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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

November 1, 2024

Mr. Christopher Leswing, Director of Building & Planning
Building & Planning Department
Township of Lower Merion
75 East Lancaster Avenue
Ardmore, PA 19003

Re: MCPC #18-0322-006
Plan Name: 1 Belmont Avenue
(17,500 sq. ft. commercial on approximately 6.76 acres)
Situate: City Avenue (N); Belmont Avenue (E)
Lower Merion Township

Dear Mr. Leswing:

We have reviewed the above-referenced tentative sketch plan as you requested on October 8, 2024. We forward this letter as a report of our review.

BACKGROUND

The applicant, KGSB, LLC, proposes to construct three new retail commercial buildings, primarily on an existing surface parking lot. An existing eleven-story, 219,390 square foot office building and an existing parking structure on the property are proposed to remain. The property is located in the township's CAD-RCA City Avenue District – Regional Center Area zoning district.

The proposed new buildings are:

- Building 1 located at the intersection of Belmont Avenue and proposed West Road is a single-story retail building containing 6,000 sq. ft.
- Building 2 located at the intersection of Belmont Avenue and City Avenue is a single-story bank building containing 3,500 sq. ft.
- Building 3 located on the City Avenue frontage of the site is a single-story retail building containing a total of 8,000 sq. ft.

Two new minor roads are shown from St. Asaph's Road and Belmont Avenue. A total of 262 surface parking spaces and 22 on-street parking spaces are shown, in addition to 344 parking spaces in the existing parking

structure attached to the office building. A central public gathering space totaling 16,666 square feet in area is shown with frontage on Belmont Avenue and West Road.

Additional improvements shown at this time include widened sidewalks along the City Avenue, Belmont Avenue, and St. Asaph's Road frontages of the site; a public multi-purpose path along the City Avenue and St. Asaph's Road frontages of the site; new internal pedestrian pathways; and stormwater management facilities.

According to the information provided, the applicant is seeking conditional use approval to hold a portion of the minimum required parking in reserve and has provided site plan drawings showing the location of a potential parking garage structure in place of the northern surface parking lot. The parking structure, if constructed, would include 14,300 square feet of additional retail space.

In total, the sketch plan submission includes site layouts for four scenarios: a surface parking lot at the corner of St. Asaphs Road and Belmont Avenue, with or without a roundabout at that intersection, and a parking structure at the corner of St. Asaphs Road and Belmont Avenue, with or without a roundabout at that intersection.

Revised plans were submitted to the Montgomery County Planning Commission on October 21, 2024, therefore the comments contained in this review letter are based on the more recently-submitted version of the proposed site plan.

COMPREHENSIVE PLAN COMPLIANCE

The City Avenue District area of Lower Merion Township is identified as a Regional Mixed Use Center in the Future Land Use Plan of the Montgomery County Comprehensive Plan, *Montco 2040: A Shared Vision*. Regional Mixed Use Centers are intensely developed suburban cores with significant retail, office, and residential land uses. The proposed development will activate portions of an existing surface parking lot with new uses and create public amenities such as a central gathering space and improved sidewalks, which is generally consistent with the goal to "encourage development and transformative investment where infrastructure already exists."

The Land Use Element of the 2016 Lower Merion Township Comprehensive Plan identifies the City Avenue District area as a Regional Center which is the primary growth area within the township. The proposed development of single-story commercial buildings amongst surface parking does not appear to significantly advance the goal of the Regional Center "to transform the predominant auto-oriented, office based environment into a more functionally diverse live/work/shop environment and a pedestrian-friendly district." However, future preliminary plan submissions that provide additional information on the design of the public gathering space and streetscape amenities may help to further demonstrate the potential benefits of the proposed development.

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the applicant's proposal. However, in the course of our review we have identified the following issues that the applicant and Lower Merion Township may wish to consider prior to moving forward. Our review comments are as follows:

REVIEW COMMENTS

ZONING ORDINANCE COMMENTS

Based on the information provided, we have identified the following items related to the Lower Merion Township Zoning Ordinance that we feel should be addressed as part of any future land development submissions associated with this proposal:

A. Frontage Occupation. Section 155-3.5.B.(1) of the township's zoning ordinance establishes how frontage occupation is calculated. Table 6.6.6 states that the minimum primary frontage required in the CAD-RCA zoning district is 60%. According to the "primary frontage calculation chart" on Sheet 7, the applicant proposes to exclude pedestrianways from the frontage occupation calculation, which is permitted by §155-3.5.B.(1). We noted that the township's definition of "pedestrianway" is: "a public or private linear space or an area where the primary users are pedestrians and that may also accommodate bicyclists." In addition, §155-6.6.B.(4) provides additional standards for what is considered a "pedestrianway" within the CAD-RCA, including that "the pedestrianway shall begin at the curbline."

   Overall, the areas identified as "pedestrianway" on the proposed site plan (highlighted in Attachment B) appear to be short segments of additional pavement that do not contribute to pedestrian or bicycle movement or meet other criteria for "pedestrianway" in §155-6.6.B.(4). However, we defer to the township regarding the applicability of this definition and the accuracy of the frontage occupation calculations provided.

B. Minimum Building Height. Section 155-6.6.D.(5) establishes a minimum building height for the entire CAD-RCA district of 2 stories, or 28 feet, and that "the second-story floor area shall be equal to or greater than 75% of the grade-level building area." It appears that the applicant proposes only single-story buildings.

C. Maximum Driveway Width. Section 155-6.6.H.(2)(c) of the township's zoning ordinance states that the "maximum driveway width is two lanes and 22 feet unless a dedicated separate left-turn egress lane is required, based on a traffic study." The driveway off of St. Asaphs Road appears to be greater than 22 feet in width.

D. Public Gathering Space Design. Future versions of the plans should include detailed designs of the proposed public gathering space in order to determine compliance with the public gathering space regulations in Table 6.6.5 of the township's zoning ordinance.

E. Development Design Standards. Future versions of the plans should demonstrate how the applicant proposes to comply with the development design standards, as required by §155-6.6.I. of the township's zoning ordinance.

F. Greening Standards. Future versions of the plans should demonstrate how the applicant proposes to comply with the greening standards, as required by §155-6.6.K.(2) of the township's zoning ordinance.

G. Street Screens. Section 155-8.4.C.(1) of the township's zoning ordinance states that surface parking "shall be masked from frontages by a building, liner, or street screen." Attachment B identifies several areas of street frontage where it appears that additional screening of the parking lot may be required.

H. Parking Space Dimensions. Table 8.5.1. of the township's zoning ordinance establishes minimum dimensions for off-street parking. It does not appear that some of the parking spaces within the northern parking lot meet these minimum dimensions, including the parallel spaces along the Belmont Avenue frontage and the perpendicular spaces along the St. Asaphs Road frontage.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS

Based on the information provided, we have identified the following items related to the township's subdivision and land development ordinance that we feel should be addressed as part of any future land development submissions associated with this proposal:

A. Public Gathering Space Design. Future versions of the plans should include detailed designs of the proposed public gathering space in order to determine compliance with the public gathering space regulations in §135-4.6.B. of the township's subdivision and land development ordinance.

B. Sidewalk across Driveways. Section 135-4.9.F.(2)(a) requires that "the grade and paving of the sidewalk shall be continuous across driveways." Future versions of the plan should be revised to show the grade and pavement material of the proposed sidewalk extending across all of the proposed driveways.

C. Pedestrian Access within Parking Lot. Section 135-4.9.Q.(7) contains standards for pedestrian pathways and crosswalks that apply to all surface parking lots with 10 or more new parking spaces. The proposed site plan does not appear to provide any pedestrian pathways through the northern parking lot. In addition, there are no pedestrian pathways shown through the southern parking lot connecting Building 3 to other site amenities such as the public gathering space.

D. Landscape Plan. In general, future submissions should include a landscape plan demonstrating compliance with all applicable landscaping requirements in the township's subdivision and land development ordinance, including the street tree requirements (§135-5.1), buffer planting requirements (§135-5.2), parking lot greening standards (§135-5.3), and greening standards (§135-5.5).

   In particular, we wish to point out several landscaping requirements that do not appear to be taken into account in the current site plan layout:
   - The northern parking lot, which appears to be a partial reuse of the existing parking lot, does not appear to comply with the parking lot landscaping design standards, such as the requirement that a planting island of at least 340 square feet in area be provided every 12 parking spaces
   - Vehicular use areas of any size abutting a public or private street or sidewalk are required to comply with additional requirements, such as street screens and buffering
   - Site elements such as dumpsters, service areas, and loading docks are required to have a screening buffer planting area of 10 feet in width, or where space is not available, a limited area buffer standard could be used
   - Planting areas for required street trees do not appear to be provided for along some sections of street frontage

E. Loading Areas. It is unclear from the information provided where any required loading areas will be provided for the proposed buildings. Section 155-8.7 of the township's zoning ordinance provides standards for loading areas, including that they shall not block pedestrian circulation. We noted that the

trash area to the east of Building 3 appears to include an area that could serve for truck parking or loading but is traversed by a pedestrian walkway.

VEHICULAR CIRCULATION

A. Intersection of West Road with Belmont Avenue. A new road labeled West Road is proposed to be constructed through the site and is shown intersecting Belmont Avenue less than 150 feet from the proposed roundabout with St. Asaph's Road. It is our understanding that additional development, including the construction of a new road intersecting Belmont Avenue, is being proposed on the adjacent site at 121 E. City Avenue. We strongly encourage the applicant to continue to coordinate proactively with the adjacent property owner, PennDOT, and Lower Merion Township to determine the best location for a new intersection along Belmont Avenue, which is a State road. Such discussions could also explore whether a traffic signal at this new intersection would be warranted and whether a pedestrian crossing could be safely accommodated at this location.

B. Placement of Driveways into Northern Parking Lot. The access driveways into the northern parking lot off of West Road and North Road are shown in close proximity to the external roads of Belmont Avenue and St Asaphs Road, respectively. Given this close proximity, it appears likely that queuing cars on West Road and North Road waiting to exit the site could potentially block cars from entering or exiting the northern parking lot.

C. Intersection of West Road and North Road. It is unclear from the information provided whether a traffic control, such as a four-way stop, will be applied at the intersection of West Road and North Road in the interior of the development tract.

D. Truck Turning Template. Sheet 10 shows a truck turning template for a trash truck to access the two proposed trash areas in the southern parking lot. However, given the proposed changes to the overall site access, we recommend that the applicant also demonstrate how a trash truck would access any existing or proposed trash areas associated with the existing office building that is proposed to remain.

E. Placement of Existing Handicapped Parking for Office Building. Three existing handicapped parking spaces are shown to remain near the northwestern corner of the existing office building. These parking spaces as shown would be perpendicular to the internal drive aisle and directly adjacent to the intersection of West Road and North Road and associated crosswalks. We defer to the township engineer to review this parking configuration in relation to the adjacent drive aisle and intersection.

PEDESTRIAN CIRCULATION

A. Pedestrian Treatment of Internal Access Drive. Proposed North Road, West Road, and the external frontages are shown to be designed with pedestrian improvements including continuous sidewalks, corner bumpouts, and marked crosswalks. However, the internal access drive between the City Avenue frontage and West Road appears to have a less pedestrian-friendly treatment with multiple driveways and a large loading zone in front of the existing office building.

B. ADA Access to Building 1. The closest handicapped parking to Building 1 is shown to be separated from the walkway around Building 1 by public gathering space. Future versions of the plans should include an ADA-accessible walkway connecting the handicapped parking to the closest entrance to Building 1.

C. Handicapped Parking and Access in Reserve Parking Structure. With regards to the parking structure proposed to be held in-reserve, a total of 14,300 square feet of additional retail space is shown within the parking structure. A single handicapped parking space is shown on the ground floor of the parking structure with additional spaces on upper levels. As part of any future submissions, an ADA-accessible pathway and marked crossings, if applicable, should be clearly shown between the handicapped parking and all proposed retail spaces.

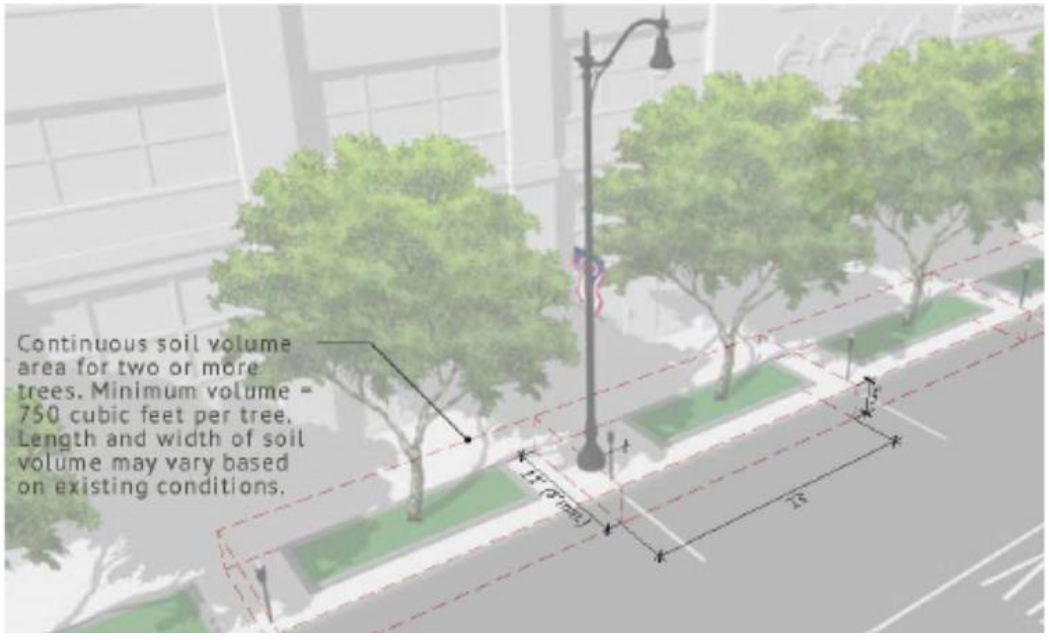
PUBLIC TRANSIT

Previous versions of a site plan for development on this site included a proposed location for a bus shelter along the City Avenue frontage of the site. It does not appear that a bus shelter is proposed as part of the current submission. We encourage the applicant to coordinate with SEPTA and Lower Merion Township to explore the opportunity to incorporate a bus shelter into the current proposal.

LANDSCAPE DESIGN

Several proposed street frontages are shown consisting of unnecessarily wide areas of pavement, in particular where additional strips of concrete are proposed along the full length of the curbline where on-street parking is proposed, in addition to the required sidewalk. As shown, this configuration appears as if it may preclude the placement of required street trees and other landscaping that could contribute to an attractive, comfortable, and environmentally-friendly streetscape in furtherance of the intent of the City Avenue District, which is in part, to "enhance the visual character and identity of the district through building mass, scale and design, landscaping and signage."

The graphic below is from §135-5.8.C. of the township's subdivision and land development ordinance and illustrates how linear tree planting areas can be used to provide adequate soil volume for street trees while also providing access to adjacent on-street parking. Areas where we feel this type of linear tree planting areas should be applied are illustrated in Attachment B.



FUTURE ROUNDABOUT

The applicant has provided site plans for the intersection of St. Asaphs Road and Belmont Avenue for four scenarios: a surface parking lot at the corner of St. Asaphs Road and Belmont Avenue, with or without a roundabout at that intersection, and a parking structure at the corner of St. Asaphs Road and Belmont Avenue, with or without a roundabout at that intersection. In the development scenario where the parking structure is constructed without a roundabout, it appears that a large landscaped area would be created. We encourage the applicant to consider creative uses of this area, even if it is temporary. For example, planting this area with a meadow mix could provide additional benefits for pollinators and stormwater management in the interim. In addition, the site design in this scenario should consider where pedestrian entrances and walkways to the retail space on the western side of the parking garage would be provided.

CONCLUSION

We wish to reiterate that MCPC generally supports the proposed development; however, we believe that our suggested revisions will better achieve the township's planning objectives for commercial development.

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 (#18-0322-006) on any plans submitted for final recording.

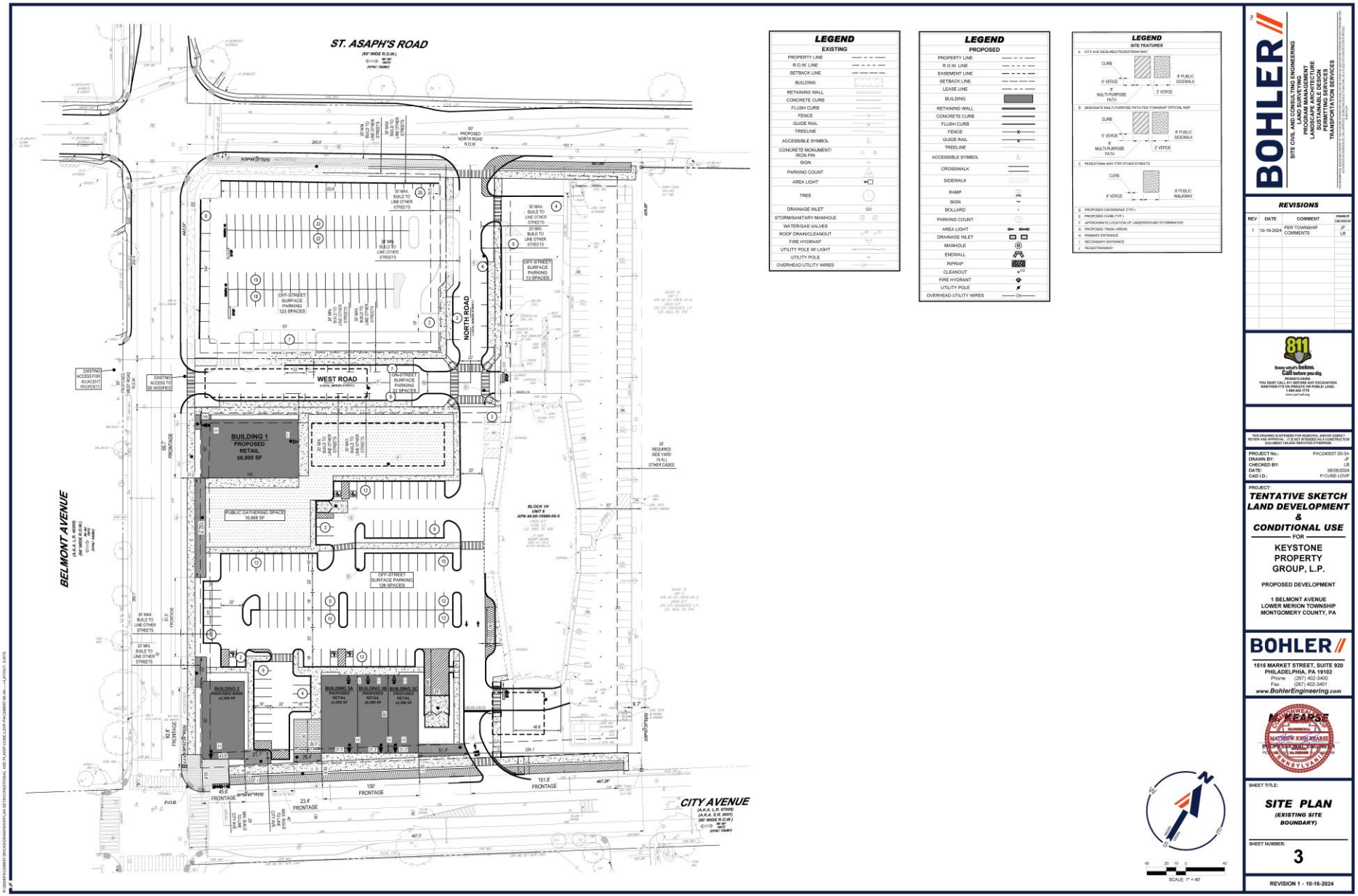
Sincerely,



Marley Bice, AICP, Community Planning Assistant Manager
610-278-3740 – marley.bice@montgomerycountypa.gov

c: George Broseman, Applicant's Representative
Gilbert P. High, Jr., Esq., Twp. Solicitor
Ernie B. McNeely, Twp. Manager
Jody Kelley, Twp. Secretary
Joseph Mastronardo, P.E., Twp. Engineer
Charlie Doyle, Twp. Asst. Dir. of Planning
Colleen Hall, Twp. Senior Planner
Greg Prichard, Twp. Hist. Preserv. Planner
Holly Colello, Twp. Planner
Sarah Carley, Twp. Planner
Hope Viviani, Twp. Planning Technician

Attachment A: Reduced Copy of Applicant's Proposed Site Plan
Attachment B: MCPC Comments on Proposed Site Plan
Attachment C: Aerial Image of Site



LEGEND
EXISTING

- PROPERTY LINE
- R.O.W. LINE
- SETBACK LINE
- BUILDING
- RETAINING WALL
- CONCRETE CURB
- FLUSH CURB
- FENCE
- GUIDE RAIL
- TREELINE
- ACCESSIBLE SYMBOL
- CONCRETE MONUMENT/ IRON PIN
- SIGN
- PARKING COUNT
- AREA LIGHT
- TREE
- DRAINAGE INLET
- STORM/SANITARY MANHOLE
- WATER/GAS VALVES
- ROOF DRAIN/CLEANOUT
- FIRE HYDRANT
- UTILITY POLE W/ LIGHT
- UTILITY POLE
- OVERHEAD UTILITY WIRES

LEGEND
PROPOSED

- PROPERTY LINE
- R.O.W. LINE
- EASEMENT LINE
- SETBACK LINE
- LEASE LINE
- BUILDING
- RETAINING WALL
- CONCRETE CURB
- FLUSH CURB
- FENCE
- GUIDE RAIL
- TREELINE
- ACCESSIBLE SYMBOL
- CROSSWALK
- SIDEWALK
- RAMP
- SIGN
- BOLLARD
- PARKING COUNT
- AREA LIGHT
- DRAINAGE INLET
- MANHOLE
- ENDWALL
- RIPRAP
- CLEANOUT
- FIRE HYDRANT
- UTILITY POLE
- OVERHEAD UTILITY WIRES

LEGEND
SITE FEATURES

A CITY AVE REQUIRED PEDESTRIAN WAY
CURB
6' VERGE
8' MULTI-PURPOSE PATH
2' VERGE
8' PUBLIC SIDEWALK

B DESIGNATE MULTI-PURPOSE PATH PER TOWNSHIP OFFICIAL MAP
CURB
5' VERGE
8' MULTI-PURPOSE PATH
2' VERGE
8' PUBLIC SIDEWALK

C PEDESTRIAN WAY FOR OTHER STREETS
CURB
6' VERGE
8' PUBLIC WALKWAY

D PROPOSED CROSSWALK (TYP.)
E PROPOSED CURB (TYP.)
F APPROXIMATE LOCATION OF UNDERGROUND STORMWATER
G PROPOSED TRASH AREAS
H PRIMARY ENTRANCE
I SECONDARY ENTRANCE
J PEDESTRIANWAY

SCALE: 1" = 40'

BOHLER
SITE CIVIL AND CONSULTING ENGINEERING
LAND SURVEYING
PROJECT MANAGEMENT
LANDSCAPE ARCHITECTURE
SUSTAINABLE DESIGN
ECOLOGICAL SERVICES
TRANSPORTATION SERVICES

REVISIONS

REV	DATE	COMMENT	DRAWN BY
1	10-16-2024	PER TOWNSHIP COMMENTS	JF / LB

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DRAWN BY: JF
CHECKED BY: LB
DATE: 09/26/2024
CAD I.D.: P-CUSE-LDVP

PROJECT:
TENTATIVE SKETCH LAND DEVELOPMENT & CONDITIONAL USE
FOR
KEYSTONE PROPERTY GROUP, L.P.

PROPOSED DEVELOPMENT

1 BELMONT AVENUE
LOWER MERION TOWNSHIP
MONTGOMERY COUNTY, PA

BOHLER
1515 MARKET STREET, SUITE 920
PHILADELPHIA, PA 19102
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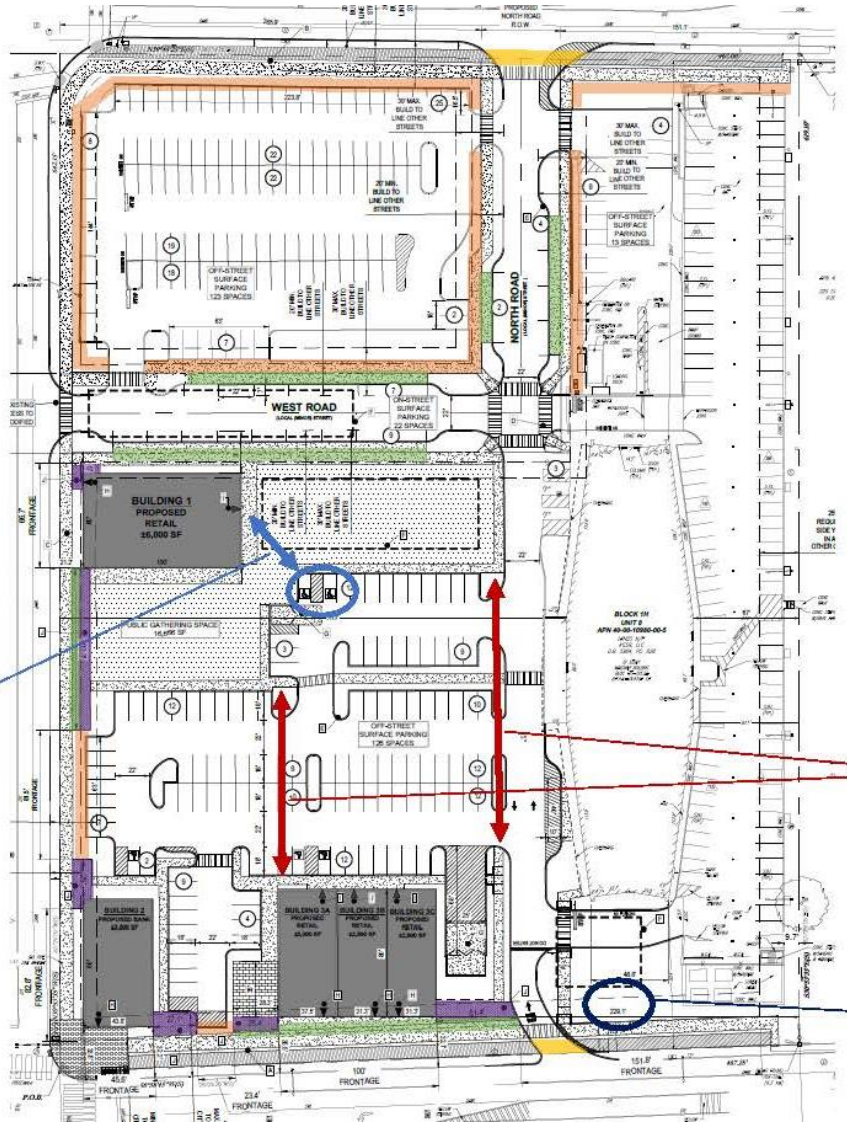
COMMONWEALTH OF PENNSYLVANIA
MATTHEW JOHN KEARSE
PROFESSIONAL ENGINEER

SHEET TITLE:
SITE PLAN
(EXISTING SITE BOUNDARY)

SHEET NUMBER:
3

REVISION 1 - 10-16-2024

MCPC Comments



Street frontages where street screens may be needed

Street frontages where additional space for street trees is needed

Areas labeled as "pedestrianway"

Crosswalks needed for multi-purpose path

ADA-accessible pathway needed between handicapped parking and building entrance

Pedestrian walkways between Building 3 and Public Gathering Space needed

Potential bus shelter location based on previous proposal



SOPI - 1 Belmont Avenue
MCPC#180322006

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Aerial photography provided by Nearmap

0 100 200 400 Feet

N