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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

REVISED

February 7, 2024

Stephanie Cecco, Borough Manager
Borough of Conshohocken
400 Fayette Street, Suite 200
Conshohocken, Pennsylvania 19428

Re: MCPC # 23-0327-003
Plan Name: Washington Street Residential
Situate- 401-433 Washington Street, Conshohocken PA
2 lots/ 481 dwelling units/10.6 acres
Borough of Conshohocken / Township of Whitemarsh

Dear Ms. Cecco:

We have reviewed the above-referenced revised land development proposal in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on January 8, 2024 in an electronic submission to this office. We forward this letter as a report of our review.

BACKGROUND

The applicant, KRE Acquisition Corp, Bridgewater NJ, has submitted a revised land development proposal of a plan previously approved by both Conshohocken Borough and Whitemarsh Township. The revised submission proposes a total of 481 dwelling units with 281 luxury apartment units in two buildings along the Schuylkill Riverfront, and 200 condo units in four buildings with frontage along Washington Street. The submission includes a new 2-lot subdivision plan.

The development tract is a vacant industrial site comprised of 2 existing lots at 401 and 433 Washington Street, and four tax parcels totaling 10.66 acres located in both Conshohocken Borough and Whitemarsh Township. Two tax parcels comprise the 4.97 acre lot at 401 Washington Street: TP 05- 00-11904-00-7 (Conshohocken) and TP 65-00-11904-00-7) and the 5.69 acre lot at 433 Washington Street is comprised of TP 05-00-11908-00-3 (Conshohocken) and TP 65-00-12685-01-2 (Whitemarsh). Approximately 2.91 acres of the development tract are in Whitemarsh Township and 7.69 acres are located in the Borough of Conshohocken. According to the plan's documentation, 401 Washington

Street contains the foundation of an industrial building owned and occupied by C&D Battery. The 433 Washington Street site is the former property of Hale Pump and contains a vacant industrial building and parking and storage areas. The development tract lies within the Borough of Conshohocken's Specially Planned District Two (SP-2) and in Whitemarsh Township's Heavy Industrial District (HVY) and the Riverfront Development District One subdistrict (RDD-1). The plan notes indicate that 60 residential units are located in the Whitemarsh Township portion of tract and the remainder are in the borough. Both lots are situated in the 100-year floodplain and development footprint lies immediately outside the Schuylkill River's FEMA-designated floodway boundary.

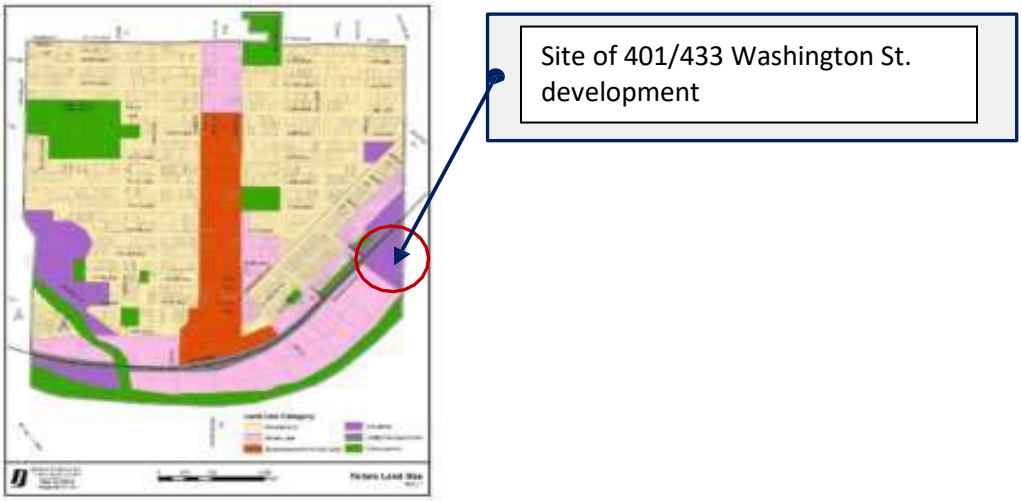
The Planning Commission's last review letter to the borough for this development was dated January 11, 2022, and was for the development of four multi-family residential dwellings totaling 598 units. The applicant's proposal is subject to a Settlement Agreement and related Plan Exhibits are part of this submission. The agreement dated October 22, 2014 states various terms of the settlement in a narrative (pages 3-7). The submitted architectural plans show six buildings on the development site: four condominium buildings (Buildings #1 thru #4) which front Washington Street and two luxury two apartment buildings (Buildings #5 and #6) with courtyards and other outdoor amenity spaces. The apartment buildings are adjacent to the Schuylkill Riverfront and overlook a large open space area which includes the required 10 ft. wide public riverfront pathway and other amenities. The site lies immediately south of SEPTA's Norristown/Manayunk Regional Rail line and the Schuylkill River Trail.

COMPREHENSIVE PLAN CONSISTENCY

Consistency with *Montco 2040*- A Shared Vision

The plans for the redevelopment of this site are 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) that extends from the Schuylkill Riverfront to East Elm Street. The 'RMUC' designation supports intensely developed areas including 'high-density, multi-family and townhomes". (Page 80) The comprehensive plan recommends that these centers should "establish more of a sense of place, ideally with a clearly defined public gathering place."https://www.montcopa.org/1579/Montco-2040-Comprehensive-Plan).

Consistency with *Conshohocken Comprehensive Plan Update, 2018.* The redevelopment proposal for this property appears somewhat compatible with the borough's future land use vision for this area as stated in the 2018 Comprehensive Plan and in Chapter Five's Future Conditions, Land Use Map #7. According to and as shown in the attached map, the future land use designation is for an 'Industrial' area. While the development tract is designated 'Industrial', it is located at a boundary with the 'Mixed-Use' area where the future land use goal is "to provide for the development and redevelopment of properties which incorporate a variety of land uses which are a complementary mix including residential, retail, commercial, employment, civic and entertainment uses in close proximity - sometimes in the same building."



Conshohocken Borough Future Land Use Map, 2018

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the applicant's proposal, however, in the course of our review we have identified several concerns that were first identified in our January 2022 review letter that remain relevant, and we recommend the borough reconsider/revisit these issues and concerns. The issues include: the provision of the required sidewalk design that addresses the placement within the legal right-of-way and the required sidewalk design width for sidewalks within the SP-2 District. Wider sidewalks are required along both Cherry and Washington Streets to address the district requirements. In addition, a permanent easement area is required in perpetuity from Washington Street to the Schuylkill Riverfront and a delineated pedestrian route should be provided. We recommend the borough consider these issues prior to final plan approval. Our comments are as follow:

REVIEW COMMENTS

1. **Site Plan Revision: Four Condominium Buildings:**
   a. *Building Setback* :
   The proposed 4 condominium buildings fronting Washington Street are shown with their building footprint within the required 15 ft. setback area. A variance from Section 27-1505.B. (2) - Building setback within the SP-2 District is required for the placement of these buildings as proposed. We believe the Washington Street's pedestrian and streetscape environment would greatly benefit from the building arrangement complying with the required setback allowing an additional 3 ft. of space for the needed amenities associated with best practices in streetscape design. A 15 ft. setback would provide adequate space for a wider sidewalk, benches, and landscape area than is proposed with the submitted streetscape design along the +/- 700 ft. of Washington Street frontage.

   b. *Landscape area between the Condominium Buildings*
   The 8500 sq. ft. landscape area (41 ft. x 215 ft.) between Buildings #1 and #2 and the similar size area between Buildings #3 and #4 appears inaccessible to residents. If this is the intention of the site planners, we believe this is a missed opportunity. It appears the area is shown as a completely landscaped area with a continuous rock rill shown along the entire length of the space with a meadow of 'tall-fescue sod' and ornamental trees and shade trees. This area could provide a space for outdoor enjoyment and leisure rather than an area to be viewed. It could become a valuable amenity space for residents with a seating/gathering space for the condominium community. The luxury apartment area appears rich with outdoor amenities while the condominium buildings appear shortchanged in nearby outdoor space. We recommend the applicant and the borough examine this arrangement and consider how this area could be improved and the space used by the condo residents.

2. **Address the SP-2 District Sidewalk Requirements:** § *22-405.1. (C.)- Sidewalk `Design Standards*

   a. *Sidewalks along Cherry Street and Washington Street*
   The applicant's resubmission includes the same sidewalk width of 5 ft. as submitted in the January 2022 site development plan. The developer is required by the borough's code to provide 15 ft. wide sidewalks along the public streets, as stated in *Section 22-405.1.C.) Design Standards for Sidewalks*. The requirements state: "Sidewalk(s) in the borough's Commercial and Specially Planned Districts shall be a minimum of 15 ft. in width". The proposed 5 ft. wide sidewalk is the bare minimum that complies with access requirements of the American with Disabilities Act (ADA). The pedestrian experience could be made safer, more attractive and comfortable for the user by increasing the width.

We recommend the applicant provide a wider sidewalk especially along the above mentioned streets. In our view, this is especially needed along Cherry Street in order for the sidewalk to be recognizable as a route to the riverfront pathway and different than an internal private walkway. Currently this sidewalk appears to serve only those parked in the perpendicular spaces along Cherry Street. We recommend a width of at least 8 ft. along this street instead of the proposed 5 ft. wide sidewalk.
Note- See graphic in the attachment for further information.

b. *Sidewalks are required behind the Condominium Buildings #1- #4.*
The site plan does not provide sidewalks on the back side of the above-mentioned condominium buildings where the entrances and exits are for the surface parking under the buildings. According to the borough's development code, Section 22-405.1. (B.), "In land developments with common areas and multiple buildings a sidewalk network shall be provided to support internal circulation and provide access between parking areas and buildings". The area behind these buildings is a 'missing link' in the required sidewalk network. As proposed, the motorists who park in these parking spaces will be forced to walk in the drive aisle to access the condo building entrances. This is not a safe arrangement for residents. We recommend that for the safety of pedestrians, the site plan should be modified to provide the required sidewalks behind these buildings.

c. *Sidewalks required to be within the Legal R.O.W.* – § 22-405.1. (D.) Design Standards.
The site development plan shows that the required sidewalks are within the applicant's property boundary, and not within the required legal right-of-way for sidewalks along both Washington Street and Cherry Street. According to Section 22-405.1. (D.) Design Standards the sidewalks are required to be in the public right-of-way rather than within the applicant's property. The applicant should dedicate the appropriate width as required so that the sidewalks along the two public streets are within the legal right-of-way.

2. Schuylkill River Public Open Space Public Access to the Riverfront

a . Public access to the Schuylkill Riverfront & Wayfinding Signage
The Borough of Conshohocken Zoning Code regulations for Riverfront Access & Open Space in SP-2 District (Section 27-1504.D. 1.-3. (a- c) requires that the development's riverfront pathway and adjacent open space amenities be publicly accessible and provide year-round opportunities for passive outdoor recreation and should facilitate circulation for pedestrians to and throughout the riverfront area. It does not appear that either the 'Riverfront, Access, Recreation or Open Space Plan' (Sheet 7/44) or Easement Plan designates how the public is to access the riverfront pathway. In addition to the sidewalk along Cherry Street, the site plan proposes 3 additional curb cuts with sidewalks in the development which could potentially provide the public connection from Washington Street to the riverfront open space. We recommend the borough ensure that a public

accessible route is designated on the plan and that appropriate way-finding signage is provided to ensure the public's route to the pathway is identifiable.
Note- See graphic attachment below.

b. *Recorded Easement Area- Dusk to dawn public access to the Schuylkill Riverfront*
As stated above, neither the 'Riverfront, Access, Recreation and Open Space Plan' (Sheet 7/44) nor the 'Easement Plan' appear to include any information regarding how the required easement area and public access to the riverfront pathway from Washington Street along Cherry Street will be ensured to be provided for public access. According to SP-2 Zoning Requirement, Section 27-1504 D. (3.)(a.)- Riverfront Access and Open Space, the development should provide: "dawn –to-dust public access" between Washington Street and the riverfront trail. According to this section, ". . . Required public access must be provided via an *easement* or *public right-of-wa*y, recorded with the land development plans." We recommend the borough ensure that the required public access easement is shown and appropriately recorded for perpetual public use and benefit.

3. Residential Development Within the Schuylkill River's 100- Year Floodplain

The development tract lies within the Schuylkill River's 100-year floodplain and residential developments along Washington Street are experiencing increasingly frequent and sometimes disastrous impacts. Most recently 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.

We recognize the borough is proactively planning how to avoid a similar scenario like the one that occurred in 2021. Our concern is that this development will inevitably place additional burdens on local and county emergency services responding to Schuylkill River flooding events, rescues at this site, and on the neighboring properties. The applicant should work with the borough and Whitemarsh Township to ensure that an effective evacuation plan for residents and their pets is established, and that there will be on-site management of this complex to assist in the event of an evacuation. We recommend the applicant provide the evacuation plan to all new residents and disclose the risks associated with living at this location and the need for residents to heed and act on all evacuation orders or risk the potential loss of life and property. In light of the catastrophic damages associated with Hurricane Ida, we believe this disclosure and caution is warranted. Given the extent of surface parking lots and accommodation of vehicles, we recommend the applicant coordinate with the Borough and Township to consider alternative parking locations in case of a flood event that may damage vehicles in the surface parking areas.

CONCLUSION

We wish to reiterate that MCPC generally supports the applicant's proposal and recommend that the borough consider to its satisfaction the above mentioned comments.

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 #23-0327-003 on any plans submitted for final recording.

Sincerely,

Barry W. Jeffries

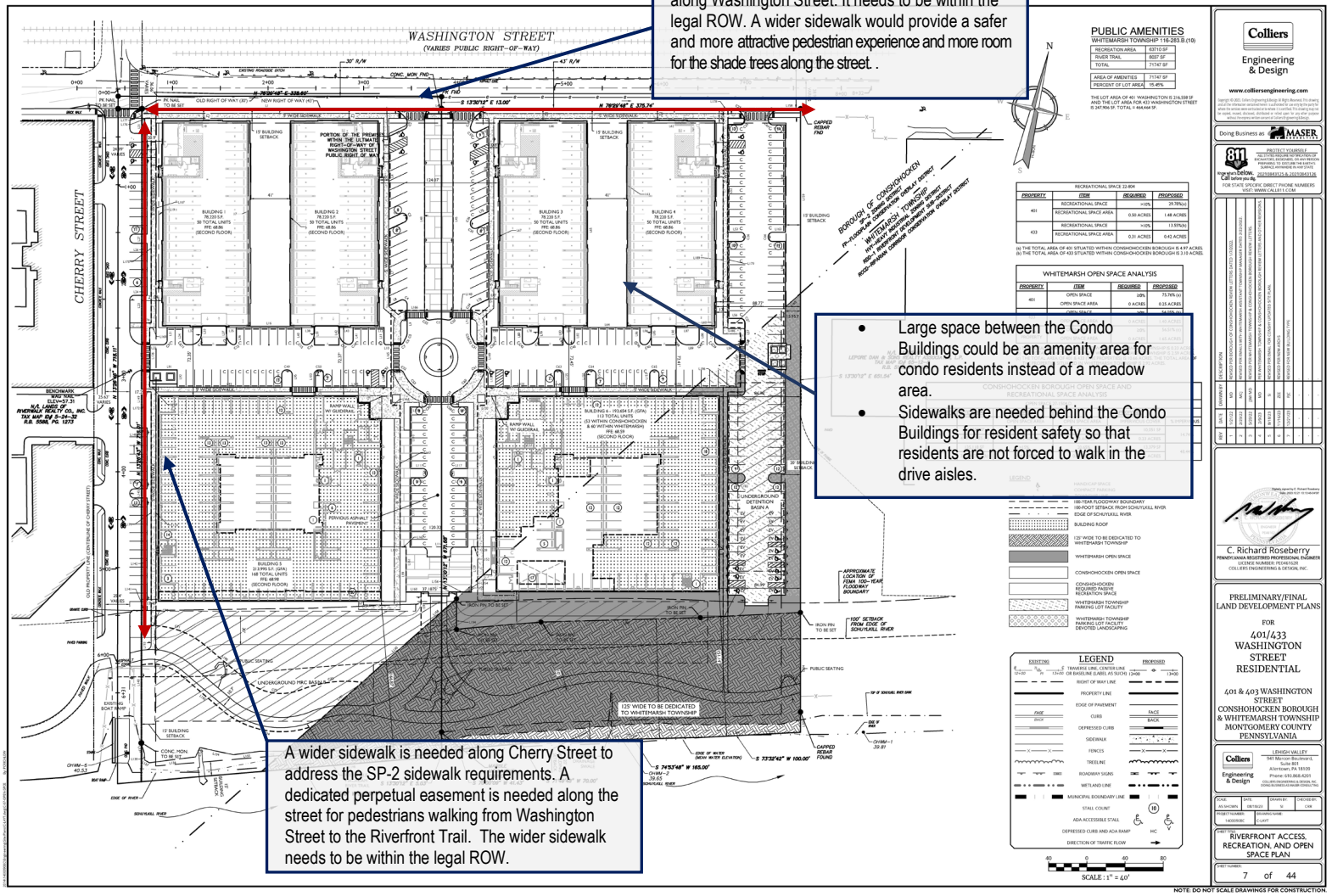
Barry W. Jeffries, ASLA, Senior Design Planner

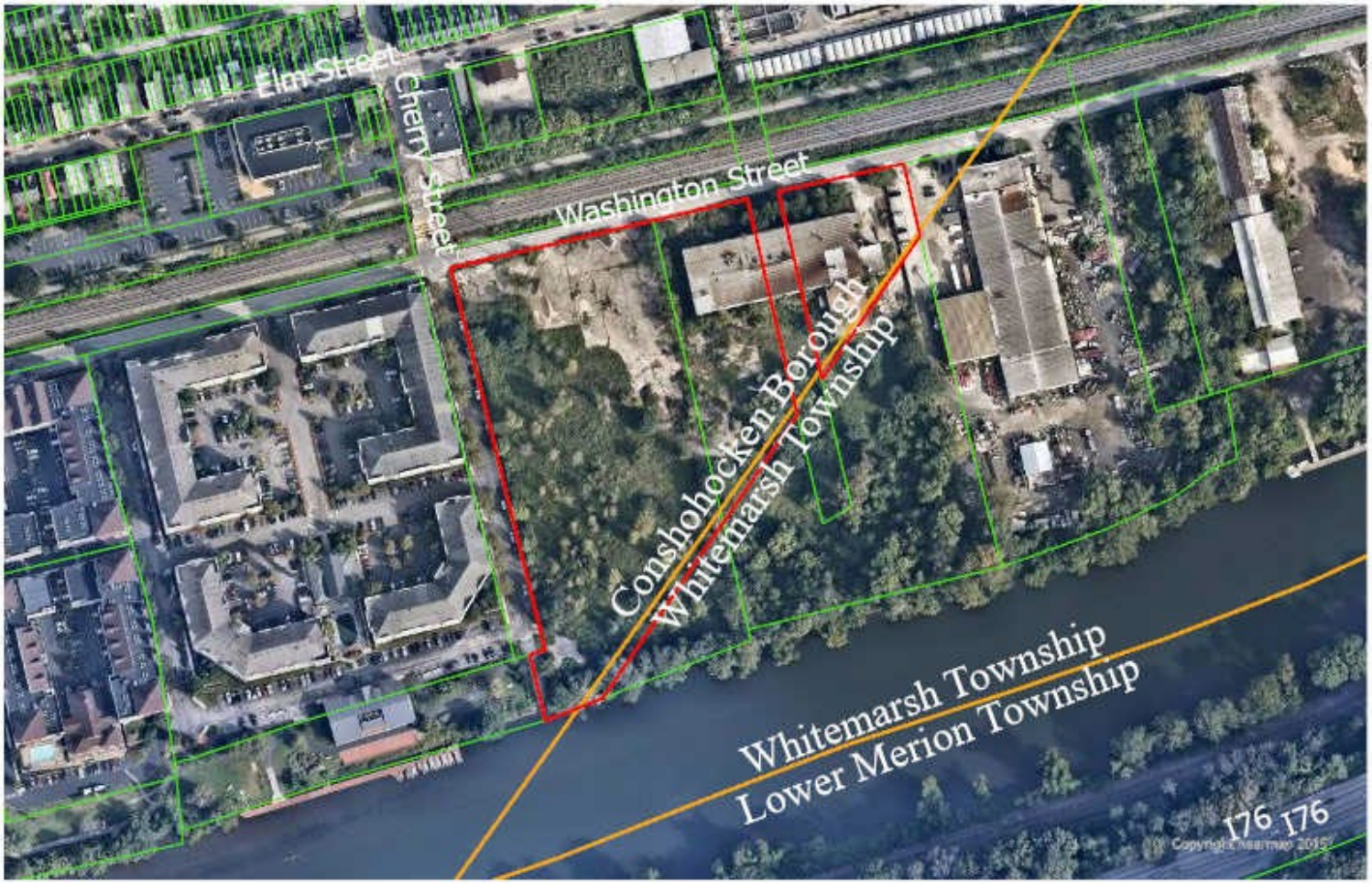
Barry.Jeffries@montgomerycountypa.gov , 610.278.3444

c: KRE Acquisition Corp. , Bridgewater N.J.
Richard Roseberry, Colliers Engineering, Applicant's Representative
Conshohocken Borough Municipal Planning Commission
Craig McAnally, Whitemarsh Township Manager
Charles Guttenplan, AICP, Whitemarsh Township Planning and Zoning Director

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

ATTACHMENTS A, B, & C



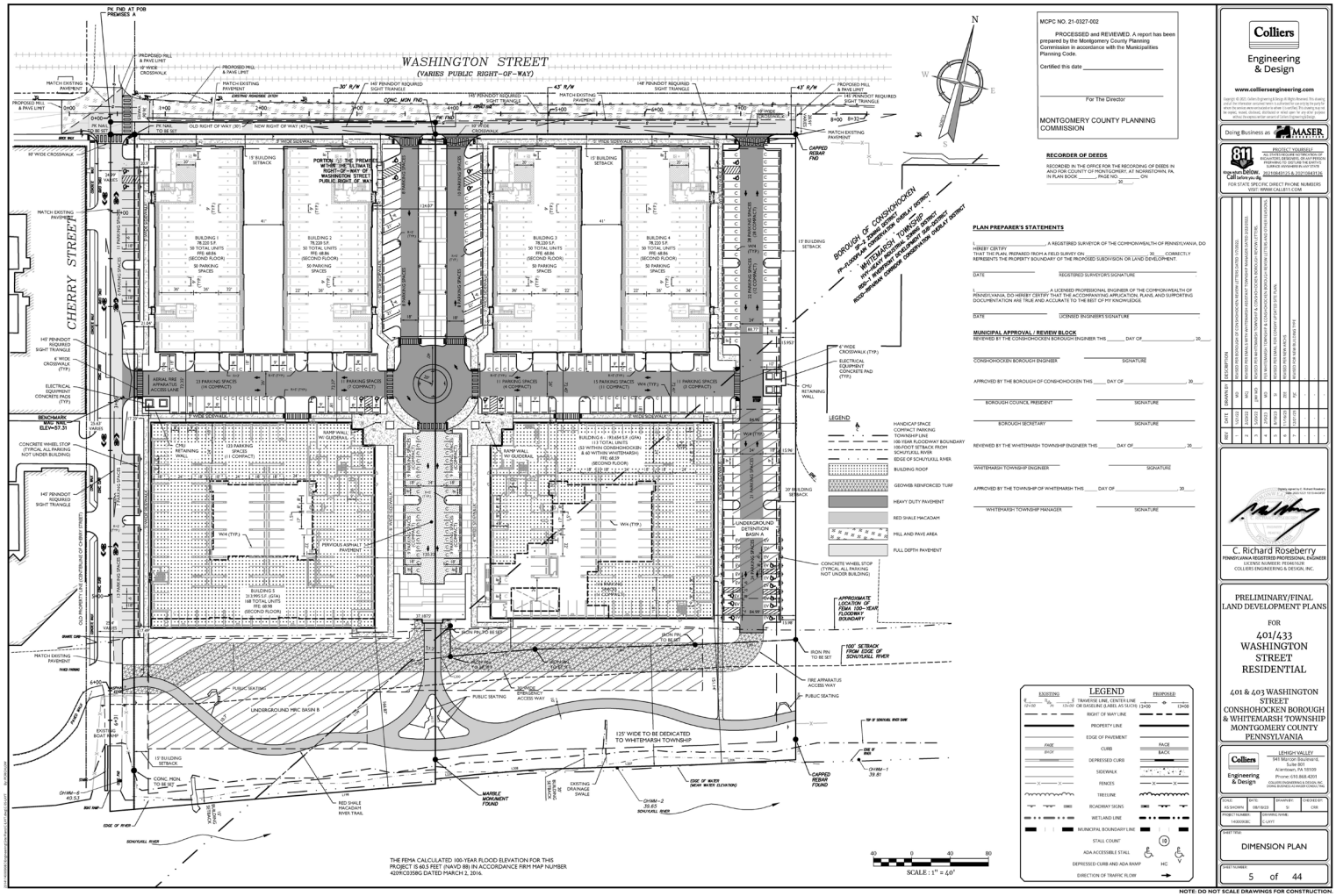


Washington Street Residential
MCPC#210327003

Montgomery County Planning Commission

0 100 200 400 Feet

N


WASHINGTON STREET
(VARIES PUBLIC RIGHT-OF-WAY)
CHERRY STREET
MCPC NO. 21-0327-002
PROCESSED and REVIEWED. A report has been prepared by the Montgomery County Planning Commission in accordance with the Municipalities Planning Code.
Certified this date _____
For The Director
MONTGOMERY COUNTY PLANNING COMMISSION
RECORDER OF DEEDS
RECORDED IN THE OFFICE FOR THE RECORDING OF DEEDS IN AND FOR COUNTY OF MONTGOMERY, AT NORRISTOWN, PA.
PLAN PREPARER'S STATEMENTS
MUNICIPAL APPROVAL / REVIEW BLOCK
LEGEND
BOROUGH OF CONSHOHOCKEN
WHITEMARSH TOWNSHIP
UNDERGROUND MBC BASIN B
125' WIDE TO BE DEDICATED TO WHITEMARSH TOWNSHIP
SCHUYLKILL RIVER
THE FEMA CALCULATED 100-YEAR FLOOD ELEVATION FOR THIS PROJECT IS 60.5 FEET (NAVD 88) IN ACCORDANCE FIRM MAP NUMBER 42091C0359G DATED MARCH 2, 2016.
SCALE : 1" = 40'
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MONTGOMERY COUNTY
PENNSYLVANIA
C. Richard Roseberry
PENNSYLVANIA REGISTERED PROFESSIONAL ENGINEER
LICENSE NUMBER: PE068162E
COLLIERS ENGINEERING & DESIGN, INC.
LEHIGH VALLEY
949 Marcon Boulevard, Suite 301
Allentown, PA 18109
Phone: 610.868.4203
AS SHOWN
08/18/23
SHEET TITLE
DIMENSION PLAN
SHEET NUMBER
5 of 44
NOTE: DO NOT SCALE DRAWINGS FOR CONSTRUCTION.