

**TALKING POINTS AGAINST AN AMENDMENT TO THE
WALLACE TOWNSHIP ZONING ORDINANCE
ADDING SECTION 1323 PLANNED COUNTRY CLUB COMMUNITY**

1. Township comprehensive plan. The Amendment is inconsistent with Wallace' 1986 comprehensive plan. The first of eight goals of that plan is to "Provide for development in an orderly manner that will retain the rural character of the community and protect the health, safety, and welfare of the Township." A planned country club community (PCCC) allows considerable residential and commercial development. The effect on the Township of either of these is hard enough to predict. Together, they constitute disorderly development. The commercial facilities of a PACC are incompatible with a quiet, rural lifestyle. They include a country club and recreation center with 112 guest suites; restaurants and a shop; a spa and wellness center with 80 more guest suites and a huge parking lot.
2. By-right plans. Development plans legal under the present zoning ordinance, hence not requiring an amendment to the code, bring about as many new houses to Wallace as does a PCCC, so they shouldn't be seen as a threat. According to Township figures, the adjusted tract area (ATA) for the proposed PCCC site along route 282 is 388.07 acres. Under Tier IV of the zoning code, 282 homes can be built (one per 60,000 square feet ATA) only seven more homes than the 275 projected for a PCCC. Up to 423 homes might be built under the Hamlet Overlay (one per 40,000 square feet), but since a hamlet can't contain more than 550 homes and must be at least 1,250 feet from another hamlet, the actual number of homes that can be built is much less. Another section of the Hamlet Overlay allows 550 homes but requires substantial low-income housing that is unlikely to be built. The by-right plans bring us about as many homes as a PCCC without the commercial development.
3. East Brandywine Creek. The Creek is a state-designated High Quality (HQ) stream. By regulation it can't be degraded with sediment and other pollutants except for compelling social or economic reasons which don't apply to a Township as prosperous as Wallace. Development is almost always harmful to streams, and extensive development like the 10% impervious cover allowed on 150 or more acres in a PCCC can be ruinous. In practice the PCCC can have far more than 10% impervious because there is no requirement that infiltration areas be close to impervious areas, meaning some infiltration areas could be swamped with more runoff than they can absorb. That development is bad for streams is shown by the near-total absence of HQ and Exceptional Value streams in developed areas. Every stream in highly-developed southern Delaware County is impaired, that is, unable to meet the quality and temperature standards designated for it by the state. Development covers over soil with impervious surface like pavement and rooftops. Trees, the best filter of polluted runoff, are cut down. Rain can't reach the ground and so runs off. Heavy construction equipment compacts soil so it absorbs less runoff on its way to a stream. The result is

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increased runoff into streams, erosion, poor water quality, and scarce aquatic life. Developers always promise to protect streams, but often they fail to maintain silt fences or build detention basins to contain runoff during construction. Best management practices, devices meant to contain post-construction runoff, often are poorly maintained. It's a mistake to trust the state Department of Environmental Protection (DEP) to solve these problems. While almost all developments need a DEP stormwater permit, DEP's review is often cursory, not involving new runoff calculations.

4. The golf course required by a PCCC is a particular threat to the Creek, because it will remove runoff-absorbing ground cover and is likely to use large quantities of pesticides. It must be certified by Audubon International, but Riverkeeper found considerable polluted runoff from an Audubon golf course in Montgomery County. The golf course proposed along route 282 is on pasture, the sort of agricultural land the comprehensive plan said should be saved.
5. Groundwater demands of a PCCC are considerable, if it doesn't use public water. The combined demands of a golf course, which alone will need six million gallons a month for six months of the year, and of several hundred homes could cause existing wells to go dry. PA law generally doesn't restrict groundwater use, so establishing liability for a dry well could be a costly, ultimately futile effort.
6. Public water. Any big development like a PCCC increases the chance public water, already available in neighboring townships, will come to Wallace. A PCCC may attract enough capital to convince the Public Utility Commission (PUC) to grant a franchise to build and provide public water to customers. The Township may oppose the franchise, but the decision is the PUC's and the great majority of the time it's for a franchise. Public water will encourage development all over Wallace. When it's readily available, developers find it cheaper to lay pipes than dig wells.
7. Trees. There are about 700 specimen trees (more than 24" in diameter 4 1/2 feet above the ground) on the proposed PCCC site along route 282. The amendment allows 10% of these and 5% of heritage trees (more than 30" in diameter) to be cut within 100' of a stream for crossings. Big trees absorb huge amounts of runoff and carbon dioxide. They are lovely to look at. None should be cut down, especially beside a stream. Stream crossings and trails can be rerouted. If big trees are cut, the replacement requirements should be tougher. For every 2" of tree diameter removed in a specimen tree, 1" of new tree diameter should be planted. For a heritage tree the ratio should be 1" to 1". The amendment sets no limit on the number of specimen or heritage trees that can be cut more than 100' from a stream. It should bar cutting of any trees, regardless of size, within 100' of a stream.
8. Economics. A fiscal study paid for by a developer found Township, School District, and County revenues would exceed expenses from a PCCC by a substantial margin. Two by-right plans would also be profitable but less so. A PCCC would increase Township revenue from real estate, real estate transfer, and earned income taxes. But the study acknowledged a fall in the price of new homes would lower revenues from all three taxes. In view of today's housing slump, the 34% drop in the price of new houses that, according to the study, would wipe out any fiscal advantage of a PCCC over the by-right plans no longer seems impossible. If revenues do fall, expenses may not. Homes

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at any price need police and fire protection.

9. Population. The fiscal study predicts the PCCC will bring 721 new residents and 200 employees to the Township. Absent from the study are the approximately 192 guest suites (hotel rooms) in the country club and recreation center. If at one time half the residences are occupied and half the hotel rooms are occupied by two people, Township population could grow by 767 or 22%, based on a 2008 population of 3,499.

10. Traffic. The Wallace comprehensive plan says "The Township road network is not conducive to support intensive development which generates or attracts large volumes of traffic. The network is a system of narrow, winding farm, lanes which were never designed to support collector or arterial road related volumes of traffic....This isolation factor has been a key component in the rural, residential development pattern experienced by the Township."