



THOMAS COMITTA ASSOCIATES, INC.  
Town Planners & Landscape Architects

## M E M O R A N D U M

TO: East Bradford Township Officials  
Patrick J. and Kathryn K. Comerford

FROM: Daniel B. Mallach, RLA, AICP, ASLA  
Thomas J. Comitta, AICP, CNU-A, RLA

DATE: January 31, 2019

SUBJECT: **REVIEW COMMENTS – STONEY RIDGE FARM BED & BREAKFAST ESTATE  
CONDITIONAL USE APPLICATION**

The enclosed Review Comments pertain to the following documents that we received on December 26, 2018, and to a Site Visit with Mr. Comerford on January 15, 2019:

- Application for Conditional Use dated December 20, 2018;
- Conditional Use Plan dated December 20, 2018, prepared by Commonwealth Engineers, Inc., consisting of two (2) sheets: Existing Conditions Plan and Proposed Improvements Plan;
- Narrative of Compliance of Bed & Breakfast Estate Standards dated December 20, 2018;
- First Floor Common Area Floor Plan Illustration;
- Aerial Photograph of the Comerford Tract;
- Impact Assessment Narrative dated December 20, 2018, prepared by Commonwealth Engineers, Inc.;
- Photograph Addendum;
- Pennsylvania Historic Resources Survey for the Richard White House, dated July 2005, prepared by Wise Preservation Planning;
- Grant of Conservation Easement document dated October 23, 2015; and
- Trail Easement Agreement document dated November 3, 2015.

Please call or email if there are any questions.



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The following Review Comments pertain to the documents listed on the Cover Memorandum.

**1. Overall Comment**

Based on the Application materials and our evaluation the property during our site visit on January 15, 2019, we believe that from the perspective of Landscape Architecture and Land Planning that the subject property is appropriate for use as a Bed & Breakfast Estate and venue for events as permitted by the East Bradford Township Zoning Ordinance (ZO). The large property will accommodate contiguous areas for visitor activities and parking with minimal disturbance of natural features, including the many mature trees on the property. There is sufficient area for additional visual buffering of the proposed larger parking area, as described in comment 3.

The comments herein are intended to promote compliance with Township Ordinance requirements, and inform additional discussion regarding the logistics of implementing the proposal consistent with the terms of the 2015 Conservation Easement and landscape architectural best practices.

These comments are also intended to support the continued good stewardship of the property, and to inform Plan refinements should the Board of Supervisors be inclined to grant Conditional Use Approval.

**2. Planting and Plan Preparation Requirements**

For all planting that may be required on this project, the Applicant Team should review §115-45.1.B (ZO) and §115-45.1.C (ZO), particularly as they pertain to the required sizes of installed plants, and the items required on the planting-related elements of a Plan submission.

**3. Buffering**

**3.A Requirement**

For the purposes of Buffering, a Bed & Breakfast Estate is considered a Single-Family Residential use. Therefore, per §115-52.B (ZO) and §95-25.1.F of the East Bradford Township Subdivision and Land Development Ordinance (SLDO), a Perimeter-type Buffer is required adjacent to "abutting" Single-Family Residential uses, and adjacent to cartway rights-of-way.

**3.B Existing Condition**

Topographic differences and existing vegetation to be preserved will supply the required Perimeter Buffer for the abutting Single-Family residences, and along Copeland School Road. In particular, the areas indicated by Mr. Comerford during our site visit as the likely locations for the placement of an event tent are not visible from off-site.

Tenting location(s) shall be established during the Conditional Use review process.

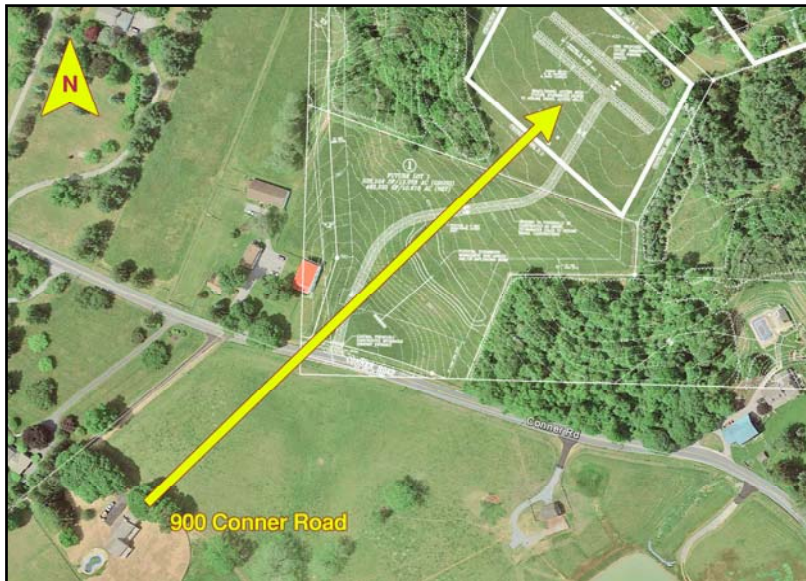


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In addition, based on our 1-15-2019 site visit, we believe that site topography provides most of the required "filtered" views of the proposed larger parking area, as required for a Perimeter Buffer. However, a more effective Perimeter Buffer would be required to buffer the Conner Road right-of-way, while also benefiting the neighbors across Conner Road (900 Conner Road). Like the proposed parking area itself, the 900 Conner Road dwelling sits on a hill above the road, and consequently has views toward the proposed parking area, as indicated in the two (2) images below:



*Conditional Use Plan + Google Earth Aerial:  
The arrow indicates the line of sight from  
900 Conner Road toward the proposed  
parking area.*

*Aerial Date: 5-24-2016*



*Photograph taken from the area of the  
proposed parking looking southwest toward  
900 Conner Road (circled).*

*Photo Date: 1-15-2019.*



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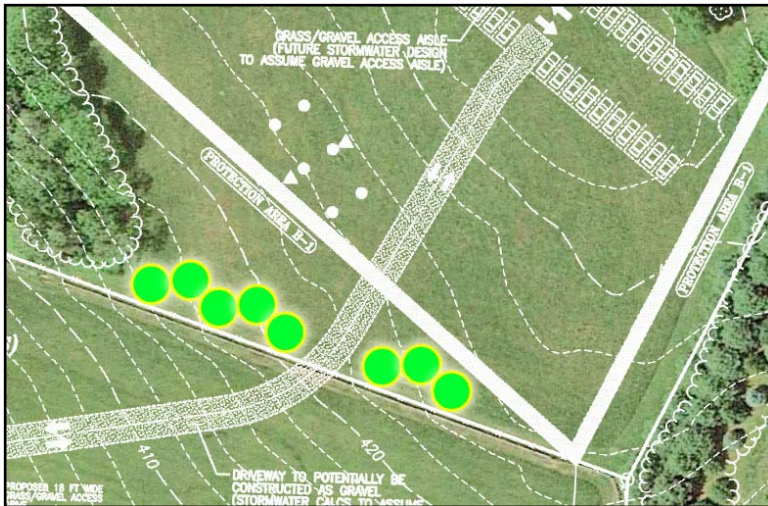
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**3.C Compliance Recommendation**

Typically, and per the explicit language of the Zoning Ordinance, a Perimeter Buffer is required "along the perimeter tract boundaries".

However, because the tract perimeter at Conner Road is at a low elevation relative to the proposed parking and 900 Conner Road, a more effective visual buffer of the proposed parking would include eight (8) evergreen trees installed further uphill, just behind the post and rail fence, as indicated in the aerial/plan overlay below. (As a further point of reference, these trees would be on the near-side of the fence in the site photograph on the previous page.)



 Recommended Evergreen Tree

This recommended Perimeter Buffer planting of eight (8) evergreen trees will benefit travelers along Conner Road and the residents of 900 Conner Road, and would maintain the aesthetic character of the property. In addition, the "lower" field closer to Conner Road is still actively farmed (currently hay). Planting on the higher north side this lower field would preserve the southern sun exposure onto the field and the scenic views of the property. (This portion of Conner Road is identified as a "Scenic Road" on the Township's Scenic Roads Map and on the Scenic Resources Map of the Township's Open Space, Recreation & Environmental Resources Plan. A portion of the subject tract adjacent to Conner Road is also identified on this Scenic Resources Map as a "Scenic Landscape".)

Per §115-52.A (ZO), required parking-adjacent planting would provide additional visual buffering and enhancement of the property. See below comment 4 for a discussion of Parking Area Landscaping.

**3.D Buffer Plant Material**

Per §95-25.1F.4 (SLDO), 75% of the Buffer plants shall be native to the region. On this project, we recommend that all of the evergreen trees be native, such as the relatively deer resistant American Holly (*Ilex opaca*), Eastern Redcedar (*Juniperus virginiana*) and White Spruce (*Picea glauca*).

Per §95-25.1.B.1.c (SLDO), evergreen trees shall be a minimum height of eight feet (8') at installation.



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**4. Parking Area Landscaping**

The discussion of Parking Area Landscaping in below comments 4.A through 4.G is intended to inform further consideration during the Conditional Use review process, and the preparation of Plans submitted subsequent to Conditional Use Approval, if granted.

For example, the Parking Area Landscaping requirements of §115-45.1.H (ZO) discuss raised planting islands and other requirements for planting in the interior of a parking area. However, the proposed parking is intended to be on existing lawn (with a potential gravel drive aisle), and we do not recommend new planting within the interior of such parking areas. Therefore, perhaps the Township would determine during the Conditional Use review process that some of the requirements discussed below may not be applicable to this project.

We still support planting around the perimeter of the unpaved parking areas that integrates with, and enhances the historic landscape and woodland/meadow ecology.

**4.A §115-45.1.H.1 (ZO):**

Requirement:

A planting strip a minimum of 10 feet in width shall be provided around the perimeter of these features [parking area].

The planting strip may contain a variety of plant material, but the material shall be capable of providing a continuous screen at a minimum height of 24 inches.

The plant material shall be placed a minimum of two feet from the edge of pavement to allow for vehicle overhang and door opening. Required plantings shall be set far enough away from the edge of pavement in areas anticipated for snow removal storage to avoid crushing plants.

Earthen berms may be a component of the perimeter planting strip, but shall not reduce the plant material requirement.

Discussion:

The intent of this requirement is to provide a "continuous screen", along with the suggestion that such planting is intended adjacent to pavement. With respect to the screen component, we mostly agree with the Applicant Team's statement in the Impact Assessment Narrative that site topography and existing woodlands will screen the two (2) proposed parking areas from adjacent roadways and properties.

See comment 3.C for recommended additional Perimeter Buffering of the larger parking area accessed from Conner Road.



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**4.B §115-45.1.H.2 (ZO):**

Requirement:

Landscaped areas totaling not less than 10% of the area within the proposed parking lot shall be provided as raised planting islands and be continually maintained. The area within the proposed parking lot shall be defined to include access aisles, landscape islands and parking spaces or storage areas suitable for parking.

Discussion:

Due to the proposed lawn/gravel surfacing, the requirement to provide raised planting islands in the interior of the parking area may not be appropriate. This is because the installation of the raised islands' curbing and related surface stabilization is typically not compatible with the "light footprint" intent of such parking.

However, if raised planting islands are not installed, the Township Engineer may recommend other durable visual cues to guide motorists within the drive aisles and parking areas.

**4.C §115-45.1.H.3.a (ZO):**

Requirement:

A raised planting island, a minimum of 10 feet in width and the length of the parking stall, shall be spaced not more than every 15 parking stalls and at the ends of rows of parking stalls.

Discussion:

On the current layout, there are rows of 17 and 29 contiguous parking stalls in the larger parking area. Therefore, raised planting islands would typically be required within these rows. However, as with the internal planting requirement of §115-45.1.H.2 (ZO) discussed in above comment 4.B, this raised planting island requirement within the interior of the parking area may not be applicable, due to the lawn/gravel surfacing.

If necessary, we would support Zoning Relief to forgo the provision of raised planting islands. However, we still recommend that the required parking island trees be installed; see below comment 4.D.

**4.D §115-45.1.H.4 (ZO):**

Requirement:

Shade trees shall be provided within the required islands and adjacent to the parking lot or vehicle storage area at a ratio of one tree per 10 parking spaces.

Discussion:

For the 56 parking stalls proposed in the larger lot, six (6) shade trees would be required. For the smaller lot with 20 proposed parking stalls, two (2) shade trees would be required.



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We recommend that these trees be planted around the edges of the proposed parking areas instead of within interior parking islands. Trees should be specified and located so that minimal pruning will be necessary in order to prevent encroachment into the parking stalls and pedestrian use areas.

A Landscape Plan submitted during Land Development would need to indicate these trees.

**4.E §115-45.1.H.5 (ZO):**

Requirement:

A minimum of 50% of the proposed shade trees shall be native to the region.

Discussion:

Consistent with the objectives of the Conservation Easement to support a healthy ecosystem, we recommend that all planting on this property be native to the region.

(Native plants tend to be well adapted to the local soil and climate conditions, particularly if they are sourced locally. There are beneficial fungal relationships in the native soils that have evolved with the root systems of our native plants over thousands of years, and this makes these plants generally healthier and better than non-natives at withstanding adverse conditions such as drought. Native plants also typically host far greater numbers and types of beneficial or non-detrimental native insects, which in turn support birds and other wildlife higher up the food chain.)

**4.F §115-45.1.H.6 (ZO):**

Requirement:

To encourage diversity in design and to accommodate changes in availability of plant material, shade trees may be substituted at the rate of two ornamental trees per shade tree for up to 50% of the shade tree requirement.

Discussion:

"Ornamental" trees are generally considered to be deciduous trees of comparatively small-to-medium mature size, with prominent flowers and/or other appealing aesthetic features. For example, trees such as Eastern Redbud (*Cercis canadensis*) and American Smoke Tree (*Cotinus obovatus*) could be worthy "ornamental" native additions to the plant mix. These trees have the advantage of being hardy and resistant to various disease/fungal/insect infestations, and are relatively unaffected by deer browse.

Utilizing this requirement on the larger parking area, where six (6) shade trees would be required (see above comment 4.D), three (3) of these at 1:2 would equal six (6) ornamental trees.

Therefore, there could be three (3) larger shade trees (such as native Birch or Maple), and six (6) ornamental trees planted around the larger parking area.



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**4.G §115-45.1.H.7 (ZO):**

Requirement:

The remainder of the planting areas shall be planted with a variety of shrubs and ground cover plantings.

Discussion:

Along with the required trees, shrubs and groundcover will serve to meet the objective that the parking areas be "effectively landscaped". Again, we recommend that all such plants be native to the region.

A Landscape Plan submitted during Land Development would need to indicate these shrubs and ground cover plantings.

**4.H Comment on Potential Ordinance Variances**

If necessary, we support limited relief of the interior Parking Area Landscaping requirements (e.g., for raised planting islands).

**5. Rain Garden / Infiltration Area Planting**

A Land Development Plan should specify the plantings proposed for the Rain Garden and/or Infiltration Berm. The Applicant Team should review §95-25.1.J (SLDO) governing the planting of stormwater management areas.

(We otherwise defer to the Township Engineer regarding the Rain Garden/Infiltration Berm.)

**6. Tree Protection and Preservation**

Based on our site visit, no trees will require removal to facilitate the proposed layout.

However, consistent with §115-45.C.2 (ZO) relative to the establishment of a "tree protection zone", Land Development Plans should indicate tree protection fencing where any temporary construction-related site disturbance would be within 50 feet of vegetation to be preserved.

Otherwise, we encourage the Property Owners to work with a Certified Arborist to evaluate short term tree maintenance needs that would minimize limb drop, and to develop a long term plan for the care of the beautiful trees on their property.

**7. Connection between Primary Parking Area and Buildings**

We recommend that the larger/primary parking area be connected to the B & B Estate buildings/tenting area via a stabilized porous-surface Path. This would add convenience, particularly for individuals with





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mobility issues or those pushing strollers, and will help keep clothes clean for special events should the ground be muddy or snow-covered.

Channeling pedestrian travel along a designated route will also reduce damage to adjacent vegetation.

The Conservation Easement (Section 3.02.c.iv) permits, as an Additional Improvement within Protection Area A, "trails covered by wood chips, gravel, or other highly porous surface". This language appears to permit the recommended Path within Protection Area A, connecting the larger parking area and B & B (making the connection between Protection Areas B-1 and B-2).

Depending on the point of connection, one (1) parking stall on the north side of the larger parking area may have to be removed so that visitors would not have to walk between closely-spaced vehicles to access the Path. (If the parking stall count is a concern, the parking area could be extended into open ground to the southeast.)

**8. Public Trail / Greenways Corridor**

A portion of the subject tract is identified as a "Greenways Corridor" on the Map 6-3 "Greenways Plan" of the Township's Open Space, Recreation & Environmental Resources Plan. A "Future Trail" is also indicated for the tract on the Map 7-1 "Trail Plan" of this document.

The Conservation Easement (of which the Township is a co-holder and beneficiary) and the Trail Easement Agreement make explicit provision for a Public Trail within the western portion of the tract.

The Conditional Use process may be an appropriate time during which to discuss the construction of a Public Trail that would connect Conner Road to Sunset Hollow Road.

**9. Sign Quantity**

Per §115-48.2.S (ZO), only one (1) sign shall be permitted for the purposes of identifying the property. The Applicant has agreed to comply with this requirement. However, some type of identifying signage may be necessary at the Copeland School Road and the Conner Road entrances.

This item should be addressed during the Conditional Use Hearing.

**10. Pool Fence & Gate**

The Applicant Team should check on any regulations pertaining to the fencing of the pool. If fencing is required, there may also be self-closing/latching requirements for the gate.

Even if there are no applicable regulations for fencing the pool, it may still be a good idea given the proposed event and overnight guest use.



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As discussed with Mr. Comerford during our site visit, and if permitted, a "rustic" looking fence, perhaps split rail with wire mesh backing, would fit best with the aesthetic of the property, rather than a metal "picket" fence.

**11. Potential National Register Listing**

According to the Historic Resource Survey provided with the Application, the subject property is "probably eligible" for listing in the National Register of Historic Places.

We recommend that the Property Owners consider nominating features of this property for such listing, particularly as much of the necessary research has already been completed.

Under Federal Law, the listing of a property in the National Register Places would place no restrictions on what the Property Owners may do with their property, unless the property is involved in a project that receives Federal assistance, usually funding or licensing/permitting. In addition, National Register listing does not lead to public acquisition or require public access (separate from the Conservation Easement and Trail Access Agreement).

However, listing may open up the opportunity for Federal preservation grants for planning and rehabilitation, and Federal as well as Pennsylvania investment tax credits.

Listing in the National Register can also be a selling point in making this property more attractive to event planners and potential overnight guests.

**12. Conclusion**

Issues pertaining to site use and event protocols such as maximum occupancy, tent location, vehicular circulation and loading will require resolution prior to, or in conjunction with, Conditional Use Approval.

Otherwise, if Conditional Use Approval is granted, the strategies discussed herein are appropriate means by which to satisfy the noted Township Ordinance requirements, and promote use of the property consistent with Easement Agreements and the Township's long-range planning initiatives.

Please call or email if there are any questions.