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Scott France, AICP
Executive Director

May 14, 2026

Mr. Charles L. Guttenplan, AICP
Director of Planning & Zoning
Whitmarsh Township
616 Germantown Pike
Lafayette Hill, Pennsylvania 19444

Re: MCPC #25-0194-002
Plan Name: Quaker Park Redevelopment
(1 lot comprising 9.15 acres)
Parcel ID: 65-00-03169-00-6
Situate: 1001 E Hector Street
Whitemarsh Township

Dear Mr. Guttenplan:

We have reviewed the above-referenced zoning ordinance amendments in accordance with Section 609 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on April 20, 2026. We have also reviewed the associated sketch plan provided alongside the proposed zoning ordinance amendment. We forward this letter as a report of our review.

BACKGROUND

BPG Office VI Quaker Park, LP has submitted a package of zoning ordinance amendments in conjunction with a tentative sketch plan. The submitted ordinance amendments are necessary to proceed with the tentative sketch plan, as the proposed revisions address several conflicts between the current zoning regulations and the development proposal.

The proposed ordinance amendments provide for the introduction of a new definition for "stacked townhome" to be incorporated into Section 116-11, along with more significant revisions to Article XL, Transit-Friendly Design Overlay (TDO) District, and Article XLI, Spring Mill Mixed-Use (SM-MU) District. The proposed amendments to Article XL include revisions to dimensional standards (Section 116-311) and bulk requirements (Section 116-312). The proposed amendments to Article XLI include revisions to use, bulk and dimensional regulations (Section 116-318); off-street parking and multi-modal connectivity (Section 116-320); building and site design (Section 116-321); and building height bonuses (Section 116-326).

The tentative sketch plan provides for the redevelopment of a 9.15-acre lot located in the TDO-1 Transit-Friendly Design Overlay District and the SM-MU Spring Mill Mixed-Use District. A large portion of the site is also located within the Floodplain Conservation Overlay District. The sketch plan provides for the construction of a 5-story mixed-use building at the intersection of Hector Street and Lee Street, the construction of 40 stacked townhomes, the construction of a trail connection along Lee Street, and revisions to existing parking facilities that will result in a total of 538 off-street parking spaces. The property currently contains a roughly 200,000-square foot office building, which is intended to remain, and a roughly 40,000-square foot laboratory building, which is intended to be demolished.

The proposed mixed-use building would contain 106 apartments and roughly 2,500 square feet of retail space (located at the intersection of Hector Street and Lee Street). The ground level includes the aforementioned retail space, 5,600 square feet of amenity space for residents, 19 rear-facing automobile garages, and portions of 11 dwelling units that span into the second story of the building. The second, third, fourth, and fifth stories would contain apartments and amenity space for residents. An outdoor amenity space for use by residents is proposed near the building along Lee Street. Each apartment unit is provided with one off-street parking space.

Forty stacked townhomes are also proposed throughout the site. Twelve of the stacked townhomes are proposed along Elm Street, which positions them within the 1% Annual Chance Flood Area and the Floodplain Conservation Overlay District. The remaining 28 stacked townhomes are proposed along Hector Street, between Sandy Street and Lime Street (vacated). Each stacked townhome is provided with a rear-facing garage and one off-street parking space within a driveway.

COMPREHENSIVE PLAN COMPLIANCE

MONTCO 2040: A SHARED VISION (2015; revised 2021)

Montco 2040: A Shared Vision, Montgomery County's comprehensive plan, supports the redevelopment and reinvestment in areas where infrastructure exists, with a special emphasis on opportunities near transit centers such as the Spring Mill area. However, the provided sketch plan includes 12 stacked townhomes along Elm Street, which are located within the floodplain. *Montco 2040* includes the goal to "improve stormwater management and reduce the impact of flooding," (pg. 38) with the supporting strategy to "work with local municipalities, developers, emergency providers, PennDOT, SEPTA, and emergency management agencies to limit development in the floodplain and limit the impact of flooding," (pg. 40). Therefore, the proposed stacked townhomes along Elm Street run contrary to the goals of the plan.

The proposed redevelopment of the portions of the site located outside of the floodplain is generally consistent with the future land use plan of *Montco 2040*. The majority of the site is defined as a 'business area,' with the southwestern portion of the site being defined as a 'regional mixed-use center.' While business areas are primarily intended to include "employment-oriented land uses, such as offices, research facilities, and industrial parks," a suitable secondary land use includes "higher-density residential uses that are buffered from other uses or on the periphery of the area," (pg. 83). Regional mixed-use centers are defined as "intensely developed suburban cores with significant retail, office, and residential land uses," where automobile, transit, and multimodal transportation options

are provided for (pg. 80). Suitable land uses include mixed-use development and high-density multifamily and townhomes. The proposed redevelopment of the site is therefore generally consistent with the future land use plan of *Montco 2040*.

WHITEMARSH TOWNSHIP SELECTIVE COMPREHENSIVE PLAN UPDATE (2020)

A similar concern related to development in the floodplain is raised in the *Whitemarsh Township Selective Comprehensive Plan Update*, which states that "any future development along the Riverfront, or in any flood zone within the Township, must be cognizant of flood potential and identify mitigation strategies on-site to allow future uses to effectively address future flood events," (pg. 37). The proposed mix of land uses appears to be generally consistent with the future land use vision for this area as a 'Mixed-Use Node' Character Area. A mixed-use node is defined by "mixed use development, including but not limited to retail, restaurants, housing, office and services," (pg. 35). In order to improve consistency with the comprehensive plan, the applicant should identify any mitigation measures related to their proposed development within the floodplain or amend the plan to eliminate the dwellings proposed in the floodplain.

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) recommends that the township and applicant discuss alternatives to the proposed residential development within the floodplain, along with mitigation measures to ensure the safety of future residents and first responders, prior to proceeding with a preliminary development plan. We generally support the proposed ordinance revisions, provided that the township is satisfied that our identified concerns have been addressed prior to adoption. We look forward to reviewing a preliminary land development plan should the applicant choose to proceed with this proposal. Our comments are as follows:

REVIEW COMMENTS

ZONING ORDINANCE ARTICLE XL, SPRING MILL MIXED-USE (SM-MU) DISTRICT

A. Proposed Amendments to Section 116-311, Dimensional Requirements. The proposed amendments to the front yard setback standards create a conflict between the existing front yard setback for "principal building, nonresidential/mixed use" and the proposed front yard setback for "principal building, residential use nonresidential building/mixed used building." The proposed amendment would appear to allow for a zero to 30-foot setback while requiring a 5-foot minimum setback, as both land use categories apply to "nonresidential/mixed use" principal buildings. This conflict should be resolved before the proposed text edits are considered.

B. Proposed Amendments to Section 116-312, Bulk Requirements. The proposed edits to the maximum building footprint for noncommercial/mixed-use create a conflict between the existing maximum allowance of 30,000 square feet and the proposed note (5), which would allow for a maximum building footprint of 45,000 square feet for the noncommercial/mixed-use buildings. The proposed maximum building footprint would be better located in place of the 30,000-square foot

allowance noted in the chart rather than under note (5), provided the township is in favor of this increased footprint.

It should be noted that the sketch plan dated 13 April 2026 denotes the footprint of the proposed mixed-use building as approximately 50,000 square feet. In contrast, the ordinance amendment under consideration would allow a maximum building footprint of 45,000 square feet. The applicant should confirm the proposed building footprint prior to pursuing ordinance revisions.

ZONING ORDINANCE ARTICLE XLI, TRANSIT FRIENDLY DESIGN OVERLAY (TDO) DISTRICT

A. Proposed Amendments to Section 116-318, Use, Bulk, and Dimensional Regulations:

1. Section 116-318.B.(1) presently prohibits single-family attached and detached homes within the TDO-1 District subarea. If the township wishes to change this policy and allow for such use in the TDO-1 District subarea while continuing to disallow such for riverfront properties, the language should be modified to ensure that the meaning of "riverfront" is understood and enforceable. Furthermore, this section would benefit from the same or similar language to that proposed under subsection (3) of this same section regarding riverfront properties.

2. The Township Zoning Ordinance includes more detailed language than is proposed for subsection 116-318.D. in Section 116-292.D. of the Village Commercial District, which the township should consider in place of the language proposed by the applicant. Specifically, subsection 116-318.D. may be amended to state the following:

> *"For a mixed-use development, the residential density shall be computed on the area of that portion of the site used for the residential development and its associated uses (including, but not limited to, parking, recreational facilities and the like). In the case of mixed-use buildings, the maximum number of dwelling units shall be reduced proportionally, based upon the proportion of the building(s) used for nonresidential purposes. (For example, with a single mixed-use building, 1/3 of which is used for nonresidential purposes, the maximum number of allowable units shall be reduced by 1/3.)"*

B. Proposed Amendments to Section 116-320, Off-Street Parking and Multi-Modal Connectivity. The proposed amendment under subsection 320.A.(1).(b). is redundant when considering subsection (c). – which states that residential and nonresidential parking requirements are additive for mixed-use developments - and it may have the unintended effect of eliminating a parking requirement for nonresidential uses that are not part of a mixed-use development. The existing language suitably addresses this concept and is therefore recommended to be retained.

C. Section 116-321, Building and Site Design. We do not support the proposed reduction to the minimum building step back from 10 to 6 feet as proposed under subsection 321.A.(4). MCPC recommends a minimum step back of 12 feet for a mixed-used building in the Spring Mill Station

area in our *Transit-Oriented Development Model Ordinance* (2021). The township is therefore encouraged to retain the 10-foot minimum step back requirement.

D. Section 116-326, Building Height Bonuses. The proposed amendment to subsection 326.A.(1).(b) would reduce the impact of the existing regulation by allowing for the procurement of renewable energy as an alternative to on-site renewable energy generation. While we commend the proposal to source electricity from Pennsylvania, additional detail and specificity in this section could help to ensure the original intended benefit is met through procurement. For example, this section could specify that electricity is procured through a power purchase agreement or similar mechanism as opposed to purchasing renewable energy credits (RECs) only.

TENTATIVE SKETCH PLAN

A. Development within the Floodplain:

1. MCPC has consistently raised our concerns regarding the potential risks to public health, safety, and general welfare associated with residential development in floodplain areas, in addition to its environmental impact. This sentiment is echoed in the *Whitemarsh Township Selective Comprehensive Plan Update* (2020), which recommends that "any future development along the Riverfront, or in any flood zone within the Township, must be cognizant of flood potential and identify mitigation strategies on-site to allow future uses to effectively address future flood events,"(pg. 37).

   Given this recommendation and the recent history of significant Schuylkill River flooding in this area of the township, we recommend that the applicant consider alternatives to the proposed dwelling in the floodplain. If the applicant chooses to proceed, they should at minimum provide the township with an emergency evacuation plan for flood events. The plan should identify the relocation site where residents, pets and vehicles would be moved during a flood.

2. The sketch plan provides for the construction of 12 stacked townhomes within the 1% Annual Chance Flood Area, which also places them within the Floodplain Conservation Overlay District. Residential construction in the floodway is prohibited by Section 116-165.A, Permitted Uses. This section only permits new residential construction in the floodway fringe and notes that any such development is subject to applicable township, state and federal regulations. The applicant should ensure that the construction of new residential dwellings lies outside the delineated floodway, and any subsequent submissions should comply with these regulations.

3. Section 116-166.C. of the Floodplain Conservation Overlay District stipulates that new construction must comply with 44 CFR 60.3.(a) through (d) of the National Flood Insurance Program. The applicant should provide the township with documentation verifying that the lowest occupied floor of the dwelling units will be elevated 1½ feet above the designated flood level and should address all other applicable regulations of the program.

4. Section 116-165.B.4. of the Floodplain Conservation District stipulates that only pervious parking and loading areas are permitted in the 1% Annual Chance Flood Area. There is no indication in the material provided that the portions of the parking area located within the

Floodplain Conservation Overlay District would meet this requirement. Furthermore, the proposed parking area also includes a below-ground stormwater management facility, though it is not clear that this type of facility is permissible within the 1% Annual Chance Flood Area.

B. Landscaping Plan:

1. The landscaping plan lacks plant diversity and relies heavily on non-native species. Nearly 300 containers of Boxwood and 455 containers of Catmint, both not native to North America, dominate the development site. This reliance on a single type of plant will not create visual interest or offer the habitat and pollinator benefits that native plants can provide. The applicant is strongly encouraged to revise the planting schedule to include more diversity and that introduces native species of plants in place of those identified.

2. The applicant is also encouraged to consider alternative ground cover to lawn within the proposed parking lot landscape islands. A mix of native ground cover and other low-growing plants could improve aesthetics, provide habitat and pollinator value, and would do better job of absorbing stormwater during storm events. If at all possible, the landscape islands running east-west -- between the stacked townhomes along East Hector Street and the parking area -- should be widened to accommodate a more robust planting area and to allow for additional stormwater infiltration.

C. Compliance with the Township Zoning Ordinance and Subdivision and Land Development Ordinance. MCPC acknowledges that certain information necessary to prove compliance with the Township Zoning Ordinance and Subdivision and Land Development Ordinance are not provided in the submitted tentative sketch plan and accompanying documentation. MCPC will provide comments on such when a preliminary plan is submitted for review.

SPRING MILL MULTI-MODAL AND TRANSPORTATION STUDY (2022)

The proposed development site occupies a large portion of the study area of the *Spring Mill Multi-Modal and Land Use Study*. The study identifies several issues and proposed improvements related to the property in question, which are summarized in the Action Plan (pages 73-76) and which the applicant is encouraged to accommodate:

A. Objective 1B: Improve access and safety for active transportation users:

- Install sidewalk and crosswalk to connect the existing Lee Street sidewalk to the SRT.
- Install RRFB and continental crosswalks at the existing pedestrian crossing of East Hector and Lee Streets.
- Review signal warrants for the pedestrian crossing at the intersection of East Hector Street and Lee Street.

B. Objective 2B: Develop a more walkable, flood-resilient waterfront, with a distinct sense of place:

- Design and install Wayfinding signage to complement Conshohocken's Wayfinding signage for a cohesive waterfront.

- Consider installing Hurricane Ida "Floodline" street art and educational signage.
- Install safe, ADA-compliant pedestrian infrastructure, where missing, throughout the study area.

C. Objective 3B: Increase and improve access to public parking in the study area:

- Continue efforts to establish a partnership with Quaker Park and incentivize a potential shared parking agreement.

CONCLUSION

We wish to reiterate that MCPC recommends that the township and applicant discuss alternatives to the proposed residential development within the floodplain, along with mitigation measures to ensure the safety of future residents and first responders, prior to proceeding with a preliminary development plan. We generally support the proposed ordinance revisions, provided that the township is satisfied that our identified concerns have been addressed prior to adoption. We look forward to reviewing a preliminary land development plan should the applicant choose to proceed with this proposal.

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 adopt this proposed zoning ordinance amendment, Section 609 of the Municipalities Planning Code requires that we be sent an official copy within 30 days. MCPC looks forward to reviewing subsequent submissions should the required text edits be adopted by the township.

Sincerely,

Timothy Konetchy

Timothy Konetchy, AICP, Senior Community Planner
timothy.konetchy@montgomerycountypa.gov – 610-292-4917

c: Craig McAnally, Township Manager
Aaron Kostyk, Chair, Township Planning Commission
Krista Heinrich, PE, Township Engineer
Sean Kilkenny, Township Solicitor
Jessica Buck, District Manager, MCCD
Boris Kaplan, Senior Vice President, Buccini Pollin Group (Applicant)

Attachments: A. Aerial Image of Site
B. Applicant's Provided Site Plan



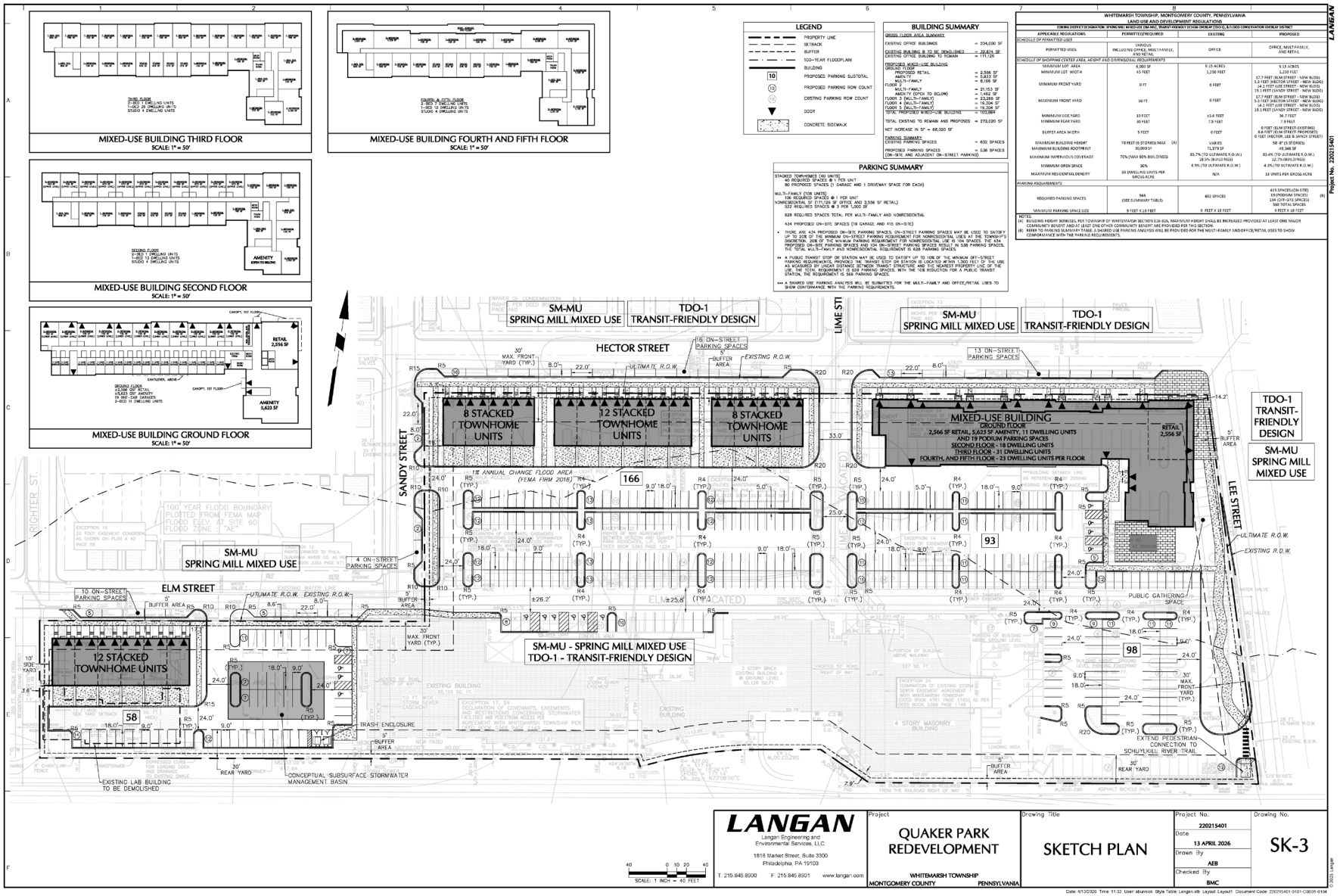
Quaker Park Redevelopment
MCPC#250194002

Montgomery County Planning Commission

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Aerial photography provided by Nearmap


MIXED-USE BUILDING THIRD FLOOR
SCALE: 1" = 50'
MIXED-USE BUILDING FOURTH AND FIFTH FLOOR
SCALE: 1" = 50'
MIXED-USE BUILDING SECOND FLOOR
SCALE: 1" = 50'
MIXED-USE BUILDING GROUND FLOOR
SCALE: 1" = 50'
LEGEND
PROPERTY LINE
SETBACK
BUFFER
100-YEAR FLOODPLAIN
BUILDING
PROPOSED PARKING SUBTOTAL
PROPOSED PARKING ROW COUNT
EXISTING PARKING ROW COUNT
DOOR
CONCRETE SIDEWALK
BUILDING SUMMARY
PARKING SUMMARY
WHITEMARSH TOWNSHIP, MONTGOMERY COUNTY, PENNSYLVANIA
LAND USE AND DEVELOPMENT REGULATIONS
SM-MU SPRING MILL MIXED USE
TDO-1 TRANSIT-FRIENDLY DESIGN
HECTOR STREET
SANDY STREET
LIME ST
LEE STREET
ELM STREET
8 STACKED TOWNHOME UNITS
12 STACKED TOWNHOME UNITS
MIXED-USE BUILDING
GROUND FLOOR
2,566 SF RETAIL, 5,623 SF AMENITY, 11 DWELLING UNITS
AND 19 PODIUM PARKING SPACES
SECOND FLOOR - 18 DWELLING UNITS
THIRD FLOOR - 31 DWELLING UNITS
FOURTH, AND FIFTH FLOOR - 23 DWELLING UNITS PER FLOOR
RETAIL 2,566 SF
PUBLIC GATHERING SPACE
SM-MU - SPRING MILL MIXED USE
TDO-1 - TRANSIT-FRIENDLY DESIGN
TRASH ENCLOSURE
EXISTING LAB BUILDING TO BE DEMOLISHED
CONCEPTUAL SUBSURFACE STORMWATER MANAGEMENT BASIN
EXTEND PEDESTRIAN CONNECTION TO SCHUYLKILL RIVER TRAIL
100 YEAR FLOOD BOUNDARY PLOTTED FROM FEMA MAP
FLOOD ELEV. AT SITE 60
FLOOD ZONE "AE"
100 ANNUAL CHANCE FLOOD AREA (FEMA FIRM 2016)
SCALE: 1 INCH = 40 FEET
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Project
QUAKER PARK REDEVELOPMENT
WHITEMARSH TOWNSHIP
MONTGOMERY COUNTY PENNSYLVANIA
Drawing Title
SKETCH PLAN
Project No. 220215401
Date 13 APRIL 2026
Drawn By AEB
Checked By BMC
Drawing No. SK-3