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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

December 5, 2024

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

Re: MCPC #24-0217-001
Conditional Use – Millennium IV- Office Site Development

Dear Ms. Cecco:

We have reviewed the above-referenced Conditional Use and Zoning Plan as requested by the borough in an electronic submission dated October 9, 2024. We forward this letter as a report of our review.

BACKGROUND

The borough has submitted a new proposal that seeks conditional use approval for the redevelopment of a 13.49 acre development tract with two office buildings totaling approximately 304,240 square feet. The applicant, Morgan Properties, Inc. who is also the owner and developer, proposes to construct the Millennium IV- Office Buildings on 5 tax parcels in the SP-2 Special Planned District 2, including:

- One- 3-story office building totaling 87,840 sq. ft., constructed over a podium base of a 2-story parking structure (79,458 sq. ft.) with 236 parking spaces
- One 6-story office building totaling 216,400 sq. ft., constructed over a podium base of a 4-story parking structure (253,336 sq. ft. - 63,334 sq. ft. /floor) totaling 960 parking spaces

The proposal requires Conditional Use approval as per Section 27-1503.(1)&(2) that restricts the height of buildings to 85 ft. An increase to a height of up to 250 ft. requires conditional use approval and is subject to other requirements of Section 27-1503.2.(A.- H.). According to correspondence received from Leonard B. Altieri III, the applicant's representative, the

anticipated maximum building height is 140 ft., not including any HVAC equipment that may be added.

Regarding the criteria for Conditional Use, the Borough of Conshohocken Zoning Code, Section 27-286.B.3 - Procedure for Conditional Use Application- Public Hearing requires that the applicant to demonstrate at a public hearing "the adequacy of the proposed vehicular circulation system and other roadway improvements, pedestrian circulation system, utilities, buffering and screening and the protection of natural resources."

CONSISTENCY WITH COUNTY & BOROUGH COMPREHENSIVE PLANS

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 area, including "high-density, multi-family and townhomes". (Page 80) https://www.montcopa.org/1579/Montco-2040-Comprehensive-Plan). The comprehensive plan recommends that these centers should "establish more of a sense of place, ideally with a clearly defined public gathering place."

Consistency with Conshohocken Comprehensive Plan Update, June, 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 the attached map, the future land use designation is 'Industrial'. While the development tract is designated 'Industrial', it is located at boundary with the 'Mixed-Use' area. A 'Mixed-Use' area's 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."

RECOMMENDATION

The Montgomery County Planning Commission has reviewed the applicant's Zoning Plan and Conditional Use application, and while we are generally supportive of the proposed office development, we have the following safety concerns:

- ❖ The arrangement of two significant office buildings without frontage along Washington Street that requires travel through a parking lot with spaces arranged perpendicular to the drive aisle and navigate smaller stub streets to reach the building and garage entrances.
- ❖ The way in which the proposed office buildings and the podium garage bases create a significant physical and visual barrier to the Schuylkill River that diminishes its value as an important scenic and natural resource.

These and other concerns are discussed below, and we believe the borough should take them into consideration when assessing this proposal.

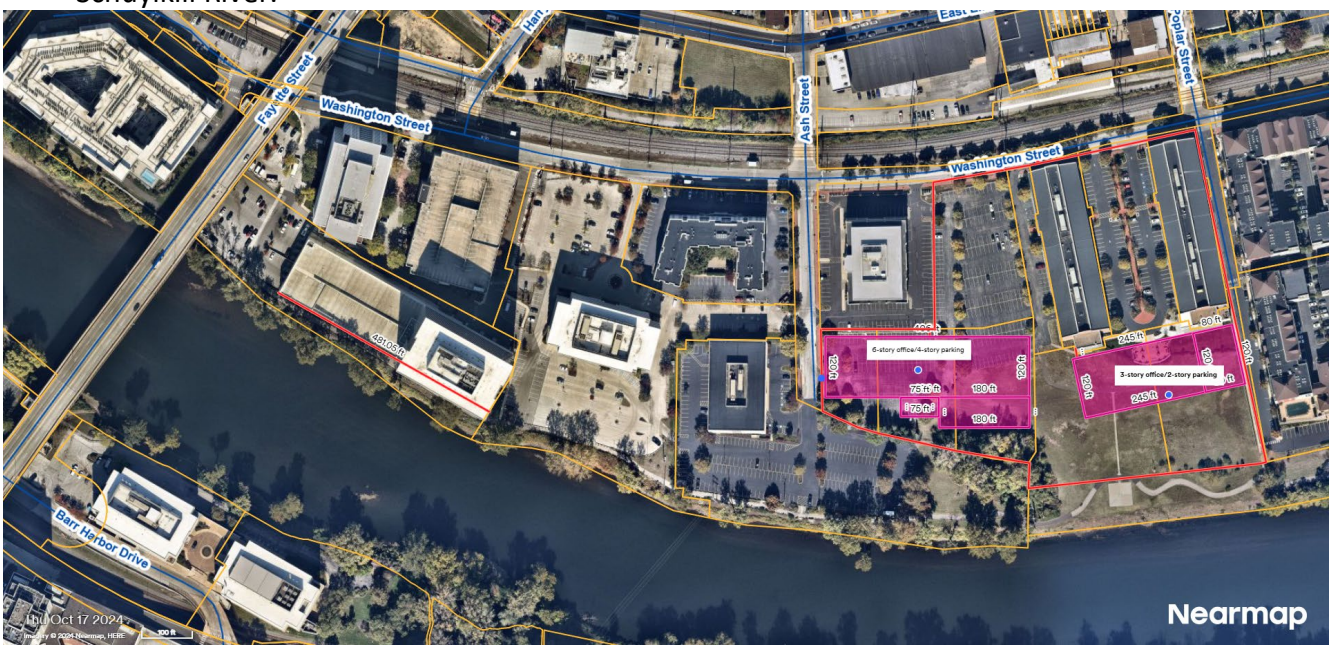
COMMENTS

1. **Vehicular Circulation – Access from Washington Street**
   The plan shows that both office buildings are proposed closer to the Schuylkill River and are arranged by driveways that do not provide a clear and direct means of access from Washington Street as needed for this scale of office development. Given this less than ideal arrangement, we have concerns regarding the access to the 3-story building that is proposed through the existing surface parking lot between the Millennium II and III buildings. A vehicle will need to navigate through a 90®linear parking lot which requires approximately 360 ft. before reaching one of the two entries to the parking garage. We believe this arrangement poses many potential safety concerns for both pedestrians and vehicles seeking to access the garage, and could potentially pose serious obstacles for emergency responders in case of a fire and flooding events. We suggest the applicant modify with a driveway aisle that doesn't conflict with cars backing out from perpendicular parking spaces into the flow of traffic and posing safety risks.

2. **Massing of the Proposed Office Buildings & Schuylkill River**
   We have concerns regarding the massing of both proposed buildings. When combined they would form a "wall to the river"– both visually and physically, creating a barrier to the riverfront for residents seeking to access the Schuylkill Riverfront pathway. The smaller 3-story building that's placed directly blocking the riverfront view shed between the Millennium II and III buildings. They diminish the design and value created by these buildings that were initially constructed in the early 2000s by O'Neill Properties. They were inspired by the 19th century, 2-1/2 -story linear industrial buildings that sat perpendicular to the river and it provided a wider green strip separating the parking bays and view corridor to the river and the Lower Merion riverbank. This physical connection and view corridor is being lost. The 6-story building to the west of the proposed 3-story office building has an even greater parallel length to the riverfront, not unlike the Hamilton Lane building. We suggest that one solution could be to reduce the footprint of the 6-story building and

increase the building height planned to be at 140 ft. building height. The graphic sketch shown below illustrates the building's massing.

We do not believe the borough and its residents are well-served by the massing of structures as shown along the riverfront. We recommend the applicant consider the arrangement of the building footprints that shrink the visual and physical barrier to the Schuylkill River.



Sketch of Proposed Building Massing along the Schuylkill River

3. Pedestrian Access & Safe, Walkable Connection from Washington Street to the Schuylkill Riverfront

The applicant's plan does not show a safe means of pedestrian access from the sidewalks along Washington Street to the riverfront trail and the borough's open space along the Schuylkill River. At Conditional Use, the applicant's plan is required, " … to include riverfront access deeded to the borough in perpetuity providing unrestricted public access to the riverfront areas in perpetuity". (Section 27-1503.F. - Height Restrictions). The route shown by the plan appears to require that a pedestrian navigate through the parking lot and driveway aisle to reach the 10 ft. wide asphalt pathway that lies between the proposed office buildings providing the only off-street and safe means to access the riverfront areas. As a condition of approval, we recommend the applicant provide a dedicated, safe route for pedestrians to access the riverfront pathway and open space areas from the Washington Street sidewalk.

4. Open Space Area along the Schuylkill Riverfront

a*. Gathering Area & Public Amenities* –

The applicant's plan indicates how the large green area on the Morgan Properties' tract immediately south of the proposed 3-story office building addition to Millennium II and III is envisioned to be used. It's a large area outside–approximately 115' x 270'– and is shown with only a 10 ft. connecting pathway to the Borough's property. The borough's regulations for Riverfront Access & Open Space in the SP-2 District (Section 27-1504.D.1.-3.) require the development to provide year-round opportunities for passive outdoor recreation and facilitate circulation for pedestrian to- and throughout the riverfront area. We recommend the applicant provide the borough with details about how this area will be used for the borough resident's passive recreation needs/desires, rather than a large green turf-area with a pathway connector.

b. *Naturalization of the Schuylkill River's Edge*

We recommend the applicant include a landscape plan in its preliminary plan submission that addresses the re-greening and enhancement of the Schuylkill River's riparian forest edge. This edge has been de-graded by various floods and other factors and we suggest the applicant's planned landscape improvements plan include a robust enhancement of the existing turf-grass area with native floodplain tree and shrub plantings.

5. Development in the 100-Year Floodplain

We believe that the proposed office use is a preferred land use at this site, given that it is not a 24/7 human occupation, as residential uses require. The proposed development footprint will further reduce both storage capacity and environmental value of the 100-year floodplain along this area. We are concerned about how the development will accommodate the ever-increasing flooding events along the Schuylkill River, given that these events are no longer rare and flooding occurred after significant rainstorms in January 2024. The borough should ensure that the applicant provides architectural details and other necessary documentation demonstrating how the proposed parking structures will be flood-proofed, and how emergency flooding events will be accommodated.

CONCLUSION

Please note that any review comment and recommendations contained in this report are advisory to the borough and final disposition for the approval of any proposal will be made by the borough.

Please be aware that the MCPC #24-0217-001 has been set aside for the applicant' plan. If any subsequent plans are submitted for final recording, this MCPC number should appear on the

applicant sheets within the plans in the box reserved for the seal of this agency. Should the governing body approve the Conditional Use for the applicant we request that a copy of the decision be provided to the County Planning Commission be sent an official copy within 30 days.

Sincerely,

Barry W. Jeffries

Barry W. Jeffries, ASLA, Senior Design Planner

Barry.Jeffries@montgomerycountypa.gov , 610.278.3444

c:
Michael Peters, Borough Solicitor
Karen MacNair, Borough Engineer
Carol DiPietro, Chair, Borough Planning Commission

Attachments: 1) Aerial Photo; 2) Site Plan

ATTACHMENTS



Millennium IV Development
MCPC#240217001

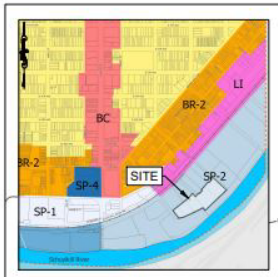
Montgomery County Planning Commission

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Aerial photography provided by Nearmap

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ZONING MAP
BOROUGH OF CONSHOHOCKEN
SCALE: N.T.S.

SITE PLAN STATISTICS

SITE ADDRESS:	WASHINGTON STREET CONDO J CONSHOHOCKEN, PA 19428
MUNICIPALITIES:	BOROUGH OF CONSHOHOCKEN , MONTGOMERY COUNTY
ZONING DISTRICT:	SP-2 - SPECIALTY PLANNED DISTRICT 2
PARCEL INFORMATION:	05001169001, 05001169999,05001169928, 05001169149, 05001169031, 05001169993, 05001169937, 05001169736, 05001169127
EXISTING USE:	RESIDENTIAL AND OFFICE SPACE
PROPOSED USE:	RESIDENTIAL AND OFFICE SPACE
LOT AREA:	GROSS: 587,769 SF (13.49 ACRES)
PLAN REFERENCE:	BOUNDARY & TOPOGRAPHIC SURVEY PREPARED BY CONTROL POINT ASSOCIATES DATED: 02/12/2024

THE BOROUGH OF CONSHOHOCKEN HEREBY APPROVES THE FOLLOWING WAIVERS REQUESTED FOR THE PROJECT:

SECTION 106	TO PERMIT NEGOTIATION OF PARK OR RECREATIONAL FACILITIES, LAND AND/OR FEES
SECTION 28-A.1.	SHOW EXISTING FEATURES WITHIN 100' OF THE SITE
SECTION 44.C.8.0	TO PROVIDE A 24' MINIMUM AISLE WIDTH FOR
SECTION 44.C.7.	TO PROVIDE A 5' MINIMUM RADIUS OF CURBLINE CURVATURE
SECTION 45.A.3.	TO PROVIDE A 10' MINIMUM WIDTH FOR SIDEWALKS

AND THE PLANTING OF TREES ALONG WASHINGTON STREET AGAINST THE WALL RATHER THAN IN THE VERGE.

THE BOROUGH OF CONSHOHOCKEN ZONING HEARING BOARD HEREBY GRANTED THE FOLLOWING VARIANCES ON JULY 25, 2007 REQUESTED FOR THE PROJECT:

SECTION 17.5.C.3.	DEVELOPMENT WITHIN 50' OF THE TOP OF BANK
SECTION 17.5.D.2.c.	STANDARDS FOR COMPLETELY DRY FLOOD-PROOFING
SECTION 20.7.1.	TO PROVIDE MORE THAN ONE ACCESS FOR THE SUBJECT PROPERTY
SECTION 20.7.L.	FROM MINIMUM WIDTHS FOR PRIVATE DRIVES

THE BOROUGH OF CONSHOHOCKEN COUNCIL GRANTED THE FOLLOWING CONDITIONAL USE APPROVALS REQUESTED FOR THE PROJECT:

SECTION 19.2.P.3.	TO CONSTRUCT MULTIFAMILY RESIDENCES
SECTION 15.4.B.3.	TO RESERVE THE RIGHT TO TRANSFER FLOOD AREA
SECTION 17.5.D.4.	TO ALLOW STORM SEWER/BIOSUTTA ALS WITHIN THE FLOODWAY
SECTION 17.5.E.5.	TO ALLOW PAVED DRIVEWAYS AND PARKING LOTS WITHIN THE FLOODWAY

PARKING REQUIREMENTS

BOROUGH OF CONSHOHOCKEN

ITEMS	GROSS SQUARE FOOTAGE/TOTAL
OFFICE REQUIREMENTS: 3 SPACES PER 100 FT OF FLOOR AREA	
MILLENIUM TWO	68,360 SF
MILLENIUM THREE	68,680 SF
LONDONBURY BUILDING D	5,730 SF
PROPOSED OFFICE BUILDING 1	216,400 SF
PROPOSED OFFICE BUILDING 2	87,840 SF
TOTAL OFFICE REQUIREMENT	(448,020 SF/1000 SF)x 3 = 1,344 SPACES
RESIDENTIAL REQUIREMENTS: 1.2 SPACES PER UNIT	
LONDONBURY BUILDING A	161 RESIDENTIAL UNITS
LONDONBURY BUILDING B	74 RESIDENTIAL UNITS
LONDONBURY BUILDING C	76 RESIDENTIAL UNITS
TOTAL RESIDENTIAL REQUIREMENT	1.2 x 309 = 371 SPACES
TOTAL REQUIRED PARKING: 1,715 SPACES	

ZONING STANDARDS:

BOROUGH OF CONSHOHOCKEN (SP-2)

ITEMS	REQUIRED	EXISTING	PROPOSED BUILDING
YARD SETBACKS §27-1505			
MINIMUM FACINT YARD (PARKING & STRUCTURE)	15 FT FROM ROW	17.6 FT	16 FT (C)
MINIMUM BUILDING SEPERATION	70 FT	>75 FT	>75 FT (C)
MINIMUM BUILDING SEPARATION ON SAME LOT/PARCEL	30 FT	> 30 FT	17.9 FT (V)
INTENSITY RATIOS §27-1504			
MAXIMUM IMPERVIOUS COVERAGE	70%	69.4 %	70.0 % (V)
MINIMUM OPEN SPACE	15%	31.6%	21.2 % (C)
MISCELLANEOUS			
MINIMUM LOT AREA §27-1504	1 AC (43,560 SF)	13.49 AC (587,769 SF)	13.49 AC (587,769 SF) (C)
PARKING §27-2011	1,715 SPACES	972 SPACES	2,001 SPACES (C)
MAXIMUM BUILDING FRONTAGE §27-1505	350 FT*	<350 FT	370.3 FT (C)(1)*
MAXIMUM BUILDING HEIGHT §27-1503	230 FT**	186 FT	<230 FT (C)(2)**
MAXIMUM ACCESS DRIVEWAY WIDTH §27-2007	30 FT	24 FT	24 FT (C)
PRIVATE DRIVE CURBLINE SETBACK §27-1505	20 FT	23 FT	20 FT (C)
MAXIMUM FLOOR TO AREA RATIO §27-1504	1.5	0.70	(779,222 SF) / (587,769 SF) = 1.3 (C)

LEGEND:
(C) = COMPLIES
(V) = VARIANCE
(CU) = CONDITIONAL USE

ADDITIONAL VARIANCES REQUESTED FOR §27-1505 B.2 AND §27-1714

*§27-1505.2: APPLICANT MEETS CONDITIONS SET FORTH TO INCREASE BUILDING FRONTAGE TO 350 FT.:
A. FACADE BREAKS SHALL BE PROVIDED SO THAT NO MORE THAN 50 FEET OF BUILDING IS A CONSISTENT FACADE.
B. BUILDING IS PROPOSED TO BE 370 FT LONG, THIS WOULD REQUIRE AN ADDITIONAL 5% OF OPEN SPACE BEYOND THE REQUIRED 15%. PROPOSED PLAN PROVIDES 20% AS REQUIRED.
C. THIS LOT DOES NOT FRONT THE SCHUYLKILL RIVER.

**§27-1503.3: APPLICANT MEETS CONDITIONS SET FORTH TO INCREASE MAXIMUM HEIGHT TO 230 FT.:
A. SITE IS ZONED SP-2.
B. LOT AREA IS 13.49 AC.
C. BUILDING IS LOCATED <2,000 FT FROM THE CONSHOHOCKEN SEPTA RAIL STATION. *VARIANCE REQUESTED.
D. THE DEVELOPMENT INCLUDE AMENITY SPACE THAT SHALL BE PRESERVED FOR PUBLIC EVENTS.

NOTE: AREA CALCULATIONS ARE BASED ON THE HIGHLIGHTED AREA SHOWN ON THE OVERALL SITE PLAN. ALL UNITS WITHIN THE OVERALL PROPERTY, AND ANY INTERNAL ENCROACHMENTS BETWEEN UNITS, ARE IN COMMON OWNERSHIP BY AFFILIATES OF MORGAN PROPERTIES. THE ENCROACHMENTS WILL BE GOVERNED BY LICENSE AGREEMENTS BETWEEN THE RESPECTIVE OWNERS.

PROPOSED 6 STORY OFFICE BUILDING
±216,400 SF (±36,066 SF/FLOOR)
PROPOSED 4 STORY PODIUM PARKING DECK
±253,336 SF (±63,334 SF/FLOOR)
960 PROPOSED PARKING SPACES

PROPOSED 3 STORY OFFICE BUILDING
±87,840 SF (±29,280 SF/FLOOR)
PROPOSED 2 STORY PODIUM PARKING DECK
±79,458 SF (±39,729 SF/FLOOR)
236 PROPOSED PARKING SPACES

WASHINGTON STREET
ASH STREET
POPLAR STREET
SCHUYLKILL RIVER

LEGEND

- EXISTING 100-YR FEMA FLOODPLAIN
- EXISTING 100-YR FEMA FLOODPLAIN WATER
- EXISTING FEMA FLOODWAY
- EXISTING FEMA FLOODWAY HATCH
- EXISTING PROPERTY LINE
- EXISTING WATERCOURSE TOP OF BANK
- EXISTING COMMUNICATION CONDUIT
- EXISTING NATURAL GAS SERVICE PIPE
- EXISTING UNDERGROUND ELECTRIC LINE
- EXISTING WATER PIPING
- EXISTING SANITARY SEWER PIPE
- YARD SETBACK LINE
- ULTIMATE RIGHT-OF-WAY LINE
- INTERNAL LOT LINES
- EXISTING EASEMENT
- PROPOSED EASEMENT
- PROPOSED CURB LINE
- PROPOSED BUILDING FOOTPRINT
- PROPOSED ASPHALT SIDEWALK
- PROPOSED STANDARD DUTY ASPHALT
- EXISTING GRAVEL
- PROPOSED OUTDOOR DECK AREA
- PROPOSED ACCESS DRIVEWAY
- OPEN SPACE

NORTH

GRAPHIC SCALE IN FEET
0 30 60 120

CALL BEFORE YOU DIG!
PA 1

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No.	REVISIONS	DATE	BY

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KHA PROJECT 112934000
07/26/2024
SCALE: AS SHOWN
DESIGNED BY: JBZ
DRAWN BY: KDR
CHECKED BY: JD

ZONING PLAN

M4 OFFICE BUILDINGS
PREPARED FOR
MORGAN PROPERTIES ACQUISITION COMPANY, LLC
BOROUGH OF CONSHOHOCKEN PA

SHEET NUMBER
Z-002