitions carry over from those in use by the Planning Commission for the past several years.*
- *The illustrations throughout the plan encourage vertical mixed use.*
- *Smart growth principles are noted as a guiding element in Chapter 1.*

Preserve

- *A recommendation was added to address regulatory methods to preserve open space. Protection of natural resources is addressed within the Protect chapter through various means.*
- *This objective was revised to clarify intent (the related recommendation was also revised).*
- *This language corresponds to the language used by the Department of Open Space. It is not our intent to change existing policy, but to reflect it.*
- *This chapter is specific to preservation and open space, hence the inclusion of open space in the recommendation. Historic and cultural resources are addressed in the Appreciate chapter more broadly.*
- *Revised.*

Live

- *A photo collage and caption has been added to help convey the intent of this recommendation and the phrase universal design has been added to the glossary.*

Prosper

- *We have clarified the text within this recommendation to indicate that the focus is growth areas, and specifically previously developed areas. Definitions for brownfields and greyfields are in the glossary.*
- *Revised.*
- *Revised.*
- *This sentence has been removed from the plan.*
- *VISTA 2025 was endorsed by the County Commissioners as the economic development strategy, and will be updated during the life of Landscapes3.*
- *The adoption language was removed.*

Connect

- *We have clarified this sentence to focus on the facilities, rather than the modes. Horse and buggy is identified in Connect, recommendation 2 text and associated photo collage as a mode of travel.*
- *Language was added within the text of recommendation 2 "...in rural Resource Areas as well as the Growth Areas that serve them".*
- *The mapping reflects existing service, not proposed.*

7/25/2018 – Phoenixville Regional Planning Committee emailed:

The Phoenixville Regional Planning Committee (PRPC) is a coalition of Phoenixville Borough, Charlestown Township, East Pikeland Township, Schuylkill Township, and West Vincent Township to coordinate efforts that advance regional common interests. The PRPC operates within the parameters of a Regional Comprehensive Plan and Implementation Agreement to direct growth into the Region's older communities and designated growth areas, to maximize the efficient use of existing public infrastructure, and to preserve the Region's rural areas. To achieve its purpose, the PRPC works to:

- Protect the unique historical, cultural, aesthetic, agricultural and natural resources that contribute to the quality of life of the Region.
- Promote economic vitality through effective organization and coordination of development, attributes, and resources.
- Implement growth management techniques to provide for orderly and well-planned new development in the Region.
- Preserve open space, natural resources, and agriculture in the Region.
- Develop multi-modal transportation choices for better mobility in and through the Region.
- Encourage walkable communities with a mix of uses and a range of housing options, where appropriate within the Region.
- Maintain and improve recreation opportunities, including the trail system, of the Region.
- Address the specific needs and unique conditions of each municipality in the Region.

Overview – We have reviewed the Draft Chester County Landscapes3 Comprehensive Plan (LS3) to provide stakeholder comment and to help assure consistency between County policy and that of the Phoenixville Regional Comprehensive Plan (PRCP) that is currently undergoing revision. The Draft Landscapes3 Plan is complete and well integrated from the standpoint of vision, goals, and policy, and is a logical and functional extension of the work of Landscapes (1996) and Landscapes2 (2009).

Landscapes Map and Landscapes Descriptions – We note the following with regard to the LS3 map and area descriptions as related the Draft PRCP:

Phoenixville Urban Landscape

LS3 describes a slightly larger urban area than Landscapes2 that extends into Schuylkill Township along Pothouse Road. The Urban use description is broad and includes the Mixed Use, High Density Residential, Medium Density Residential, and Village areas depicted on the PRCP Land Use Map. LS3 and PRCP are viewed as consistent in promoting higher intensity, walkable, mixed use development in and adjacent to Phoenixville.

East Pikeland Suburban Center

The LS3 proposed Suburban Center extends into the Route 113 and Route 23 corridor in East Pikeland where there is considerable commercial and higher density residential use. The PRCP and East Pikeland zoning both extend a higher intensity Mixed Use Economic Development Area further north along Routes 23 and 724 than is shown on the LS3 map. It is recommended that the County map be revised to reflect Regional and Township land use policy.

Ludwigs Corner Rural Center

The proposed Rural Center is slightly larger than that shown in Landscapes2 and reflects recent and pending development of the area. It is generally consistent with the draft PRCP Future Land Use Map. From the standpoint of use description, the PRCP depicts the area as a Mixed Use and Medium Density Residential area and as an Economic Development Area. Although pending development is not small in scale per the precise language of LS3, design standards are incorporated in the PRCP and current development plans to establish a pedestrian scaled mixed use area. The LS3 and PRCP are viewed as largely consistent.

Rural Landscapes

The Rural landscapes are expanded from Landscapes2 to LS3 in West Vincent and East Pikeland Townships. This is viewed as consistent with the Rural and Low Density Residential classifications depicted on the PRCP draft Land Use Plan.

Goal Area: Preserve – We offer the following comments:

The **Conservation Corridors Map** is a clear illustration of policy. Greenway corridors along the Schuylkill River, French Creek, and Pickering Creek are effective tools for environmental protection and recreation. These policies will be reinforced in the PRCP update.

Goal Area: Protect – We offer the following comments:

Each of the LS3 natural resource protection goals, objectives, and strategies are reinforced in the PRCP. LS3 should consider policies for enhanced riparian buffers and other Best Management Practices (BMPs) in High Quality (HQ) and Exceptional Value (EV) watersheds.

Goal Area: Appreciate – We offer the following comments:

The **Heritage Regions and Corridors Map** is a clear and informative illustration of policy. LS3 advocacy of Heritage Tourism is reinforced in the PRCP.

Goal Area: Live – The PRCP is consistent with LS3 in terms of housing, community services, and recreation policy.

Goal Area: Prosper – We offer the following comments:

LS3 policy to increase zoning and regulatory flexibility for changing workplace and commercial environments is also central to the PRCP. The policies are consistent.

Goal Area: Connect – We offer the following comments:

The LS3 **Circuit Trail Map**, **Public Transit Map**, and **Roadway Network Focus Area Map** are all clear and informative illustrations of policy. They also are reflected in PRCP advocacy of enhanced multi-modal accessibility. LS3 and the PRCP both advocate re-establishing passenger rail service along the Schuylkill River corridor that would link Phoenixville and the Region with Philadelphia, Reading, and points between.

The LS3 recommendation to support resilient energy infrastructure through innovation and creation of distributed energy systems is reinforced in the PRCP. The PRCP goes a step further in specifically advocating non fossil sourced energy for the power and transportation sectors to reduce greenhouse gas emissions. We believe LS3 should unequivocally advocate non- polluting energy sources.

Metrics to Measure Success – This is an innovative and beneficial aspect to LS3 that establishes parameters by which the attainment of goals and objectives are measured.

However, LS3 lacks a success metric for energy resiliency and non-polluting energy development. We recommend that this be incorporated under the **Connect** metrics.

We appreciate the opportunity to review and provide stakeholder comment in the development of LS3. Please contact us with any questions pertaining to these comments.

CCPC Response:

Map

- *No response necessary*
- *The map boundaries in East Pikeland Township have been revised.*
- *No response necessary*
- *No response necessary*

Preserve

- *No response necessary*
- *Protect*

- *The map of natural resource priority protection areas has been revised to include High Quality waters.*

Protect

- *The map of Natural Resource Priority Protection Areas has been revised to include High Quality waters.*

Appreciate

- *No response necessary*

Live

- *No response necessary*

Prosper

- *No response necessary*

Connect

- *Language has been revised in various recommendations to more directly note the relationship to climate change. Chapter 1 text includes discussion of overall community and environmental resilience.*

Metrics

- *In developing metrics for Landscapes3 our criteria included the ability to clearly influence the metric, the ability to track the metric into the foreseeable future (i.e., the data will remain available and consistent), and selecting a metric that has data available at the county level. We did not feel that any metric related to energy met these criteria.*

7/31/2018 – Christina Watersheds Municipal Partnerships emailed:

Since 2009 the Christina Watersheds Municipal Partnerships (formerly the Christina TMDL Implementation Partnership) has been a collaboration of non-profit organizations, consulting professionals, and concerned citizens working to assist Chester County municipalities with the improvement of local streams through the successful implementation of the Christina Basin TMDL and more recently through the MS4 process. The health of the County's water resources is vital to ensure local streams meet their designated uses, provide efficient ecosystem services on which all citizens rely, and continue to provide significant economic benefits to the local economy. Chester County has been and continues to be a key partner in this effort through various financial and technical resources. An important component of the County's contribution is through the County comprehensive plan, Landscapes2, and the Landscapes3 update. Landscapes2 was an award-winning plan that built on the success of Landscapes and many companion plans in the interim, such as Linking Landscapes, Watersheds, and others. We value the foresight the various Boards of Commissioners have had in guiding our County to be the healthy, vibrant, desirable place it is and feel the current administration is providing a path for 10 years of increased pride, preservation, and economic opportunity for all current and future residents.

As the County releases the first draft of Landscapes3, the CWMP Planning Team respectfully submit the following comments on the Landscapes3 Draft Goals, Objectives, and Recommendations – Public Review Draft June 15, 2018, and we welcome the opportunity to further discuss our comments and participate in the process.

Overall Comments:

- Compared with other comprehensive plans of this day and age for sophisticated areas, there's essentially no acknowledgement of our changing climate, no policies on resiliency, and only very limited attention to energy conservation.
- The draft plan, and the Preserve Chapter, admirably calls for expanding the current amount of protected open space (farmland, natural and cultural resource land, water resources). However, the plan doesn't set any expansion targets or metrics to evaluate success. Is the assumption that if preserved acreage numbers are increasing, the County's plan will be fulfilled?
- *Landscapes2* was more inclusive, providing roles for municipalities, citizens, institutions, organizations, etc.
- The draft plan under-emphasizes the appropriate use of zoning under "Preserve" and "Protect". This is very different from past Landscapes plans and takes the pressure off those municipalities who are resistant to the use of restrictive zoning. It seems to assume that important lands will be preserved through conservation easements and purchase of development rights.
- Smart Growth and PA's Keystone Principals included in prior Landscapes plans are not mentioned. Is there an alternative that is being used as a guiding philosophy for Landscapes3 that can be referenced and cited following adoption?
- Finally, we request the County Planning Commission provide data on the successful implementation of Landscapes2 recommendations so that yet-to-be implemented components still relevant may be considered for inclusion in Landscapes3.

Proposed Preserve Chapter

1. Increase Protected Farmlands – supporting text for this recommendation does not discuss the importance of agricultural zoning to protect farmland. While zoning is not permanent, when applied to farmland it buys time for conservation interests to cultivate permanent agricultural easements, among other benefits. Similarly, this text could mention other complementary tools to agricultural zoning, such as Transfer of Development Rights. This is an important option where farms may not score well under County/State farmland preservation program, or where the private sector can help finance the preservation of agricultural resources.
2. Under Encourage Restoration and Stewardship – the important role watershed organizations and land trusts can play in implementing this recommendation should be added to the narrative. These types of non-profits are viewed by other recommendations as important contributors. Further, the plan seems to imply that natural resources not on protected open space, and therefore possibly more vulnerable, will not receive similar efforts. Finally, any County assistance for restoration activities should be offered from a new funding source and not reduce the amount of funding in current open space or planning programs.
3. Recommendation 2 states that "...there are no longer ample opportunities to protect significantly large natural areas...", how has the CCPC determined this and how does it define "significantly large" or "ample opportunities?"

4. Farmland Preservation Opportunities Map: how has the CCPC determined and defined “Priority” farms? Please include explanations on how determinations were made on this and other key data throughout the plan.
5. Recommendation 3 calls for additional parks for recreation and states that municipalities should drive the effort but does not provide any tools, recommendations, or commitments for the County to assist the effort. Previously the County has provided funding for municipal open space and recreation plans and made them a requirement for acquisition or capital improvements. The County should again assist with funding of open space and recreation funds using new County funding programs that do not reduce funding from existing County open space or planning programs.

Proposed Protect Chapter

1. We strongly support the planned update to Watersheds. Like any planning effort, Watersheds needs to be updated to address current and anticipated issues and evaluated to determine which recommendations have been implemented and which need additional action.
2. If the County’s use of the Preserve Chapter covers only permanent protection mechanisms such as easements, then the Protect Chapter should recommend use of agricultural preservation zoning to protect prime farmland soils and retain a viable mass of agriculture, use of transferable development rights as a viable option to the purchase of development rights, and use of conservation design and other compact development techniques as an effective method of protecting natural (and cultural) resources. Natural resource protection standards are very important, but not the only tool in the toolbox.
3. The May 2018 Brandywine-Christina State of the Watershed report indicates some promising trends in water quality for several parameters, such as Dissolved Oxygen and Orthophosphate. Open space and water quality protection programs appear to be improving or stabilizing water quality within the Brandywine-Christina watershed and ongoing monitoring is critical to assessing the benefits. This component of the plan should be accompanied by a commitment to continued funding of the CCWRA’s monitoring stations.
4. Natural Resource Priority Protection Areas map should label Broad Run, since it is shown, but not identified, as an EV watershed. Also, this seems to be a good map to show designated Important Bird Areas (IBAs) which are important ecological landscape features and are not represented elsewhere in the plan.
5. Landscapes2 recommended the development of a Natural Resources Handbook, this recommendation should be included as an appropriate new tool for Landscapes3.
6. We support the enhanced technical assistance to municipalities supporting on-lot sewage management programs.

Chester County should encourage new special protection waters designations on streams and watersheds within the County boundaries through the Watersheds update process.

Proposed Appreciate Chapter

1. We support the creation of funding programs for protection of designated historic resources, but the funds should not reduce funding from existing County open space or planning programs.
2. We believe the County could serve a valuable role in adaptive reuse by providing technical assistance on reuse of existing historic structures that currently may not meet current building codes but otherwise may provide a valuable economic benefit, especially in urban centers.

Proposed Live Chapter

1. We support the County's Goal and feel that Smart Growth and PA's Keystone Principals should be directly referenced in the plan's recommendations.
2. The County should support and provide technical assistance for increased densities in urban areas and employment centers through infill, zoning, and increased building heights.
3. Please provide a source for the intended incorporation of universal design into the plan, with accompanying definition, background information, and supporting materials.
4. As mentioned above, we support enhanced and expanded recreational opportunities, especially in under-served communities, and urge the County to assist with funding of open space and recreation using new County funding programs that do not reduce funding from existing County open space or planning programs.

Proposed Prosper Chapter

1. Recommendation 1: "Create a countywide redevelopment program to revitalize underutilized properties", what is the definition of an underutilized property? The plan should state this effort will explicitly be for brownfields, greyfields and infill in urbanized areas and not be used to increase sprawl via redevelopment in other landscape types such as suburban areas. If "highest and best use" is used as the metric, then many natural areas, agricultural lands, and/or under-developed properties may be inappropriately targeted.
2. Recommendation 2: "Zoning that provides an adequate land area to create a sustainable tax base is a necessary step". What is defined as a "sustainable tax base" and how will "adequate land area" be determined?
3. We support continuation of the existing support for Chester County's urban centers, especially the City of Coatesville.
4. We support the agricultural economic development recommendation but note that the recommendation should be corrected to state that agriculture is Chester County's leading industry, not "a" leading industry.
5. Under Ensure Economic Development Strategies Remain Responsive – the narrative needs to be corrected to reflect that VISTA 2025 was not adopted as an official County plan or policy. The County Commissioners adopted Resolution # 48-14 endorsing support for the VISTA 2025 Economic Development Strategy on 11/6/14.
6. Also, to avoid leaving the County Planning Commission and other important stakeholders out of future VISTA updates, the last line of the narrative should be worded to state "The Chester County Economic Development Council, in partnership with the County Board of Commissioners and its Planning Commission, the private sector, and other stakeholders will lead the effort to update VISTA 2025."

Proposed Connect Chapter

We support the Connect Chapter Goal, Objectives, and Recommendations especially as they relate to integrated water, sewer, and land use planning, with primary focus on existing infrastructure maintenance and resilience.

We thank you for your time and consideration of you submitted comments and welcome continued dialogue.

CCPC Response:

Overall comments

- *Various objectives and recommendations address specific elements of sustainability (increasing protected open space, protecting natural resources, reusing historic structures, encouraging housing near employment opportunities, supporting multimodal transportation options, expanding the trail network, and increasing energy resilience). In the full draft of the plan there is general supporting text for sustainability and resiliency. The energy recommendation was revised to be more specific.*
- *The county notes a percent goal for open space within its strategic business plan, Managing for Results. Metrics for Landscapes3 will include the percent of protected open space, a measure of the connectivity of the open space network, and a measure of protected farmland versus the amount of farmland in use.*
- *Language within each recommendation notes entities that should be significantly involved in implementation, and Chapter 10 provides more detail on the entities and the suggested activity.*
- *One recommendation was added to specifically address regulatory open space tools. There is a specific recommendation in the Protect chapter for natural resource policy and ordinance assistance.*
- *There is general language within the full draft regarding smart growth, with a definition and link to more information in the glossary.*
- *There is various information online regarding achievements related to Landscapes and Landscapes2, as well as the annual report cards that were developed for Landscapes2. Within the Landscapes3 plan we have information on accomplishments in Chapter 1.*

Preserve

- *One recommendation was added to specifically address regulatory open space tools.*
- *Land trusts were added to the recommendation text as a partner. The language was revised to clarify that stewardship is always appropriate for natural resources, regardless of ownership status, and that significant funding for restoration should include a mechanism to protect the resource/restored area into the future.*
- *This language was revised.*
- *The map was created based on the criteria for the county open space preservation funding, and after input from the Brandywine Conservancy on the specifics of that criteria. Considerations included existing land use, prime farmland soils, parcel size, and proximity to existing easements. Introductory text to the map notes that the map is not meant to depict every potential future agricultural easement, but rather the general extent of remaining opportunities.*
- *There are existing county programs in place to fund the planning and acquisition of park lands, notably the Vision Partnership Program and the Municipal Grant Program. The county programs are anticipated to continue under Landscapes3.*

Protect

- *No response necessary.*

- *A new recommendation was added to the Preserve chapter to address regulatory tools for open space.*
- *The water resource monitoring recommendation addresses the continuation of the existing monitoring program as well as a commitment to modify the program over time to address new needs brought about by changes.*
- *The map does not label EV waters, it does label watersheds. We have revised the map to indicate this more clearly. We have added Important Bird Areas to the map.*
- *As part of the Brandywine Creek Greenway Strategic Action Plan, the Planning Commission worked with Brandywine Conservancy on the Implementation Tool Kit, which provides detail on both regulatory and non-regulatory methods for open space, natural resource, and cultural resource preservation and conservation. While not a “guidebook”, the Tool Kit does address the intent of the Landscapes2 recommendation. We remain committed to more broadly distributing information on the tools covered within the Tool Kit and addressed within our own website (such as our eTools).*
- *No response necessary.*
- *We agree that discussion of special protection waters and expanding designations for streams within the county should be part of the Watersheds update process.*

Appreciate

- *It is currently not the intent to divert funding from existing open space or planning programs.*
- *No response necessary.*

Live

- *Chapter 1 language generally references smart growth principles.*
- *Live, recommendation 1, addresses direct provision of policy and ordinance assistance for housing. Prosper recommendations 2, 3, 8, and 9 address technical assistance and support of directing growth appropriately, particularly to our Urban and Suburban Centers.*
- *Universal design is an element of planning and design that has seen increased focus in recent years, particularly with the aging of the Baby Boomers generation and a focus on providing spaces that are accessible across a range of abilities. Further information can be found from various sources, including the American Planning Association and AARP. We have added a photo collage and caption to further convey the intent of the recommendation, and added the phrase universal design to the glossary.*
- *There are existing County programs that support public open space and recreation, including the Municipal Grant Program through the Department of Open Space and eligibility of park, recreation, and open space plans within the Vision Partnership Program.*

Prosper

- *We have clarified the text within this recommendation to indicate that the focus is growth areas, and specifically previously developed areas. Definitions for brownfields and greyfields are in the glossary.*

- *This sentence was removed from the plan.*
- *No response necessary.*
- *Determining “a” leading industry for Chester County is difficult, given that different measures can lead to different conclusions (data such as number of workers, location quotient, revenue generated, etc.). Throughout the plan we discuss multiple leading industries, agriculture among them.*
- *This language was corrected through removal.*
- *As county department involvement in VISTA 2025 extends beyond the Planning Commission to include Community Development, Agricultural Development Council, and others the language was not changed.*

Connect

- *The language for the water, sewer, and land use recommendation was revised to note a focus on maintenance and modernization of existing infrastructure.*

7/30/2018 – Penn Township Supervisors emailed:

The Penn Township Supervisors wish to express their thanks and support to the Chester County Planning Commission for their efforts in updating the Chester County Comprehensive Plan, Landscapes3.

After reviewing Landscapes3 with the Penn Township Planning Commission and reviewing their letter dated July 30, 2018, the Supervisors are in agreement with the Penn Township Planning Commission assertion that the area north of US Route 1 be amended and designated as either "Rural" or "Agricultural" for the reasons enumerated in the Penn Township Planning Commission's July 30, 2018 letter. It is our desire that Landscapes3 be consistent with the Penn Township Municipal Zoning Map and the Penn Township Comprehensive Plan.

The Supervisors wish to express their thanks to the Chester County Planning Commission for this opportunity to offer comment regarding Landscapes 3.

7/30/2018 – Penn Township Planning Commission emailed:

The Penn Township Planning Commission (PTPC) expresses its support for the draft Chester County comprehensive plan, Landscapes 3, and extends thanks to the Chester County Planning Commission for its excellent work. The Penn Township Planning Commission members would like to draw your attention to one issue of concern.

US Route 1 runs east-west through Penn Township dividing it roughly in half and providing a de facto boundary between the northern portion of the township, and the southern. The northern portion, above Route 1, was zoned to retain its rural character while the southern portion, below Route 1 hosts substantial suburban development. In accordance with the zoning, a municipal sewer system serves a significant portion of the suburbanized area south of US Route 1. There is no municipal sewerage north of US Route 1 consistent with the Supervisors intent to preserve the rural character of the township about the Route 1 bypass.

The current draft Landscapes Map broadly reflects this north-south distinction but designates a relatively small area (about 200 acres) north of US Route 1 as "Suburban" which would be inconsistent with intention of and spirit of the township zoning map. With this letter, the PTPC respectfully requests that the entirety of Penn Township north of US Route 1 be designated as either "Rural" or "Agricultural" so that Landscapes may remain consistent with the Penn Township Municipal Zoning Map and the Penn Township Comprehensive Plan.

The PTPC's concern is that many of the uses envisioned for "Suburban" designated areas are not compatible with on-lot sewage disposal, nor our zoning for that area which is 2 acres and above. The density implied by the term "Suburban" would require either municipal sewerage or on-lot community systems as well as public water, which is not the intent of current or future Penn Township zoning. The Township's Act 537 plan projects no future extension of municipal sewerage north of Route 1, citing both zoning (primarily low-density residential and agricultural use, Section 5.1.2 p. 31) and the "significant cost and technical difficulties associated with constructing a sewer line across Route 1" (Ibid. and Section 5.1.3.5, p.35). Further, the Act 537 plan clearly discourages community systems (Section 5.2.5, p. 41).

In restricting municipal sewerage to south of US Route 1, the Penn Township Board of Supervisors, through its Act 537 and zoning, has stated its intention to maintain the rural character of the northern region. The PTPC fears that the "Suburban" designation may invite development pressure, or be used to justify zoning modifications, that would in turn force extension of the sewer across US Route 1 through a modification of the Act 537 plan. If this were to occur, the Township would likely find it difficult to limit further extension of sewer lines and the rural character of the northern part of the Township could be seriously jeopardized creating an inconsistency with our Comprehensive Plan.

It could be argued, in objection to the requested "Rural" designation, that four parcels (about 80 acres) north of Route 1 are currently zoned "C-2 Special Limited Business District", a designation that allows large commercial buildings and shopping centers and is clearly not "rural." In response, the PTPC notes that approximately half (about 40 acres) of the C-2 area is now owned by the Township and slated for use as an active recreation park and is deed-restricted in perpetuity as such in accordance with grant funding requirements of both the Chester County Open Space Fund and the Land and Water Conservation Fund (US Department of Interior and the PA DCNR). The remaining 40 acres consist of three parcels, each already occupied by establishments (a retail store, a manufacturing facility, and a medical office building) that are constrained from major expansion in part, at least, by the absence of municipal sewer. Thus, in the PTPC's view, the current C-2 zoning should not deter the County from mapping the entire northern part of Penn Township as "Rural" or "Agricultural".

The PTPC and its members wish to express their thanks to the Chester County Planning Commission for this opportunity to offer comment regarding Landscapes3.

CCPC Response:

With respect to your request, the Landscapes map has been revised to reflect Route 1 as the general boundary between the Suburban Center/Suburban landscapes and the Rural landscape.

7/31/2018 – Christopher Bashore, Malvern Borough Manger emailed:

At the request of the Chester County Planning Commission, the information pertaining to Landscapes3 was circulated to the members of Borough Council and the Planning Commission. I offer the following comments from members of each body:

Amy Finkbiner. PhD - Malvern Borough Council

The whole Borough is shown as Urban Center, which I believe is the same as Landscapes2. But perhaps we want take a look into classifying the southern portion (Prep/ Retreat/ R1) as Suburban, to match Willistown.

Zoe Warner - Malvern Planning Commission

Overall, the plan provides strong guidance far the county's municipalities. I appreciate the emphasis on preserving land and agricultural resources while providing for sustainable growth. There were a few objectives that could be expanded to offer more guidance. Specifically, I would like to see the following included.

Within the preservation initiative there is an opportunity to promote resource stewardship on all preserved lands with the goal of achieving multiple layers of benefits on different types of preserved land (e.g., improving water quality, soil conservation, providing wildlife and aquatic habitat, etc.). Therefore, the call for stewardship should not only be for open space and public preserves, but should also include land under conservation and agricultural easement. My recommendation would be to revise Recommendation 6 to read "encourage the restoration and stewardship of land and resources on protected open spaces and preserved land."

The protect initiative should tie land use to climate change. A resilient environment will be a necessity for addressing and mitigating climate-related changes. We will need land use policies that do not make areas more vulnerable by exacerbating outcomes related to land use, especially in relation to rain events and stormwater runoff. The recommendations should acknowledge changing weather patterns. This could be addressed in Recommendation 4 by expanding the recommendation: Utilize the countywide water resources monitoring network to assess and respond to changing resource conditions resulting from growth and land use change and longer- term climatic changes.

Thank you for including the MPC in the review process. I hope my ideas are helpful.

On behalf of Malvern Borough, we thank you for including us in this process. Please do not hesitate to contact me if you have any questions. Thank you.

CCPC Response:

As a policy decision, all areas of the county's boroughs are designated as Urban Centers. This continues the policy set by prior Landscapes plans.

The recommendation specific to stewardship within the Preserve chapter has been revised to clarify the intent of appropriately managing resources regardless of location, while noting that investment of significant funds for restoration should include a mechanism to protect the resource in the future.

Language has been revised in various recommendations to more directly note the relationship to climate change. Chapter 1 text includes discussion of overall community and environmental resilience.

8/1/2018 – Ellen Ferretti, Director, Brandywine Conservancy emailed:

Subject: Comments on June 15, 2018 LS3 Review Draft

Several weeks ago I asked my staff at the Conservancy to review the above referenced version of the draft Landscapes3 comprehensive plan so that comments could be submitted to you and your plan update team. Rather than have each staff person enter their comments through your website, I'm summarizing their comments below for your consideration for the next draft.

Everyone here appreciates the County Planning Commission's openness to public input as the draft comprehensive plan update is being finalized. The fact that you and your colleagues visited our Conservancy offices in Chadds Ford in an effort to resolve many of our concerns speaks highly of the County's efforts to produce a sound planning document. We thank you and your staff for listening to our concerns, and for adjusting maps and text accordingly, leading up to the June 15th draft. The comments on the following pages are offered with a similar objective, i.e., to strengthen the current draft.

I will start by listing what I perceive to be some overall staff comments:

- The plan appears to be comprehensive in scope and contains many timely and clearly stated goals and policies. Maps and illustrations are clear, nice to look at, and those describing the landscapes depicted on the Landscapes3 map are helpful.
- Landscapes and Landscapes2 had identified and explained the basic workings of "tools" or practices municipalities could use to implement the County-wide plan. Thus far, LS3 takes a more high-level, policy approach. Perhaps a thorough summary of tools and practices municipalities can use to implement LS3 goals and policies, such as innovative zoning, or impact fees, will be included in an appendix?
- Chester County has prided itself in being a leader among other PA counties as well as those of neighboring states, particularly in planning, open space, and economic development. Which is why it's surprising that so little attention is given in this draft to promoting sustainability at the county, regional, and community levels. This draft has only limited acknowledgement of our changing climate, no policies on resiliency, very limited attention to energy conservation, and little to no guidance for its municipalities.
- With regard to our work as part of the County core conservation group, the draft plan, and particularly chapter 4, calls for expanding the current amount of protected open space (farmland, natural and cultural resource land, water resources). However, the plan doesn't establish any expansion targets, and the proposed POST system metric has very little value without these targets to measure County success. Aside from adoption of this plan, what other

assurances will the conservation community and municipal officials have with respect to the County Commissioners' continued commitment to open space preservation?

- Landscapes2 was more engaging and inclusive, providing roles for municipalities, citizens, institutions, organizations, etc., in implementing the Plan. LS3 seems to be more County-focused, in many cases with specific actions directed to various County departments.
- The draft plan is light on acknowledging the benefits of municipal zoning under "How We Preserve" and "How We Protect". This is also very different from past Landscapes plans, and we believe minimizes the value of zoning as an important supplement to conservation or protection efforts. For example, Chapter 4 assumes that important lands will be preserved through conservation easements and purchase of development rights. We believe it's critical for municipalities to also establish or maintain agricultural preservation or rural conservation zoning where preservation of large landscapes is desired. Through the language of Landscapes and Landscapes2, the County's comprehensive plan has been helpful in supporting a municipality's zoning efforts in this manner.
- Although staff had ensured that earlier LS3 maps and text acknowledged the Brandywine Creek Greenway, we don't readily see where this draft acknowledges the Greenway. Given that the County is a BCG partner, and given the County Planning Commission's formal acknowledgement of the Greenway at a one of its earlier meetings, we assume that LS3 would at least acknowledge, if not promote, the Greenway as one of the County's key natural and recreational areas. Later in our comments, possible locations are identified within chapters 4 through 9 that could reference the Greenway.
- According to the County's proposed LS3 outline (presented in Steering Committee meeting #6), chapter 3 is to include "overall recommendations on partnerships, funding, planning assistance, and regional efforts". We assume that this chapter is not yet drafted. Otherwise, there's no mention of funding of County initiatives or municipal implementation efforts anywhere else in the draft plan.
- When our core conservation group met with County Planning Commission staff, we reached consensus regarding the importance of updated municipal open space, recreation and environmental resources plans in determining future open space and recreational needs and related funding requirements. Our recollection was that County staff also felt this was a valid objective, and implied that LS3 would emphasize this need. However, there's nothing in the current draft that we can find.
- We suggest that LS3 recognize the ongoing efforts of the Brandywine/Christina Cluster, particularly with respect to utilizing collected water quality data produced on behalf of the William Penn Foundation by the Cluster team, particularly as a metric for stream health under How We Protect. The Brandywine/Christina Cluster is one of eight areas created by the William Penn Foundation within the four-state Delaware River Basin and is a focus area for water quality enhancements through significant funding and collaborative efforts of many non-profit organizations. We would be happy to share more information on this effort with County staff and how it can supplement the County's highly-successful water resources protection efforts.

Specific text comments now follow.

- Proposed Chapter 4. How We Preserve
 1. Increase Protected Farmlands - supporting text for this recommendation does not discuss the importance of agricultural zoning to protect farmland. While zoning is not permanent, when applied to farmland it buys time for conservation interests to cultivate permanent agricultural easements, among other benefits. Similarly, this text could mention other

complementary tools to agricultural zoning, such as Transfer of Development Rights. This is an important option where farms may not score well under County/State farmland preservation program, or where the private sector can help finance the preservation of agricultural resources.

2. Under Encourage Restoration and Stewardship -The important role land trusts can play in implementing this recommendation should be added to narrative. Land trusts are viewed by other recommendations as important contributors.
 3. Conservation Clusters and Corridors map does not explain what conservation corridors (the green dots) are.
- Proposed Chapter 5. How We Protect
 1. If we accept the County's use of the word "preserve" to cover only permanent protection mechanisms such as easements, then "how we protect" should recommend use of agricultural preservation zoning to protect prime farmland soils and retain a viable mass of agriculture, use of transferable development rights as a viable option to the purchase of development rights, and use of conservation design as an effective method of protecting natural (and cultural) resources. Natural resource protection standards are very important, but not the only tool in the toolbox.
 2. Natural Resource Priority Protection Areas map should show the Brandywine Creek Greenway as a conservation corridor. It should also label Broad Run, since it is shown, but not identified, as an EV watershed. Also, this seems to be a good map to show designated Important Bird Areas (IBAs)?
 3. Monitor impacts of change on water resources - should the narrative under the recommendation reference the Brandywine/Christina cluster as a primary partner for monitoring stream water quality?
 - Proposed Chapter 8. How We Prosper
 1. Under Ensure Economic Development Strategies Remain Responsive Narrative needs corrected to reflect that VISTA 2025 was not adopted. The County Commissioners passed a resolution of support. This may sound like a "minor" issue, but it's not.
 2. Also, to avoid leaving the County Planning Commission out of future VISTA updates (they were left-out of VISTA, which was one of the reasons VISTA could not be adopted by the CCC), the last line of the narrative should be worded to state "The Chester County Economic Development Council, in partnership with the County Board of Commissioners and its Planning Commission, and the private sector, will lead the effort to update VISTA 2025.
 - Proposed Chapter 9. How We Connect
 1. Under Advance Multi-Modal Transportation, Create A Countywide Interconnected Trail Network, there should be mention in the supporting paragraph of the Brandywine Creek Greenway, forming the current western extent of the Circuit Trail.
 2. Similarly, the Brandywine Creek Greenway should be shown or acknowledged on the How We Connect Policy Map, Circuit Trails.
 - Landscapes

In general, this discussion of the Landscape categories for the Landscapes3 map contains some good information and helpful illustrations. Implementation tools are identified here which are lacking under the goal narratives.

1. The Transferable Development Rights tool is mentioned for use in some of these landscapes. However, the only Landscape recommended for TOR receipt is Rural Center. Other Landscapes which clearly are appropriate for TOR receipt are the Suburban, Suburban Center, and Urban Center Landscapes.
2. Under Suburban Center Landscape, Preservation Focus, restoration of impacted natural resources is as important as preservation of natural resources and should be added.
3. Under Suburban Landscape, Preservation Focus, restoration of impacted natural resources should be added here too.
4. Under Agricultural Landscape, Preservation Focus, agricultural preservation zoning should be listed as an appropriate tool.

Thank you again for encouraging comments from the public as you, your staff, other County departments, and the Commissioner-appointed Steering Committee work diligently to produce a plan which represents, and is embraced by, Chester County's diverse stakeholders. Should you have any questions with comments contained in this letter, please feel free to contact me at eferretti@brandywine.org or by phone at 610-388-8393.

CCPC Response:

Overall comments

- *No response necessary.*
- *One recommendation was added to specifically address regulatory open space tools. Details on many tools are currently provided in the Planning Commission's webpage for Planning Guides and Toolbox (<http://www.chescoplanning.org/MuniCorner/AllTools.cfm>). We anticipate including various links as appropriate within the web-version of Landscapes3, and will be promoting the guides and toolbox during implementation of Landscapes3.*
- *Various objectives and recommendations address specific elements of sustainability (increasing protected open space, protecting natural resources, reusing historic structures, encouraging housing near employment opportunities, supporting multimodal transportation options, expanding the trail network, and increasing energy resilience). In the full draft of the plan there is general supporting text for sustainability and resiliency. The energy recommendation was revised to be more specific.*
- *The county notes a percent goal for open space within its strategic business plan, Managing for Results. The Commissioners remain committed to open space, and funding for open space preservation has remained stable for several years.*
- *The plan does include recommendations for county departments. Language within each recommendation notes entities that should be significantly involved in implementation, and Chapter 10 provides more detail on the entities and the suggested activity.*
- *One recommendation was added to specifically address regulatory open space tools. Discussion of regulatory tools is also included with reference to natural resources, historic resources, and land uses.*
- *References to the Brandywine Creek Greenway have been added to the full draft plan.*

- *Chapter 3 text includes general information on partnerships, funding, planning assistance, regional efforts. Much of this narrative is also touched on in Chapter 1, to reinforce the elements of education, planning, technical assistance, regulation, programs and services, and construction. After the full plan was generated staff felt it was not necessary to include recommendations in Chapter 3, and that the core principles were sufficient. Chapter 10 also addresses these topics.*
- *Municipal park, recreation, and open space plans are currently eligible for funding under the Vision Partnership Program and will remain eligible. Multiple recommendations note county support for recreation expansion, open space networks, natural resource policy and ordinance assistance, and recreational opportunities.*
- *Language was added to the water monitoring recommendation to note that information sharing should occur.*

Specific comments

- *4.1: Language was added to the farmland preservation recommendation and a recommendation was added to discuss regulatory mechanisms.*
- *4.2: Land trusts were added to the recommendation text as a partner.*
- *4.3: The introductory text explains conservation corridors.*
- *5.1: One recommendation has been added to specifically address regulatory open space tools.*
- *5.2: A map of the Brandywine Creek Greenway was added within the Protect chapter. EV waters are not specifically labelled on the map. Stream labels correspond to watersheds, and the map has been revised to more clearly indicate this. We have added Important Bird Areas to the map.*
- *5.3: Language has been added to note that information sharing should occur. Chapter 10 includes more information on partners.*
- *8.1: The language was corrected.*
- *8.2: As county department involvement in VISTA 2025 extends beyond the Planning Commission to include Community Development, Agricultural Development Council, and others the language was not changed.*
- *9.1 & 9.2: The Greenway is referenced in the Project chapter.*
- *Map 1: Tool references were removed from the landscape category descriptions.*
- *Map 2: This change has been made.*
- *Map 3: This change has been made.*
- *Map 4: Tool references were removed from the landscape category descriptions.*

8/6/2018 – Gina Wheeler, West Fallowfield Township Secretary, emailed:

The Board of Supervisors reviewed the Landscapes Map at their meeting held on July 18, 2018. At that meeting, the Board determined the West Fallowfield Township Planning Commission should review the maps and offer recommendations to the Board of Supervisors. The map will be reviewed by the Planning Commission at their monthly meeting on August 14, and the Board will review their recommendations at their regularly scheduled monthly meeting on August 15, 2018. Any comments or changes will be provided following the Board of Supervisors meeting.

CCPC Response:

- *No response required*

8/7/2018 – Victoria Laubach, Executive Director, Green Valleys Watershed Association emailed:

Thank you for your presentation at last night's West Vincent Township BOS meeting. As I mentioned at the meeting it would be much appreciated if on the natural resource priority protection areas if High Quality waters would also be incorporated into the map. High Quality and Exceptional Value waters are the highest designations DEP gives to streams. There is very little difference in the designations and given the county's quantity of HQ & EV streams, unique in SE PA, they should all be recognized as priority protection.

High Quality Waters - Surface waters having quality which exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water by satisfying Water Quality Standards of the PA Code § 93.4b(a). Satisfies benchmarks of Chemistry and Biology and supports a high quality aquatic community.

Exceptional Value Waters - Surface waters of high quality which satisfy water quality standards of the PA Code § 93.4b(b). Beyond meeting High Quality Benchmarks, Exceptional Value Water:

- Is a surface water of exceptional recreational significance;
- Is of exceptional ecological significance; or
- Is located within a protected zone e.g. State Park.

I would also point out that the William Penn Foundation and many other funders have invested a significant amount in the county's water resources and they wouldn't if they didn't think its important. I found this interesting:

https://www.sbnphiladelphia.org/event/entrepreneurs-roundtable-clean-water/?mc_cid=22a976005d&mc_eid=f8ecb327c2

It reminds me of a meeting many years ago with Senator Dinniman when he was emphatic that the reason businesses find Chester County desirable is because of the abundance of clean water. Thank you for your consideration.

CCPC Response:

With respect to your request, the map of Natural Resource Priority Protection areas has been revised to include High Quality waters. The online version of this map may be interactive and allow a viewer to access additional detail.

8/7/2018 – Blair Fleischmann, Executive Director, S.A.V.E. emailed:

This mailing is in response to the requests to Landscapes3 Steering and Stakeholder team members for review and comment on the county's comprehensive plan update. In our review, we considered the first and second versions of Landscapes. We also referenced the Pennsylvania Municipalities Planning Code

(MPC) for the purpose of a comprehensive plan and requirements that would be used by municipalities in their adoption and enforcement of land use regulations.

We commend the Chester County Planning Commission (CCPC) for the extensive efforts to make this an open and inclusive process. The draft documents clearly reflect input gathered from a variety of sources. The draft language and maps include concepts of the input that we either expressed directly or generally supported over the months of preparation by the CCPC. The interactive maps, photographs and diagrams make the plan extremely visual. The CCPC staff has done an excellent job of communicating with the citizens of the county through a variety of methods about the plan and its process.

Early on, we recognized that it would be a challenge to reflect the overlap within each of the six selected Goal areas. Each of the Goal areas identifies Objectives and Recommendations. The overlap of content may make it difficult to use the document to reference certain subject matter without reading the entire document. For example, land application of community wastewater is endorsed under Protect, but is not referenced under Connect where sewage facilities planning is discussed. Additionally, Planning Principles and Land Use guidelines are separated from the Goals and Objectives and provided in the text that follows six of the eight Landscapes Description Maps. The Metrics to Measure Success graph describes tracking, measuring, and determining each of the six Goals, but it is not always clear how or who will implement the Recommendations in order to achieve the Objectives. Given that comprehensive plans are reviewed for consistency, will the Chester County municipalities be able to pivot from the goals, objectives, policies, and action plans followed in Landscapes² to the goals, objectives, and recommendations presented in Landscapes³?

It will be important for readers to understand the level of the government agency or department being identified in the plan and what official role each might have in the process. There are some minor variations of the references to the different departments, as well as other government or non-profit agencies. Most of the acronyms are spelled out at least once, with the possible exception of TMACC and GVFTMA, but the references are not always consistent. This is especially important when funding is involved and there can be matching levels of participation. These roles and identities are also important in terms of legal authority. Certain agencies and non-profits can partner together to create or fund a plan or project, but each must follow a pre-designed process.

More specifically, we offer the following. Under the proposed Live Goal, Recommendation 2 - We question the establishment of a "land bank". This term generates many questions, but ultimately what safeguards would be implemented to ensure the intended outcome? Recommendation 8 - The term "universal design" is offered without any background information or supporting source material.

Under the Prosper Goal, Recommendation 1 - What would be the definition of an "underutilized property"? The plan should state this effort will explicitly be for brownfields, greyfields, and infill in urbanized areas and not used to increase sprawl in other landscape types such as suburban areas. Recommendation 2 - What is defined as a "sustainable tax base" and how will "adequate land area" be determined? Given that certain types of development can ultimately be of greater cost than benefit, this issue should be rigorously vetted before being incorporated into the plan. Without a glossary of terms or other guiding principles, some of these terms could be open to interpretation or applications that are not consistent with the Goals or Objectives of the plan. Recommendation 5 - If the county actively markets its location and amenities, wouldn't this make it more difficult to achieve the goals of preserving and protecting those aspects of Chester County that are desired by its residents?

Under the Connect Goal, Recommendation 10 - We support the coordination and integration of water, sewer, and land use planning, but existing infrastructure maintenance and resilience should be prioritized over expansion into proposed growth areas.

The Landscapes3 draft document talks about the need to respond to changing conditions resulting from growth and land use change, but there appears to be no mention of the need to respond to climate change. We support the update to *Watersheds*, but believe it is critical to develop a Natural Resources handbook as well. Municipalities are learning first hand the impacts of stormwater, so it is important to demonstrate how these activities are linked together.

The MPC calls for the preservation of prime agricultural land and natural and historic resources. We support the county's financial and technical assistance with historic preservation and adaptive reuse of historic structures. The county can provide incentives by providing financial support for municipal open space or recreational plans, but it will be important to continue to fund the county's existing vision partnership planning and open space preservation programs so that matching funding from other sources can be leveraged to protect the viability of agriculture, the number one industry in Pennsylvania, as well as the natural resources that sustain us.

S.A.V.E.'s mission is to promote the quality of life and community character of southern Chester County through Smart Growth principles that support safe transportation, agriculture, villages and the environment. We appreciate the opportunity to participate in the Landscapes3 process because of its direct relationship to our mission.

CCPC Response:

- *We have provided various listings to help users navigate the plan. Each recommendation chapter includes a summary listing of recommendations. Goal area descriptions are provided in multiple places to remind users what elements fall under what goal areas. Chapter 10 provides a listing of all of the plan's recommendations, organized by goal area, with detail on implementing entity and activities. The online version of the plan will be able to more directly connect related recommendations. We have presented to many of our municipalities throughout the development of Landscapes3, and will continue to engage with them regarding the plan's structure and focus areas.*
- *The current draft of the plan generally avoids the use of acronyms in the text unless it is a situation where the acronym is clearly better known than the full name (such as SEPTA). We have included a list of acronyms in the appendix, along with descriptions of implementing entities. Chapter 10 includes detail on leading implementing entities, along with activities that could be undertaken.*
- *We have removed the phrase "land bank". It is our intent to encourage activities such as that which Phoenixville has recently undertaken, where excess Borough property has been designated for use in developing affordable housing.*
- *We have added a photo collage and caption for universal design in the chapter, and added a definition in the glossary.*
- *We have clarified the text within this recommendation to indicate that the focus is growth areas, and specifically previously developed areas. Definitions for brownfields and greyfields are in the glossary.*
- *This sentence has been removed from the plan.*

- *The marketing recommendation serves multiple purposes – to retain existing businesses, to attract a skilled workforce, and to attract new businesses. The primary focus is intended to be retention of existing businesses and attraction of a skilled workforce, with attracting new business as a lesser purpose. The overall balance of preservation and growth is an overarching goal.*
- *The language for the water, sewer, and land use recommendation was revised to note a focus on maintenance and modernization of existing infrastructure.*
- *Language has been revised in various recommendations to more directly note the relationship to climate change. Chapter 1 text includes discussion of overall community and environmental resilience.*
- *As part of the Brandywine Creek Greenway Strategic Action Plan, the Planning Commission worked with Brandywine Conservancy on the Implementation Tool Kit, which provides detail on both regulatory and non-regulatory methods for open space, natural resource, and cultural resource preservation and conservation. While not a “guidebook”, the Tool Kit does address the intent of the Landscapes2 recommendation. We remain committed to more broadly distributing information on the tools covered within the Tool Kit and addressed within our own website (such as our eTools).*

8/14/2018 – Jim Wylie emailed:

I was hoping for some more comments by end of day yesterday, but we didn't get them together.

[Here is the shared doc](#) where we have collected some comments and suggestions. Hope you will see them as constructive and informative. Especially in light of an evolving energy policy in PA with respect to renewables with new legislation approved this year (CPACE) and the likelihood of Community Solar later this year or next and Community Choice Aggregation on the horizon (approved in at least 7 states I think). All intended to encourage community-level renewable energy generation and purchasing.

Thanks for considering input at this late date.

CCPC Response:

Various edits were made to clarify policy regarding sustainable and clean energy policy.

9/27/2018 – David Dondero, Housing Partnership of Chester County, emailed:

The Housing Partnership of Chester County (HPCC) is a 30 year old nonprofit organization that works closely with the Chester County Department of Community Development to assist the citizens of the county acquire and maintain decent, affordable housing.

We have received and reviewed the most recent draft of the Chester County Comprehensive Plan Update (Landscapes3). To more completely understand the Objectives and Recommendations of the authors we are interested in obtaining any operative glossary of terms used throughout the draft document.

CCPC Response:

Thank you for your interest in Landscapes3. I've attached an unformatted version of the full appendices for the plan. This includes descriptions of implementing parties (related to chapter 10), acronyms, and a glossary.

We intend to post the most recent draft of the plan online tomorrow. That version will include the appendices, as well as respond to requested changes that were made the Chester County Planning Commission Board and the Landscapes3 Steering Committee over the past two weeks. I don't believe any of those edits were in the three housing specific recommendations that start the Live chapter. There were minor text edits within the Live chapter to better address accessibility and mobility, and some of the photos were replaced with images that better convey the intent of associated text.

Please feel free to contact me with any questions or comments.

Thanks again for your interest in the development of Landscapes3.

10/10/2018 – Ed Theurkauf for the Phoenixville Regional Planning Commission emailed:

Thanks for the response letter to the PRPC comments with regard to LS3. We are glad to assist in this vital planning project and gratified that our recommendations received due consideration.

LS3 looks to me to be a visionary and meticulously constructed policy document that will serve Chester County well. I'm sure you and your staff are taking much pride in your effort, and deservedly so.

CCPC Response:

We appreciate your comments and support, and look forward to working with Phoenixville Region on Landscapes3 implementation.

Phone Comments:

8/20/2018 – Spencer Claypoole, North Coventry Supervisor and historian call to Susan Elks:

Mr. Claypoole called to request that we consider labeling the Schuylkill Canal in addition to the Schuylkill River on the historic themes map. He felt the canal itself was an important enough historic resource and also a generator of tourism related to recreation and heritage tourism to include on the map.

CCPC Response to Mr. Claypoole: We have mapped the Schuylkill River Heritage Area on our chapter 2 Appreciate map, identified the Schuylkill River corridor as an important water corridor within the Appreciate chapter (recommendation #2, historic themes maps), and called out the opening of the canal on the Appreciate chapter's timeline (recommendation #6).