



April 1, 2026

East Vincent Township Board of Supervisors
262 Ridge Road
Spring City, PA 19475

Attn: Robert Zienkowski, Township Manager

RE: Pennhurst Data Centers – Conditional Use Application
Review No. 1

GFT, Inc. has completed a review of the Conditional Use Application for the above-mentioned project. This project is located within the IMU – Mixed Use and is Tax Parcel Number 21-1-92.7, 21-1-76, 21-1-92.8, 21-1-91, 21-1-92.9, and 21-1-92.10 and contains 123.07 acres. This project proposes the following:

- The construction of a mixed-use site with office and data center use.
- The construction of a power generating facility.

The following documents were submitted for our review:

- 2026-03-12 Cover Letter 2
- 2026-03-11 Conditional Use Plans Sheets 1 to 7 of 7
- 2026-03-11 Traffic Statement

(1) Traffic Review completed By Traffic Planning and Design, Inc, Dated April 1, 2026, is attached and incorporated into this review.

The applicant has submitted a Conditional Use Application for the data centers being proposed as a part of the site improvements. Under Section 27-2802.3.E any use that is permitted by-right, by conditional use, or by special exception in the General Industrial (GI) district may be permitted as a conditional use within the IMU. The uses allowed in the GI District are governed by Chapter 27 Part 13 (Section 27-1302) of the Township ordinances. Under this section, specifically section 27-1302.4.F, any lawful use in addition to those listed and not on the list of prohibited uses may be permitted by conditional use in the GI district.

The applicant has indicated that they are requesting the following conditional use approvals:

- §27-2802.3.E – A conditional use approval is requested to permit the data centers in the IMU District provided that the development meets the provisions set forth for the GI District
- §27-1303.1.G – A conditional use approval is requested to increase the maximum building height beyond two stories and 35’ through receipt of transferable development rights.

- §27-1104.2.B – A conditional use to increase the total floor area to be greater than 45,000 square feet through transferable development rights.

Existing Conditions/Conditional Use Plans – Pennhurst Data Centers

Plans Prepared By: Langan Engineering and Environmental Services, LLC

Dated: 10/9/2025, last revised 03/11/2026

The following deficiencies were noted in our review and must be resolved prior to consideration of conditional approval:

Zoning

1. §27-202 – Zone One: Inner Riparian Buffers in areas where very steep slopes (+25%) are located within and extend beyond such margin, Zone One shall extend to include the entirety of the steep slopes up to a maximum dimension of 100 feet on either side of the subject wetland, water body or stream. Zone Two: Outer Riparian Buffer begins at the outer edge and on each side of any area delineated within Zone One and occupies an additional area, if any, within 50 feet of the nearest edge of any wetland or 100 feet of any stream, lake or pond, measured as for Zone One. Zone Two shall further extend to include any area of hydric soil as defined herein and not included in Zone One, regardless of dimension, location, or relationship to Zone One. The Riparian Buffers must be revised on the plans to show Zone One and Zone Two per the definitions section of the Zoning Ordinance.
2. §27-1104.2.D – No individual building shall be placed closer to any other building than the height of the taller of such adjacent building. The building separation does not appear to meet this requirement. The proposed building separations must be shown on the plans.
3. §27-1302. – A Power Generation Facility is not a permitted use unless it is a Public Utility. A Zoning variance is required for this use.
4. §27-1303.1.G – When approved by the Township subject to conditional use approval, maximum building height may be increased beyond two stories and 35 feet upon receipt of transferable development rights as provided in Part 24. Part 24 Transferable Development Rights §27-2404.1.B.(2) states the maximum building height may be increased subject to conditional use approval in the GC, GI or PO Districts. This site is located in the IMU District and would require a Zoning variance to increase the building height.
5. §27-1403.2.A.(5) – Any historic district included in the National Register of Historic Places or any historic district which has received a determination of eligibility (DOE) by the Pennsylvania Historical and Museum Commission (PHMC) must conform to the Special Provisions for Historic Resources listed in §27-1403. An updated PHMC Clearance must be provided.

6. §27-1403.4.A. – A Demolition Permit must be submitted to the Township and is subject review by the Historical Commission in §27-1403.4.B.
7. §27-1502.2 – Prohibited uses on Very Steep Slope Areas (greater than 25%) includes the erection or buildings or streets, the installation or subsurface sewage disposal systems, and the disturbance or removal of topsoil on land sloping greater than 25% shall be prohibited except permitted uses by special exception or conditional use in §27-1502.3. It appears that there will be very steep slopes being disturbed as a result of the erection of buildings and site grading. A Zoning variance is required to permit very steep slope disturbance for the proposed site improvements.
8. §27-1502.3.C. – Uses permitted Subject to Special Exception or Conditional Use Approval in Areas of Very Steep Slope (greater than 25%) include access roads that shall be suitable for the passage of emergency vehicles in the event of fire or accident. It appears that the proposed driveways will disturb existing very steep slopes. The Fire Marshal should provide feedback on the site layout to determine if these roads are necessary for emergency vehicle access.
9. §27-1709.B. – All required parking shall comply with the provisions of §22-431 of the East Vincent Township Subdivision and Land Development Ordinance [Chapter 22], as applicable.
10. §27-1709.C.1.E. – For any use permitted by special exception or conditional use, it shall be the burden of the applicant to present evidence of the parking needs the proposed use. The Board of Supervisors, when granting conditional use approval, may attach specific parking requirements of this Part using the conditional use criteria set forth in §27-1901. The applicant must provide parking calculations to demonstrate adequate parking is being provided.
11. §27-2802.3.E – Planned commercial development including outlet center, involving more than one principal use on a single lot or tract, including any use otherwise permitted by right, special exception, and/or conditional use in the GI District, are subject to the provisions set forth in §27-1103.2 and 27-1104.2. As such, a conditional use approval as requested to permit the data centers in the IMU District must meet the provisions set forth for the GC District §27-1103.2 and 27-1104.2. The buildings as presented on the plan exceed the permissible building size. Zoning variances would be required to permit the building sizes as proposed, as they exceed the maximum permitted floor area per building.

Conditional Use

1. §27-1901.3.B – Applicant shall demonstrate evidence of adequate water supply and sewage disposal capability. Will serve letters for sewer and water facilities providers to demonstrate adequate supply.

2. §27-1901.5.B.(1) – Notice of the public hearing must be given as set forth in this section of the ordinance. Proof that notification must be provided to the Township.
3. §27-1901.6.L.– The adequacy of sanitation and public safety provisions, where applicable, and the necessity to provide a certificate of adequacy of sewage and water facilities from a governmental health agency in any case where required or deemed necessary. Will serve letters for sewer and water facilities providers must be provided to demonstrate adequate supply.
4. §27-1901.6.M.– Sufficient land area shall be available to be able to effectively screen the proposed conditional use from adjoining different uses if required by the Board of Supervisors. Sufficient buffers must be provided in areas of woodland and tree removal along the property boundaries adjacent to sensitive receptor.

Subdivision and Land Development

1. §22-307.2.D. – At the time of preliminary plan submittal, a required environmental impact statement prepared pursuant to §22-307.6.C. shall substitute for the site analysis and impact narrative. The site analysis and impact narrative shall not substitute for an EIS unless otherwise approved by the Board of Supervisors.
2. §22-429.1. – An updated wetlands report must be provided, and the location of the UNT and must be shown on the plans. The Riparian Buffers, where applicable, must be shown around the existing UNT on the plans in accordance with the Zoning Ordinance §27-202.
3. §22-429.2.C.(2) – No specimen vegetation shall be removed from any lot or tract except where applicant demonstrates to the satisfaction of the Board of Supervisors that such removal is essential to eliminate hazardous conditions(s) or otherwise permit lawful use of the lot or tract; where permitted, removal of specimen vegetation shall be minimized. The specimen trees to be removed must be noted on the plans and a Tree Inventory Table must be provided.
4. §22-429.2.C.(3) – Woodland replacement calculations in accordance with §22-429.2.D. must be provided to demonstrate the property has adequate capacity for the tree replacements required.
5. §22-429.2.E. – Woodland Management Planning must be provided to the Township. The applicant has indicated in the Site Analysis and Impact Narrative in the previous submission that they will comply with the requirements outlined in this section of the ordinance.
6. §22-429.2.F. – A Replacement Guarantee must be provided to ensure all replacement plantings found not to be in a healthy and/or sound condition during such time period shall be replaced

with the same type and amount of plantings. The applicant has indicated in the Site Analysis and Impact Narrative in the previous submission that they will comply with the requirements outlined in this section of the ordinance.

7. §22-429.3.C. – No structures shall be placed within any riparian buffer area as defined in §22-202, and no land disturbance shall be permitted within any riparian buffer area subject to further limitation within Zone One set forth in §22-429.3.D. The Master Conditional Use Plan indicates that “Existing Wetland to Remain; Construction of Substation to Avoid Riparian Buffer”; however, it appears that there will be steep slopes and very steep slopes disturbance within the Riparian Buffer. The plans must be revised to be consistent.
8. §22-429.3.D. – No woodland disturbance or other land disturbance, shall be permitted within any Zone One: Inner Riparian Buffer, except for the conditions located in this section of the ordinance. A variance will be required to permit woodland and land disturbance within the Zone One Riparian Buffer.
9. §22-431.1.C.(5) – The following provisions shall apply to handicapped parking, subject to the Americans with Disabilities Act, Title III Regulations promulgated by the U.S. Department of Justice (28 CFR, Part 36, revised July 1, 1994). Handicap parking calculations must be provided and included in the overall site parking calculations.

General

1. A proposed impervious coverage calculation table must be provided on the Conditional Use Plan.
2. The reference to the substation around the existing wetlands buffer must be revised.
3. Details of the Power Generation & Battery Storage area must be provided.

Potential Conditions of Approval

1. The site shall be subject to a Phase 1 and 2 environmental remediation study, and remediation shall be completed as required. PA Act 2 Land Recycling Certification for Residential use must be obtained for the Site and provided to the Township prior to any construction permits being issued.
2. No independent power generation on site.
3. Water and Sewer.
 - i. A DCC must be served by a public water system and wastewater disposal system. The Applicant shall demonstrate, to the satisfaction of the Township Engineer,(i)

the anticipated water usage by the DCC and (ii) that sufficient capacity currently exists (or will exist) to serve the needs of the DCC. The DCC shall not be designed or operated (including cooling systems) to draw on private wells.

- ii. The DCC shall be designed to include a closed-loop water circulation system(s) to cool DCC processing equipment or parts or, in the alternative, such other technology and systems to minimize DCE sound emissions from DCC cooling equipment and the DCC's use of water, acceptable to the Township's Engineer.
4. Sound, Noise and Vibration Limits. The sound and vibration emitting from a DCC shall, unless excluded hereby, in every instance be limited as follows:
- i. Maximum decibel level for any noise measurable with a Class 1 sound meter described in ANSI S1.4-2014/IEC61672, or equivalent sound meter:
 - 1. from 7:00 AM to 7:00 PM: 50 db or Daytime Ambient Sound plus 3 dB(Z).
 - 2. from 7:00 PM to 7:00 AM: 50 db or Nighttime Ambient Sound plus 3 dB(Z).
5. No vibration generated by the DCC that is discernible to the human sense of feeling shall be perceptible without instruments at any point beyond the property lines of the DCC.

The above items must be addressed to the satisfaction of East Vincent Township or made a condition of any consideration for approval.

If you have any questions or require any additional information, please contact me.

Very truly yours,

GFT INFRASTRUCTURE, INC.



Roger A. Phillips, P.E.
Principal Project Manager



April 1, 2026

Mr. Roger A. Phillips, P.E
GFT, Inc.
1010 Adams Avenue
Audubon, PA 19403

RE: Pennhurst Data Centers– Traffic Review #2
East Vincent Township, Chester County, PA
TPD No. EVTO.00003

Dear Mr. Phillips:

Introduction

The Pennhurst Data Centers development is proposed to be located in East Vincent Township, Chester County, Pennsylvania at the site of the former Pennhurst State School and Hospital. The proposed development is proposed to include **1,886,400 square feet of data center space**. Vehicular access will be provided to the existing local roadway network via Brown Drive and Dunlap Drive.

Transportation Review

Per your request, Traffic Planning and Design, Inc. (TPD) has reviewed the following items associated with above referenced application:

- *Traffic Statement for Conditional Use Application*, prepared by Langan Engineering, dated March 11, 2026;
- *Traffic Impact Study for the Pennhurst Redevelopment*, prepared by McMahon Associates, dated May 7 2021;
- *Site Analysis and Impact Narrative – Pennhurst Data Centers*, prepared by Langan Engineering, dated October 9, 2025;
- *Master Conditional Use Plan – Pennhurst Data Centers*, prepared by Langan Engineering, dated March 11, 2026.

Based on our review, we offer the following comments:

Transportation Impact Study (TIS)

1. The *Traffic Statement* prepared by Langan Engineering cites a McMahon Associates traffic impact study completed in 2021 for a previous land development proposal. This study assumed that the Pennhurst site would be redeveloped, and that Phase 1 would include approximately 230,000 square-feet of light industrial space and 94,651 square-feet of office space. Langan opines that they believe that *"the previous study was prepared in accordance with applicable standards and guidelines and that the information and analyses results provided in the report are still valid."* While we agree that the methodology of the study appears to be within industry standards for the preparation of a traffic impact study and that the current application for data centers will generate less traffic than the previous development proposal, we disagree that the results and conclusions remain valid. We feel that the use or reliance on the 2021 McMahon study is not appropriate for the following reasons:
 - a. The traffic counts were conducted in 2017, 2018, and 2019 (6-8 years ago). Counts older than three (3) years are not acceptable as they do not represent present-day traffic conditions. Moreover, PennDOT does not accept counts older than 3 years.
 - b. The traffic counts were conducted pre-COVID-19. As a result of the pandemic, drivers' habits and business operations have changed significantly.
 - c. The McMahon study recommended off-site roadway improvements necessary to mitigate the traffic impact of the redevelopment. A number of these improvements will require acquisition of right-of-way. No information has been provided that explains if the necessary properties can be obtained to completed the required improvements.
2. Per Chapter 27 (Zoning), Part 19 (Conditional Use Process), Section 27-1901 Procedures and Criteria, Criteria for Review of Conditional Use Applications, 6.J, *"The location and layout of the proposed use is suitable with respect to probable effects upon highway traffic, and assures adequate access arrangements in order to protect major streets and highways from undue congestion and hazard. The Board of Supervisors may require that the applicant demonstrate that the proposed use shall not result in a lowering of the level of service on adjacent road segments and intersections as defined by the most recent edition of the Highway Capacity Manual from the Transportation Research Board. As a policy, proposed projects should incorporate designs which assure safe and efficient access and maintain a level of service "C," as a minimum, on all adjacent road segments and intersections.*

In our opinion, the Applicant cannot comply with this criteria at this time due to fact they are relying on traffic studies and recommendations that are invalid and or/deficient. The Langan traffic statement declares that a new Transportation Impact Study will be completed as part of the land development process with East Vincent Township. However, until such time that the Township and its consultants review said updated traffic study, it is not possible to determine if the Conditional Use traffic criteria can be satisfied.

Site Plan/Vehicular Access

1. Based on the McMahon traffic study, the proposed new traffic to/from the redevelopment of the Pennhurst site will utilize: a) Brown Drive to Schuylkill Road (S.R. 0724), b) Brown Drive to Pennhurst Road and Bridge Street, and c) Dunlap Drive to N. Church Street and Bridge Street. If this access plan will remain for the current application, we have concerns with the existing cartway width of a number of these roads, specifically Dunlap Drive and N. Church Street. In addition, the pavement conditions of these roadways is insufficient to handle any increase in the traffic volumes.

2. The Applicant should provide information regarding: 1) traffic related to the demolition of the existing on-site building, and b) construction traffic. In light of the existing deficiencies noted in Comment #1, use of these roadways by heavy vehicles, however temporary, will only exacerbate the conditions.
3. As noted in Traffic Impact Study Comment #1.c, the Applicant is committing to the completion of certain roadway improvements that in their opinion will mitigate traffic impacts that will result due to the new development. One of these improvements is dependent on the acquisition of a property/house located at the intersection of Brown Drive and Old Schuylkill Road. As this acquisition is necessary to provide direct access to Schuylkill Road, the Applicant should provide information as to the feasibility of this improvement.

General Comments

1. If not already completed, the Applicant should discuss with the Township the protocols for emergency vehicle access. Our office defers to the Fire Marshal regarding the suitability of internal circulation for emergency access.
2. A response letter must be provided with the resubmission detailing how each comment above has been addressed, and where each can be found in the resubmission materials (i.e., plan sheet number(s), page number(s), etc.) to assist in the re-review process.
3. TPD reserves the right to make additional comments as additional information is submitted.

If you have any questions, please contact me at your earliest convenience.

Sincerely,

A handwritten signature in blue ink that reads "Greg Richardson". The signature is fluid and cursive.

Greg Richardson, P.E.

Executive Vice-President

grichardson@TrafficPD.com

cc: East Vincent Township Board of Supervisors
East Vincent Township Planning Commission