



Fwd: Campmeeting - WCT Zoning Ordinance

From: Benjamin Slotznick <bslotznick@gmail.com>

Date: Sat, Jul 23, 2022 at 11:00 AM

Subject: Campmeeting - WCT Zoning Ordinance

To: Dave LLoyd <dllloyd@ephratarehab.org>, Jeff Steckbeck <jsteckbeck@steckbeck.net>

Cc: D.A Dale Building Designs <dondaledesigns@comcast.net>, George Leyh <georgeleyh@yahoo.com>, John Brosious <bro4sons@gmail.com>, Hal Myers <hmmyers@verizon.net>

Dave and Jeff,

The Campmeeting Zoning Working Group recognizes that writing the new proposed West Cornwall Township (WCT) Zoning Ordinance was a large and involved undertaking. We appreciate the consideration that the Township has given to Campmeeting's unique issues and heritage. At the same time, as we read over all of the many provisions in the ordinance (not just the R-4 provisions), we found some inconsistencies among different provisions that may need to be resolved, and some issues that may require clarification.

Our comments are attached. We hope you find them useful. We are sending our comments now, so that if the Township needs to discuss these issues with the Gannett Fleming consultants or the Township Solicitor there is time to do that before the public hearing.

We certainly do not speak for all of Campmeeting. We realize that other Campmeeting members or other Campmeeting committees may have their own comments on the Zoning Ordinance. And we may make additional comments of our own.

Thanks for all your hard work. We would be happy to discuss any of these issues with you if that would be helpful.

Very truly yours,

The Campmeeting Zoning Working Group

Ben Slotznick

Don Dale

George Leyh

John Brosious

WEST CORNWALL TOWNSHIP PROPOSED ZONING ORDINANCE

From: Campmeeting Zoning Working Group

Date: July 18, 2022

The Mt. Gretna Campmeeting Zoning Working Group consists of 4 residents of Campmeeting: Ben Slotznick, Don Dale, George Leyh, and John Brosious. The Group has had the opportunity to read over the entirety of the proposed new West Cornwall Township (WCT) Zoning Ordinance. We're pleased that the new R-4 District intends to recognize the unique characteristics and traditions of Campmeeting in order to preserve them. We commend the WCT Zoning Team on developing the many provisions of this lengthy and entirely new zoning ordinance, and designing that complex document so that for the most part the separate provisions interact seamlessly. We would like to call your attention to a few provisions which seem contradictory or conflicting.

- Parking space is not defined consistently. In two places it is specified as having minimum dimensions of 9' x 18' (R-4 provision §27-1207.1.B and Off-Street Parking provision §27-2102). In another its minimum dimensions are defined as 10' x 20' (Definitions §27-101).
- Utility setbacks might have an inconsistency. There is a possible conflict between the R-4 setbacks in §27-1203, for non-residential uses, and the Supplementary regulation §27-1923 (which grants Public Utilities Exemptions). In R-4 the non-residential front yard is between 0 and 5 feet – and no more than 5 feet, whereas the Public Utilities Exemption requires at least 10 feet. (For most districts, the Public Utilities Exemption is a more lenient or flexible standard, but for R-4 it is stricter.)
- Steep slope provisions might have an inconsistency. The Supplementary regulation §27-1914.2.D, Steep Slope provision applies only when 25% or more of a lot has steep slopes. In contrast a nearly identical provision in the Environmental regulations §27-2004 (A.2) applies when a lot has any amount of steep slope.

We would also appreciate some language to make it clear how some R-4 regulations (discussed below) interact with other provisions.

Parking and Paving

R-4 Ground Cover Standards

- Neither “pervious” nor “impervious” is defined. Neither “pervious” nor “impervious” is defined anywhere in the zoning ordinance. Is stone or gravel considered pervious or impervious? Is there an industry standard or Pennsylvania state regulation that could be referenced with respect to what degree of perviousness is acceptable in the R-4 Ground Cover Standards of §27-1206.1 or can it be defined in the Definitions section §27-101?
- Paving Campmeeting streets. Ground Cover Standards of §27-1206 do not permit paving our private streets with macadam. This is most likely an omission. Can the first sentence of this section be revised to read something like the following (added words highlighted in yellow)?

“Fully impervious surfaces shall be limited to structures, private streets, and pedestrian walkways.”

Off-Street Parking Standards

- Driveways and curb requirements in R-4. Much/most of Campmeeting does not have curbs, and parking spaces are often very close to lot lines and each other. The R-4 parking provisions are intended to provide relief, but do not clearly address the Driveway and Curb requirements of §27-2108. Can the ordinance be revised to clarify this (see suggestion below)?
- Required hard surface for parking lots conflicts with R-4 pervious surface requirements. The Off-Street Parking regulations in §27-2111 require that parking lots need to be hard surface, but R-4 Ground Cover Standards in §27-1206.1 do not permit new paving of parking spaces. (Both the Carter Street and Kauffman Street parking lots have a gravel surface.)

To correct these conflicts, can the R-4 Parking section §27-1207.1.A be revised to read something like the following (added words highlighted in yellow)?

“Parking spaces may be located adjacent to drivable streets, within the required front yard for lots fronting drivable streets, and are exempt from off street parking regulations §27-2108 and §27-2111.”

Environmental regulations: parking lot plantings. Because of the extensive plantings and tree cover maintained by Campmeeting throughout the R-4 district, Campmeeting should be exempt from additional perimeter and interior plantings in their off-site parking lots (particularly on Carter Street and Kauffman Street). Adding planting areas to Campmeeting parking lots would just require Campmeeting to enlarge the parking lots with additional parking spaces and access lanes to compensate for those parking spaces lost. (Notice that the Kauffman Street lot, while owned by Campmeeting and adjacent to Campmeeting, is not designated as R-4.)

To address this concern, can the R-4 Parking section §27-1207.1.C be revised to read something like the following (added words highlighted in yellow)?

Required off-street parking may be located in one or more off-site parking lots or structures, provided that all spaces are within 1000 ft of the lot. Because of the extensive tree cover maintained in the R-4 district, such off-site parking for the R-4 district that is located within or adjacent to the R-4 district shall be exempt from the parking lot planting regulations of §27-2004.B.3.

Alternatively, a sentence like this could be incorporated into §27-1210.

Private parking garages within Campmeeting. There are a number of garage and storage buildings located on 1st Street between Carter Street and Route 117. Some of these are owned by Campmeeting. Over the years, others have been sold to individuals along with the land on which they had been built. The Campmeeting owned garages are undoubtedly permitted by right in the R-4 district as accessory uses and structures under §27-1202.9. or additional off-site parking structures under §27-1207.1.C. The conflict is that for the privately held garages, under the proposed WCT Zoning Ordinance, an accessory

building or use must be on the same lot as the primary structure or use, but each of these garages, as the only structure on its lot might be considered a sole primary use.

To address this issue, can the R-4 Use Permitted by Right section §27-1202.9 be revised to read something like the following (added words highlighted in yellow)?

Customary accessory uses and buildings incidental to any of the above permitted uses, **even if constructed as the sole structure on a separate lot within the R-4 district.**

Signs: in keeping with Campmeeting's atmosphere as a retreat and vacation spot

- Cottage name signs. Campmeeting has a tradition of cottages having names, like "Dew Drop Inn". Often these employ puns or other word play. Small signs on many cottages proclaim those names. Such "cottage name" signs do not seem to be permitted by right under any of the Sign regulations (such as §27-2203.A.1). Can the R-4 or Sign ordinance be revised to explicitly permit this (see suggestion below)?
- Decorative flags and banners. A number of cottages also have decorative banners and flags, such as those commemorating the 125th Anniversary of Campmeeting and Chautauqua. Can the R-4 or Sign ordinance be revised to permit these as well? (see below)? For example, could a sentence be added at the beginning of the R-4 sign regulation §27-1208 that reads something like the following (added sentence highlighted in yellow)?

Signs not exceeding 2 square feet in area and bearing the name or "nickname" of a cottage are permitted by right, along with flags and banners that serve a solely decorative function. Otherwise, signs shall be permitted in accordance with Part 22 of this Chapter.

- Short term rental "for rent" signs. The proposed WCT Zoning Ordinance permits Guest Homes to have signage indicating their guest accommodations, §27-2203.D. However, the Short Term Rental regulations do not permit such signs (See Supplementary regulation §27-1926.2.A. Could a sentence be added to the R-4 or Short Term Rental regulations permitting small "for rent" signs?

A possible sentence might read: **For a short-term rental that has obtained a zoning permit, a "for rent" sign not exceeding 2 square feet in area may be posted, without additional application for an additional permit.**

- Short term rental notice sign. Short-term rentals are required to post a notice with contact information, see §27-1926.2.J. However, regulations prohibit any change in outside appearance indicating that the property had a change in use, §27-1926.2.A. This implies that the short term rental notice must be posted inside, and not visible from the outside. If that is the case, then a neighbor wanting to complain cannot see the contact information!

In contrast, many Campmeeting cottages have been permitted to post small "for rent" signs, and Campmeeting regulations require that a rental notice with contact information be visible

from the outside of the home, so that if there are noise problems, the owner can be contacted. Could a sentence be added to the R-4 or Short Term Rental regulations permitting the required short term rental notices to be seen from the outside?

A possible sentence might read: **For a short-term-rental unit, the unit address as well as the name and 24-hour phone number of the owner(s) and local contact must be visible from outside of the dwelling; this visibility may be satisfied by posting the notice required for short-term rentals by §27-1926.2.J. in a window of the dwelling, with this information facing the outside.**

Lighting: in keeping with Campmeeting's atmosphere.

- Street lights. Campmeeting street lights (on both pedestrian walkways and driving streets) are on private Campmeeting property, and illuminate not only the streets, but adjacent properties. This may violate Supplementary lighting regulation §27-1925.3.A. Could street lights on private streets be exempt, or explicitly considered "necessary for site security and the safety of residents" per §27-1925.3.C?
- Porch, architectural, and foliage lighting. Many Campmeeting properties have "holiday-style" lighting all year round (i.e. strings of Christmas lights around porches, as well as laser lights in the trees). These may violate Supplementary lighting regulations §27-1925.3.A, §27-1925.3.B, and §27-1925.3.G. Could these holiday-style lighting displays be exempt as acceptable architectural lighting?

Other R-4 provisions

- Eaves and rain gutters. There is no provision for eaves or rain gutters projecting into yard setbacks. Could a footnote be added to the R-4 table of Lot Area, Yard, and Coverage Requirements including setbacks §27-1203, a footnote 3 to the "Yard Requirements" column, that would read something like:

3. Eaves and rain gutters may project a maximum of 1.5 feet into a side yard, provided that they terminate no closer than 2 feet from a lot line.

- Rebuilding nonconforming uses. Nonconformities regulation §27-2304.D.4 limits structural repairs to 50% of a nonconforming structure. However, most Campmeeting cottages will need structural repairs from time to time – they are old; and many have some part which is nonconforming. Instead, the ordinance should perhaps specify as 50% **of the nonconforming part** of the structure. Could §27-2304.D.4 be revised to read something like the following (new phrase highlighted in yellow)?

A maximum aggregate of 50 percent of the structural or weight bearing components of the nonconforming **part of the** structure may be replaced, during structural alterations, so that repairs and maintenance do not actually involve replacement of the old structure with a new one over any period of time.