# **ENVIRONMENTAL ASSESSMENT**

### **Land and Water Conservation Fund**

Embreeville Complex 1818 West Strasburg Road West Bradford Township, Chester County, PA 19382 Tax Parcel #s 50-8-9 and 50-8-9.4 (in part)

#### Prepared for:

West Bradford Township 1385 Campus Drive Downingtown, PA 19335

#### Prepared by:



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Montrose AGC Project # 2020-4118 April 26, 2021



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#### CHAPTER 1: PURPOSE, NEED, BACKGROUND

#### 1.1 **SUMMARY**

This project involves the acquisition of the property known as the "Embreeville Complex" by West Bradford Township (Township). The Township strives to acquire and preserve open space as part of a long-term comprehensive planning, and plans to convert the property to open space for public outdoor recreational use. The Township has evaluated multiple alternatives and has selected to convert this property as an addition to the Township park system.

The Township has a unique opportunity to provide its citizens with a substantial area of open space featuring significant natural and cultural resources, passive recreation areas, and athletic facilities.

This Environmental Assessment has been prepared to identify and evaluate the potential social, economic, and environmental impacts relating to the proposed project. The Environmental Assessment also documents the project purpose and need, the alternatives considered, and the criteria used to evaluate the alternatives and select a preferred alternative. This Environmental Assessment has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 and implementing regulations, 40 CFR Parts 1500-1508; National Park Service Director's Order #12 and Handbook, Conservation Planning, Environmental Impact Analysis, and Decision-Making; and Section 106 of the National Historic Preservation Act of 1966 as amended, and implementing regulations, 36 CFR Part 800.

#### 1.2 PURPOSE

The purpose of the proposed acquisition project is to purchase the property in order to create a public park, including both recreational areas and natural lands for public use. The proposed improvements further promote the Township's goals to preserve open space, while minimizing environmental impacts.

The Township plans to convert approximately 183 acres of the property into a public park with outdoor athletic facilities and a series of recreational trails, which will connect the proposed park



to a land trust preserve to the south. The park will create a large contiguous area of preserved land and open space available to the public, offering recreational and educational opportunities to the public.

#### 1.3 NEED AND BACKGROUND

Both the Township and Chester County have expressed the need to protect open space and create recreational areas in their Comprehensive Plans. The Township's Open Space Referendum "preserves West Bradford Township's history, beauty and scenic landscapes, minimizes traffic volume and congestion, preserves ecological benefits, such as clean water and air, allows West Bradford Township to counter pressure from developers, and preserves our stable tax base". The addition of a public park on the property will be a great asset to the community.

Besides boasting significant natural resources and scenic views of adjacent protected natural areas, the property has historical and cultural significance. The land was the site of the Chester County Almshouse from approximately 1800 until 1941 and as the Embreeville State Hospital for psychiatric patients until 1980. The majority of the land has been largely unused since that time and vacant since 2007. The gravesite of "Indian Hannah" (the last known survivor of the Lenni Lenape tribe in Chester County) is marked by a monument just a few feet beyond the southern property line. Two potter's field cemeteries and Star Gazers' Stone (used in the survey of the Mason-Dixon Line) are also located adjacent to the property.

The property was purchased from the Commonwealth of Pennsylvania in 2013 and the current Owner attempted to develop the property into residential homes and commercial office space. After zoning appeals were filed by the Owner, a Settlement Agreement was signed in December 2019 between the Township and the Owner to deter development. Several environmental studies have been conducted on the property, which identified numerous environmental concerns. These concerns will all have been addressed at the time of the property acquisition, as stated in the Settlement Agreement.



#### 1.4 LOCATION AND SETTING

The project is located in a scenic, rural area along the southern border of the Township in Chester County, Pennsylvania. It is located along a rolling hillside, and features areas of meadow, prime farmland soils, 86 acres of young and mature forest, and several small tributaries feeding the West Branch of Brandywine Creek. It is bounded by the following features:

- North West Strasburg Road and an Aqua PA water storage facility.
- <u>East</u> Undeveloped parcel (agricultural) owned by the Society for the Prevention
  of Cruelty to Animals (SPCA) proposed for residential housing and a
  Pennsylvania Department of Transportation (PennDOT) maintenance facility.
- West State Police barracks and residential properties.
- <u>South</u> Embreeville Road/Telegraph Road, Natural Lands' ChesLen Preserve, and Newlin Township lands

The property location, structures, and major features are shown on **Figure 1**. Existing recreational facilities and natural resources are depicted on **Figure 2**.



### **CHAPTER 2: DESCRIPTION OF ALTERNATIVES**

Two alternatives were considered for this project:

- A. No action.
- B. Convert the existing property into a township park.

#### 2.1 <u>ALTERNATIVE A – NO ACTION</u>

Property ownership would remain the same. The buildings are currently unsafe to enter, the property is vacant and not secure, and trespassing and vandalism have been documented. The current owner is unable to follow through with the residential/commercial development project they envisioned. Under this alternative, the property is unattractive and unsafe, and the Township's residents are not provided with the potential recreational benefits that Alternative B provides.

#### 2.2 ALTERNATIVE B – PROPOSED ALTERNATIVE

The proposed alternative is to convert the property into a public park. In doing so, the property would be secure from future development, cultural and natural resources would be protected, outdoor recreational and educational opportunities would be provided to the Township's residents, and undisturbed areas would benefit wildlife.

The proposed plans are in very early stages of development. Approximate areas proposed for passive recreation (undeveloped natural areas, hiking trails) versus active recreation (athletic fields, courts, parking areas) and proposed easements are shown on **Figure 3**. An approximately 13-acre portion of the property is being considered for construction of a sewage spray irrigation field. This area of the property is specifically excluded from the LWCF boundary.

Approximately 183 acres will be included in the park conversion. The proposed LWCF boundary is shown on **Figure 4**.



Conceptual plans for the park will likely include improvements to existing roads and parking lots, improved lighting, construction of additional athletic field and courts, improving vehicular access from adjoining roads and pedestrian access from surrounding public recreation areas. Proposed easements may include (1) stormwater and utility easements for a 33-home residential community proposed for the SPCA parcel adjacent to the northeast of the property; (2) a pedestrian access easement between the west side of the SPCA parcel and the park, as well as; (3) possible access and utility easements across Newlin Township land to improve access to the southern end of the property, aligning Ryan Boulevard with Route 162.

The current expected timeframe for the acquisition is the end of 2021 and improvements are to be completed by the end of 2024. The development plans may include improvements to existing ball fields, construction of basketball, tennis, and other athletic facilities, construction of a trail network, improvements to existing roads and parking areas, installation of LED lighting, and construction of fences.

The park will likely be accessible from 6:30 AM to dark, except for specific lighted facilities, such as tennis and basketball courts, which may remain open until 9:30 PM in the summer season. It will be accessible by vehicle from both West Strasburg Road (north entrance) and Route 162/Embreeville Road/Telegraph Road (south entrance) with several parking lots. The Park Master Plan will include details on how the new park will connect with the adjoining preserved land and trails. ChesLen Preserve (a 1,282-acre nature preserve open to the public and owned by Natural Lands) is located directly to the south, across Route 162. ChesLen features important wildlife habitat, portions of the Brandywine Creek Greenway, and over nine (9) miles of hiking/ walking trails. Connecting the proposed park with this property will enhance and connect wildlife corridors, preserve historic/cultural resources of the region, provide soil and watershed protection, protect sensitive wildlife habitats, soils, woodlands, streams, and riparian buffer zones, and allow for the development of regional recreational trails.

Alternative B is also the Environmentally Preferred Alternative. This alternative will protect the existing environmental resources for generations to come. The majority of physical improvements will be located within former building footprints in order to minimize the impacts to surrounding natural areas. Existing vegetation along onsite tributaries, wetland areas, and riparian buffers will be left undisturbed. Woodlots will be left in place, and most trees will remain



except for a limited number (if any) that may interfere with recreational improvements. Soils will be left in place to the extent possible, and water quality will be protected.



#### **CHAPTER 3: AFFECTED ENVIRONMENT**

The property is located along a rolling hillside in a scenic portion of southern Chester County, and features areas of meadow, prime farmland soils, 86 acres of young and mature forest, and several small tributaries feeding the West Branch of the Brandywine Creek.

There are two (2) existing easements on the property. AQUA PA water lines run north-south near the western boundary of the property to a water storage facility on West Strasburg Road. A sanitary sewer right-of-way is located on the eastern portion of the property, connecting a wastewater treatment plant to the PennDOT facility adjacent to the property. Athletic fields used by West Bradford Youth Athletics already exist on the southern portion of the property.

A Phase II ESA, as well as building inspections for hazardous materials and universal wastes, are currently underway. Demolition of the 11 former hospital buildings and connecting tunnels is underway, and will be completed prior to the Township acquiring the property. These structures had been abandoned for many years and were in stages of advanced deterioration and vandalism. Parking areas and driveways will be kept, and surface impacts resulting from construction/demolition traffic will be repaired before converting the park and allowing access to the public.

Currently, the park is going through a preliminary conceptual design. All other proposed improvements (i.e. tennis and basketball courts) are conceptual. Final locations and details for park improvements will be provided in the Township's Master Plan. The park will serve the residents of West Bradford Township and Chester County, and visitors to the area. Several ball fields are already present on the southern portion of the property and the addition of tennis and basketball courts will give additional outdoor recreational opportunities to visitors.

There are two (2) existing easements currently at the property. AQUA PA water lines run north-south near the western boundary of the property. A sanitary sewer right-of-way is located on the eastern portion of the property. Potential future easements could be related to development of the SPCA parcel located to the east of the property, as well as access and utility easements on the south end of the property to improve access to the southern end of the property, aligning Ryan Boulevard with Route 162.



#### **CHAPTER 4: ENVIRONMENTAL IMPACTS**

No adverse environmental impacts will result from the conversion of the property into parkland. Improvements to the property will include enhanced community livability, recreation resources and general aesthetics. Known contaminants will be removed from the property and all areas will be deemed environmentally safe for human interaction.

#### 4.1 <u>AIR QUALITY</u>

The majority of impact to air quality will occur during initial site preparation, grading, excavation, and construction of the park facilities. Construction-generated emissions may potentially result in increases in localized particulate matter concentrations, adverse health effects, and nuisance concerns, but are temporary. Asphalt paving of driveways and parking areas may emit organic vapors for a short time after application. The only potential impact to air quality lasting after the initial park construction would be vehicle exhaust emissions of park visitors.

#### 4.2 <u>CIRCULATION AND TRANSPORTATION</u>

Similar to air quality, construction of the park facilities may temporarily increase large truck usage of the small rural roads bordering the property. Post-construction, there may be a slight increase in vehicle traffic on West Strasburg Road and Route 162/Embreeville Road/Telegraph Road. Vehicular access to the property will be improved at both the northern and southern entrances. Long-term, impacts to circulation and transportation are expected to be minimal.

#### 4.3 <u>CLIMATE</u>

As the proposed use of the property is passive recreation (athletics, walking, hiking, jogging, etc.), no adverse climate impacts are anticipated.

#### 4.4 <u>CONTAMINATION AND HAZARDOUS MATERIALS</u>

From 2006 to 2008, Stell Environmental conducted a Phase I and Phase II Environmental Site Assessments (ESAs) on behalf of the Commonwealth of Pennsylvania Department of Public

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Welfare. As part of the due diligence for the proposed acquisition, the Seller and Township have retained environmental consultants to perform environmental assessments and inspections:

#### **Environmental Due Diligence**:

- Montrose AGC's March 6, 2020 Phase I ESA Report, prepared for the Township
- Montrose AGC's Phase II ESA Report, to be completed and issued to the Township in 2021

#### Hazardous Materials and Universal Waste Characterization:

- EDiS Company's initial and post-abatement building inspection reports for asbestos-containing materials, prepared in 2020 for the Township
- Bay Hill Environmental, LLC's Lead-Based Paint Inspection Reports, prepared in 2020-2021 for Embreeville Redevelopment, LP
- Montrose AGC's pre-demolition inspections for hazardous materials and universal wastes, prepared in 2020-2021 for the Township

As part of the Phase II ESA, soil and groundwater sampling activities are underway to determine if past uses have impacted the environmental quality of the property. Before the Township takes ownership of the property, any identified environmental concerns will have been investigated and (if applicable) remediated to the Pennsylvania Department of Environmental Protection Residential Statewide Health Standards.

The current owner is proceeding with the demolition of all structures, including 11 former state hospital buildings and nearly a mile of underground utility and pedestrian tunnels. All aboveground structures and utilities will be removed and all subsurface utilities will be disconnected and abandoned. All buildings are being inspected for asbestos-containing materials, lead-based paint or glaze, and other hazardous materials and universal wastes. All buildings are then re-inspected for these materials to ensure they have been removed prior to demolition. The basements and tunnels will be backfilled with demolition masonry debris under the oversight of Montrose AGC's geotechnical engineer. The building materials proposed for



backfill are being tested for the presence of lead-based paint, as well as any chemical constituents related to surface staining.

#### 4.5 BIOLOGICAL RESOURCES

There are no known critical habitats for endangered or threatened species located within the project area. Woodlands and riparian areas on the eastern and western portions of the property will be preserved and not directly impacted. Development of the park will not only secure these areas from potential future development, but also create lasting corridors for wildlife dispersal from ChesLen Preserve and beyond.

#### 4.6 <u>ENVIRONMENTAL JUSTICE</u>

Equal accessibility is extremely important to the Township. The Township wants the proposed park to be open and accessible to all, and wants the development and design to reflect the needs of the majority of its residents. As part of the acquisition process, the Township held extensive discussions with local residents regarding the desired uses of the property, and the outcome of those discussions are being incorporated into the Master Plan. The Township anticipates that a steering committee will be created to accept public input regarding the development of the property.

#### 4.7 GEOLOGICAL RESOURCES

There are no known unique geological resources on the property. There will be minor to negligible impacts to geological resources during construction of the facilities. Existing driveways and parking areas will be maintained with few anticipated adjustments. The majority of physical improvements will be located within former building footprints in order to minimize the impacts to surrounding natural areas. Soils will be undisturbed to the extent possible.

#### 4.8 HISTORIC OR CULTURAL RESOURCES

The property has historical and cultural significance. A monument for "Indian Hannah", the last surviving member of the Native American Lenni-Lenape tribe in Chester County, is located at

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the southern property line. This monument will feature prominently in future plans as a point of interest and historical significance for visitors.

The land was the site of the Chester County Almshouse from approximately 1800 until 1941 and as the Embreeville State Hospital for psychiatric patients until 1980. The Township is conducting a Phase I Archaeological Study to identify areas of low, medium, and high archaeological interest.

The majority of the property has been largely unused since that time and vacant since 2007. The buildings are unsafe and are currently being demolished, but there are still opportunities for public education about the history and former use of the property.

#### 4.9 INVASIVE SPECIES

Currently, there is no monitoring or control of invasive species currently at the property. Construction of the proposed project will result in minimal ground disturbance, which can result in the establishment of invasive plant species. Following development of the park, however, opportunities will exist for non-profit or independent volunteer groups to organize invasive species removal efforts.

#### 4.10 LAND USE AND PLANNING

A Park Master Plan will be generated by the Township describing the development of recreational facilities, walking paths, and hiking trails, as well as the protection of the existing natural features and habitats. There have been public hearing and comment periods related to the purchase. No formal public comment period has been introduced relating to the development of the property, as proposed development plans have not been generated. The Master Plan will be made available for public comment before it is finalized. Their website has a page dedicated to updates on the Embreeville project that is accessed from the home page. Documents, press releases, and other information regarding the property are made public on the Township website. The Township Board of Supervisors has kept the local residents informed throughout the process in public meetings where the public is able to comment on the Township's actions. The Township Manager has made himself available to answer questions



relating to the purchase of the property. The Township will work with other agencies and organizations such as PA Department of Conservation and Natural Resources, Natural Lands and the Brandywine Conservancy to develop regional recreational and conservation planning and physical connections to nearby resources.

#### 4.11 LIGHTSCAPES

As the property is currently vacant, development of a park will require a net gain of lighting. LED lighting will be used around the recreational facilities, parking areas, and driveways. Cut-off type fixtures may be used to limit light pollution of the night sky. The majority of the park is likely to be closed to the public after dark, with only certain lighted facilities (tennis and basketball courts) remaining open until 9:30 PM, so light pollution is expected to be limited.

#### 4.12 MIGRATORY BIRDS

While lighting of athletic fields around dusk may cause concern for nocturnal species and night-migrating songbirds, there will be a net benefit for migratory bird species. The preservation of a rich diversity of woodland, shrubland, and edge habitats across the property will secure important stopover habitat for both migrating and resident species.

#### 4.13 <u>RECREATION</u>

The development of this park will enhance recreational opportunities of residents and visitors in the area. Athletic fields used by West Bradford Youth Athletics already exist on the southern portion of the property. New types of outdoor recreation activities may include construction of basketball and tennis courts and a trail system for jogging, walking, hiking, birding, equestrian trail riding, and dog walking. These activities provide a wide range of short- and long-term physical and emotional benefits to the public.

#### 4.14 SOCIOECONOMICS

The construction of this park will have no negative impacts on the community and would be a benefit to all residents of the area. The park will be open to anyone to enjoy and use. No



populations have been identified that would be disproportionally impacted by the proposed project. The development of the park is not expected to have a negative impact on the tax base of the Township.

#### 4.15 NOISE

Development of the park may increase noise levels in the vicinity of the park when athletic facilities are in use. However, there are existing youth association ball fields at the property. The addition of new fields and courts is not expected to cause a dramatic change in the noise levels. Noise levels will not exceed State or Municipal regulatory thresholds or ordinances at any location.

#### 4.16 UNIQUE ECOSYSTEMS

While valuable wildlife habitat exists on the property, no unique ecosystems have been identified.

#### 4.17 WATER QUALITY

Existing vegetation along on-site tributaries, wetland areas, and riparian buffers will be left undisturbed. Woodlots will be left in place, and most trees will remain except for a limited number (if any) that interfere with recreational improvements. Soils will be left in place to the extent possible, and water quality will be protected.

#### 4.18 MANDATORY CRITERIA

Approval of this project would not have negative effects on environmental, historic, or cultural resources. Indeed, the preservation of this land as a municipal park would protect, improve, and/or enhance many of the items listed in this section (public health, historic features, wildlife habitat, soil and water quality, etc.).



### **CHAPTER 5: COORDINATION AND CONSULTATION**

The following people contributed to the development of the Environmental Assessment.

Montrose Environmental: Scott Ward, Staff Professional

Christopher D. Valligny, Project Professional

Barbara Forslund, Consultant

West Bradford Township: Justin Yaich, Township Manager

**PA DCNR:** Ashley Rebert, Chief, Land Conservation and Stewardship

Brandywine Conservancy: Kimberly T. Gordon, Associate Planner

#### **PUBLIC INVOLVEMENT**

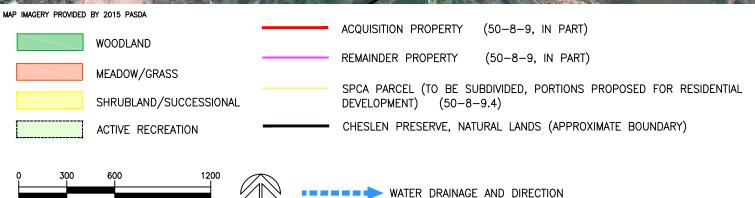
The Environmental Assessment is being made available for public review and comment during a 30-day period.

#### **CONCLUSION**

Conversion of the property from the existing use to a public park will not cause significant negative impacts on natural, cultural, or historical resources. Note that this document does not constitute an Environmental Impact Statement.



# **FIGURES**



1 INCH = 600 FT

- 2. ALL EXISTING ABOVE GROUND STRUCTURES AND TUNNELS TO BE DEMOLISHED. ROADS AND PARKING AREAS TO BE MAINTAINED.
- 3. ACQUISITION PROPERTY (201.00 ACRES) DEPICTED
  AS THE TITLE LINE AND NOT THE RIGHT—OF—WAY
  LINES. BOUNDARY IS PRELIMINARY AND SUBJECT TO CHANGE.
- 4. SOURCE: PRELIMINARY PROPERTY BOUNDARIES FROM 'AMENDED SCHEDULE 1'DATED APRIL 15, 2021 BY DL HOWELL

EMBREEVILLE COMPLEX

1818 and 1750 West Strasburg Rd., West Bradford Township, PA 19382
Parcel ID #s 50-8-9 and 50-8-9.4

# **EXISTING CONDITIONS**



A MONTROSE ENVIRONMENTAL GROUP COMPANY
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WEST CHESTER, PENNSYLVANIA 19380
Tel: 610.840.9100 Fax: 610.840.9199 Web: www.advancedgeoservior

Scale:	1"=600'	
Drawn By:	KHF	2
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:\Projects\2019\20194003 - Embreeville Complex ESA\CAD\DWG\MODELS\Figure 3 - Proposed Condition:

1 INCH = 600 FT

- 3. ACQUISITION PROPERTY (201.00 ACRES) DEPICTED AS THE TITLE LINE AND NOT THE RIGHT—OF—WAY LINES. BOUNDARY IS PRELIMINARY AND SUBJECT TO CHANGE.
- 4. SOURCE: PRELIMINARY PROPERTY BOUNDARIES FROM 'AMENDED SCHEDULE 1' DATED APRIL 15, 2021 BY DL HOWELL.



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MAP IMAGERY PROVIDED BY 2015 PASDA

PRELIMINARY LWCF BOUNDARY

- ALL EXISTING ABOVE GROUND STRUCTURES
   AND TUNNELS TO BE DEMOLISHED. ROADS
   AND PARKING AREAS TO BE MAINTAINED.
- 2. ACQUISITION PROPERTY (201.00 ACRES)
  DEPICTED AS THE TITLE LINE AND NOT THE
  RIGHT-OF-WAY LINES. BOUNDARY IS PRELIMINARY AND SUBJECT TO CHANGE.
- 3. SOURCE: PRELIMINARY PROPERTY
  BOUNDARIES FROM 'AMENDED SCHEDULE 1'
  DATED APRIL 15, 2021 BY DL HOWELL.

GRANTEE: WEST BRADFORD TOWNSHIP PARK NAME: EMBREEVILLE COMPLEX (183 ACRES)

LOCAL SPONSOR SIGNATURE/DATE: \_\_\_\_\_\_

SLO/ASLO SIGNATURE/DATE:\_\_\_\_\_

NPS SIGNATURE/DATE: \_\_\_\_\_ LWCF NUMBER:\_

# A MONTROSE ENVIRONMENTAL GROUP COMPANY 1055 ANDREW DRIVE, SUITE A WEST CHESTER, PENNSYLVANIA 19380 Tel: 610.840.9100 Fox: 610.840.9199 West www.advoncedgeoservic-

EMBREEVILLE COMPLEX

1818 and 1750 West Strasburg Rd., West Bradford Township, PA 19382
Parcel ID #s 50-8-9 and 50-8-9.4

# PRELIMINARY LWCF BOUNDARY MAP



1 INCH = 600 FT

