



Natural Lands

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MEMO

TO: Bob Zienkowski, Manager
East Vincent Township

FROM: Richard M. Tralies, RLA
Senior Director of Planning

CC: Applicant
Township Consultants

DATE: March 30th, 2026

RE: **Penn Hurst Holdings, DE, LLC
Data Centers - Conditional Use Application
Planner's Review of Revised First Submission**

I have reviewed the materials submitted in reference to the Penn Hurst Holdings, DE, LLC Conditional Use Application, including: the CU Application Form, dated October 9, 2025, signed by Derek Strine, Managing Member of Penn Hurst Holdings; the Master Conditional Use Plan, the Existing Conditions Plan, and the Site Analysis and Impact Plan, and the Site Analysis and Impact Narrative all prepared by Langan Engineering, dated October 9, 2025. I have also reviewed the revised materials which include a cover letter, dated March 12, 2026, revised conditional use plans, last revised March 11, 2026 and a traffic statement, dated March 11, 2026, all prepared by Langan Engineering.

It should be noted that the applicant was represented at the East Vincent Township Board of Supervisors meeting held on Wednesday, December 3rd. The applicant's representatives provided a presentation during which they shared more information about the proposed data centers. While the presentation was informative and useful, the information presented has not been considered as part of this review, as the information has not all been memorialized in plans or submitted documents at this time.

The applicant seeks Conditional Use Approval, to permit construction of a complex of offices, power generation facilities, battery storage facilities, and data centers on the site of the Pennhurst State School and Hospital. The development is proposed across six separate parcels, totaling approximately 123 acres within the Industrial Mixed Use (IMU) Zoning District. The revised Master Conditional Use Plan shows three buildings containing data centers and offices, totaling approximately 943,00 sf, accompanied by an additional 943,00 sf of equipment yards. Two small guardhouses, extensive parking areas and many stormwater basins are also proposed.

This office typically reviews matters of general planning, historic resources, circulation, trails, parks, recreation, landscaping, natural resource protection, and open space preservation. I offer the following comments in accordance with the Conditional Use requirements contained in Part 19 of the Township Zoning Ordinance, as well as other sections of Township Ordinances as referenced below:

Conditional Use Review

1. **ZO Section 27-1901.3.A.** Ownership, states that the tract of land under application for conditional use approval shall be in one ownership, or shall be the subject of an application filed jointly by the owners of the entire tract and shall be under unified control. If ownership of the entire tract is held by more than one person or entity, the application shall identify and be filed on behalf of all of the said owners. Approval of the plan shall be conditioned upon agreement by the applicant or applicants that the tract shall be developed under single direction in accordance with the approved plan. ***The Conditional Use application lists six parcels as part of the application. According to ChesCoViews (Chester County's online GIS Parcel Viewer website), five of the parcels are owned by the applicant, Penn Hurst Holdings, DE. However, one parcel, UPI #21-1-91, is owned by Matthew Herzog. Mr. Herzog has not been identified as an applicant, and no agreement of sale has been provided to signify that all six parcels are under single ownership. The applicant should clarify the ownership situation in accordance with this ordinance section.***
2. **ZO Section 27-1901.3.B.** Sewer and Water Facilities, states that the applicant shall demonstrate evidence of adequate water supply and sewage disposal capability. All water supply and sewage disposal facilities shall be designed and constructed in compliance with 22-423 and 22-424 of the East Vincent Township SLDO and the East Vincent Township Sewage Facilities Plan. ***While I defer to the Township Engineer on this matter, it does not appear that the applicant has provided adequate information regarding water and sewage use.***
3. **ZO Section 27-1901.4.C.(1)** requires submission of an existing features plan in accordance with the provisions of the Township Subdivision and Land Development ordinance Section 22-307.1, which lists the information required to be shown on the existing features plan. The applicant has provided an existing features plan which includes most of the required information. ***However, the plan should be revised to address the following:***
 - a. **307.1.A(1) – Drainage basins and subbasins (Existing watersheds and subwatersheds)**
 - b. **307.1.A(9) – Generalized geological characteristics, including rock formation types and locations of fault zones. We recommend the plans be revised to identify underlying geology and any potential issues that could arise due to the characteristics of that geology.**
 - c. **307.1.A(12) - Historic resources pursuant to this chapter and the Zoning Ordinance. Historic resources have been provided on the Site Analysis documents but should also be shown on the Existing Conditions Plan.**
4. **ZO Section 27-1901.4.C(2)** requires submission of a site analysis and impact narrative in accordance with the provisions of the Township Subdivision and Land Development Ordinance Section 22-307.2. indicating how any or all of the resources included on the existing features plan will be affected by the proposed development, and shall describe mitigating measures to be employed in addressing these impacts. ***The applicant has provided a site analysis and impact plan and narrative which includes most of the required information. However, the plan should be revised to address the following:***
 - a. **307.2.A** states that the written narrative shall identify and evaluate the proposed development's potential adverse impacts on sensitive receptors in proximity to proposed action. Receptors include, but are not limited to, adjacent and nearby land uses such as, schools; churches; existing residential neighborhoods and other types of development; The plans and narrative

show nearby sensitive receptors and list their distances. **However, the revised plan does not yet show any detail regarding location of the proposed substation and power generation and battery storage areas, only 5 acre hatched areas.. Additionally, the existing wastewater treatment facility has not been considered a sensitive receptor. We recommend revising the plans to show more detail regarding the potential locations for the substation and power generation and battery storage areas and considering their impact on sensitive receptors. Additionally, the plans should be revised to consider the wastewater treatment plant and connected lines as sensitive receptors, as the plant likely contributes clean water to the Schuylkill River and any damage to the plant or its connected lines could pollute the river and groundwater. The narrative should be revised to explain the potential effects and mitigation measures related to these sensitive receptors.**

5. **ZO Section 27-1901.6** establishes the Criteria for Review of Conditional Use Applications. The following criteria shall be used as a guide by the Board of Supervisors in evaluating a proposed conditional use. It shall be the burden of the applicant to demonstrate compliance with all applicable criteria:
 - a. **ZO Section 27-1901.6.A.** states that, any applicant for conditional use approval shall have the burden of demonstrating to the satisfaction of the Board of Supervisors that provision is made to adequately reduce or minimize any noxious, offensive, dangerous, or hazardous feature or features thereof, as the case may be. Board of Supervisors may deny conditional use approval where applicant has failed to do so or where any use is otherwise deemed to be dangerous or potentially dangerous to the public health, welfare or safety, or which constitutes or may constitute a public hazard whether by fire, explosion, or otherwise. **It is currently unclear whether the proposed use is potentially dangerous to the public health, welfare or safety, as the narrative and plan do not address the specifics of data center operations, their potential effects, which may include noise, vibration, odor, etc, or the proposed contents of the buildings, which may include heavy metals, batteries and diesel fuel.**
 - b. **ZO Section 27-1901.6.B.** states that, the use(s) proposed shall be limited to those authorized as conditional uses within the district in which the lot or parcel is situated. The property subject to conditional use application shall be suitable for the use desired. The use is authorized as a potential conditional use, as the IMU district permits by Conditional Use, any use permitted as a Conditional Use in the GI District. ZO Section 27-1302, which describes the use regulations for the GI District, states that a building may be erected or used ...for any lawful purpose in addition to those uses listed, subject to conditional use approval. **The applicant appears to meet this criterion.**
 - c. **ZO Section 27-1901.6.C.** states that the size, scope, extent, and character of the conditional use desired shall be consistent with the spirit, purposes, and intent of the East Vincent Township Comprehensive Plan, Open Space Plan, and this chapter. The proposed mixed uses of office and data centers appears to be consistent with the Township Comprehensive Plan in scope, as they may be appropriate uses for an industrial district. **However, the size, extent and character does not appear to be consistent. The plans currently show rectangular buildings with little detail and heights described only as "greater than 35 feet." The proposed array of data centers and office buildings are in stark contrast to the existing somewhat rural surroundings. More information is required about the proposed heights of the buildings, as well as outbuildings and accessory uses, such as the proposed substation.**

- d. **ZO Section 27-1901.6.D.** states that, the proposed use at the location set forth in the application shall be in the public interest and serve the public health, safety, and general welfare. It is currently unclear whether the proposed use at the location set forth will be in the public interest and serve the public health, safety and general welfare. ***The plans have not described in detail how the potential issues such as noise and safe management of batteries, heavy metals, heat and diesel fuel may be addressed.***
- e. **ZO Section 27-1901.6.E.** states that, consideration of the character and the type of development in the area surrounding the location for which the request is made, and a determination that the proposed use is appropriate in the area and will not injure or detract from the use or value of the surrounding properties or from the character of the neighborhood. While the mixed use development is proposed within the IMU district, it is a small district, surrounded by a veterans hospital, single family residences, a park and a regionally important trail, the Schuylkill River Trail. ***The applicant should demonstrate, potentially through precedent studies, other analysis and more detailed proposals, that the proposed use would not injure or detract from the use or value of the surrounding properties or from the character of the neighborhood. Injury or detraction should be considered not just by the use itself, but also the effects of the proposed use, which could include groundwater or electricity use, increased traffic or pollution.***
- f. **ZO Section 27-1901.6.F.** states that, the development, if more than one building, will consist of a harmonious grouping of buildings or other structures. ***The proposed layout appears to be harmonious.***
- g. **ZO Section 27-1901.6.G.** states that there will be no adverse affect of the proposed conditional use upon the logical, efficient, and practicable extension of public services and facilities, such as public water, sewers, police and fire protection, recreational opportunities, and public schools. Where appropriate, adequate arrangements for expansion or improvement of such services and facilities may be required as condition(s) of approval. ***It is unclear whether the proposed use will have an adverse affect on the local public services and facilities. Two of the proposed buildings are in close proximity to the Schuylkill River Trail and could affect the character of the trail and trail users ability to enjoy the outdoors. Additionally, as data centers typically contain arrays of computers, batteries, diesel fuel and other specialized equipment, it is unclear whether the local fire companies are equipped or trained to handle a fire at a facility like this. Additionally, without knowing the proposed heights of the buildings, it is unclear whether they pose additional risks to fire fighters.***
- h. **ZO Section 27-1901.6.H.** states that the use of any new construction and proposed change in use of existing buildings will be compatible with the existing uses in the immediate vicinity and that the proposed use shall be compatible with the character of the neighborhood. ***While the proposed use is consistent with an industrial district, the proposed use is very different, and not clearly compatible, with the existing character of the neighborhood and the existing uses in the vicinity.***
- i. **ZO Section 27-1901.6.I.** states that if the development is to be carried out in progressive stages, each stage shall be so planned that the conditions and intent of this chapter shall be fully complied with at the completion of any stage. ***It is currently unclear whether the proposed use and development would be implemented in stages.***
- j. **ZO Section 27-1901.6.J.** states that 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. ***We defer to the Township Traffic Engineer on this matter.***

- k. ***ZO Section 27-1901.6.K.*** states that the interior traffic circulation shall provide safe and convenient circulation for all users, including pedestrian and vehicular modes of transit, applicant shall demonstrate that sufficient safeguards such as parking, traffic control, screening, and setbacks can be implemented to remove any potential adverse influences the use may have on adjoining uses. In addition, all emergency access design considerations shall be addressed and incorporated into the proposed plan. ***We defer to the Township Traffic Engineer on this matter.***
- l. ***ZO Section 27-1901.6.L.*** states that 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. ***We defer to the Township Engineer and Chester County on this matter.***
- m. ***ZO Section 27-1901.6.M.*** states that 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. ***It is currently unclear whether there is sufficient land to effectively screen the proposed conditional use, as no proposed landscaping has been shown. Additionally, many of the proposed improvements are located very close to property boundaries, including the veterans hospital. Furthermore, without a real understanding of the potential height of the proposed buildings, it is impossible to determine whether its even physically possible to effectively screen them from view.***
- n. ***ZO Section 27-1901.6.N.*** permits consideration of any other development impacts and/or proposed mitigation identified by the submitted site analyses. ***The Township may wish to consider the potential effects of noise, vibration, odor, glare and other effects, NOT included in the site analysis.***
- o. ***ZO Section 27-1901.6.O.*** states that the Board of Supervisors may consider additional standards and criteria set forth in § 27-2009, "Standards for Review of Special Exception," to the degree the Board of Supervisors deems such standards to be applicable to review of the conditional use application. The Township may wish to consider ZO 27-2009. E & F, which state:
 - i. E. Conditions are being imposed on the grant of the request necessary to ensure that the general purpose and intent of the property adjacent to the area included in the proposed special exception is adequately safeguarded with respect to harmonious design of buildings, aesthetics, planting and its maintenance as a sight or sound screen, landscaping, hours of operation, lighting, numbers of persons involved, allied activities, ventilation, noise, sanitation, safety, smoke and fume control and the minimizing of noxious, offensive or hazardous elements.
 - ii. F. The proposed special exception does not materially and adversely affect the safety, health and general welfare of the Township.

The concepts addressed above in E & F could potentially be included in a Community Benefits Agreement or additional conditions to be imposed by the Township.

- p. ***ZO Section 27-1901.6.P.*** states that uses shall meet all applicable provisions and requirements of the East Vincent Township Subdivision and Land Development Ordinance [Chapter 22] and all other applicable ordinances and regulations whether or not propounded by East Vincent Township. ***It is currently unclear whether the applicant intends to comply with all other applicable ordinances. This review pertains primarily to the proposed use, not to site design, layout or an extensive review for consistency with all ordinances. Should the application reach the land development stage, far more information would be required.***
 - q. ***ZO Section 27-1901.6.Q.*** states that the Board of Supervisors may impose such conditions, in addition to those required, as are necessary to assure that the intent of this chapter is complied with, which conditions may include, but are not limited to, harmonious design of buildings, planting and its maintenance as a sight or sound screen, the minimizing of noise, glare, noxious, offensive or hazardous elements, adequate standards of parking and sanitation. ***The Township may consider imposing additional conditions which are consistent with the draft data center ordinance currently being considered.***
6. If you have any questions, please don't hesitate to contact me at the phone number above (ext. 262) or at rtrialies@natlands.org. Thank you for the opportunity to review this plan.