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Scott France, AICP
Executive Director

March 6, 2026

Ms. Sherri Griffith, Planning/Zoning Administrative Assistant
Upper Pottsgrove Township
1409 Farmington Avenue
Pottstown, Pennsylvania 19464

Re: MCPC 26-0020-001
Plan Name: 994 Commerce Drive
(1 lot/314 dus comprising 21.33 acres)
Situate: Commerce Drive (east)/North State Street (north)
Upper Pottsgrove Township

Dear Ms. Griffith:

We have reviewed the above-referenced subdivision and land development plan in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on January 30, 2026. We forward this letter as a report of our review.

BACKGROUND

The proposal concerns the preliminary land development of a multifamily residential community at 994 Commerce Drive in Upper Pottsgrove Township. The project site comprises two adjoining parcels (County Parcel ID 60-00-02821-00-8 and 60-00-02821-01-7), which are proposed to be consolidated into a single 21.33-acre tract.

The development proposes 314 multifamily dwelling units across 4 buildings, with individual buildings containing between 68 and 99 units. A range of one- and two-bedroom units is planned, and the project provides 628 total parking spaces, as required by the Zoning Ordinance.

The subject property lies within the LI - Limited Industrial District. Other ancillary improvements include amenity structures, sidewalks, internal drives, and landscaping.

COMPREHENSIVE PLAN COMPLIANCE

COUNTY COMPREHENSIVE PLAN

The proposed multifamily development at 994 Commerce Drive is generally consistent with *Montco 2040: A Shared Vision*. The site is located within a designated growth area and is identified in the Future Land Use Plan as encompassing both a Business Area and a Suburban Residential Area.

Business Areas are primarily employment centers that accommodate offices, research facilities, and industrial parks. The plan emphasizes that these areas should evolve to include supporting uses—such as retail, services, and day care—while carefully buffering impacts, such as noise, light, and pollution, from nearby neighborhoods. Suburban Residential Areas are primarily housing-focused, with single-family detached homes as the dominant type. However, the comprehensive plan explicitly allows denser residential development near employment centers, major non-residential areas, or train stations, making these neighborhoods adaptable and connected rather than isolated.

The applicant's proposal aligns with these Montco 2040 themes as follows:

- Connected Communities - The proposed multifamily development at 994 Commerce Drive supports the Connected Communities theme by placing new housing within an existing employment and commercial corridor, strengthening connections among residents, jobs, and community destinations.
- Vibrant Economy - By transforming underutilized light-industrial-zoned land into workforce-supportive housing, the development advances the county's goal of encouraging investment within designated growth areas rather than expanding into undeveloped land.

REGIONAL COMPREHENSIVE PLAN

The 994 Commerce Drive site is within the Primary Growth Area, as shown in the Future Land Use Map of the Pottstown Metropolitan Regional Comprehensive Plan, where high-density residential is a suggested use. The Regional Comprehensive Plan contains development guidelines for high-density residential development, which state that "new and infill high-density housing should be located within or adjacent to established communities that are within reasonable walking distance of commercial centers, schools, and parks." The proposed multifamily development is located in the vicinity of two large shopping centers; however, no pedestrian or direct vehicular connections are shown between the proposed residential development and adjacent commercial uses. A major potential benefit of locating high-density residential in this location would be the ability of future residents to walk to employment, shopping, and services in the adjacent commercial centers; therefore, additional pedestrian connections should be evaluated.

The proposed land development could also be modified to better reflect these additional development guidelines articulated in the Regional Comprehensive Plan:

- Apartment developments should prioritize pedestrian circulation by providing continuous sidewalks throughout the site and direct pedestrian connections to adjacent neighborhoods, commercial areas, parks, and civic spaces, ensuring walking is a primary means of internal and external travel.
- Usable open space should be centrally located within the development as greens, courtyards, or shared outdoor areas that are visible, accessible, and integrated into the site design, rather than left as leftover or buffer zones.
- Parking should be designed to avoid overshadowing the site or streetscape by placing parking facilities within buildings or at the rear or side of structures and ensuring surface parking is visually unobtrusive.

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports this proposal. However, during our review, we identified the following issues municipal officials may wish to consider before final approval. Our comments are as follows:

REVIEW COMMENTS

GENERAL COMMENT

A. Use Regulations/Apartment Uses LI Light-Industrial District. Section 350-105 of the Zoning Ordinance permits certain uses in the LI Light Industrial District by reference to uses not allowed in at least one other zoning district. Since multifamily residential development is permitted in the R-4 District, it does not appear that multifamily is a permitted use in the LI District. We defer to the Township Zoning Officer to determine if the proposed multifamily use is permitted in the LI District.

TRANSPORTATION ISSUES

A. Coolidge Street Improvements - The plans for 994 Commerce Drive show frontage along Coolidge Avenue and propose roadway improvements or Coolidge Street widening. The street is considered an unopened or partially improved paper street, with its public or private status and long-term function debated due to nearby development. The county advises the township to confirm the legal status of Coolidge Street and clarify how the project's improvements relate to it.

According to the plan, a retaining wall would be constructed within the Coolidge Street right-of-way. Locating an access road and retaining wall within a paper street's right-of-way raises concerns. Paper streets are reserved for future public use and infrastructure placement may hinder the municipality's ability to extend or improve the street in the future. The proposed improvements appear to provide private access to land intended for public use, creating ambiguity regarding ownership, maintenance, and liability, especially for the retaining wall. Additionally, the wall and roadway could restrict future utility work, street widening, or sidewalk construction, possibly requiring removal at a later date.

B. Internal Vehicular Circulation:

1. Access Drive and Parking Layout - The plans depict perpendicular parking along the internal access drive, which serves as a primary circulation route. Typically, perpendicular parking on access drives is discouraged or prohibited due to safety concerns, as it forces vehicles to back into the travel lane, creating conflicts with traffic, pedestrians, and service vehicles, and reducing sight distance. The layout also blurs the line between an access drive and a parking aisle. Since the drive handles two-way traffic and provides site circulation, it effectively functions more like a private street, which makes the parking plan problematic. The applicant's engineer should revise the plan to reduce or eliminate perpendicular parking, ensuring compliance with ordinances and improved safety.

2. Loading/Unloading/Delivery Functions - The plans lack designated loading/unloading areas for deliveries, service vehicles, or short-term drop-offs. It is recommended to provide adequate on-site facilities to avoid blocking access drives, parking, or pedestrian routes. Without dedicated spaces, routine activities such as package and food deliveries may occur in parking areas or along drives, causing conflicts with vehicle and pedestrian traffic. The applicant should revise plans to include clearly marked off-street loading areas that allow safe vehicle access without obstructing parking or pedestrian routes.

3. Emergency Vehicles - We note that a Truck Turn Plan is included, but it's unclear if site conditions fully support emergency access, staging, and maneuvering. Emergency routes need adequate width, grades, turning radii, and clearance for fire and emergency vehicles. Concerns exist that parking, backing, and circulation conflicts could hinder access along Commerce Drive and internal drives. The applicant should coordinate with the Township Engineer and Fire Marshal to assess if improvements—such as widening roadways, restricting perpendicular parking, enabling turning movements, and revising layouts- are needed to ensure safe, unobstructed emergency access.

C. Internal Pedestrian Circulation:

1. Overall Site Accessibility - The plans lack a comprehensive pedestrian network, with minimal, discontinuous sidewalks, risking unsafe pedestrian-vehicular interactions. Clear, continuous routes are needed to connect parking, entrances, and site features in compliance with municipal standards. The applicant's engineer should revise the plans to include coordinated sidewalks, crosswalks, and accessible paths to ensure safety.

2. Trail Access - The proposed walking trail appears to include segments with slopes exceeding 15 percent. Trails with grades this steep pose safety risks, including slip-and-fall hazards, limit usability for a broad range of users, and are prone to erosion and long-term maintenance issues. The applicant should reevaluate the trail alignment and grading to reduce slopes to a more appropriate level or consider alternative routing or switchbacks to improve safety and sustainability.

3. ADA Accessibility - In a related issue, a callout placed on the plan indicates that planned walking trails on the site shall feature a "wood chip" surface. This raises ADA accessibility concerns due to its apparent grades and wood chip surface, which generally do not meet the requirements for a stable, firm, and slip-resistant accessible route. It is unclear whether the trail is intended to function as part of the site's pedestrian circulation system and, if so, how ADA-compliant access is provided. The applicant's engineer should clarify the intended function of the trail and revise the plans to demonstrate ADA compliance or provide a compliant alternative route.

   In addition, the plan shows a "stepped" parking lot near Building #3 with different elevation bays separated by a continuous planting island. While such parking responds to site topography, it raises concerns about pedestrian circulation, accessibility, and long-term use. The planting island appears to be the main grade separator, but it's unclear how pedestrians can safely move between levels without crossing landscaped or vehicular areas. Clear ADA-compliant routes are needed between levels, but plans don't show how people with mobility issues can navigate without entering drive aisles or facing steep grades. Continuous islands may act as physical barriers if not thoughtfully designed with crossings or ramps. The applicant's engineer should reevaluate the layout to ensure safe, direct, and accessible connections, possibly by breaking islands for crossings, adding ramps or walkways, or revising grading and circulation to eliminate barriers.

D. External Pedestrian Connectivity. The plans lack external pedestrian connections between 994 Commerce Drive and the nearby uses along Commerce Drive and in the Route 100 corridor. Pedestrian facilities are mainly within the site, with no continuous routes to adjacent properties, employment, transit, or trails.

   Commerce Drive is a shared access route for various uses, but without sidewalks or connections the development is effectively isolated, forcing short trips by vehicle. This misses opportunities to encourage walking and reduce vehicle trips. Municipal officials and the applicant are encouraged to collaborate in evaluating the feasibility of installing sidewalks, shared paths, or potential future connections along Commerce Drive and to adjacent parcels. Plans should show how pedestrian links could develop over time and align with regional and county planning goals.

E. Multimodal Options. The development at 994 Commerce Drive does not adequately support a multimodal transportation environment that emphasizes safe, connected options for walking, biking, micromobility, transit, and vehicles—enabling users to choose modes over private cars. The applicant should revise plans to better support this, including creating an accessible pedestrian network, improving connections to Commerce Drive and nearby parcels, and considering bike, micromobility,

and transit facilities. These changes would enhance site functionality and align with Route 100 corridor planning goals.

OPEN SPACE ISSUES

A. Open Space Layout. The proposed open spaces are mostly along the site's perimeter, which may limit residents' access. Central open spaces offer better accessibility, pedestrian connectivity, and community cohesion. The MCPC recommends relocating open spaces to be more centrally located on the site, connected by sidewalks, and near buildings to support active or passive recreation. The applicant should reconfigure the layout to include a centrally located open space that fosters community interaction.

B. Safety and Security Concerns. The proposed children's playground is located in an isolated area at the rear of the site. The location raises safety and security concerns related to limited visibility, reduced passive surveillance, and accessibility. Playgrounds not visible from dwelling units, streets, or pedestrian routes may limit supervision, reduce oversight, and increase risks of inappropriate behavior or delayed emergency response. We recommend integrating recreational spaces into visible, active areas connected to the pedestrian network, benefiting from natural surveillance from nearby residences and activity. The applicant should consider relocating the playground to a more central, visible spot near sidewalks and residential units to improve safety, usability, and long-term functionality.

C. Proposed Dog Park. The plans propose a dog park as part of the development's open space network, but the layout routes a trail through it. This configuration raises safety, operational, and use concerns. Dog parks are controlled, off-leash areas, whereas trails are intended for continuous pedestrian movement, which can lead to conflicts and safety issues. Routing a trail through the dog park can disrupt access, complicate fencing, and increase maintenance. The applicant's engineer should consider relocating the trail around the park, along its perimeter, to maintain safety and functionality.

D. Proposed Swimming Pool. The plans show a proposed swimming pool adjacent to Building #2, near a sidewalk. Placing the pool so close to a pedestrian route raises safety, operational, and design concerns. Sidewalks are intended for safe pedestrian movement, whereas pools are active, wet recreational areas with many users and controlled access. An adjacent pool could create hazards such as slipperiness, conflicts with pedestrians, and confusion about the sidewalk's boundary. Pools usually require fencing or barriers for safety, and sufficient separation from sidewalks is needed to prevent unauthorized access. The applicant's engineer should revise the layout by adding setbacks, fencing, landscaping, or relocating the pool to another area to improve safety, comfort, and security.

ARCHITECTURAL ISSUES

A. Building Massing. Building #4, the proposed 4-story, 99-unit apartment building with an overall length of approximately 365 feet, represents a substantial building mass. While the building's height may be appropriate for its context, the length and continuity of the façade create a scale that may appear visually imposing and monotonous, particularly from the pedestrian perspective and along the adjacent public rights-of-way.

To mitigate the visual impact of the building's length and mass, we encourage the applicant's representatives to consider breaking up the long façade into smaller visual segments using meaningful offsets, recesses, or projections. Hence, the building reads as a series of smaller components rather than a single continuous structure.

ZONING ORDINANCE COMPLIANCE

A. Steep Slope Conservation District (Article V). The submitted plans show steep slope areas per the Zoning Ordinance on the applicant's property. MCPC notes that regulations require a special exception for roads, driveways, and parking only if no practical alternative exists within these steep-slope areas.

B. Parking Held in Reserve. (Section 350-143). The plan provides two on-site parking spaces per unit, leading to significant surface parking that influences building placement, circulation, and site design. While the ordinance mandates two spaces per unit, the township's zoning includes a reserve parking provision (Section 350-143) offering flexibility over time.

   The applicant should consider using reserve parking to meet requirements, reducing initial parking construction. The plan could reserve land for the full required parking, with some spaces built only if needed, helping comply with parking rules while improving site layout, reducing impervious surface, and increasing landscaping and pedestrian areas.

   The township might evaluate if applying Section 350-143's reserve parking could lead to a more efficient, better-designed site while ensuring future parking if necessary.

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMPLIANCE

A. Landscape Requirements (Section 310-37). This plan submission does not include a landscape plan. Therefore, it is difficult to assess how the plan complies with the SALDO regulations on tree preservation/replacement, parking lot landscaping, and buffering standards. We observe, however, that the plan may not fully comply with parking lot landscaping standards due to the placement of parking lot planting islands. MCPC recommends completing the landscape plan to comply with all applicable requirements and submitting it to the township for review.

MISCELLANEOUS/OTHER

A. Highway Occupancy Permit. While site access is proposed via a township road, Commerce Drive, and no direct access to a state road is shown, PennDOT retains jurisdiction over the intersecting state roadway. If PennDOT determines that off-site improvements are necessary as a result of this development, the applicant shall be responsible for securing a PennDOT Highway Occupancy Permit and implementing such improvements as required by the Department.

CONCLUSION

The proposed development site is within a designated growth area and aligns with Montco 2040 goals for housing near employment centers and for developing underutilized light-industrial–zoned land. While the proposal is generally consistent with the Pottstown Regional Comprehensive Plan, it does not fully reflect best practices for high-density residential development, particularly in walkability, open space design, and parking lot layout. Moreover, based on our interpretation of the Zoning Ordinance, developing multifamily housing on this LI Light Industrial–zoned property may not be allowed. Although MCPC can support the overall concept if permitted, it identifies numerous design, circulation, pedestrian, landscaping, and open-space issues that the applicant should address before plan approval.

Please note that the review comments and recommendations in this report are advisory to the municipality, and final disposition on 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 before 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 (26-0200-001) on any plans submitted for final recording.

Sincerely,

Kevin Chavous

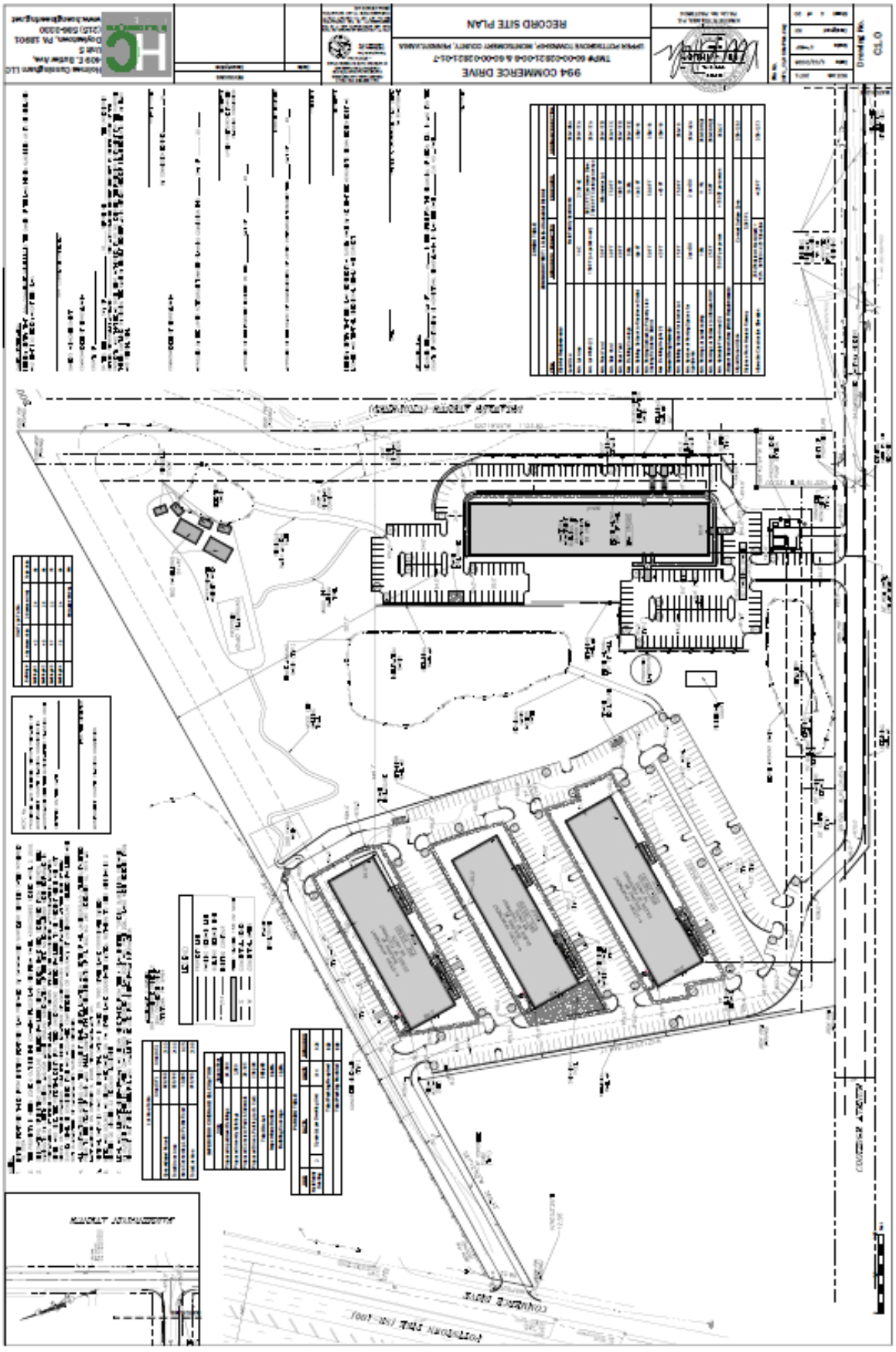
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Benjamin Barland, P.E., Holmes Cunningham, Applicant's Engineer
Paul Lutz, PennDOT Engineering District 6
Dan Weand, Interim Township Manager
Pete Eisenbrown, Township Engineer
Eric C. Frey, Township Solicitor

Attachments: Aerial View of Site
Reduced Copy of Applicant's Plan



994 Commerce Drive
MCPC#260020001


994 COMMERCE DRIVE
RECORD SITE PLAN
C1.0