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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

September 5, 2024

Mr. Charles L. Guttenplan, AICP
Director of Planning & Zoning Officer
Whitemarsh Township
616 Germantown Pike
Lafayette Hill, Pennsylvania 19444

Re: MCPC # 19-0018-004
Plan Name: Villanova University Boathouse
1 lot /18.138 sq. ft. comprising +/- 9.02 acres
Whitemarsh Township

Dear Mr. Guttenplan:

We have reviewed the above-referenced subdivision and land development in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on July 19, 2024 in an electronic submission to this office. We forward this letter as a report of our review.

BACKGROUND

The applicant, Villanova University, has submitted a preliminary plan for the redevelopment of a former industrial site as a recreational boating facility utilizing the Schuylkill River for boating. The Planning Commission reviewed a sketch plan of this development proposal in a letter to the township dated March 25, 2024. This submission revises the earlier plan with the addition of a 5,473 sq. ft. storage building situated immediately west of the principal building. The applicant proposes the demolition of the majority of a 42,484 sq. ft. industrial building and plans to use +/- 12,665 sq. ft. of an existing building's footprint to construct a two-story recreational building. The first floor is designed to store boats while the second floor is a large area open to the first floor with overlooking support rooms. Adjacent to the two buildings are wide concrete pads leading to a boat ramp and dock at the river's edge.

The application states that approximately 3.0 acres of the 9.8 acre tract will be impacted by the development. The property at 601 Washington Street is Tax Parcel # #65-00-12679-00-9, which lies in the township's Heavy Industrial District (HVY), the Riverfront Development District (RDD-1), and the Floodplain Conservation Overlay District. As pertains to the site's zoning, the township regulations for

the Riverfront Development Overlay District are additive to the requirements of the underlying district(s), and in the event of a conflict, take precedence over the underlying zoning district(s). The plan notes indicate that the "entirety of the project site area is located in the 100-year floodplain".

The submitted application indicates that various variances and waivers from the township's Zoning Code and Land Development Code will be sought. The application indicates that other types of relief are required, including:

- A Special Exception-Required for the use of a boating dock in the Floodplain Conservation Overlay District. Section 116-166. Special Exception.
- Conditional Use Approval-Needed for a Boathouse in the Riverfront Development Overlay District. Sec. 116-280.F.(2.)

The history of this site includes a land development proposal reviewed by the Montgomery County Planning Commission (MCPC) in a letter dated April 20, 2022. The land development plan was submitted by 601 Washington St. Associates, LP; the developer proposed the construction of a 4-story, 227 unit apartment building for this site.

The property has an Environmental Covenant recorded with the Montgomery County Recorder of Deeds on April 3, 2023. The Covenant states that the site has a history of industrial operations, which consisted of the manufacture of pressure and storage tanks for water, oil and gas. As part of these activities, welding and metal fabrication took place between 1926 and 1967. Currently the site is primarily vacant, with a portion of it being used for storage and sale of landscape materials, as well as the storage of boats used by local rowing teams.

COMPREHENSIVE PLAN COMPLIANCE

Consistency with *Montco 2040*- A Shared Vision

The plans for the redevelopment of this site as a recreational use is consistent with the future land use vision and stated goals of *Montco 2040: A Shared Vison*, the comprehensive plan and future land use vision for the county. The Future Land Use Map of the plan designates the land use vision for the site as part of a larger 'Regional Mixed-Use Center' (RMUC) extending from the Schuylkill Riverfront to Spring Mill East Elm Street.
"https://www.montcopa.org/1579/Montco-2040-Comprehensive-Plan).

Consistency with the *Whitemarsh Township Selective Comprehensive Plan Update, 2020* & The *Spring Mill Multi-Modal and land Use Study, March 2022.*

The redevelopment proposal for this property appears compatible with the township's future land use vision for this area envisioned as a 'Waterfront District Character Area', as recommended by the *Whitemarsh Township Selective Comprehensive Plan Update, 2020* and specifically in the plan's Chapter Four- Future Land Use Plan. The future land use goal for this character area is to support high-density development and quality public spaces along the riverfront. The redevelopment proposal supports the goals of creating green space along the Schuylkill River and ensuring recreational access and enjoyment of the river.

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the applicant's preliminary plan submission. Many of the issues we raised in our review of the sketch plan appear to be addressed. There are several issues that remain pertinent and bear emphasizing including: the potential future subdivision of the 9.0 property, the resiliency of the site development to flooding with the increasing frequency of the Schuylkill River flooding this areas, and applicant's proposed Washington Street improvements. We recommend the applicant and the township consider these issues and our comments.

COMMENTS

1. Future Site Development & Environmental Issues-

The applicant is developing only approximately 1/3rd or 3 acres of the 9.8 acre site. The applicant should provide additional information to the township on their vision for how the remaining vacant 6.0 acres may be redeveloped. As noted the property has a history of industrial activity, and environmental investigations were conducted at the property as documented by the recorded Environmental Covenant of April 2023. The Covenant states that a determination was made on the presence of hazardous contaminants in the soil and groundwater. As a result, activity and uses are limited at the site, as outlined in that environmental covenant. Approval of any development/activity for the site requires consideration as to the limitations and restrictions outlined in the environmental covenant.

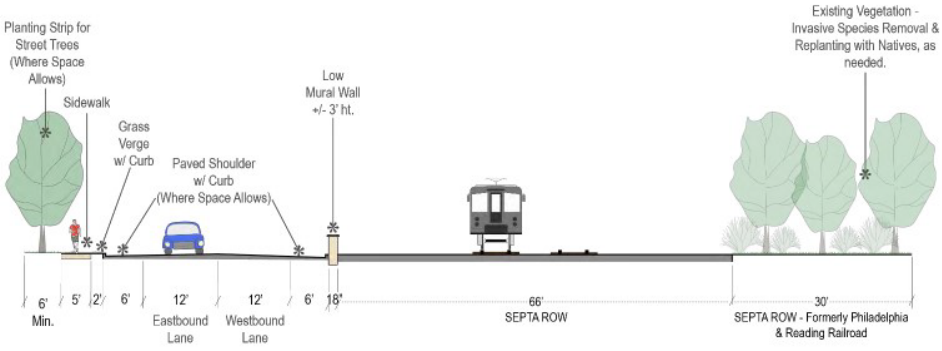
2. Washington Street Streetscape-Improvements

a. RDD-1 Streetscape requirements and the right-of-way width

The township should ensure that the applicant's plan addresses the goal of a pedestrian-friendly, unified streetscape along Washington Street. The recommended improvements and amenities should be established along the entire frontage of the applicant's parcel and meet the township's district requirements and recommendations from the Spring Mill Multi-Modal Study.

The Township's requirement for pedestrian-oriented development, §116-283 D.1-

requires a number of pedestrian-oriented elements, including: pedestrian lighting, benches, wide sidewalks, and pavement variety, with the strip between the curb and sidewalk. While the plan shows many of these elements, there are some discrepancies. The applicant's plan proposes a 43 ft. ultimate right-of-way and a 30 ft. wide roadway. A waiver is requested for the requirement of a 36 ft. wide roadway width. It is not clear how the recommended amenities as shown below from the SMMM Study can be constructed within the proposed right-of-way and roadway width. We recommend the township assess the proposal to ensure that it is consistent with the Spring Mill Multi-Modal and Land Use Study. We believe the recommendation for a 3 ft. high mural wall is both useful and a needed improvement to screen the railroad corridor along Washington Street.



Washington Street – Typical Cross Section

The widening of Washington Street west of the David's Bridal property would provide for a dedicated pedestrian path on the south side of the road, two travel lanes with dedicated shoulders and a low wall that separates the traveled way from the adjacent SEPTA right-of-way. Where space allows, street trees and pedestrian-scale lighting could also be included to provide a more inviting path for pedestrians. The inclusion of the low wall on the north side of the street provides an opportunity for collaboration between the Township and local artists and/or school art departments to prepare a decorative design for the wall that can incorporate local historical context into the proposed improvements.

Recommended Cross-section of Washington Street- Spring Mill Study

b. Washington Street sidewalk material

The applicant should address the discrepancy on the plan for the material composition of the sidewalk along Washington Street. The symbol representing the sidewalk is the same symbol for the 10 ft. wide 'red-shale' macadam pathway along the riverfront. The symbol in the plan's legend for sidewalks shows concrete, however the concrete symbol is not used in the plan's depiction of sidewalks along Washington Street. The plan should be corrected and a concrete sidewalk should be constructed along Washington Street.

c. Pedestrian-scale lighting – Section105-47.K.(6.)

The site plan does not provide the required pedestrian-scale lighting along Washington Street. This is a required improvement in the Riverfront Development District as stated in Section 105-47.K.(6.). We recommend the applicant work with the township to determine the appropriate type of lighting fixture planned for Washington Street, to ensure a consistent design along the street corridor.

3. Schuylkill Riverfront Access – Pathway Landscape Improvements

The plan shows the required perpendicular public access to the riverfront, the dedicated riverfront trail with seating areas, and the dedicated open space areas as required by Section 116-284. The applicant should ensure that the other required riverfront amenities, including lighting the riverfront pathway are provided. We recommend the plan include a native shade planting along the perpendicular pathway. Trees could be planted 30-35 ft. on-center, along the 350 ft. long perpendicular pathway to the river and, over time, establish a shaded corridor to the river. Species could include the same native floodplain species recommended below. [Comment #6.a.2.]. This improvement would be a valuable 'green-investment' to restore the river's floodplain environment and provide a visual boundary line for the property owner.

4. Base Flood Elevation and 116-204. Alteration of a Structure in the Floodplain Conservation District

The applicant's plan does not document the Base Flood Elevation of the proposed structure as required by Floodplain Conservation District regulations. According to Note #4 on Sheet # 2/ 23 of the plan, the Base Flood Elevation will be determined for a variance from FEMA – Federal Emergency Management Agency. The township's requirements for an alteration of a structure in the Floodplain Conservation District [Section 116-204.A.] requires that, to the greatest extent feasible, the applicant should elevate or flood-proof the proposed buildings. The architectural elevations of the building do not show the building's flood-proofing measures or the proposed building's elevation above the Base Flood Elevation. The applicant should address the requirements and provide the township with the required documentation and related building improvements to ensure the building's resiliency to the river's floods.

5. Emergency Preparedness and the Proposed Development Within the Schuylkill River's 100-Year Floodplain

Emergency preparedness is an important consideration in the assessment of the proposed development. The site lies within the Schuylkill River's 100-year floodplain and floodway fringe, and developments along Washington Street are experiencing increasingly frequent and sometimes disastrous impacts. The street was partially inundated by flood waters on January 10, 2024 and experienced a disastrous event with Hurricane Ida on September 1-2, 2021. Several hundred cars were damaged and many were a total loss from the impacts of the hurricane.

Our concern is that redevelopment as a recreational center may place additional burdens on local and county emergency services responding to Schuylkill River flooding events and rescues at this site and on neighboring properties. The applicant should coordinate with the township's emergency services and fire departments to develop a flood and emergency preparedness plan. The applicant should provide the township with details of its emergency preparedness plan and how its ramp and dock will be secured during flooding events.

6. Site Improvements

a. Landscape Plan

1. *Landscape Restoration*

As a significant portion of the applicant's parcel will not be developed, we believe the tract's undeveloped areas should receive greater attention. We recommend the applicant provide a robust landscape restoration plan for the areas which were previously used for outdoor storage of various materials. Restoration could include more extensive riparian forest plantings using bare-root plantings of smaller caliper, the removal of invasive vegetation, and the establishment of meadow areas with native shrubs and grasses. We recommend the applicant consider these measures and submit a restoration plan for these areas.

2. *Selected Tree Species for Washington Street and the Parking Lot*

The proposed street tree species and parking lot trees are 'Goldspire' Gingko, 'Musashino' Zelkova and 'Skyline' Honeylocust, which are not considered part of Piedmont floodplain tree community. We recommend that native, well-adapted floodplain tree species be selected, including: Princeton American elm (*Ulmus americana* 'Princeton', Sycamore (*Platanus occidentalis*) and Hackberry *(Celtis occidentalis*).

Section 105-48.1.A. Landscaping of the township's code recommends, "the applicant is encouraged to select native plant species and water-conserving plants." . . . and " to choose those species which may be expected to be found together under more or less natural conditions on tracts of land comparable to those where the trees and shrubs are to be planted." We recommend the applicant consider substituting native floodplain tree species for the introduced tree species that have been selected -- Ginkgo, Zelkova, and 'Emerald Green' Arborvitae. We recommend that consideration be given to native tree species including: *Betula nigra* (River birch), *Platanus occidentalis* (Sycamore), and *Celtis occidentalis* (Hackberry).

b. Debris and Industrial Storage Containers

Recent aerial photographs indicate that the site has various areas of debris scattered, along with other objects and what appears to be metal containers and concrete barriers along the perimeter. We recommend that as a condition of approval for the site's redevelopment the township require the clean-up of the remnants of the previous activities and the removal of any debris from previous industrial activities.

CONCLUSION

We wish to reiterate that MCPC generally supports the applicant's proposal but we believe that our suggested revisions will better achieve the township's vision of riverfront redevelopment. We recommend the township consider and address these review comments to your satisfaction.

Please note that the review comments and recommendations contained in this report are advisory to the municipality 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 # 19-0018-004.

Sincerely,

Barry W. Jeffries

Barry W. Jeffries, ASLA , Senior Design Planner

Barry.Jeffries@montgomerycountypa.gov , 610.278.3444

c: Villanova University, Applicant
Mike Roth, P.E., Pennoni, Applicant's Representative
Aaron Kostyk, Chair, Whitemarsh Township Planning Commission

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

ATTACHMENT A & B



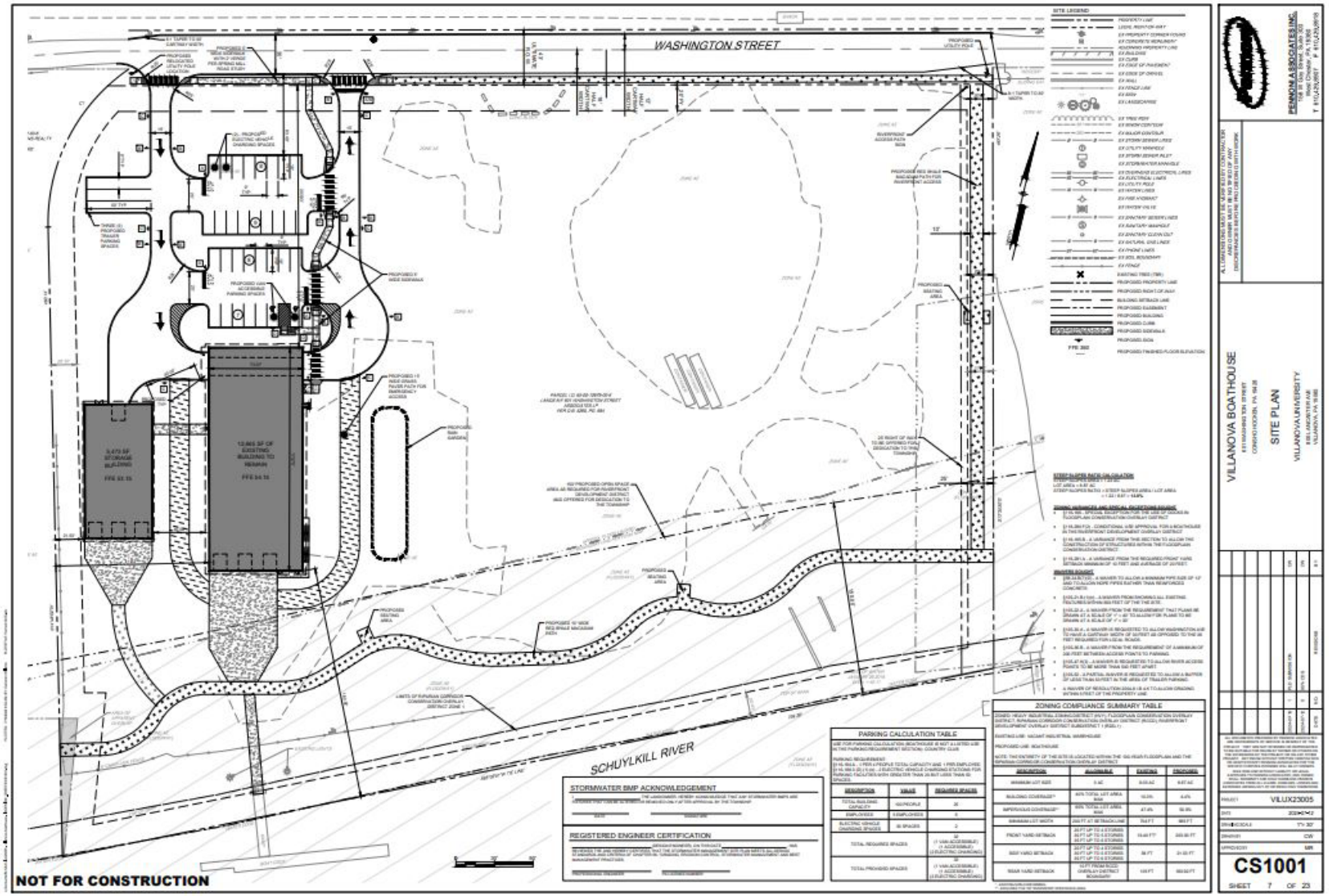
Villanova University Boathouse
MCPC#190018004

Montgomery County Planning Commission

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Montgomery County Courthouse - Planning Commission
PO Box 311 Norristown PA 19404-0311
(p) 610 278-3722 (f) 610 278-3941
www.montcopa.org/plancom
Aerial photography provided by Nearmap


WASHINGTON STREET
SCHUYLKILL RIVER
NOT FOR CONSTRUCTION
VILLANOVA BOATHOUSE
SITE PLAN
VILLANOVA UNIVERSITY
CS1001