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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

June 4, 2024

Alison Giles, Zoning Officer & Planning Coordinator
Upper Dublin Township
801 Loch Alsh Avenue
Fort Washington, PA 19034

Re: MCPC # 21-0164-003
Plan Name: The Woods Apartments
(1 lot comprising approximately 32.5 acres)
Situate: 1410 E Butler Pike (cross street: Susquehanna Road)
Upper Dublin Township

Dear Ms. Giles:

We have reviewed the above-referenced subdivision plan in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on May 22, 2024. We forward this letter as a report of our review.

BACKGROUND

The applicant, MCH Developing LLC, is proposing to develop four new multi-family buildings and associated parking areas at an existing 32.5-acre multifamily residential complex. Three of the proposed buildings (Buildings 1, 2, and 3) would be 8-unit, 2-story buildings, and Building 4 would be 4 stories 44 units, for 68 dwelling units. Two of the proposed buildings would be located on opposite sides of Lincoln Drive W, from Susquehanna Road. A total of 134 parking spaces are proposed, 4 of which would be ADA spaces.

The property contains sensitive environmental features, including watercourses and wetlands in the western and eastern portions of the site, as well as heavily wooded areas and steep slopes, in the southern portion of the property near Route 309 and near Watercourse A/Tannery Run. Underground modular stormwater storage is proposed with the development. There is an existing residential structure south of Tannery Run and east of Lincoln Drive W, which would be demolished.

The Woods Apartments shares a property line with Temple University Ambler Campus. The proposal includes the construction of a walking path to connect to the campus. In addition, 7,000 square feet of additional recreation area is proposed.

The property is located in the AHS-Apartment House Special Zoning District and is served by public water and sewer. We reviewed previously submitted proposals for this site in letters dated June 21, 2021 and November 2, 2022.

COMPREHENSIVE PLAN COMPLIANCE

A. *MONTCO 2040* – The proposal is generally consistent with *MONTCO 2040: A Shared Vision*, which designates the area as "suburban residential" future land use category; however, the area of the proposed development site is also interspersed with areas that are designated for open space preservation. Tannery Run constitutes an area that should be preserved to help meet the comprehensive plan's goals to improve stormwater management and reduce the impact of flooding and to conserve environmentally sensitive areas.

B. Upper Dublin Comprehensive Plan. The proposal is also generally consistent with the Upper Dublin comprehensive plan, as the property is identified as a high-density residential area in the future land use map. The proposed development would contribute to the goal of providing housing opportunities to meet the needs of current and future Township residents. However, we feel that the proposal does not meet the goal to conserve and enhance Upper Dublin's natural resources and to develop in a balanced way.

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the applicant's proposal, however, in the course of our review we have identified a number of key issues that we believe should be resolved prior to final plan approval. Our comments are as follows:

REVIEW COMMENTS

OVERALL COMMENT

We commend the applicant for proposing an expansion to the existing residential campus that appears to be sensitive to the environmental context and scale of the existing campus. In addition, we commend the applicant for providing a dedicated pedestrian walkway to the Temple Ambler Campus to improve pedestrian connectivity.

Since our previous review letter, the buildings have been reconfigured somewhat and appear to be scaled more consistently with the existing buildings and more integrated into the exiting campus, rather than building in currently undeveloped/wooded areas of the property.

STORMWATER MANAGEMENT

Tannery Run passes through the site and runs south through Upper Dublin neighborhoods and into Ambler Borough, causing flooding issues in Ambler. We wish to reiterate the following comments from our previous review letter:

A. Downstream Flood Protection. To help prevent against future flooding issues that may be caused by additional development of this site, runoff needs to be managed properly to mitigate flooding downstream.

B. Impervious Coverage. The development would increase the impervious coverage from 33% to 38% (permitted impervious is 60%, § 255-81.C(2)), in an environmentally critical area. The extra impervious coverage and reduced number of trees on the site would increase the runoff flows. We recommend that the applicant make sure that the culverts under Route 309 and Sumneytown Pike are sized adequately to accommodate the anticipated flow.

1. Pervious Parking. To accommodate the required parking, new spaces are proposed for various locations within the site. In order to reduce the impervious coverage of parking lots, the applicant may want to consider porous paving in the parking lot areas, where feasible.

LANDSCAPING

A. Replacement Trees. The township requires that "Where more than 25% of the existing trees have been removed, every remaining tree, eight inches in diameter or more, which is destroyed because of site improvements shall be replaced" as a step towards re-establishing woodlands (§ 212-32.H(1)). Based on the landscape plans provided, the applicant appears to be providing sufficient replacement trees, in particular around the proposed Building 4 and the associated parking lot. We strongly encourage the applicant to plant as many trees as possible in the areas that are currently wooded and that are planned to be developed in order help reestablish the woodland edge and support a healthy ecosystem. If there is not space on the property to plant more replacement trees, we suggest coordinating with the township to find other places in the township where the replacement trees could be planted.

B. Parking Lot Landscaping. Upper Dublin's Subdivision and Land Development Ordinance (SALDO) requires that one shade tree be planted per every twelve parking spaces (§ 212-32.F(4)). While many of the additional parking spaces are proposed to be extensions to existing parking areas, a large parking lot is proposed to be in the center of the site (Parking 10) and another large parking lot is proposed to be nearly surrounding proposed Building 4. Based on the landscape plans provided, the applicant appears to be planting adequate trees and shrubs around the parking lot; however, we encourage the applicant to consider adding more landscape islands to provide as much canopy cover as possible over the parking lot, to mitigate the heat island and water quality issues associated with increased impervious coverage. We recommend the applicant reference the MCPC Sustainable Green Parking Lots guidebook for information about how to design parking lot landscaping and greening.

CONCLUSION

We wish to reiterate that MCPC generally supports the applicant's proposal but we believe that our suggested revisions will better achieve Upper Dublin's planning objectives for multifamily developments and environmentally sensitive areas.

Please note that the review comments and recommendations contained in this report are advisory to the township and final disposition for the approval of any proposal will be made by the municipality.

Should the governing body approve a final plat of this proposal, the applicant must present the plan to our office for seal and signature prior to recording with the Recorder of Deeds office. A paper copy bearing the municipal seal and signature of approval must be supplied for our files. Please print the assigned MCPC number (24-0164-003) on any plans submitted for final recording.

Sincerely,



Claire Warner, Senior Community Planner
Claire.Warner@montgomerycountypa.gov – 610-278-3755

c: Jack Mandelbaum MCH Developing LLC, Applicant
Nadif Bracey, Ludgate Engineering, Applicant's Engineer
Kurt Ferguson, Manager, Upper Dublin Township
Michael J. Cover, Chair, Upper Dublin Planning Commission
Tom Fountain, P.E., Upper Dublin Township Engineer

Attachment A: Aerial Image of Site
Attachment B: Reduced Copy of Applicant's Proposed Site Plan

ATTACHMENTS A & B

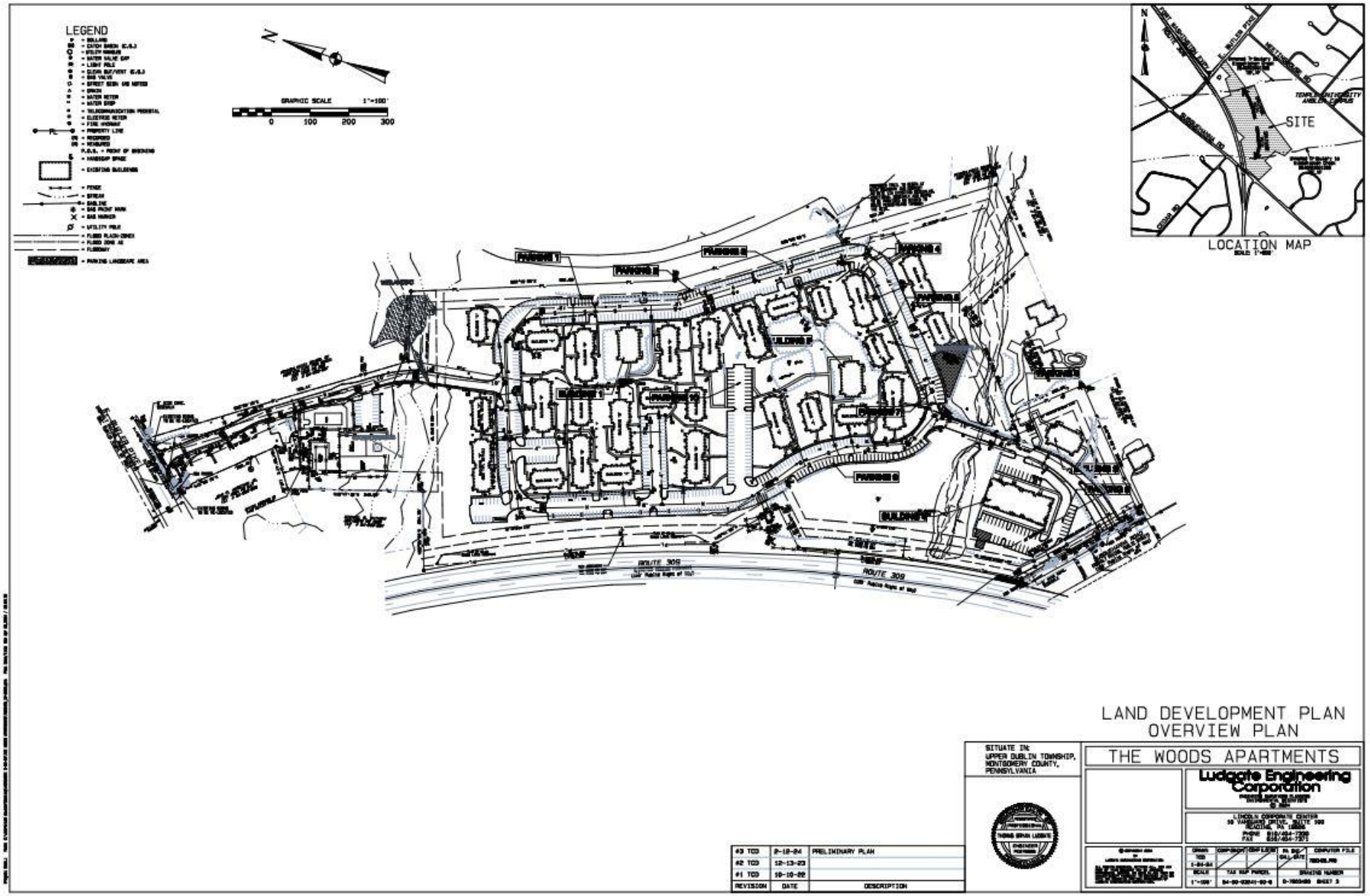


Woods Apartment
MCPC#210164003

Montgomery County Planning Commission

0 200 400 800 Feet

N


LEGEND
GRAPHIC SCALE 1"=100'
0 100 200 300
N
SITE
LOCATION MAP
PARKING 1
PARKING 2
PARKING 3
PARKING 4
PARKING 5
PARKING 6
PARKING 7
BUILDING A
BUILDING B
BUILDING C
BUILDING D
BUILDING E
BUILDING F
BUILDING G
BUILDING H
ROUTE 309
ROUTE 309
LAND DEVELOPMENT PLAN
OVERVIEW PLAN
SITUATE IN:
UPPER DUBLIN TOWNSHIP,
MONTGOMERY COUNTY,
PENNSYLVANIA
THOMAS BRIAN LUDGATE
PROFESSIONAL ENGINEER
COMMONWEALTH OF PENNSYLVANIA
#3 TCD 2-12-24 PRELIMINARY PLAN
#2 TCD 12-13-23
#1 TCD 10-10-22
REVISION DATE DESCRIPTION
THE WOODS APARTMENTS
Ludgate Engineering Corporation
LINCOLN CORPORATE CENTER
30 VANGUARD DRIVE, SUITE 200
READING, PA 19606
PHONE 610/404-1300
FAX 610/404-1301
DRAWN TCD
DATE 1-24-24
SCALE 1"=100'
COMPUTER FILE
TAX MAP PARCEL 54-00-03241-00-6
DRAWING NUMBER