

**MONTGOMERY COUNTY  
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**MONTGOMERY COUNTY  
PLANNING COMMISSION**

MONTGOMERY COUNTY COURTHOUSE • PO Box 311  
NORRISTOWN, PA 19404-0311  
610-278-3722  
FAX: 610-278-3941 • TDD: 610-631-1211  
WWW.MONTCOPA.ORG

SCOTT FRANCE, AICP  
EXECUTIVE DIRECTOR

January 10, 2022

SUBJECT: Lower Frederick 2040 Public Comment Period Summary

TO: Boards and Staff of Lower Frederick Township

FROM: John Miklos, Community Planner

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## BACKGROUND

The public comment period for the *Lower Frederick 2040* draft plan began in October, 2021, when MPC-required entities were notified and invited to give comment. Public announcement of this comment period was also given at that time, using the township's website, marquee sign, posted notice in the township office, and outreach at public events.

## SUMMARY OF PUBLIC COMMENTS

To date, thirteen (13) public comments have been collected. Five of the submitted comments are from entities that the MPC identifies as those required to receive notice. This group includes three neighboring municipalities, the Perkiomen Valley School District, and the Montgomery County Planning Commission. These five entities each reviewed the plan and, apart from encouragement on aspects of the document and the planning process, offered no further comments. The remaining comments were submitted by residents of the township. One of the resident comments simply voiced support for plan. The other resident submissions commented on the following topics:

- Evacuation routes and emergency plans
- Sewer extensions to serve current residents
- Public outreach regarding the plan
- Heavy truck traffic on Delphi Road
- Priority given to housing and trails
- Natural resource preservation
- Riparian buffers
- Road design in new development
- Road safety and speeding
- Roadside litter
- Traffic impacts of proposed development
- Timeliness and accuracy of census and demographic data
- Omission of farmland data

- Trails and sidewalks mapping
- Economic development planning
- Housing projections methodology
- Sewage treatment capacity
- Local Planning Agency involvement

## RECOMMENDED REVISIONS

Based upon reviews and submitted comments, the following revisions are recommended:

- P. 29: revise text of *Water Quality* section and Figure 2.7 to report findings of 2021 EPA assessments. This assessment found that Goshenhoppen Creek, Scioto Creek, and Swamp Creek are nonattaining with respect to support for aquatic life. Revise to cite the impairments identified in the assessment and refer to where these conditions are described elsewhere in the chapter.
- P. 31: Update Figure 2.8 to indicate the locations of Prime Farmland soils and Soils of Statewide Importance.
- P. 35: Update Figure 2.11 to correct misidentified parks and open space parcels.
- P. 46: Note that the given roadway functional classification used in the text and Figure 3.5 are PennDOT's.
- P. 47: Add source citation for DVRPC traffic counts used in Figure 3.6.
- P. 49: Insert reference to new DVRPC sidewalk network tools and related program.
- P. 50: Revise text of *Bicycling* section to note the presence of *Bike Montco* routes in the township.
- P. 51: Add map of *Bike Montco* routes to Figure 3.10.
- P. 52: Clarify the phrasing of the transportation goal "Encourage connected growth that enhances residents' transportation options." Recommended revision: "Encourage transportation connections in future growth to enhance residents' transportation options."
- P. 52: Append "...as recommended in *Bike Montco*." to implementation strategy 9a.
- P. 62: Revise "Lower Frederick is responsible for the other four minimum control measures..." in *Stormwater* section to read: "In the township, Lower Frederick administers the other four minimum control measures..."

## ATTACHMENTS

The following documents are attached:

1. Lower Frederick Township Manager's letter to Trappe Borough (an example of the public comment period notice sent to MPC-required reviewers)
2. Review comments from Trappe Borough
3. Review comments from Montgomery County Planning Commission
4. Review comments from Perkiomen Township
5. Review comments from Limerick Township
6. Review comments from Perkiomen Valley School District
7. Comments submitted by Gail Gosser-Smith
8. Comments submitted by David Donaldson
9. Comments submitted by Pat Gill
10. Comments submitted by Jennifer L. De Long

11. Comments submitted by Donna Bulen
12. Comments submitted by Patricia Gill
13. Comments submitted by Melissa O'Donnell and Kirk and Lorraine Grater
14. Comments submitted by Linda Jansson

**From:** [manager@lowerfrederick.org](mailto:manager@lowerfrederick.org) [mailto:[manager@lowerfrederick.org](mailto:manager@lowerfrederick.org)]

**Sent:** Tuesday, October 19, 2021 4:15 PM

**To:** [Borough.manager@trappeborough.com](mailto:Borough.manager@trappeborough.com)

**Subject:** Lower Frederick Comprehensive Plan

Dear Mr. Dolny:

Lower Frederick has completed a draft comprehensive plan: *Lower Frederick 2040*. The full draft comprehensive plan can be found on the Lower Frederick Township website at [https://lowerfrederick.org/?page\\_id=3996](https://lowerfrederick.org/?page_id=3996) for your review. Hard copies of the draft comprehensive plan are available at the Lower Frederick Municipal Building, 53 Spring Mount Road, Schwenksville PA 19473.

This plan is the culmination of a multi-year planning process that was led by a community steering committee. Extensive public input was gathered during the comprehensive planning process through, a community open house, an online surveys, a virtual workshop, and monthly steering committee meetings.

Pursuant to Section 302(a) of the Pennsylvania Municipalities Planning Code (MPC), prior to adoption of the comprehensive plan, the local governing body shall consider the comments of the county, contiguous municipalities, and the local school district. We ask that you review the document and direct your comments to the contact listed below within 45-days of receipt of this letter. A letter has been sent to you in the mail.

If you have any comments and questions please contact:

John Miklos, Community Planner, Montgomery County Planning  
Commission  
(610) 278-3554, [jmiklos@montcopa.org](mailto:jmiklos@montcopa.org)

Thank you for your time.

Sincerely,

Mark L. Hudson

Township Manager

Lower Frederick Township

53 Spring Mount Road

Schwenksville, PA 19473

P: 610-287-8857

E: [manager@lowerfrederick.org](mailto:manager@lowerfrederick.org)

**From:** Marcus V. Dolny <borough.manager@trappeborough.com>

**Sent:** Wednesday, October 20, 2021 12:56 PM

**To:** manager@lowerfrederick.org

**Subject:** RE: Lower Frederick Comprehensive Plan

Mark,

Thank you for giving us an opportunity to review and comment. Also congratulations on coming to the end of this process. At this time there are no comments we wish to make regarding the plan.

Marcus V. Dolny  
Trappe Borough Manager  
610-489-7181 Ext. 2  
610-489-8827 Fax

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SCOTT FRANCE, AICF  
EXECUTIVE DIRECTOR

November 12, 2021

Mark Hudson, Township Manager  
Lower Frederick Township  
53 Spring Mount Road  
Schwenksville, PA 19473

Re: MCPC #21-0296-001  
Plan Name: Lower Frederick Comprehensive Plan  
Lower Frederick Township

Dear Mr. Hudson:

We have reviewed the above-referenced comprehensive plan in accordance with Section 302 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on October 28, 2021. We forward this letter as a report of our review.

## **BACKGROUND**

In collaboration with our office, Lower Frederick has drafted a new comprehensive plan, *Lower Frederick 2040*. As stated in the document's introduction, the plan is intended to serve as Lower Frederick Township's long-range plan and establishes community goals, acting as a supplement to the regional comprehensive plan. The plan is the product of extensive public outreach, detailed data analysis, the active participation of the steering committee, and consultation with other township committees and staff.

## **RECOMMENDATION**

The Montgomery County Planning Commission (MCPC) supports the adoption of Lower Frederick Township's Comprehensive Plan 2040, as we have found it to be generally consistent with the county and regional comprehensive plans. MCPC encourages the township to use this document for guidance on future projects and zoning changes. Our comments are as follows:

## **REVIEW COMMENTS**

### **CONSISTENCY WITH COMPREHENSIVE PLAN**

***Montco 2040: A Shared Vision*** – The *Lower Frederick 2040* plan is generally consistent with goals and objectives established in the county comprehensive plan. The policies of *Montco 2040: A Shared Vision* are

grouped under three themes: Connected Communities, Sustainable Places, and Vibrant Economy. The township's plan provides several recommendations that further the Connected Community goals, such as supporting sidewalk and trail networks and ensuring future development expands residents' options for traveling the township. To support Sustainable Places, the plan addresses the township's pressing stormwater management issues and extends Lower Frederick's efforts to preserve natural features. *Lower Frederick 2040* supports the goals of the county comprehensive plan's Vibrant Economy theme by providing new business development opportunities in commercial areas, and improving village areas to beautify business areas and enhance pedestrian access to local destinations. The Future Land Use Plan conforms to the County Land Use Vision element of the county comprehensive plan.

***Central Perkiomen Valley Regional Comprehensive Plan*** - The township's comprehensive plan is generally consistent with goals and objectives established in the *Central Perkiomen Regional Comprehensive Plan Update*. This plan complies with regional Future Land Use Plan and is congruous with CPVRPC policies that seek to provide a more efficient land use pattern which preserves open space, encourages sustainable development and preserves the character of the area.

#### PLAN IMPLEMENTATION

We encourage the township to review future subdivision and land development proposals for consistency with the *Lower Frederick 2040* plan. As a comprehensive community vision created with input from the public, it can provide guidance for future development in the township. We further encourage the township to regularly review progress towards implementing the goals of the plan and update or adjust the priorities and strategies to accommodate future changes in funding sources, regulatory policies, and the needs of the community.

#### CONCLUSION

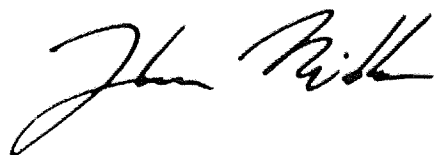
We wish to reiterate that MCPC supports the adoption of the township's proposed comprehensive plan, *Lower Frederick 2040*. We feel that the plan will be a great asset to the township and a favorable reflection of both the steering committee's dedication and the effective work done by its members and township staff to encourage and empower public participation throughout the planning process. The document provides a clear vision for the township as Lower Frederick updates its regulatory controls to protect the existing community character and natural resources while encouraging appropriate growth.

We hope that the township will use this plan to provide direction for township projects and investments and shape future development to achieve the community's vision for the future.

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

Should the governing body adopt this draft comprehensive plan, Section 306 of Act 247, "The Pennsylvania Municipalities Planning Code," requires that we be sent an official copy within 30 days.

Sincerely,

A handwritten signature in black ink, appearing to read "John Miklos". The signature is fluid and cursive, with the first name "John" and last name "Miklos" clearly distinguishable.

JOHN MIKLOS, Community Planner

[jmiklos@montcopa.org](mailto:jmiklos@montcopa.org) – (610) 278-3554

c: Crystal Gilchrist, Chair, Township Planning Commission  
Peter Nelson, Township Solicitor





November 19, 2021

Mark Hudson, Manager  
Lower Frederick Township  
53 Spring Mount Road  
Schwenksville, PA 19473

Dear Mr. Hudson:

**SUBJECT: Lower Frederick Comprehensive Plan**

At the November meeting, the Perkiomen Township Board of Supervisors reviewed Lower Frederick Township's draft comprehensive plan. The Board discussed this plan and had no comments. I was asked to relay this decision to you and your Board.

Please do not hesitate to contact me if you have any questions.

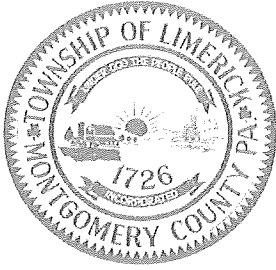
Respectfully yours,

A handwritten signature in cursive script that reads "Cecile M. Daniel".

Cecile M. Daniel  
Township Manager  
Perkiomen Township

Cc: Correspondence File





## LIMERICK TOWNSHIP

646 WEST RIDGE PIKE  
LIMERICK, PENNSYLVANIA 19468  
[www.LimerickPA.org](http://www.LimerickPA.org)

### ADMINISTRATION OFFICES

(610) 495-6432  
FAX (610) 495-0353  
FAX (610) 495-0952

### POLICE DEPARTMENT

(610) 495-7909  
FAX (610) 495-5702

December 7, 2021

**SENT VIA E-MAIL TO: [lowerfrederick2040@lowerfrederick.org](mailto:lowerfrederick2040@lowerfrederick.org)**

Mr. Mark Hudson, Manager  
Lower Frederick Township  
53 Spring Mount Road  
Schwenksville, PA 19473

**RE: Lower Frederick 2040 – Comprehensive Plan Update**

Dear Mr. Hudson:

Thank you for the opportunity to review the Lower Frederick 2040 – Comprehensive Plan Update, as Limerick shares a small border with your township.

Staff has reviewed your draft plan and we have no comments or suggestions to offer.

Please let me know if you have any questions; feel free to contact me at the Limerick Office.

Sincerely,

LIMERICK TOWNSHIP

Daniel K. Kerr  
Township Manager

DKK/mlm

cc: Board of Supervisors  
Greta Martin Washington, Director of Community Planning

**From:** Russell, Barbara <brussell@pvsd.org>  
**Sent:** Saturday, December 18, 2021 9:02 AM  
**To:** manager@lowerfrederick.org  
**Subject:** Re: Lower Frederick Comprehensive Plan

Dear Mark,

Thank you for sharing and for the opportunity to provide feedback. I realize it has been some time since you shared the opportunity. The plan is comprehensive and well presented. I appreciate the recommendations developed and the amount of feedback from the community received and recorded as part of the work.

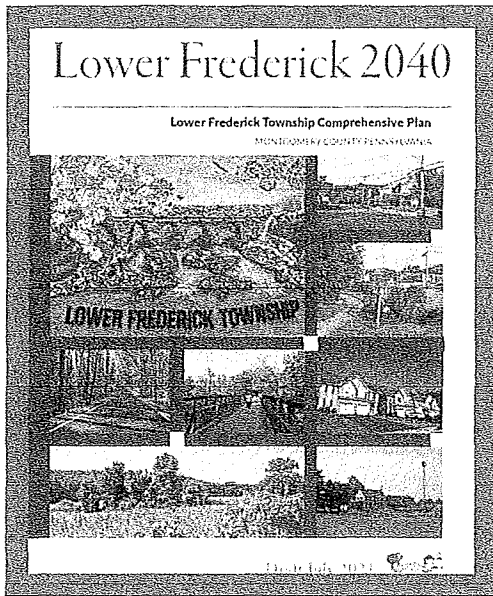
My best to Lower Frederick in moving the ideas forward.

Happy holidays!

**Barbara A. Russell, Ed.D.**  
**Superintendent**

610.489.8506 ext. 1101  
Perkiomen Valley School District  
3 Iron Bridge Dr. • Collegeville, PA  
[www.pvsd.org](http://www.pvsd.org)

# REQUEST FOR PUBLIC COMMENT



Name:

GAIL GOSSEN-SMITH

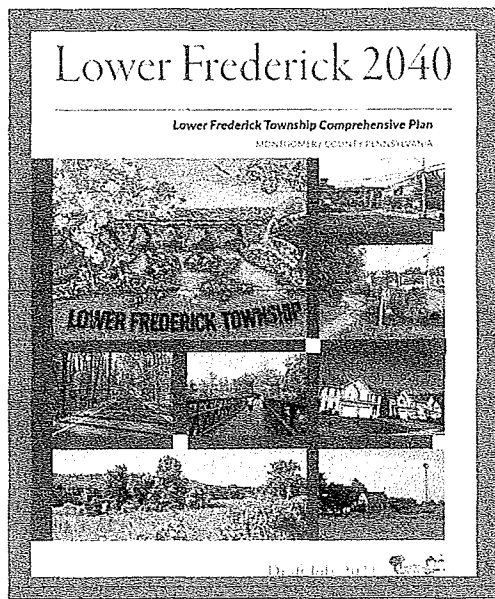
Address:

Gerloff Rd

Your Comment:

NATURAL AREA preservation  
very important! RAPARIAN Buffers Extremely  
important! making Developers have →  
connecting Roads. in there development.

## REQUEST FOR PUBLIC COMMENT



Name:

David Donaldson

Address:

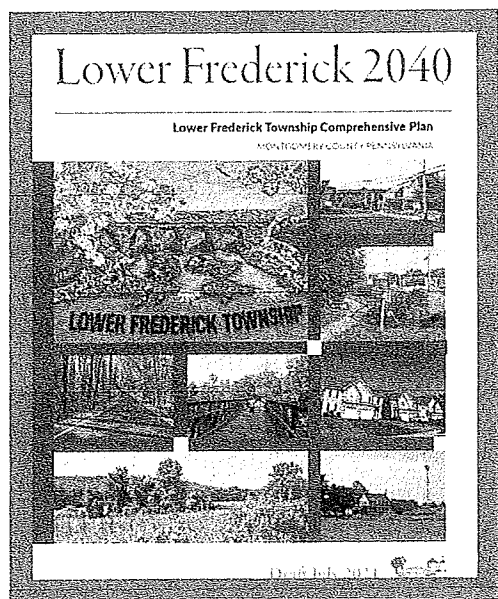
207 Delphi Rd

Schuensville PA 19473

Your Comment:

Limit Tri-Axle Trucks  
ON Delphi Rd Due to  
Road not sized for that  
type of traffic

# REQUEST FOR PUBLIC COMMENT



Name:

Pat Gill

Address:

Game Farm Rd

Your Comment:

Evacuation Routes & location to wait out  
big storms

# REQUEST FOR PUBLIC COMMENT

LOWER FREDERICK TOWNSHIP / 53 SPRING MOUNT ROAD /

Name:

SCHWONKSVILLE, PA  
19472

Jennifer L. De Long

Address:

2080 Salford Station Road

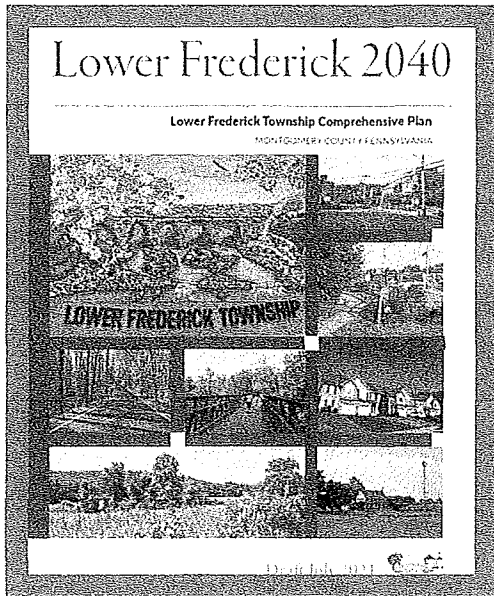
Perkiomenville, PA

18074

Your Comment:

I am 100% in favour of this  
plan. Thank you!

J.L. De Long



**Subject:**Re: 2040 Plan

**Date:**Wed, 3 Nov 2021 12:50:03 -0400

**From:**Donna Bulen [REDACTED]

**To:**LowerFrederick2040 <[LowerFrederick2040@lowerfrederick.org](mailto:LowerFrederick2040@lowerfrederick.org)>

It is very unsettling to see all this open spaces non-sense right now. It is ridiculous and a waste of money. All while some of us have been waiting patiently for years to be hooked up to a public sewer system. Some of us are in desperate need. It seems as though the township's priorities are in high density housing projects, bike trails, and foot paths rather than taken care of long term residents.

Donna Bulen

On Wed, Nov 3, 2021 at 12:35 PM LowerFrederick2040

<[LowerFrederick2040@lowerfrederick.org](mailto:LowerFrederick2040@lowerfrederick.org)> wrote:

Hello Ms. Bulen,

I am sorry to learn that you were not aware of the 2040 plan. Here's a brief overview of how the 2040 plan has progressed... In 2018, the township Supervisors (Terry Sacks, Chuck Liedike and Marla Hexter) voted to start the process of creating the 2040 plan - this was done at a public meeting. Since then, the township has advertised and held regular public meetings to work on the plan - advertisements have been done via a combination of newspaper, website, social media and emails sent to residents. In June of 2019, the township advertised and held an Open House event for the 2040 plan and gathered feedback from residents. During the summer of 2020, a postcard mailing for a survey was sent to residents - in addition, we also included an announcement on sewer customer bills.

Again, I am sorry to learn that you were not aware of the 2040 plan initiative. The link to the 2040 plan is provided below and we welcome your review and comments. Please feel free to provide feedback to this email address.

[https://lowerfrederick.org/?page\\_id=3996](https://lowerfrederick.org/?page_id=3996)

Best regards,

Chuck Yeiser

Comprehensive Plan Steering Committee Co-Chair

Lower Frederick Township

Email: [LowerFrederick2040@lowerfrederick.org](mailto:LowerFrederick2040@lowerfrederick.org)

On 11/2/2021 6:27 PM, Donna Bulen wrote:

I have lived here since 1999 and this is the first I am hearing about this 2040 Plan. How are you making an informed decision about the residents want when you sampled a very small percentage of the households.

Why was I not included in this survey? How were residents informed of this survey?

Sincerely

--

Donna Bulen  
[REDACTED]



**From:** [REDACTED]

**Sent:** Thursday, November 4, 2021 12:01 PM

**To:** [manager@lowerfrederick.org](mailto:manager@lowerfrederick.org)

**Subject:** Comprehensive Plan/ basic questions

Hello Mark Hudson, Township Manager Frederick.

On election day I had the chance to speak with members of the Lower Frederick 2040 project. One of my questions to them was due to the recent flooding by Ida to our area, not just to Game Farm Road, but to areas of Schwenksville and Limerick, was there a evacuation plan for residents. The day of the hurricane the only response in evacuating was to get into our car and sit for hours on Mine Hill road. That was freighting in itself. We know from past water the fire co. and police know which areas are prone to flood waters. During this conversation there is no such plan. So my question is can a evacuation plan be formulated with Frederick, Schwenksville and Limerick?

On another matter, The side walks on Game Farm Rd along the Town Home are in need for repair, they are uneven, cracked with open areas and parts crumbling. Is there anything the Township can help with in repairing or even replacing the sidewalks? Can you come here to see if anything can be done or if it is even a matter for Frederick Township.

I want to thank you for all you have done to help all of us here on Game Farm over the past several months.

Respectively,

Patricia Gill  
15 Game Farm Road  
Schwenksville Pa. 19473  
[REDACTED]

**Subject:**Township Plan Requests and Concerns

**Date:**Fri, 12 Nov 2021 17:50:51 -0500

**From:**Melissa O'Donnell

**To:**[lowerfrederick2040@lowerfrederick.org](mailto:lowerfrederick2040@lowerfrederick.org)

Greetings. I wanted to attend the meeting yesterday that is held every second Thursday, but was unable to make it. I grew up on, and live at 11 Smith Rd. There have been concerns since I was a child that I know our new neighbors share, and more, for their children who now live across the street. I know they have contacted the township multiple times, asking for signs cautioning drivers who speed, and even ones who dont, that there are blind spots on our narrow, 25mph road, that make it very dangerous where the kids get on and off the bus. This was to no avail, and the neighbors have actually spent their own money in order to place a sign alerting drivers that a bus stops over the blind crest of the hill. There are many accidents on this road, and it seems like every week we are picking up broken car parts from our front yards. We really need some signs here, and probably a speed bump. The safety issue is very concerning on multiple levels, not to mention all the litter on the street. It would be great to have a no littering sign along with safety precatations. I have picked up and photographed appx 10 full trash bags of trash on this street in just this past year.

Our family built and has owned this farm since the late 1800s. Since the foundation of Schwenksville, it was the only residence on Smith Rd, until the Renningers built across the street in what I think was the 1950s. There have never been more than 5 houses total on this portion of Smith, from Gamefarm Rd. to Centennial St. I say this, because there is already too much traffic for this tiny street to handle, and I know THP is attempting to build what I am told is at least 40 townhomes on the lot across the street that was recently sold, and that the entrance will be on Smith Rd. This is 100% a horrible idea, not only for the street, but the town itself die to the location itself. 4 houses would be too much added traffic for this street to handle, let alone 40, or more. Beyond hoping THP's proposals are not approved, I am pleading with the township today, that if the THP proposals are approved, to divert the entrance through the Summits, since the properties border each other. I believe this will be more efficient and safer for everyone.

Thank you for your time and service to the community.

Best Regards,

Melissa O'Donnell

Kirk and Lorraine Grater

# Linda A. Jansson

110 Simmons Rd, P.O. Box 25, Perkiomenville, PA 18074

llanjans@perkiomenvillepa.gov

12/31/21

Lower Frederick Board of Supervisors and Members of Comprehensive Plan Steering Committee

Lower Frederick Township

53 Spring Mount Road

Schwenksville, PA 19473

Dear Lower Frederick Board of Supervisors and Members of Comprehensive Plan Steering Committee:

I am writing at this time to offer my review and comments regarding the proposed draft Comprehensive Plan for Lower Frederick Township (LFT). The attached comments are offered in both my capacity as a current member of the Lower Frederick Township Planning Commission, along with being a lifelong township resident. Having a vested stake in our future vision for LFT, creating the best Comprehensive Plan possible is paramount.

Although it's evident much effort has been put forth by our Comp Plan Steering Committee in drafting this plan, there still appears to be major revisions needed prior to adoption. The attached comments go into greater detail, yet a brief overview of the issues are:

- Outdated and inaccurate census data and demographics
- Omission of farmland/prime farmland data, a requirement of Article III, Section 301(a)(6) of MPC
- Inaccurate graphics of existing trails and sidewalks within the township
- Omission of critical infrastructure data (current/future sewage treatment capacity and availability)
- Lack of specifics/details of desired economic opportunities in our Village Mixed Use areas
- Contrary and conflicting projected future housing needs with vast discrepancies in housing amounts
- Contrary "recommendations" regarding available infrastructure vs proposed future housing needs
- Lack of involvement or input by legally defined "Local Planning Agency" in drafting this Comp Plan as required by Article III, Section 302, of MPC

Please take the attached detailed comments into consideration prior to adoption of this draft Comprehensive Plan. Our main goal should be to produce the best possible Comprehensive Plan for our municipality's future, yet as written, this plan falls slightly short of that mark.

Respectfully,

*Linda A. Jansson*

Linda A. Jansson

Vice-Chairperson of Lower Frederick Township Planning Commission

Lifelong Resident of Lower Frederick Township

### **Comments from Linda A. Jansson – Lifelong Resident and Vice Chairperson of LFTPC:**

Although it is evident a great amount of effort went into building “the framework” of this draft Comprehensive Plan, it contains outdated, inaccurate, and omitted information. This has created conflicting assertions throughout the plan, which impact many of the proposed recommendations. Additionally, many of the recommendations and goals put forth are contrary to our community’s sentiment expressed at both the June 2019 Open House and 2020 Online Public Survey.

Below are some discrepancies found which I implore our Board of Supervisors to consider prior to voting to adopt this Comprehensive Plan as written. As stated above, there is a great framework to build upon, yet this plan should still be treated as a “draft plan” until these contradictions are addressed and plan is updated for accuracy and compliance. For continuity, will address the discrepancies chapter by chapter:

- **Community Profile: Demographics** – Section contains outdated and “estimated” population data and demographics. This resulted in overinflated population data which carries thru to all chapters of plan. A data source cited is the American Community Survey (ACS). Unfortunately, data contained within the plan’s text and Figures 1.1 thru 1.14, are intermixed with data from years 2018 & 2019 of the 5-year ACS’s estimates & 2010 Decennial Census. There is no cohesive relationship to these figures other than they come from same source.

The ACTUAL 2020 Census data has been partially released confirming these “estimated” population figures are inaccurate/inflated. Additional specific 2020 local demographics are slated to be released no later than March of 2022. Our Comprehensive Plan should contain current accurate data and should utilize the 2020 Census actual figures not “estimated” inaccurate data. This will require a re-write of pages 6 thru 13 of draft Comp Plan.

- **Natural Environment & Open Space** – For the most part, this chapter is well written and accurately depicts the current natural resources which our community overwhelmingly identified as areas of protection/concern. One thing lacking from this chapter is failure to mention LFT’s three Permanently Preserved Farms (175+ acres), our Agricultural Security Area (700+ acres), and other agricultural parcels within Act 319. These land uses are briefly mentioned in one small paragraph of the first chapter, yet in context of *changing* our land use map to convert these parcels into residential developments, not to maintain as farmland.

These farmland preservation methods require more mention within the plan as permanently preserved and/or potentially preserved open space. One of the highest ranked community comments from both the open house and online survey was the desire for open space and rolling farmland. To exclude any mention of farmland preservation from the Comp Plan is contrary to community sentiment and it’s a required component of a Comp Plan under Article III, Section 301(a)(6) of the Municipal Planning Code. This topic needs to be added.

- **Transportation** – Figure 3.9 – Pedestrian Facilities – is inaccurate. Residential developments shown as already having trails/sidewalks have yet to be built. Map verbiage should be changed to indicate these shaded areas are “proposed developments” not existing trails/sidewalks. This figure also fails to show the new sidewalk installed on Goshen Road in townhouse complex. Other trails, for which LFT already has recorded deed easements, are omitted from this map. These currently held and recorded trail easements should be shown on Figure 3.9.

- **Infrastructure** – This chapter does not accurately reflect present or future conditions. Since our public water supply is controlled by others (SBA) and stormwater recommendations seem to be in line with community goals, these comments will be limited to sewage infrastructure. Figure 4.2 has “sewer service” extending deep into our Rural Resource Area where public infrastructure is not permitted. This restriction is also contained within our Central Perkiomen Valley Regional Comprehensive Plan. Our current R1 zoning also does not permit this public infrastructure. Inclusion of this map is both contradicting and confusing. This figure either needs to be removed or updated to reflect current zoning and compliance with our existing Regional Comprehensive Plan. Additionally, instead of striving compliance with our current Regional Comp Plan, LFT’s draft Comp Plan recommends **CHANGING** CPVRPC’s Land Use map to allow for higher density development and public infrastructure in our Rural Resource Area. This is NOT the sentiment expressed by our community at the 2019 Open House or the 2020 Online Survey. This draft Comp Plan also recommends giving away sewage capacity to neighboring municipalities.

**WE DO NOT HAVE SEWAGE CAPACITY FOR EITHER RECOMMENDATION.**

Please refer to the below chart:

| <b><u>Available Capacity of New STP Based on 280 GPDs per EDU:</u></b>   | <b><u>EDU/GPD</u></b> | <b><u>GPD</u></b> |
|--|-----------------------|-------------------|
| Permitted/Designed Capacity of New STP:  | 500,000               | 500,000           |
| Minus 10% Capacity To Allow for I & I,<br>Peak Weather Events, Maximum Capacity/DEP Fines  |                       | -50,000           |
| Minus Existing Customers/EDUs (As of December 2021) :  | 1114 x 280            | -311,920          |
| Minus connections from Fulmer, Riverside & Bavington<br>(69 to 82 EDUs projected in project scope):  | 69 x 280              | -19,320           |
| Minus Melbourne Hills (proposed 46/48 lots):   | 46 x 280              | -12,880           |
| Minus Prestige/Cichocki/Reiter (proposed 42 lots + 1 existing home):   | 43 x 280              | -12,040           |
| Minus Existing Homes on Little Road<br>(proposed to connect either via Melbourne or Prestige)  | 7 x 280               | -1,960            |
| Minus GenTerra/Rose Tract (proposed 31 lots):  | 31 x 280              | -8,680            |
| EDUs to Connect Z'ville Rd Systems<br>(SBA plus 7 homes if going to manhole @ Mr. Lee's/Rt. 29):   | 8 x 280               | -2,240            |
| Remaining GPDs for New Residential Construction (R2, R3 & R4),<br>Existing Homes, Future Failed Systems, And Any Proposed New<br>Construction in VMU, OI, LI, Zoned Areas: |                       | <b>80,960</b>     |
| <b>Planning on 280 GPD per EDU: 80,960 GPD ÷ 280 GPD =</b>   |                       |                   |
| <b><u>289 Remaining EDUs For Any and ALL Future Connections</u></b>  |                       |                   |

- **Village Development & Community Character** – This chapter contains mostly contradicting, inaccurate and inflated data. The chapter is entitled “Village Development”, yet very little content is devoted towards a concept of how our community would like to see existing village spaces developed. Little to no discussion/recommendations are offered for the economic development opportunities in these areas. To the contrary, this chapter speaks mostly of developing our Rural Resource Areas with higher density residential development rather than mixed-use business opportunities a village setting offers. It would serve the plan better to split this chapter into two or three separate chapters.

A chapter devoted solely to Village Development should be created. This chapter should include but not be limited to streetscape and design features, desired businesses to attract, a plan for the mixed-use areas, desired parking and interior road layouts, along with common public open spaces. Many of these concepts are touched on within the draft Comp Plan and just need to be expanded upon in more detail in a separate chapter.

As for other inflated future housing needs mentioned, they’re loosely expressed under heading of “Community Character”. This is where much of the conflicting data is contained, sometimes within same page/paragraph. For example on page 71, Figure 5.6 shows, based on DVRPC population estimates, an additional 224 to 310 housing units need to be added to our housing stock by 2040. Our current/future sewage capacity can accommodate this increase. Yet on page 72, a contrary amount of 543 future homes are listed as needed based on figure 5.7. No source is cited for this figure/graph with the text conceding this figure is 75% more homes than are needed based on cited population figures. Just drawing a “line on a graph” extending upward, with no supporting documentation or source cited, is not a credible graphic. Both projected housing figures cannot be true, nor does our current and future sewage infrastructure support this secondary inflated housing figure. Either Figure 5.7 needs removal or the Infrastructure Chapter must be rewritten with an explanation and plan as to how these additional “250+ extra homes” are going to be serviced by sewer infrastructure.

Additionally, on page 74, plan is showing a 2020 Zoning Capacity Analysis contrary to the 2005 LFT Build Out Analysis, even though no zoning or land use changes have been made in the last 15 years. This 2020 analysis calls for an increase of 455 housing units, 250+ homes more than is supported by projected population growth figures. To arrive at this inflated housing figure, it appears Figure 5.9 is showing build out occurring on permanently preserved parcels, open space, steep slopes, waterways, floodplains, etc.. Additionally it calls for 388 residential units being built in our VMU area, allowing for little to no economic development. Our present/future sewage capacity cannot support this inflated housing growth figure without expansion to our present plant and/or construction of a new WWTP.

This recurring figure of an “additional 250+ homes” above and beyond what projected population figures and actual census data support, further emboldens a theory that a “pre-determined” number of homes were already decided upon prior to this plan being written and data is being manipulated to arrive at this predetermined housing amount. This is further spelled out on page 79 where it is stated *“however proposed future land developments may require revisions to the Future Land Use map”*.

All this conflicting and inflated housing data begs the question, was this draft chapter of the Comp Plan written with any consideration of our current zoning and our community’s expressed sentiments for Lower Frederick’s future or was it written for residential land developers to increase their profits?

- **Plan Implementation** - All recommendations and strategies outlined within Items 1 thru 15 (d) seem to support the goals and desires of our community, but as mentioned above, sewer infrastructure items 16, 16(a) & 16(b) are contrary to our zoning, regional comp plan and present/future sewage capacity. Items 16(c) thru 22(b) and 24 thru 24(c) seem to support the goals and desires expressed by our community and are worthwhile goals/recommendations.

Items 23 & 23(a) – **Zoning and Future Land Use** – are given a high priority to **CHANGE** our Zoning, Future Land Use map, Act 537 and Open Space plans to reflect “changing development patterns”. Little to no discussions/recommendations are mentioned within the plan as to why or what zoning is proposed to be changed. The only apparent explanation offered is on page 79 where it states these changes need to be made to SUPPORT FUTURE LAND DEVELOPMENTS. This is NOT inline with the sentiment expressed by our community. No accurate data contained within this plan supports Zoning or Land Use changes other than the inflated housing data. If the true intent of these “recommended” Zoning, Land Use, Act 537, and Open Space changes are not in support of “for profit land developers”, then more clarification needs to be included within plan’s text as to exactly WHAT changes are being proposed and WHY. As written, the vagueness of this recommendation lends itself to misinterpretation and could be a future liability to our township.

- **Appendix A – 2019 Open House Responses** - Please read these responses from this well attended open house. Community sentiment clearly indicates maintaining our rural character and open spaces, along with protection of our natural resources as top priorities. These responses DO NOT indicate any desire to change our Zoning, Land Use map or Act 537 plan to accommodate high density land developments. Traffic control also seems to be a major concern yet LFT can only do so much since outside entities have input on this issue.
- **Appendix B – 2020 Online Public Survey** – Again, please read these responses from this well participated online survey. The community sentiment and desires are almost exactly the same as the in person open house held in 2019 with overdevelopment, dense development, traffic, and loss of open spaces all being major concerns. Changing our Zoning, Land Use map, and Act 537 plan to accommodate for profit land developers is NOT a vision or future goal expressed by the community. Revisions to plan need to be made prior to adoption to accurately reflect the goals and vision of our community. As the plan is written now, especially chapter on Village Development and Community Character, no consideration to residents’ responses seems to be incorporated.
- **Appendix C – VD & CC Survey Report** - This MCPC report mirrors what was presented in Appendix B. Question 3, with 150 individual specific responses (pages 109 thru 113) to what an “Enhanced Village Area” means, need to be incorporated into above proposed *separate* chapter dealing just with Village Development. This village vision expressed by our community is not adequately addressed in draft Comp Plan and requires many more specifics. This topic deserves a separate chapter, not bundled into land development concepts for whole township. Also of note, Question 4, has one of the HIGHEST responses (173 strongly agree/agree) to preservation of farmland, yet draft Comp Plan has completely omitted any maps or discussion of our three permanently preserved farms (175+ acres), our ASA (700+ acres) or parcels enrolled in Act 319. This high priority is also shared in responses to Question 7. If farmland is such a high priority to our community, why was this data omitted from the Comp Plan, especially when inclusion of this topic is required by the MPC when drafting a Comp Plan? Was this done at the behest of land developers whose only vision for LFT is to develop this farmland with high density housing? Without further clarification the Steering Committee’s recommendations of changing our Zoning, Land Use and Act 537 plan seem to support this assumption. Again, please read the responses received from our community and revise Comp Plan accordingly to reflect.

- **Appendix D – Methodology** - Page 144 clearly states the conclusion of the two analyses utilized within the draft Comp Plan is that: **"The township's present ZONING provides sufficient opportunities for development to accommodate LFT's projected population growth over the next 20 years"**. This indicates there is NO need to change current Zoning or Land Use map so why is that recommendation given such a HIGH priority? Without the plan giving any specific proposed Zoning and Land Use changes, other than on page 79 calling for changing Zoning and the Land Use map to accommodate "proposed future land developments", this recommendation is contrary to cited population data, projected future housing needs, and community sentiment.

There are also discrepancies between LFT's 2005 Open Space Build Out Plan vs 2020 Zoning Capacity Analysis. Although this appendix does speak of EAFs being deducted from 2020 Zoning Capacity Analysis, this vast difference of an additional 455 residential units between these two analyses is not adequately explained. The explanation of only 56 residential units being counted in VMU area's 2005 analysis vs the 388 VMU residential units depicted in the 2020 analysis does not fully explain a 455 unit discrepancy. Nor does the explanation of *changes* in LFT's natural features (steep slopes, floodplains, watercourses, wetlands, bedrock, etc.) allowing for MORE developable area adequately explain the remaining 399 extra housing units proposed by this methodology. Additionally in the 2020 Zoning Capacity Analysis, LFT's permanently preserved farmland totaling over 175+ acres (restricted from development in perpetuity) appear to be included in this development total, artificially inflating these housing numbers by almost 90 homes.

Regardless of methodology used, any future housing developments, connections of existing parcels with failing septic systems, or commercial development in the VMU, OI & LI areas beyond currently proposed developments (Prestige/Cichocki, Melbourne Hill, GenTerra/Prestige) cannot exceed 289 EDUs without expansion and/or construction of a new WWTP. Failure to address and coordinate this needed infrastructure with the proposed future housing needs does not meet the criteria and/or preparation requirements of a Comprehensive Plan outlined in Article III, Section 301, of the Municipal Planning Code (MPC).

Lastly, in regard to the draft Comp Plan's adoption procedure outlined in MPC's Article III, Section 302, the Lower Frederick Township Planning Commission (LFTPC), our legally defined "Local Planning Agency", has never been given an opportunity to review, comment, or offer suggestions towards this Comp Plan's contents at any official LFTPC meeting. To the contrary, at the June 11, 2020, Comp Plan Steering Committee meeting, Mr. Eric Jarrell, MCPC Planner, restricted comments from any LFT committees or the public until the 45 day comment period we are presently in now. See below excerpt from 6/11/20 Steering Committee's minutes:

## **2. Discussion of the Comprehensive Plan Status- Mr. John Miklos, MCPC Community Planner**

Mr. Miklos provided the LFT Comprehensive Committee members with an update on the progress that MCPC has made with furthering the plan's development. He noted that the Infrastructure and Transportation chapter draft is now complete. The draft chapter for Natural Resources and Open Space is nearly complete. Mrs. Gilchrist stated, and Mrs. Amy Sacks concurred that it would be beneficial to have those draft texts available for the public's ability to review. The LFTCPSC supports having the township manager place the draft texts on the LFT website placed under Boards and Commissions- "Comprehensive Steering Plan Committee". Mr. Jarrell, MCPC Planner noted that once posted on the website it would be advantageous to restrict committee or public text comments until the final 45 day public comment period. Comments should be channeled thru the Comprehensive Plan's email address. Mrs. Gilchrist noted that posted draft would include solely the text, all supportive graphics and photos would be included by MCPC at a later time.

This edict issued by Mr. Jarrell, MCPC Planner, further adds to the clandestine nature of this plan's creation. Why would the legally defined "Local Planning Agency" be restricted from providing comment?



When the concept of developing a Comprehensive Plan exclusive for LFT was first proposed in October of 2018, the LFTPC was told the appointed Steering Committee would prepare draft chapters for our input and review. This never happened. The Comp Plan Steering Committee, with no legal authority other than that, *a working steering committee*, has acted in the capacity as the Local Planning Agency throughout this draft Comp Plan's development. There is no grant of power contained within MPC's Article II, Sections 201 & 202, which allows the previous governing body to create *TWO* separate Planning Commissions for the township.

The only allowed interaction of LFTPC in the development of this plan was at the July 15, 2021, LFTPC meeting, when Steering Committee Co-Chair, Ms. Gilchrist, provided LFTPC with a prepared list of recommendations and asked the LFTPC to rank them in order of importance. LFTPC members were not permitted to add suggestions or recommendations, just rank these already prepared recommendations provided by the Steering Committee. As outlined in above comments, this lack of ongoing input from LFTPC or other LFT Boards and Committees has resulted in a draft Comp Plan filled with outdated, inaccurate, and contradicting data.

Based on MPC's Article II, Sections 201 & 202, along with Article III, Section 302, this draft Comp Plan should never have advanced to our Board of Supervisors for a vote of approval without inclusion of comments by our legally defined "Local Planning Agency", the Lower Frederick Township Planning Commission.

The efforts of the Steering Committee are duly noted and greatly appreciated, yet without input from LFTPC and other LFT Boards, Committees and Councils, along with consideration of the public's input, this plan should NOT be adopted as written. It should be treated as exactly what it is, a draft Comp Plan, with revisions still needed. These revisions should be tasked to the "Local Planning Agency", as mandated by MPC's Article III, Section 302, with many thanks to the Steering Committee for creating such a great "framework" to build upon. Again, implore the Board of Supervisors to delay adoption of this draft Comp Plan until all contradictions are addressed and compliance is achieved.