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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

July 26, 2024

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

Re: MCPC #21-0164-004
Plan Name: The Woods Apartments - CU
(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 conditional use plan as you requested on July 22, 2024. We forward this letter as a report of our review.

BACKGROUND

The applicant, Woods Realty Associates LLC, is proposing to develop four new multifamily apartment buildings and parking lot expansions at an existing multifamily residential complex. The property is located in the AHS-Apartment House Special Zoning District, within which "apartment house or group of apartment houses" that are designed as a single project are permitted by conditional use (§ 255-80.A).

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.

We reviewed previously submitted proposals for this site in letters dated June 21, 2021, November 2, 2022, and June 4, 2024.

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

CONDITIONAL USE

Uses that are permitted upon conditional use approval by the Board of Supervisors must meet the conditional use standards that are outlined in Section 255-194 of the zoning ordinance. We generally support the use and proposed expansion of the existing residential development.

PREVIOUS REVIEW COMMENTS

We reviewed previously submitted proposals for this site, the latest version of which we reviewed in a letter dated June 4, 2024. While this submission is for the conditional use approval of the proposed development, we wish to reiterate the following comments from our previous review letter which we feel are important to the success of the development overall and the protection of natural resources on the site.

A. Downstream Flood Protection. Tannery Run passes through the site and runs south through Upper Dublin neighborhoods and into Ambler Borough, causing flooding issues in Ambler. 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. Stormwater Management. The development would increase the impervious coverage in an environmentally critical area (permitted impervious is 60% in the AHS District, § 255-81.C(2)). 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. In addition, the applicant may want to consider porous paving in the parking lot areas, where feasible, in order to reduce the impervious coverage of parking lots.

C. Landscaping. In order help reestablish the woodland edge and support a healthy ecosystem, 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. 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.

1. *Parking Lot Landscaping*. In addition to new parking spaces that would be located scattered throughout the site, two large parking lots are proposed. Upper Dublin's Subdivision and Land Development Ordinance (SALDO) requires that one shade tree be planted per every 12 parking spaces (§ 212-32.F(4)). 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.

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 (24-0164-004) on any plans submitted for final recording.

Sincerely,



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

c: Woods Realty Associates LLC, Applicant
Carl N Weiner, Esq., Applicant's Representative
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



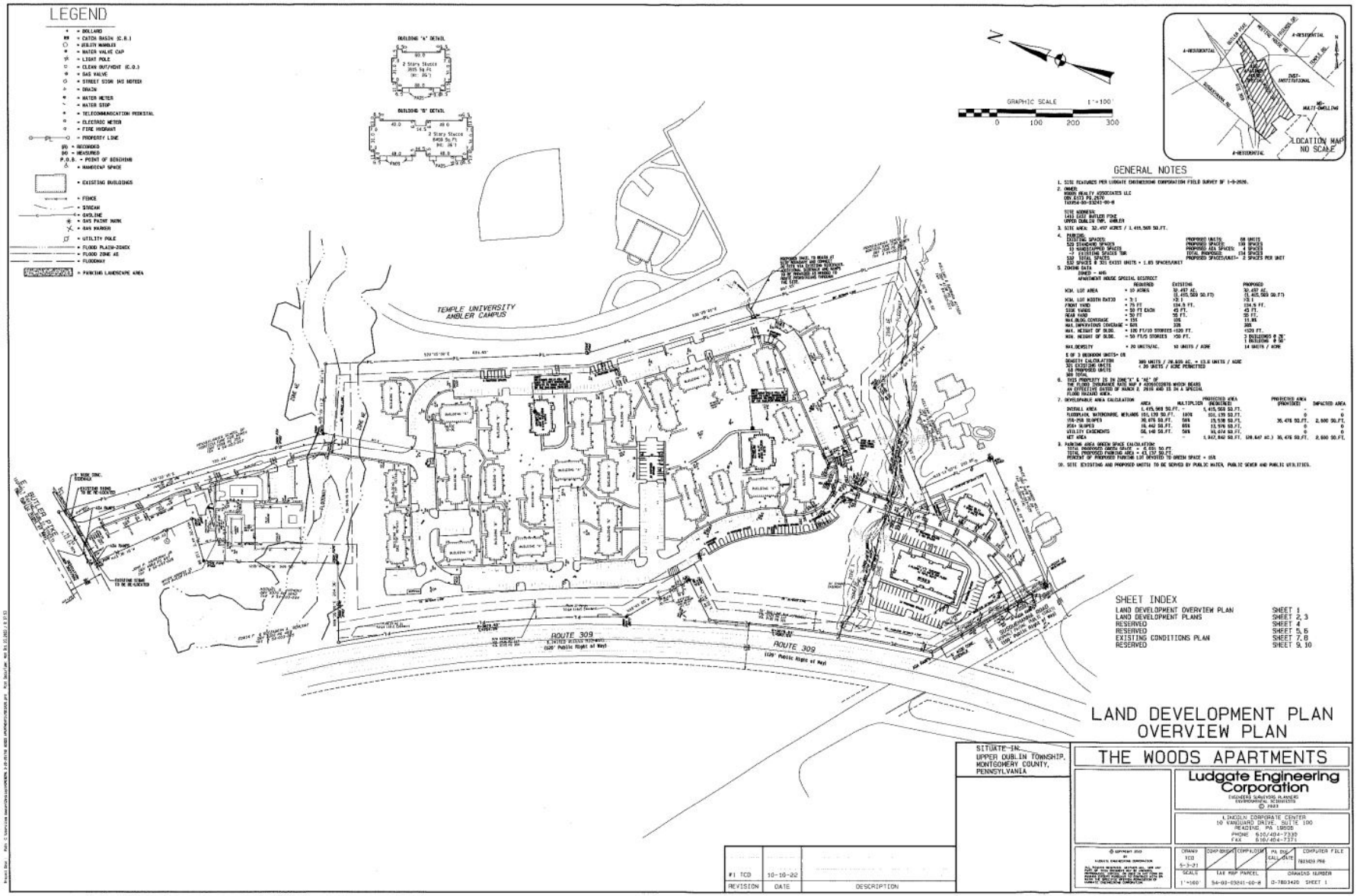
Montgomery County Planning Commission

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www.montcopa.org/plancom
Aerial photography provided by Nearmap

Woods Apartment - CU
MCPC#210164004


LEGEND
GENERAL NOTES
SHEET INDEX
LAND DEVELOPMENT PLAN
OVERVIEW PLAN
THE WOODS APARTMENTS
Ludgate Engineering Corporation
TEMPLE UNIVERSITY AMBLER CAMPUS
ROUTE 309
SITUATE IN:
UPPER DUBLIN TOWNSHIP,
MONTGOMERY COUNTY,
PENNSYLVANIA