

January 28, 2022

TO: Planning Commission Members

FROM: Jillian Dierks, Planner, Building and Planning Department

SUBJECT: PRELIMINARY PLAN – 231 & 251 St. Asaphs Road, One & Three Bala Plaza & 333 E. City Avenue, Two Bala Plaza, Bala Cynwyd. LD# 3819 & 3820. Ward. 9

On January 10, 2022 staff presented the Preliminary Plan for One, Two, and Three Bala Plaza to the Planning Commission. The proposal is outlined on the attached memo to the Planning Commission dated January 7, 2022, which also includes relevant background information, including the property description and zoning classification, as well as the staff review comments and recommendations.

CONDITIONS OF APPROVAL & FUTURE REVIEW PROCESS

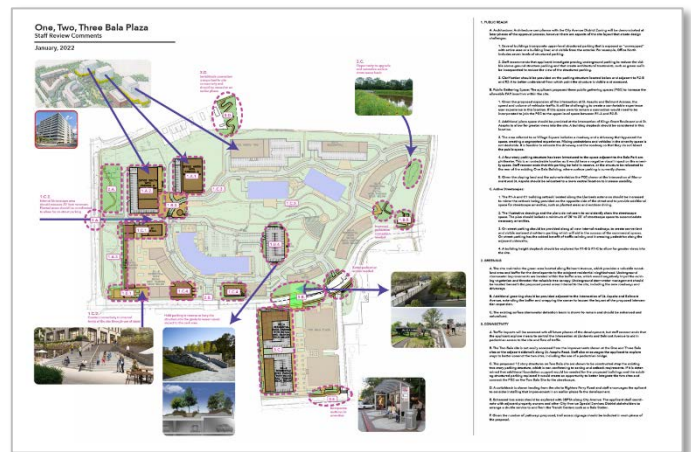
Staff has drafted recommended conditions of approval (COA), which incorporate the staff recommendations presented at the January 10th meeting, the Planning Commission’s comments (see below), and the Township Engineer’s review. Most notably, a condition of approval requires the applicant to seek Amended Preliminary Plan approval for each phase of the development. This will function similar to a Second Stage Plan, giving the Township and the Planning Commission an opportunity to further review and approve each phase of proposal in greater detail, while allowing the applicant the ability to record the plan while pursuing tenants for each phase.

The Amended Preliminary Plan review will focus on specific design details, such as architecture, landscaping, and streetscape, as well as individual stormwater designs and traffic impact.

STAFF & PLANNING COMMISSION REVIEW

As mentioned above, staff’s review comments were presented to the Planning Commission and are included in more detail in the attached memo and graphic. The comments were organized into three categories, and relate back to best practices in land use planning and the established goals and objectives of the City Avenue Zoning District:

- 1) **Public Realm:** Improvements that enhance the community environment and seek to elevate the visual character and identity within the district through design.
- 2) **Connectivity:** Improvements that minimize pedestrian and vehicular conflicts and create safe and inviting pedestrian accessways, thereby reducing traffic congestion.
- 3) **Greening:** Improvements that create landscaped open areas and enhance the character and quality of existing adjacent and proposed residential neighborhoods.



The review comments have been incorporated into the conditions of approval.

In addition to staff's recommendation the Planning Commission's comments included, but were not limited to:

- Appropriateness of a single-use residential building (R-1C) and the siting of this building at the primary site access.
 - A condition of approval has been included which requires the applicant to explore relocating the hotel to the west in the place of R1-C or to relocate Building R1-C to another location on the site. (COA 5)
- Location and need for structure parking garage (C-3).
 - A condition of approval has been included which requires the applicant to explore relocating/eliminating Building C-3 (Parking Garage). (COA 5)
- Impact to existing mature trees along Belmont Avenue.
 - A condition of approval has been included requiring the applicant to explore relocation of the underground stormwater improvements located within the woodland area along Belmont Avenue that impact the existing canopy trees. (COA 19)
- Inclusion of affordable or moderate housing
 - A condition of approval has been included requiring the applicant to work with the Township to explore a possible mutual agreement to add moderate rate-income housing in future phases of the master plan development (COA 4)
- Appropriateness of building materials
 - Conditions of approval have been included requiring:
 - Architectural compliance with the City Avenue District Zoning (155-217.F.5) shall be demonstrated with the Amended Preliminary Plan. The applicant shall submit a design manual demonstrating how the development will comply with the applicable standards and shall include building elevations and colored renderings. (COA 8)
 - The architecture of the Belmont Avenue-facing building façade should complement the adjacent residential neighborhood. (COA 10)

TOWNSHIP ENGINEER'S REVIEW

The Township Engineer's review is attached and ensures that the proposal can meet the standards in place while also providing a guide for the applicant when preparing the Amended Preliminary Plan for each project phase. Staff has included a condition of approval (COA 2) requiring:

2. *The Township Engineer's review letter dated January 6, 2022, shall be incorporated by reference into these conditions of approval to the extent the same is not inconsistent with these conditions of approval. Compliance shall be demonstrated prior to the recording of an Amended Preliminary/ Final LD Plan.*

231 & 251 St. Asaphs Road, One & Three Bala Plaza & 333 E. City Avenue, Bala Cynwyd, LD# 3819 & 3820, Ward 9.

Expiration Date – 2/28/2022.....Zoning District – CAD-RCA

Consider a Preliminary Land Development Plan. The Plan dated August 9, 2021, last revised October 15, 2021, prepared by Apex Design + Engineering Group, shows the phased redevelopment of the two sites. The plan includes the construction of thirteen new structures at 231 & 251 St. Asaphs Road which include: Five mixed-use buildings containing a total of 567 residential units above first floor retail uses and structured parking; Three office buildings above structured parking with first floor retail on the ground floor garage level; two commercial retail buildings; one single-use residential building containing a total of 70 units; one hotel building; and a structured parking deck. The plan also includes the construction of construction of two new, mixed-use buildings on and above the upper plaza level of the existing parking structure at 333 E. City Avenue. The following conditions shall be complied with on an Amended Preliminary/ Final Plan. The plan is referred to the Planning Commission with attention called to the following conditions:

AMENDED PRELIMINARY PLAN REVIEW:

1. Each Phase, as identified on the Phasing Plans, shall require an Amended Preliminary/Final Plan. An application for Amended Preliminary/ Final Plan approval shall be approved as follows (i) the application for Amended Preliminary/ Final Plan approval shall be reviewed by the Board of Commissioners at a public meeting and any approval thereof shall granted at a public meeting, and (ii) final approval by the Township of such Amended Preliminary/ Final Plan application approved by the Board of Commissioners shall be processed by the Lower Merion Township Building & Planning Department on an administrative basis.

TOWNSHIP ENGINEER’S REVIEW:

2. The Township Engineer’s review letter dated January 6, 2022 shall be incorporated by reference into these conditions of approval to the extent the same is not inconsistent with these conditions of approval. Compliance shall be demonstrated prior to the recording of an Amended Preliminary/ Final Plan.
3. The applicant shall meet with the Township Public Works Department following the submission of each application for Amended Preliminary/ Final Plan approval

MODERATE INCOME HOUSING:

4. The applicant shall work with the Township to explore a possible mutual agreement to add moderate rate-income housing in future phases of the master plan development.

SITING:

5. The Applicant shall explore revisions to the Plan which relocate the hotel to the west, relocate Building R1-C, relocate, or eliminate Building C-3 (Parking Garage), relocate the ring road and Office North Building driveway which bisect the Village Square amenity space, and modify the Office North Building such that its main entrance faces the entrance to the Office South Building. The decision to include any or all changes will not constitute a substantial change or modification to the plan.
6. Building height setbacks should be explored for R1-B & R1-C (to the extent that R1-C is located adjacent to the intersection of St. Asaphs Road and Kings Grant Boulevard) to allow for greater views into the site.
7. The applicant shall explore increasing the setbacks of buildings R1-A and C1 from the Llanberis Road extension.

ARCHITECTURE & ACTIVE STREETSCAPES:

8. Architectural compliance with the City Avenue District Zoning (155-217.F.5) shall be demonstrated as part of each Amended Preliminary/ Final LD Plan application. The applicant shall submit a design manual demonstrating how the development will comply the applicable standards and shall include, building elevations and colored renderings.
9. The applicant shall explore reductions of the amount of exposed or “unwrapped” upper story structured parking visible on the building exterior. If upper story structured parking is visible from a public way, the applicant shall explore architectural treatments, such as green walls, to reduce visibility.
10. The applicant shall explore design elements in the architecture of the Belmont Avenue-facing building façade that complement the adjacent residential neighborhood.
11. On-street parking should be provided along all new internal roadways, to create convenient and visible metered short-term parking to aid in the success of the commercial spaces, to the extent required by Zoning Code Section 155-217.D.5.b.
12. The applicant shall explore potentially providing additional streetscape space adjacent to commercial uses to accommodate streetscape amenities, such as planted areas and outdoor dining.
13. The proposed 12 and 8 story structures on the Two Bala site are shown to be constructed atop the existing two-story parking structure, which is legally non-conforming to zoning and setback requirements. If it is determined at the time of construction that additional foundation support would be required for the proposed buildings and the existing structured parking replaced, the applicant shall explore opportunities to further integrate the two structures and connect the public gathering space on the Two Bala site to the streetscape.

PUBLIC GATHERING SPACE:

14. The applicant shall explore relocating the public gathering space shown at the intersection of St. Asaphs & Belmont Avenue to a location adjacent to the site entrance at the intersection of St. Asaphs & Kings Grant Boulevard and building R1-B. The applicant shall explore the feasibility of redesigning the improvements shown at the intersection of St. Asaphs & Belmont Avenue to enhance the green spaces at this location.

15. The applicant shall explore incorporating a means of connecting the streetscape improvements along St. Asaphs to the upper-level space between R1-A and R1-B.
16. The applicant shall explore relocating the public gathering space shown at the intersection of Monument Avenue and St. Asaphs Road to a more central location to increase usability.

GREENING:

17. The applicant shall explore installing additional greening adjacent to the intersection of St. Asaphs Road and Belmont Avenue, extending the buffer and wrapping the corner to lessen the impact of the proposed intersection expansion.

STORMWATER MANAGEMENT:

18. A stormwater management plan complying with Stormwater Management & Erosion Control Code 121 and shall be prepared and sealed by a Registered Engineer and submitted with an application for Amended Preliminary/ Final LD Plan approval.
19. The applicant shall explore the relocation of all or a portion of the underground stormwater improvements located within the woodland area along Belmont Avenue that impact the existing canopy trees.
20. The applicant shall explore locating all or a portion of stormwater management facilities beneath the proposed paved/ hardscape areas internal to the site, including the new roadways and driveways.
21. The existing surface stormwater detention basin at the corner of Belmont Avenue and Righter's Ferry Road shown to remain shall be enhanced and naturalized.

TRAFFIC IMPACTS & CONNECTIVITY:

22. A transportation impact study shall be provided with each application for Amended Preliminary Land Development Plan approval. On site transportation improvements, as may be required by the Township and PennDOT, shall be implemented by the applicant to support and mitigate impacts associated with the full buildout of the site, commensurate with each phase of development.
23. The Two Bala site is not easily accessed from the improvements shown at the One and Three Bala sites or the adjacent sidewalk along St. Asaphs Road. Staff also encourages the applicant to explore ways to better connect the two sites.
24. A switchback pedestrian connection leading from the site to Righters Ferry Road shall be provided with Phase 1.
25. Trail access and directional signage access shall be included in each phase of the Project.
26. The applicant shall submit a plan identifying any changes in design, under construction, or required by PennDOT for the roadways immediately adjacent to the site with each Amended Preliminary Plan.

27. A traffic impact fee estimate based on the expected average weekday PM peak hour trip generation shall be submitted with each Amended Preliminary Plan in accordance with applicable Township ordinances. The fee shall be provided prior to the issuance of a building permit. Any discrepancy between the amount of the fee paid and the amount as required by the ordinance shall be reconciled between the Applicant and the Township after issuance of the building permit.

TRANSPORTATION DEMAND MANAGEMENT:

28. Enhanced bus access should be explored with SEPTA along East City Avenue.
29. With each application for Amended Preliminary/ Final LD Plan approval, the applicant shall meet with SEPTA, Township Staff and City Avenue Special Services District to assess service needs and evaluate opportunities to:
- a. Increase public transit usage.
 - b. Enhance pedestrian connectivity to public transit.
 - c. Reduce operational issues.
30. The applicant shall cooperate with adjacent property owners and other City Avenue Special Services District stakeholders to explore arranging a shuttle service to and from the Transit Centers such as a Bala Station.
31. The applicant shall explore implementation of one or more of the following actions to reduce vehicle trips:
- A. Join the Greater Valley Forge Transportation Management Association (GVFTMA) which advocates increased mass transit service in the area and helps organizations develop Travel Demand Management plans; and
 - B. Join the Delaware Valley Regional Planning Commission's (DVRPC) RideECO program, which can be offered as an employer-paid benefit, through a pre-tax payroll deduction, or with the employer paying a portion of RideECO.
 - C. Provide shuttle service to and from Cynwyd Line and Wissahickon Transfer Station;
 - D. Dedicate a bulletin board/kiosk at main entrances for mass transit/ride sharing information including the schedules for SEPTA Service;
 - E. Identify a Human Resources (HR) person as the trip reduction/ride sharing/mass transit contact person for employee questions and distribution of mass transit schedules, etc.; and
 - F. Once a year distribute updated mass transit schedules and ride sharing information to employees.

RECREATION FEE:

32. The applicant shall demonstrate compliance with Subdivision & Land Development Code Section 135-50.1 (Dedication of Land for Recreation; Fees In Lieu) with each Amended Preliminary Plan. Land area used for density increase may not count toward the recreation area requirement. Any discrepancy between the amount of the fee paid and the amount as required by the ordinance shall be reconciled between the Applicant and the Township after issuance of the building permit.

HISTORICAL:

33. The applicant shall explore, among other ideas, the potential use of historic names associated with Bala Cynwyd history for the naming of certain public gathering spaces, roadways, and buildings.

SUSTAINABILITY:

34. The applicant shall explore incorporating alternative energy approaches into the project design and construction including rooftop solar photovoltaic panels or solar canopies; geothermal, air-source or hybrid heat pump HVAC and water heating systems at all phases of development.
35. The applicant shall explore pursuing Green Building Certification including USGBC LEED (Leadership in Energy and Environmental Design), GBI Green Globes, ILFI Net Zero Energy, EnergyStar for Commercial Building or USGBC LEED-Zero certification at all phases of development.
36. With each Amended Preliminary Plan submission, the applicant shall submit the plan to the Township's Environmental Advisory Council (EAC) for the evaluation of the environmental impacts of the proposed building materials and sourcing, construction methods and building utilities, and projected energy usage.

STANDARD CONDITIONS OF APPROVAL:

37. A deed of consolidation shall be recorded subsequent to the recording of the Phase 1 Final Plan.
38. The error of closure shall be provided for the consolidated lot and shall not be greater than 1:5,000.
39. The Record Plan indicating the tract perimeter survey shall be sealed by the professional land surveyor.
40. Property line dimensions and bearings are required for the lot consolidation.
41. Concrete road control monuments shall be shown to be installed at the right-of-way at the intersection of each property line. Iron pins or other survey monumentation shall be permitted if concrete monuments cannot be installed. Approval from the Township Engineer is required for the substitution.
42. The existing structures and driveways on adjoining properties within two hundred (200') feet of the development shall be clearly provided.
43. The Final Plan for any approved Amended Preliminary/ Final LD Plan, complying with all applicable conditions of approval, shall be filed with the Department of Building and Planning within twelve (12) months from the date of the Preliminary Plan approval by the Board of Commissioners.
44. Subject to the provisions of the Pennsylvania Municipalities Planning Code, the owner shall make payment of fees and expenses of the Township's professional consultants who perform services on behalf of the Township with respect to these plans and the work contemplated thereunder and will establish and maintain with the Township those escrows for the payment of such fees required by Township Code. Owner agrees that any statement from the Township for such fees which remain unpaid for a period of 30 days may be recorded against the property as a municipal lien.
45. Subject to the provisions of the Pennsylvania Municipalities Planning Code, the owner shall make payment of the Township Engineer's inspection fees within 30 days of presentation of an invoice for such payment. A penalty of 1.5% per month will be due for late payments from the date of presentation. If any shares are not paid within 60 days of presentation, the Township may elect to suspend any outstanding permits until all pending charges are settled.

46. The property owner(s) shall comply with all applicable federal, state, county, local and Lower Merion Township ordinances and laws regardless of specific mention herein.

January 7, 2022

TO: Planning Commission Members

FROM: Jillian Dierks, Planner, Building and Planning Department

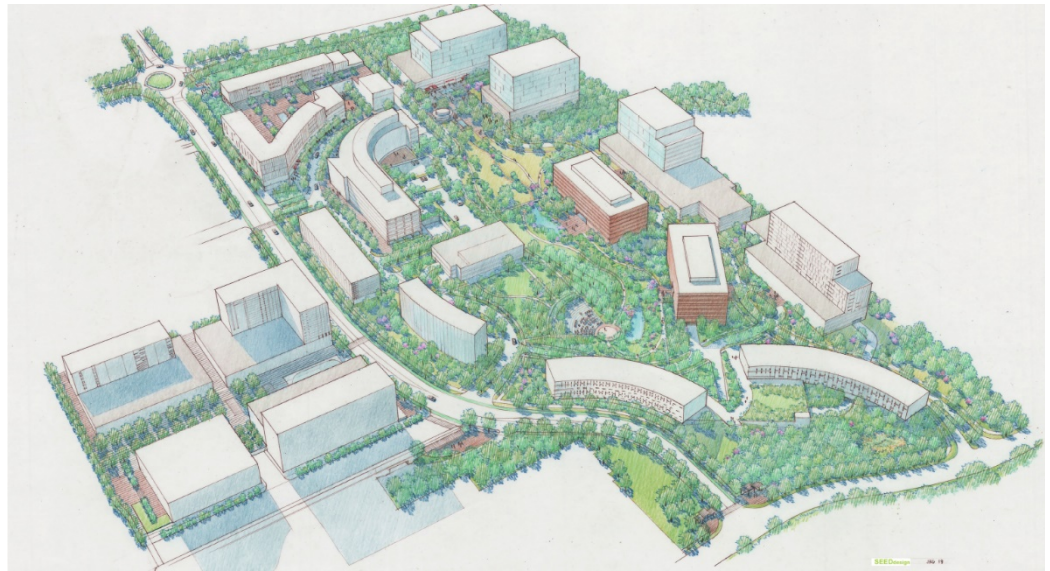
SUBJECT: PRELIMINARY PLAN – 231 & 251 St. Asaphs Road, One & Three Bala Plaza & 333 E. City Avenue, Two Bala Plaza, Bala Cynwyd. LD# 3819 & 3820. Ward. 9

PROPOSAL

The applicant, Alfred Fuscaldo, on behalf of Bala Plaza Property, Inc., is seeking Preliminary Land Development Plan approval for a phased master redevelopment/infill plan that includes the following:

One & Three Bala Plaza:

- Phased construction of thirteen new structures containing:
 - Five mixed-use buildings containing a total of 567 residential units above first floor retail uses and structured parking ranging in height from five to fifteen stories (including the parking structure):
 - Building R1-A, being 75' in height and consisting of 76 residential units above 5,790 sq. ft. of retail/restaurant space;
 - Building R1-B, being 75' in height and consisting of 98 residential units above 32,644 sq. ft. of retail/restaurant space;
 - Building R2-A, being 53' in height and consisting of 64 residential units above 23,883 sq. ft. of retail/restaurant space;
 - Building R2-B, being 63' in height and consisting of 95 residential units above 17,280 sq. ft. of retail/restaurant space;
 - Building R2-C, being 15 stories in height and consisting of 164 units above 9,717 sq. ft. of ground floor retail.
 - Three 13 to 14 story structures (including the parking structure) containing office above structured parking with first floor retail on the ground floor garage level (Office South, Office North and Office North Two).
 - Two commercial retail buildings (Building C1 & C2) ranging in height from one to two stories;
 - One single-use residential building (Building R1-C) containing a total of 70 units with a height of five stories;
 - One hotel building (Building H1) containing 168 rooms with a height of eight stories;
 - A four-story structured parking deck (Building C3) containing approximately 486 parking spaces to include 3,070 sq. ft. of retail/ restaurant space.
- Relocation of the existing access driveway along Belmont Avenue approximately 160 feet to the southeast from its current location;



- Reconfiguration of the existing surface parking areas with the net removal of 2,207 surface parking spaces and the addition of 4,690 structured parking spaces for a total of 4,874 parking spaces on the site.
- Construction of minor private streets and pedestrian pathways throughout the site.
- Creation of multiple public gathering spaces totaling 521,535 sq. ft. (12 acres).
- Construction of an outdoor amphitheater.
- Installation of multipurpose pathways along Monument Road, Belmont Avenue, and within the interior of the site.
- The installation of twenty subsurface stormwater management systems. One Bala, Three Bala West and Three Bala East are proposed to remain and with the exception of the vehicular access from Belmont Avenue (which is being relocated) the remaining access points along St. Asaphs Road and Monument Road are to remain.

Two Bala Plaza:

- Construction of two new, mixed-use buildings on and above the upper plaza level of the existing parking structure:
 - Building R3-A, being 123’ feet tall and containing 135 residential units and 21,228 sq. ft. of retail/restaurant space with structured parking.
 - Building R3-B, being 83’ feet tall and containing 55 residential units and 23,453 sq. ft. of retail/restaurant space with structured parking.
- Reconfiguration of the existing structured parking with the net removal of 405 parking spaces on the upper plaza level and the addition of 560 structured parking spaces for a total of 1,474 parking spaces on the site.
- The installation of one stormwater management system. The existing buildings and lower two parking decks on the site are proposed to remain and vehicular access into the site is not altered.
 - Creation of one public gathering space in accordance with the Official Map totaling 9,200 sq. ft. and the aggregation of public gathering space totaling 68,650 sq. ft. (1.6 acres).
 - Installation of multipurpose pathways along St. Asaphs Road and Monument Road.

The proposal is illustrated on the attached fifty-seven sheet plan set prepared by Apex Design + Engineering Group dated August 9, 2021, last revised October 15, 2021.

PLAN REVISIONS

Since the Planning Commission reviewed the proposal in December 2019, the plan has been revised in the following ways:

- The addition of a four-story structured parking deck (Building C3) containing approximately 486 parking spaces to include 3,070 sq. ft. of retail/ restaurant space adjacent to the amphitheater.
- Completed the connection of the interior loop road, at the direction of the Township Fire Marshal, in front of Buildings R2-A & R2-B.
- The removal of the surface parking area immediately adjacent to the amphitheater and on either side of Building R1-C.
- The elimination of several driveway connections to the interior loop road.
- The conversion of the top level of the parking structure between Buildings R2-A and R2-B to a green roof and patio areas.

PROPERTY DESCRIPTION

The entire site is comprised of three properties (231, 251 St. Asaphs Road & 333 E. City Avenue) measuring approximately 56 acres, with frontage on Belmont Avenue, Righters Ferry Road, Monument Avenue, St. Asaphs Road, Decker Boulevard and E. City Avenue.

231 & 251 St. Asaphs Road - One & Three Bala Plaza: The site is currently improved with three buildings, One Bala Plaza, a six-story office building, and Three Bala Plaza, which includes two, seven-story office buildings and 2,271 surface parking spaces. Signalized



231 & 251 St. Asaphs Road, One & Three Bala Plaza

access to the site is located at two locations on St. Asaphs Road with non-signalized access from Belmont Avenue and Monument Road.

333 E. City Avenue - Two Bala Plaza: The property is currently improved with two existing buildings including a ten-story office building containing 290,011 sq. ft. and a three-story retail building containing 100,788 sq. ft. Both buildings sit atop an underground parking garage that contains 872 spaces with an exposed upper level containing 421 parking spaces. The property is accessed by a driveway off Decker Boulevard and three driveways off St. Asaphs Road. The property is accessed by a sidewalk along East City Avenue, St. Asaphs Road and Decker Boulevard.



333 East City Avenue, Two Bala Plaza

REVIEW PROCESS:

The proposal received Tentative Sketch Plan approval on December 18, 2019 and the Preliminary Land Development Plan application was filed on August 12, 2021.

The *tentative* schedule for the Preliminary Land Development Plan review of the proposal is as follows:

Past	October 25, 2021	Community Meeting	Discussion of the Proposal with the applicant and community members
→	January 10, 2022	Planning Commission	Discussion of the Preliminary Land Development Plan
UPCOMING	January 31, 2022	Planning Commission	Review of the Preliminary Land Development Plan
	February 9, 2022	Building & Planning Committee	Review of the Preliminary Land Development Plan
	February 16, 2022	Board of Commissioners	Review of the Preliminary Land Development Plan

Additional information about the Township’s Land Development approval process is illustrated in the [Subdivision & Land Development Flowchart](#). This application is currently in the *Stage 4: Public Meetings* portion of the process.

Project Phasing: Given the scope of the proposed improvements the applicant has been working with the Township to create a developer’s agreement, which in part will allow the applicant to develop the project in phases over a thirty-year period but also requires a secondary review by the Planning Commission and approval by the Board of Commissioners for each phase or subphase of the proposal. It is at this time that the staff and the Planning Commission will be making detailed comments and recommendations on the details of plan aspects such as natural features compliance, stormwater design, and architecture. The five project phases are shown on sheets 18-29.

ZONING:

The City Avenue District (CAD) is an approximately four-square mile area anchored along the City Avenue corridor (Route 1). The district comprises roughly 50% of the Township’s commercial area and accounts for roughly 48% of the Township’s commercial tax revenue. Centrally located with convenient access to Center City and served by an existing public transportation network of seven bus lines and two regional rail lines, the district boasts many desirable land uses, including two universities and a variety of corporate headquarters. Located on the periphery of the Main Line, the area provides short commute distances to some of the region’s most historically affluent and desirable bedroom communities. The

district saw its beginnings in the auto-oriented 1950s and was known for its “Golden Mile” of luxury hotels, high rise condominiums, office buildings, and exclusive stores boasting cutting edge mid-century modern design.

The district had seen limited development and some decline when the City Avenue Special Services District, Lower Merion Township and Philadelphia partnered in 2007 to collectively work to rezone both sides of City Avenue. At the time no new office buildings of significance had been constructed since 401 City Avenue was built in 1988. The area was showing visual signs of decline evidenced by the aging stock of one-story retail structures. A lack of reinvestment in the built environment resulted in concerns that the declines would begin to negatively impact surrounding residential property values. The district was facing increased competition as attractive and updated centers were developed in the Navy Yard, King of Prussia, and Conshohocken.

Prior to the adoption of the City Avenue Zoning District, interest was expressed in transforming the district into a walkable work, live, play, shop and learn environment that:

- Maximizes development opportunities.
- Attracts high-quality regional tenants (including retail uses that are more consistent with the surrounding neighborhood demographics).
- Provides competitive amenities.
- Enhances the economic stability of the corridor.

In 2007 the Township was awarded a grant from the Delaware Valley Regional Planning Commission (DVRPC) to undertake a comprehensive analysis of the zoning districts on both the Lower Merion and Philadelphia sides of the corridor, resulting in zoning recommendations that were presented to the Board of Commissioners in 2008.

The intent of the proposed rezoning was to encourage higher density, multiple use, pedestrian-oriented development, and more economically productive use of land parcels in the vicinity of City Avenue. Philadelphia enacted the City Avenue Zoning District in 2009.

The CAD is made up of three distinct areas including: the Regional Center Area (RCA), the Bala Cynwyd Retail district (BCR) and the Bala Village district (BV). The RCA and the BCR districts were adopted in 2012. The BV district was adopted under a separate ordinance in 2014.

The application was submitted prior to the [December CAD 2018 amendments](#), which sought to equalize the intended land use mix by limiting the development potential for future multifamily projects while simultaneously providing additional design flexibility necessary to promote commercial development and addressing needed technical “clean ups.” The applicable zoning code will be provided to the Planning Commission and is available at the link below:

Pre-December 2018 City Avenue District Code: <https://app.sharebase.com/#/folder/2395/share/166-rQq7U4Cvd6QWXDRLD8T9uMk7ftc>

While standards were amended in the code, the goals and objectives remain unchanged and are provided below:

(1) General goals and objectives. The City Avenue District Regional Center Area (RCA) is intended to encourage higher-density, multiple-use, pedestrian-oriented development, and more economically productive use of land parcels in the vicinity of City Avenue (U.S. Route 1) (as shown on Map 1). It recognizes the importance of City Avenue as both a gateway and as an economic generator for Lower Merion Township by permitting higher densities with a mix of land uses while providing sufficient off-street parking.

(2) These general goals and objectives include the following specific purposes:

- a) Enable the development of a mix of commercial, institutional and residential uses.*
- b) Minimize pedestrian and vehicular conflicts and encourage the renovation and erection of buildings that provide direct connections from buildings to the street and sidewalk.*

- c) *Discourage the dependence on automobile use by promoting alternate modes of transportation, including buses and trains, improving connections and links to public transit and creating safe and inviting pedestrian accessways, thereby reducing traffic congestion.*
- d) *Create transition in bulk and scale between higher-density development and existing residential neighborhoods.*
- e) *Enhance the visual character and identity of the district through building mass, scale and design, landscaping and signage, all appropriate to the goals and objectives of the RCA zoning.*
- f) *Promote the smooth and safe flow of vehicular traffic through the corridor while reducing cut-through traffic in the neighboring residential districts by creating pedestrian-scaled blocks, separated by public access streets with sidewalks.*
- g) *Encourage the development of shared parking, wrapped structure parking, underground structure parking, and attractive and convenient off-street parking facilities to reduce on-street congestion and facilitate vehicular and pedestrian circulation.*
- h) *Promote the creation and maintenance of landscaped open areas among buildings for public gathering space.*
- i) *Protect the character and quality of existing residential neighborhoods proximate to the RCA.*

Official Map

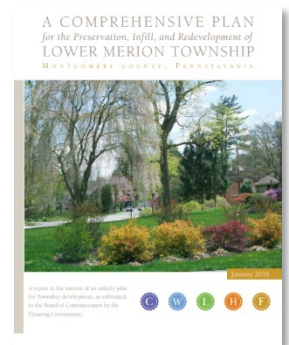
The [Official Map](#) is a planning tool granted to municipalities by the Pennsylvania Municipalities Planning Code (MPC) to allow for the designation of future public facilities on a map. The CAD ordinance includes incentives for providing public amenities such as public gathering spaces and multi-purpose pathways. It also requires the construction of new, pedestrian-scaled streets to make existing mega blocks more walkable. The Official Map supplements the City Avenue District by establishing the community’s desired locations for these future public amenities.

Transportation Service Area

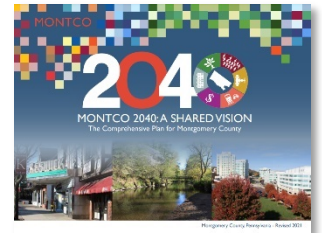
In anticipation of the additional development and vehicular traffic generated from new developments under the new zoning district, the City Avenue Transportation Service Area (TSA) was established in April 2010. The existence of a TSA enables the Township to implement an impact fee for projects within the TSA boundaries to pay for roadway improvements attributable to traffic generated from the new development. The impact fee is based on Act 209 TSA studies, including a [Land Use Assumptions Report](#), [Roadway Sufficiency Analysis](#), and [Transportation Capital Improvement Plan](#). An additional benefit of establishing a TSA is the ability to leverage outside funds, such as grants, as future transportation improvements are already planned and have some level of public support.

REGIONAL AND TOWNSHIP COMPREHENSIVE PLAN COMPLIANCE

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 is generally consistent with 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 the staff review comments are aimed at ensuring that the proposed configuration of new buildings, streets, and pathways helps to advance the goal to create “a pedestrian friendly district.”



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 is generally consistent with the goal to “encourage development and transformative investment where infrastructure already exists”.



APPLICABLE STUDIES AND REPORTS

The [Township website](#) includes a page focused on projects involving the City Avenue Corridor and serves as the clearing house for information related to the proposed City Avenue District rezoning, and proposed capital improvements.

- [Land Use Assumptions Report](#)
- [Roadway Sufficiency Analysis & Transportation Capital Improvements Plan](#)
- [City Avenue Official Map](#)
- [City Avenue Connectivity Plan 2014](#)



ADDITIONAL REVIEWS

- [Montgomery County Planning Commission Review](#) (*attached*) - The County review notes that the plan is consistent with the Comprehensive Plan and includes specific recommendations related to connections to other proposed development in the district, public transit connections, site layout, building design, pedestrian circulation, and tree removal. The County recommendations have been either addressed on the attached plan or have been incorporated into the staff review comments and/or will be included in future recommended conditions of approval.

STAFF REVIEW COMMENTS

Staff’s site recommendations have been organized into three categories, but all relate back to best practices in land use planning and the established goals and objectives of the City Avenue Zoning District:

- 1) **Public Realm:** Improvements that enhance the community environment and seek to elevate the visual character and identity within the district through design.
- 2) **Connectivity:** Improvements that minimize pedestrian and vehicular conflicts and create safe and inviting pedestrian accessways, thereby reducing traffic congestion.
- 3) **Greening:** Improvements that create landscaped open areas and enhance the character and quality of existing adjacent and proposed residential neighborhoods.

The below comments are repeated on the attached map for quick reference.

1. PUBLIC REALM

- A. Architecture: Architectural compliance with the City Avenue District Zoning will be demonstrated at later phases of the approval process, however there are aspects of the site layout that create design challenges.
1. Several buildings incorporate upper-level structured parking that is exposed or “unwrapped” with active uses or a building liner, and visible from the exterior. For example, Office North includes seven levels of structured parking.
 2. Staff recommends that the applicant investigate providing underground parking to reduce the visible above ground structure parking and that architectural treatments such as green walls be incorporated to reduce the view of the structured parking.
 3. The architecture of the Belmont Avenue-facing building façade should complement the adjacent residential neighborhood.
- B. Public Gathering Space: The applicant proposed multiple public gathering spaces (PGS) to increase the allowable FAR incentive within the site.
1. Given the proposed expansion of the intersection at St. Asaphs Road and Belmont Avenue, the speed and volume of vehicular traffic, it will be challenging to create a comfortable user experience in this location. If this space were to remain a connection a potential connection should be investigated to join the PGS to the upper-level space between R1-A and R1-B.
 2. Additional plaza space should be provided at the intersection of Kings Grant Boulevard and St. Asaphs Road to allow for greater views into the site. A building stepback should be considered in this location.
 3. The area referred to as Village Square includes a roadway and a driveway that bypasses the space, creating a segmented experience. Mixing pedestrians and vehicles in the amenity space is not desirable. It may be feasible to relocate the driveway and the roadway so that they do not bisect the public space.
 4. A four-story parking structure has been introduced to the space adjacent to the Bala Park amphitheater. This is an undesirable location as it would have a negative visual impact on the amenity space. Staff recommends that this parking be held in reserve, or the structure be relocated to the rear of the existing One Bala Building, where surface parking is currently shown.
 5. Given the sloping land and the auto-orientation, the PGS shown at the intersection of Monument Avenue and St. Asaphs Road, the applicant shall explore moving it to a more central location to increase usability.
- C. Active Streetscapes:
1. The R1-A and C1 building setbacks located along the Llanberis Road extension should be increased to mirror the setback being provided on the opposite side of the street and to provide additional space for streetscape amenities, such as planted areas and outdoor dining.
 2. The illustrative drawings and the plans do not seem to consistently show the streetscape space. The plan should include a minimum of 20’ to 25’ of streetscape space to accommodate necessary amenities.
 3. On-street parking should be provided along all new internal roadways, to create convenient and visible metered short-term parking which will aid in the success of the commercial spaces. On-street parking has the added benefit of traffic calming and increasing pedestrian along the adjacent sidewalks.
 4. A building height stepback should be explored for R1-B & R1-C to allow for greater views into the site.

2. GREENING

- A. The site maintains the green area located along Belmont Avenue, which provides a valuable woodland area and buffer for the development to the adjacent residential neighborhood. Underground stormwater improvements are located within the buffer area, which would negatively impact the existing vegetation and threaten the valuable tree canopy. Underground stormwater management should be located beneath the proposed paved areas internal to the site, including the new roadways and driveways.

- B. Additional greening should be provided adjacent to the intersection of St. Asaphs Road and Belmont Avenue, extending the buffer and wrapping the corner to lessen the impact of the proposed intersection expansion.
- C. The existing surface stormwater detention basin is shown to remain and should be enhanced and naturalized.

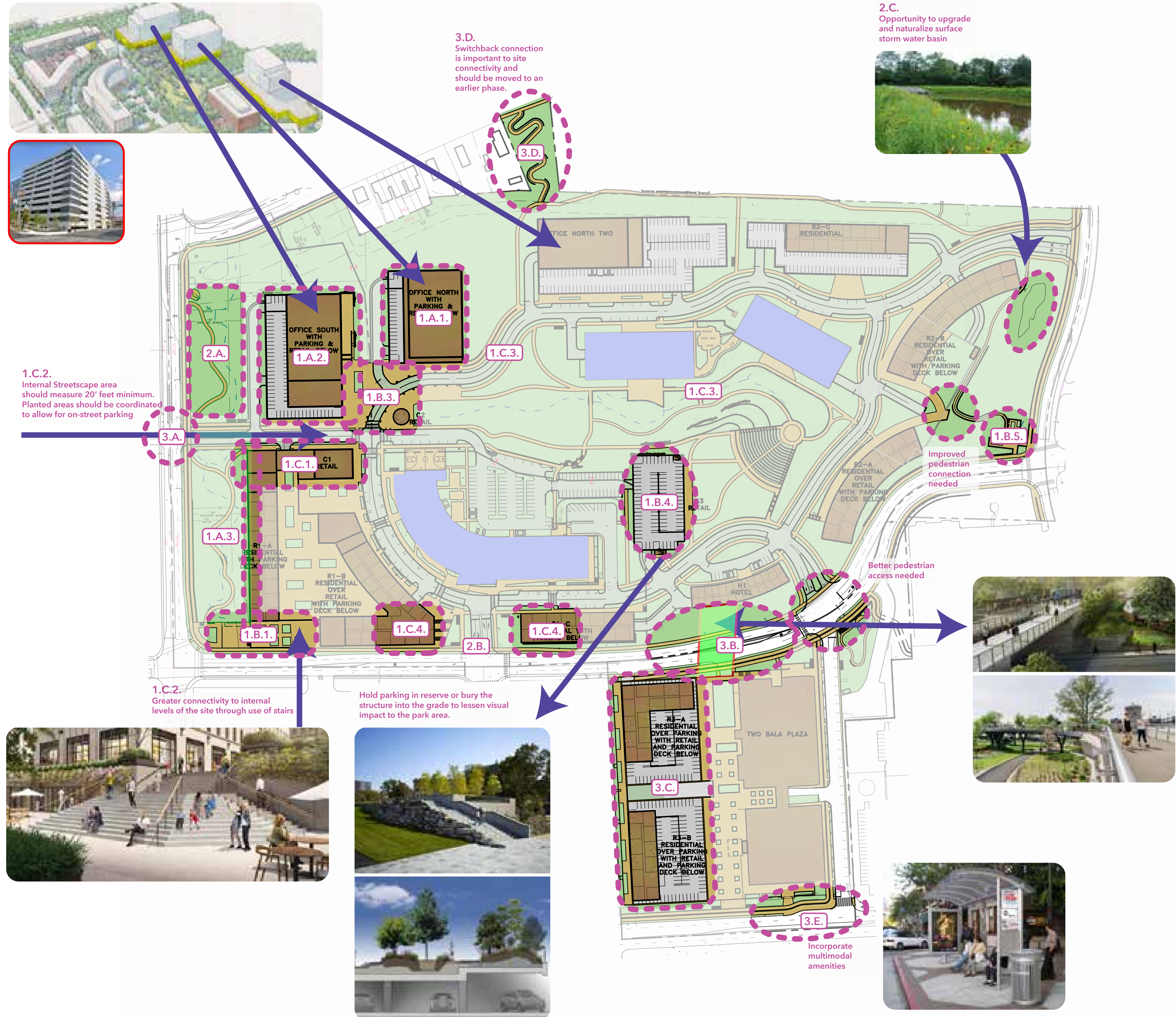
3. CONNECTIVITY

- A. Traffic impacts will be assessed with all future phases of the development, but staff recommends that the applicant explore means to control the intersection at Llanberris Road and Belmont Avenue to aid in pedestrian access to the site and flow of traffic.
- B. The Two Bala site is not easily accessed from the improvements shown at the One and Three Bala sites or the adjacent sidewalk along St. Asaphs Road. Staff also encourages the applicant to explore ways to better connect the two sites, including the use of a pedestrian bridge.
- C. The proposed 12 and eight story structures on the Two Bala site are shown to be constructed atop the existing two-story parking structure, which is non-conforming to zoning and setback requirements. If it is determined that additional foundation support would be needed for the proposed buildings and the existing structured parking replaced, it would create an opportunity to better integrate the two sites and connect the PGS on the Two Bala site to the streetscape.
- D. A switchback is shown leading from the site to Righters Ferry Road and staff encourages the applicant to consider installing that improvement in an earlier phase of the development.
- E. Enhanced bus access should be explored with SEPTA along East City Avenue. The applicant shall coordinate with adjacent property owners and other City Avenue Special Services District stakeholders to arrange a shuttle service to and from the Transit Centers such as a Bala Station.
- F. Given the number of pathways proposed, trail access signage should be included in each phase of the proposal.

One, Two, Three Bala Plaza

Staff Review Comments

January, 2022



1. PUBLIC REALM

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B. Additional greening should be provided adjacent to the intersection of St. Asaphs Road and Belmont Avenue, extending the buffer and wrapping the corner to lessen the impact of the proposed intersection expansion.

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**TOWNSHIP
OF
LOWER MERION**
MONTGOMERY COUNTY

TOWNSHIP ENGINEER

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LOWM 254.60

January 6, 2022

Christopher Leswing, Assistant Director of Building and Planning
Township of Lower Merion
75 East Lancaster Avenue
Ardmore, PA 19003

**Re: One, Two & Three Bala Plaza Development
Preliminary Plan Review**

Dear Mr. Leswing:

In accordance with your request for the above referenced submission, we have reviewed: a set of fifty-seven (57) plans dated 08-09-21, profiles, and associated stormwater management calculations dated 08-08-21, prepared by Apex Design and Engineering Group; a set of twenty-eight (28) landscaping plans dated 08-09-21 prepared by SEEDdesign, LLC; and a Traffic Impact Study (TIS) report dated 08-12-2021 prepared by F. Tavani and Associates, Inc. We offer the following comments for your consideration:

A. MAJOR ENGINEERING ISSUES

- ❖ **Stormwater**—The post-construction stormwater management design is incomplete for all phases of the project. Due to a history of severe stormwater issues north of the property, increased control of the volume and rate of runoff that will discharge from the development should be provided. The stormwater management analysis is to be updated for consistency and for compliance with the minimum ordinance requirements.
- ❖ **Subdivision Plan** —Insufficient information is provided for the consolidation of the two parcels. Property boundaries, existing/proposed rights-of-way, and easements are to be dimensioned by bearings and distances in accordance with the minimum plan requirements.
- ❖ **Traffic** – The proposed development is one of several pending major developments surrounding the intersection of Belmont Avenue and St. Asaph's Road which will collectively have a large impact on the existing roadway network. The traffic impact study (TIS) indicates that this development will generate approximately 1,000 new peak-hour vehicular trips, 200 new peak hour pedestrian/bicycle trips, and 150 new peak-hour mass transit trips. The TIS also indicates that the first phase of this particular development is not anticipated to be completed until 2034, with the full build-out proposed to be fully completed by the year 2051, which is an unusually long timeframe for the purposes of projecting traffic conditions. Additionally, PennDOT is currently studying the implementation of a multi-lane roundabout at this intersection. The applicant must continue to work with the Township, the City Avenue Special Services District, PennDOT, and the adjacent developers to formulate an overall mitigation plan for the roads and intersections impacted by the development(s)

With the resolution of the above major engineering issues and the remaining comments in this letter incorporated, we recommend that the Preliminary Plan be approved.

B. ORDINANCE REQUIREMENTS

1. Section 155-162.7(B)—The Conservation Inventory Plan shows more trees in excess of a 6-inch (6”) caliper on each of the lots than indicated by the Wooded Lot Calculation table on sheet LP-1. Also, there are existing shade trees that were not surveyed, but should be included in the overall count. The Wooded Lot Calculation table shall be updated with an accurate tree inventory.
2. Section 101-5C(2b)—The construction disturbs and is situated in slopes exceeding twenty-five (25%) percent. The proposed stormwater management basin, PCSM 1.2, shall be relocated to avoid construction on existing steep slopes.
3. Section 101-6A(1)—All woody vegetation to be retained within twenty-five (25’) feet of a building site or disturbed area shall be protected from equipment damage by fencing placed at the driplines. Accurate location of the driplines must be shown on the plan. No tree protection has been indicated on the plans.
4. Section 101-6A(5)—No impervious cover shall be permitted within the driplines of trees to remain without approval from the Township Arborist. Impacted trees on- and off-site shall be clearly identified on the plan.
5. Section 101-9 – Minimum planting standards are determined by the road frontage or property boundary length based on the “view” (hidden, filtered, or obstructed). The Landscape Plan shall show where the three types of views are located to correspond to the table on sheet LP-1, and update the table as necessary to specify the required number of trees and/or shrubs.
6. Section 101-9B(2)—For every twelve (12) parking spaces, there shall be one (1) planting area of at least 340 square feet. The planting area(s) shall be distributed throughout the parking area to maximize tree canopy coverage over the entire parking lot. This has not been clearly provided for the surface parking areas.
7. Section 121-4A(1b)1—As the property is located within the Lower Merion Act 167 Drainage Area Release Rate District, the two (2) year post development peak rate of runoff shall be controlled to the one (1) year pre-development peak rate of runoff. The five (5) year frequency storm must be controlled to the two (2) year pre-development rate. The ten (10), twenty-five (25), fifty (50) and one hundred (100) year storms shall be controlled to the peak discharges which occurred prior to development in the respective storm frequencies. The analysis does not consider the proposed development on Two Bala Plaza and improvements within the public rights-of-way.
8. Section 121-4B(2a)1, 121-15—At a minimum, the increased volume of stormwater generated by the proposed development for the twenty-five (25) year storm shall be recharged. Calculations documenting this shall be submitted. As there is a history of severe stormwater issues to the north of the development, we request additional runoff volume be recharged for runoff flowing to this direction. Storage volumes within the basins, utilized to achieve the recharge requirement may not be considered available for peak rate reduction calculations.

9. Section 121-4A, 121-15—Tailwater effects shall be evaluated for the proposed stormwater management facilities. The basin routings for interconnected PCSM facilities indicate a “free outfall” for the outlet structure; however, tailwater shall be set by the downstream facility. PCSM facilities discharging to existing storm sewers require a downstream capacity evaluation to set the tailwater elevation.
10. Section 121-4A(1b), 121-6D(6)—The during construction peak rate of runoff controls have not been documented. A waiver of this section is required to defer during construction design plans to the phased Preliminary Plans.
11. Section 121-4A(2)—The capacity of roof drains for the design storms must be documented.
12. Section 121-4A(4)—The responsibility for the continued maintenance and operation of the detention basin and other facilities shall be the obligation of the property owner. This note shall be clearly indicated on the plan.
13. Section 121-4B(2b), 121-4F(2b4)—Calculations shall be provided demonstrating that the capacity of the existing stormwater conveyance system is sufficient to convey the post construction flows with no back loading into the detention basins.
14. Section 121-4B(2d)5—The seepage bed must be demonstrated to empty the Rev, volume within four (4) days. If the minimum Rev volume cannot be recharged, a waiver to this code section must be obtained.
15. Section 121-4E(2d)— Specific details for all seepage beds shall be provided.
16. Section 121-4E(2d)—The distance from the stormwater facilities and the structure shall be dimensioned on the plan. Adequate separation between the system and footings shall be provided.
17. Section 121-4E(3)— An access and maintenance easement that is of sufficient width to provide access and egress from a public right-of-way shall be provided around all BMPs or stormwater management facilities. Alternatively, supporting documents for a blanket access and maintenance easement which will provide access and egress from a public right-of-way to the stormwater management facilities may be submitted. The Township Solicitor shall approve the easement documents.
18. Section 121-4F(3)—Profiles must be provided for all sections of pipe with diameters of fifteen (15”) inches or greater. Several pipe sections meeting this criterion have not been provided.
19. Section 121-4F(10)—Structures or clean-outs shall be used where abrupt changes are made in storm sewer alignment. These must be clearly noted on the plans.
20. Section 121-5A(1)—The maximum bare areas shall not exceed twenty-five (25%) percent of the total area at any one time. Phasing of the construction will be required. A plan with the required phasing shall be submitted and the sequence of construction adjusted as required in order to be consistent with the phasing plan. This shall be evaluated with the Preliminary Plan for each phase.
21. Section 121-6B—Certification attesting to the completeness of the design and compliance with Chapter 121 of the Lower Merion Code shall be included and signed on the plans.

22. Section 121-6C—The limits of disturbance shall be adjusted to include all disturbance. The total amount of square feet of earth disturbance shall be listed for the project.
23. Section 121-6D—Drainage area maps for the during construction stormwater management, control analysis calculations, and qualification of the existing storm sewer system connections shall be provided. The maps shall include all inlets, trench drains, and rainwater collection pipes. This shall be evaluated with the Preliminary Plan for each phase.
24. Section 121-6D—Time of concentration analysis worksheets analysis shall be provided for during construction drainage areas to ensure the proper development of each. The paths shall be shown on the drainage area maps. This shall be evaluated with the Preliminary Plan for each phase.
25. Section 121-6H—The size and species of trees on the property within twenty-five (25') feet of disturbance shall be included on the plan. Some of this information has been omitted.
26. Section 121-6J—A sequence of construction activities shall be added to the plan. Removal of trees in the construction areas and installation of tree protection fence, a temporary basin, seepage bed, conveyance piping and connection to the existing storm system shall be listed. Notification of the Township Engineer shall be listed in the sequence following installation of protective barriers and prior to earth disturbance. Notification of the Township Engineer for inspection shall be listed prior to installation of the PCSM facilities and required site improvements. Removal of sediment barriers shall be performed only after concurrence of the Township Engineer. This shall be evaluated with the Preliminary Plan for each phase.
27. Section 121-12—A NPDES Permit must be obtained from the Montgomery County Soil Conservation District prior to issuance of any permit.
28. Section 121-15— Pipe and inlet capacity calculations shall be provided for all proposed storm sewers. Inlet and pipe capacities shall be verified to collect and convey peak runoff flows for the 100-year design storm without bypass, where the storm sewer system is connected to proposed PCSM facilities. Channel design and stabilization calculations shall be provided for the centralized open drainage channel.
29. Section 121-15—Pond reports shall be provided for the during construction basins. The report shall indicate the stage-storage and outflow parameters used for the during construction basin routing analysis for each during construction system. This shall be evaluated with the Preliminary Plan for each phase.
30. Section 121-15—Access to the stormwater basins large diameter piping for maintenance shall be provided. Special considerations shall be included for PCSM facilities located beneath parking structures. The access shall be shown in the plan view detail. A detail shall be added to the plan of the access structure and steps.
31. Section 121-15—The runoff crossing to the adjacent properties during the construction phase of the project shall be managed so that the water quality/quantity impact is minimized to the adjacent properties. Diversion berms, stoned construction staging areas, and inlets/piping shall be noted to be provided as required or as directed by the township so as to ensure acceptable conditions during the construction phase. This shall be evaluated with the Preliminary Plan for each phase.

32. Section 121-15—It shall be clearly demonstrated that the information used in the calculations for the basin stage storage volume is equivalent to the volume provided in the system shown on the plans. The volumes referenced in the design report and on the plan are inconsistent with the calculations.
33. Section 135-17A(1)—The Record Plan indicating the tract perimeter survey shall be sealed by the professional land surveyor.
34. Section 135-17A(2) – Property line dimensions and bearings are required for the lot consolidation.
35. Section 135-32—Concrete road control monuments shall be shown to be installed at the right-of-way at the intersection of each property line. Iron pins or other survey monumentation shall be permitted if concrete monuments cannot be installed. Approval from the Township Engineer is required for the substitution.
36. Section 135-17B(1), 135-17B(13)—The existing structures and driveways on adjoining properties within two hundred (200') feet of the development shall be clearly provided.
37. Section 135-17B(1)—The existing sanitary sewers shall be shown to within two hundred (200') feet of the development.
38. Section 135-17B(1)—All existing utility service locations shall be shown from the mains to the building.
39. Section 135-17B(2)—The cartway width shall be provided for all roads. Existing rights-of-way shall be dimensioned and described by bearings and distances. The limits and type of existing curb shall be provided.
40. Section 135-17B(6)—The error of closure shall be provided for the consolidated lot and shall not be greater than 1:5,000.
41. Section 135-17B(13)—The existing storm sewers, inlets and any other manhole or other structure shall be shown within 200'. Invert, rim, and grate elevations shall be indicated. The size and material of all storm sewers shall be provided.
42. Section 135-17B(13)—Parking restriction and traffic control signs shall be shown within 200 feet.
43. Section 135-17C(13)—The location of existing storm sewers and culverts shall be fully shown within 200 feet. The size, material and termination of the sewers shall be clearly provided.
44. Section 135-17C(13)—Existing sanitary sewer mains shall be shown to within 200 feet of the property line. The rim and invert elevations shall be shown for all structures either on the property or upgrade/downgrade from any sewer connection.
45. Section 135-19B(8)—The Fire Marshal must approve the design for access and maneuverability. The maneuverability at the front and rear of the Hotel shall be documented.
46. Section 135-19B(8)—The actual sight distance triangles shall be shown for all driveways. Clarification shall be provided as to the values used to calculate the distances listed on the plan for the minimum safe stopping distance required by PennDOT Publication Title 67, Chapter 441. It shall be noted what

improvements if any are necessary to be performed to achieve minimum safe stopping distance. The Traffic Safety Unit of the Lower Merion Police Department must approve the final drive configuration.

47. Section 135-19B(8)—The Pavement and Marking Plan submitted shall show more detail. Centerline double-yellow pavement markings shall be shown at intersecting drives where stop signs are located and where directed to be placed in order to provide more orderly movement of traffic. “No Parking by Order of the Fire Marshal” signs shall be indicated where directed by the Township Fire Chief Fire Officer.
48. Section 135-19(B)(8) – The applicant has submitted a traffic impact study (TIS) for the proposed development. We offer the following comments on the TIS:
 - a. The applicant must clarify that all existing buildings to remain were included in the anticipated trip generation of the development.
 - b. The TIS must include background traffic associated with both the 121 City Avenue development and the 1 Belmont Avenue development.
 - c. Due to the mixed-use nature of the proposed development, the anticipated off-peak and weekend trip generation of the site shall be evaluated to determine if the proposed use of the amphitheater will exceed the peaks considered.
 - d. The average rate method for the retail use (LUC 820, Shopping Center) was applied, which produces a significantly lower trip generation estimate when compared with the fitted curve method. Based on the Institute of Transportation Engineers (ITE) Trip Generation Handbook (TGH) process for selecting the trip generation method, the fitted curve method is to be used if the size of development is within the data range, the number of data points is greater than 20, and the fitted curve falls within the data points cluster near the development size.
 - e. The TIS followed the recommended process in the ITE TGH for multi-modal trip reductions and used the data provided in Appendix D to develop transit / walk / bike percentages for reducing the number of estimated trips. However, the TIS does not include justification for why the specific Appendix D data was used or how the final percentages were developed.
 - f. The Highway Capacity Manual (HCM) 2010 Results were reported; however, HCM 6th Edition results are to be reported.
 - g. The 95th Percentile Queue results shall be summarized in a table.
 - h. HCM 2010 Results are not available for the following intersections based on the included Synchro reports. This shall be noted on the results table and in the TIS.
 - i. St. Asaph’s Road & Conshohocken Road
 - ii. St. Asaph’s Road & Belmont Avenue
 - iii. St. Asaph’s Road / Presidential Boulevard & Monument Road
 - i. The TIS suggests converting signalized right turn lanes at three intersections to channelized right turn lanes with yield control. Lower Merion Township is currently removing channelized right turn lanes in the township due to concerns about pedestrian safety. The channelized right turn lane recommendation shall be removed and other mitigation methods considered.

- j. The westbound Shopping Center Driveway at St. Asaph's Road & Clwyd Avenue / Shopping Center Driveway intersection is expected to be LOS F in the 2051 PM No Build Peak Hour with significant increase in delay in 2051 PM Build Peak Hour. The TIS shall investigate mitigation for this driveway.
 - k. The applicant must work with the Township to implement the recommended mitigation plan at the following intersections:
 - i. Conshohocken State Road & St. Asaph's Road
 - ii. St. Asaph's Road & Clwyd Road
 - iii. Belmont Avenue & St. Asaph's Road
 - iv. Monument Road & St. Asaph's Road
 - v. Righters Ferry Road & Monument Road
49. Section 135-40—A Planning Module or Exemption must be approved by the Philadelphia Water Department (PWD) and DEP prior to recording the Final Plan. A tabulation of sanitary sewer flows and EDUs required for the development is to be provided.
50. Section 135-41.1(A)—Adequate water supply must be documented for the subdivision. A letter from Aqua Pennsylvania must be submitted certifying adequate supply.
51. Section 135-41.4— Greening standards shall be incorporated into the plan. Note on the Landscape Plan where the additional planting area is provided to meet the requirements.
52. Section 135-64A(A)(2)—A transportation impact fee is applicable to this development. Due to the unusually long timeline anticipated to complete the proposed development, the Township may wish to defer the assessment of the impact fee, which may be further updated in the future.

C. ENGINEERING COMMENTS

- 1. The architectural plans for the integrated construction of the proposed mixed-use buildings above existing structured parking are to be provided to verify parking capacities and confirm adequate vehicular circulation patterns.
- 2. Dedication of additional rights-of-way and/or easements are required for the proposed pedestrian improvements along the perimeter streets. Proposed rights-of-way and easements shall be dimensioned and described by bearings and distances and offered for dedication.
- 3. The Planting Schedule provided on sheet LP-24 and LP-25 is a comprehensive list of all plants that could possibly be used. Provide an edited plant schedule showing only plants to be used on this project. Cross reference the Township's table (Chapter A1777) regarding Planting Materials and Specifications. Invasive and/or exotic plant species shall be avoided. The landscape plan will be reviewed after a detailed planting plan is completed.
- 4. Detail sheet LP-14 includes a detail for Underground Bioretention Cell at Sidewalks and Plazas, but it is not clear on the plan where these are located. If underground bioretention cells are proposed, the landscape plans should indicate the limits of the cells under the paving.

5. The Fire Marshal must approve the location of the fire hydrants shown on the Final Plan. For example, the applicant shall consult with the Fire Department regarding whether the existing fire hydrants along City Avenue and St. Asaphs Road must be relocated due to the installation of the multi-purpose path.
6. The applicant shall contact the Fire Marshall's office regarding access to the rear area of the buildings, the roadway access to enter all properties and the overall site circulation.
7. The applicant shall meet with and address comments from the Township Public Works Department.
8. Adequate emergency spillways are required for all surface stormwater management basins. Emergency spillways shall not discharge into the right-of-way without sufficient downstream conveyance capacity.
9. The PCSM plan details shall be comprehensive, complete and consistent with the design calculations.
10. The township inlets receiving the connection shall be noted to be repaired/ replaced as required or as directed by the Township Engineer.
11. All inlets in non-paved areas shall be shown to be graded in a twelve (12") inch sump condition in order to increase the efficiency of runoff collection. This shall include the temporary grading condition. Spot elevations shall be added to the plan to clarify grading.
12. All HDPE pipe shall be further specified as smooth interior.
13. Discrepancies in the PCSM inverts in the plan set and stormwater management report shall be corrected.
14. Discrepancies in pipe details between the profile sections and plan sets shall be corrected.
15. Driveway profiles shall be provided and clearly labeled to correspond to the plan.
16. No proposed roadways will be accepted for dedication by the Township; however, the dimensions for interior roads shall be designed in accordance with Township standards.
17. All proposed sanitary sewers intended to support the proposed development will not be accepted for dedication by the Township. Ownership and maintenance responsibilities shall be provided on the plan.
18. Concrete sidewalk shall be shown and noted to clearly cross all drives at grade. The width shall be dimensioned on the plan and meet the minimum township standard of four (4') feet.
19. Utility easements shall be provided for the water, gas, sanitary and electric service lines if/as applicable. Metes and bounds shall be added and the width dimensioned on the plan. The language of the easement documents must be approved by the Township Solicitor.
20. Top and bottom of wall elevations and details are to be provided for proposed retaining walls. Calculations shall be provided for wall clear heights exceeding four (4') feet or for walls with equivalent surcharge loading if/as applicable.
21. A PennDOT Highway Occupancy Permit will be required to be obtained for the driveway improvements. The township shall be copied on all correspondence with PennDOT.

22. Overlapping and occluded text shall be revised. A complete legend shall be provided on the plans.

23. A copy of the revised plan shall be submitted with any changes highlighted. A letter shall also be provided with the revised plan indicating how each requested revision has been addressed in the re-submission.

Please advise if we may be of further assistance in this matter.

Sincerely,



Joseph A. Mastronardo, P.E.

PENNONI ASSOCIATES

Township Engineer

cc: Jeffrey Smith, Assistant Township Manager
Charles Doyle, AICP, Assistant Director of Planning
Apex Design and Engineering Group
F. Tavani and Associates, Inc.

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SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

December 15, 2021

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

Re: MCPC #19-0096-002

Plan Name: One & Three Bala Plaza and Two Bala Plaza

One & Three Bala Plaza:

(1 lot/567 du and 944,648 sq. ft. commercial on approximately 50.2 acres)
Situat (One & Three Bala Plaza): St. Asaphs Road (N); Belmont Avenue (E)

Two Bala Plaza:

(1 lot/190 du and 44,681 sq. ft. commercial on approximately 11.3 acres)
Situat (Two Bala Plaza): City Avenue (N); Decker Boulevard (W)
Township of Lower Merion

Dear Mr. Leswing:

We have reviewed the above-referenced subdivision and land development plans in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on August 24, 2021. We forward this letter as a report of our review.

BACKGROUND

The phased redevelopment of two, adjacent properties owned by a single property owner is proposed in the CAD-RCA City Avenue District – Regional Center Area zoning district. Previously, these proposals were reviewed under two separate MCPC review numbers. The proposal for One & Three Bala Plaza was previously reviewed under MCPC #19-0096-001 in a review letter dated July 24, 2019. The proposal for Two Bala Plaza was previously reviewed under MCPC #19-0097-001 in a review letter dated July 24, 2019.

One & Three Bala Plaza Background:

The applicant, Bala Plaza Property, Inc., proposes to consolidate two lots known as One & Three Bala Plaza to create an approximately 50.2-acre lot and construct thirteen new buildings. Three existing office buildings totaling 742,413 square feet are proposed to remain.



The new buildings and other improvements are proposed to be constructed in four phases:

Phase 1

- Building "R1-A" located near the intersection of St. Asaphs Road and Belmont Avenue contains 3,428 sq. ft. of retail, 2,362 sq. ft. restaurant, and 76 residential units with a parking deck below
- Building "R1-B" located along St. Asaph's Road adjacent to the existing One Bala Plaza building contains 22,644 sq. ft. of retail, 10,000 sq. ft. of restaurant, and 98 residential units with a parking deck below
- Building "C1" located adjacent to Building "R1-B" contains 14,440 sq. ft. retail and 2,000 sq. ft. restaurant
- Public gathering space at the corner of St. Asaphs Road and Belmont Avenue

Phase 2

- Building "Office South" located near the intersection of Belmont Avenue and Righters Ferry Road contains 246,718 sq. ft. of office, 11,646 sq. ft. of retail, and 8,000 sq. ft. of restaurant with a parking garage
- Building "Office North" located to the north of the existing One Bala Plaza building contains 215,258 sq. ft. of office, 6,756 sq. ft. of retail, and 2,000 sq. ft. of restaurant with a parking garage
- Building "C2" located between Building "Office North" and the existing One Bala Plaza building contains 1,190 sq. ft. restaurant

Phase 3

- Building "Office North 2" located between the existing Three Bala Plaza West and the rear property line contains 232,316 sq. ft. of office, 16,300 sq. ft. retail, and 2,000 sq. ft. restaurant with a parking garage
- Building "R2-C" located between the existing Three Bala Plaza East building and the rear property line contains 9,717 sq. ft. retail and 164 residential units with a parking garage
- Public gathering space at the corner of St. Asaphs Road and Monument Road
- Public multipurpose pathway along rear property line with an additional pathway down to Righters Ferry Road

Phase 4

- Building "R1-C" located between the existing One Bala Plaza building and St. Asaphs Road contains 70 residential units with parking below
- Building "R2-A" located near the intersection of St. Asaphs Road and Monument Road contains 19,883 sq. ft. retail, 4,000 sq. ft. restaurant, and 64 residential units with a parking deck below
- Building "R2-B" located to the east of the existing Three Bala Plaza East building contains 13,280 sq. ft. of retail, 4,000 sq. ft. restaurant, and 95 residential units with a parking deck below
- Building "H1" located near the intersection of St. Asaph's Road and Decker Boulevard contains 168 hotel rooms
- Building "C3" located to the east of the existing One Bala Plaza building contains 1,870 sq. ft. retail and 1,200 sq. ft. restaurant lining one side of a parking garage

A new system of internal roads and driveways is shown connecting to two existing traffic signals along St. Asaphs Road at Decker Boulevard and at Kings Grant Drive. The access driveways to the site from Belmont Avenue and Monument Road are shown to be relocated. A total of 189 surface parking spaces and 4,690 structured and below-grade parking spaces are proposed. A central gathering space is shown containing several walking paths and an amphitheater. Two smaller public gathering spaces with rain gardens and bike parking are shown along St. Asaphs Road at Monument Road and at Belmont Avenue.

Additional improvements shown at this time include widened sidewalks along the St. Asaphs Road, Monument Road, Belmont Avenue, and Righters Ferry Road frontages of the site; stormwater management facilities; and new internal pedestrian pathways.

Two Bala Plaza Background:

The applicant, Bala Plaza Property, Inc., proposes to construct two new buildings on the approximately 11.3-acre property known as Two Bala Plaza. One existing office building with 262,072 square feet and one existing retail building with 101,475 sq. ft. are proposed to remain.

The new buildings are proposed to be constructed as part of phase 4 of the overall redevelopment. Building "R3-A" located to the west of the existing Two Bala Plaza building and fronting on St. Asaphs Road contains 11,228 sq. ft. of retail, 10,000 sq. ft. of restaurant, and 135 residential units over a parking deck. Building "R3-B" located to the west of the existing Two Bala Plaza building with some frontage on City Avenue contains 13,453 sq. ft. of retail, 10,000 sq. ft. of restaurant, and 55 residential units over a parking deck.

Multiple access driveways to the parking garage are shown: two off of St. Asaphs Road and one off of Decker Boulevard. A total of 26 surface parking spaces along Decker Boulevard and 1,448 structured and below-grade parking spaces are proposed. A public gathering space is shown in the center of the site connecting the four buildings. An additional public gathering space is shown on the corner of St. Asaphs Road and Decker Boulevard across Decker Boulevard from the proposed buildings.

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

COMPREHENSIVE PLAN COMPLIANCE

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 is generally consistent with the goal of the Regional Center "to transform the predominant auto-oriented, office based environment into a more functionally diverse live/work/shop environment," however we encourage the applicant to coordinate with the township to ensure the proposed configuration of new buildings, streets, and pathways helps to advance the goal to create "a pedestrian-friendly district."

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 is generally consistent with the goal to "encourage development and transformative investment where infrastructure already exists".

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) generally supports the applicant's proposal. However, in the course of our review we identified the following issues that we feel should be addressed prior to moving forward with the land development. Our review comments are as follows:

GENERAL REVIEW COMMENTS

CONNECTION TO OTHER PROPOSED DEVELOPMENT

We wish to reiterate that we feel that the further development of both the One & Three Bala Plaza and Two Bala Plaza properties with additional residential, retail, office, and public gathering spaces creates an important opportunity to ensure that these two large sites are well-connected so that future workers and residents on both sites can access and utilize the amenities on either site.

We recognize that it is challenging to activate all frontages of the proposed buildings given the size of the development tract; however, ensuring the site is not only internally-focused, but also activates and connects to external street frontages, especially St. Asaph's Road is important to ensure that the interconnections within the district as-a-whole can be enhanced through the development.

For example, we feel that it is important to improve all of the signalized intersections along St. Asaph's Road with high-visibility continental-style crosswalks and pedestrian push-button signals at all corners to improve pedestrian connections between the two sites. Improved pedestrian crossings at all intersections, as well as wayfinding signage, would also help to improve pedestrian access to and from the existing SEPTA bus stops located along City Avenue.

PUBLIC TRANSIT CONNECTIONS

Due to the amount of new residential and non-residential development proposed on the sites, we strongly encourage the applicant to consider ways to improve connections between the proposed new buildings and existing transit networks and stops to encourage utilization of these resources. For example, there is an existing SEPTA bus stop served by three bus routes located on the City Avenue frontage of Two Bala Plaza. In addition, the Bala SEPTA Regional Rail station is located less than one mile away.

Overall, the applicant may wish to explore the possibility of extending or re-routing SEPTA bus service to the One & Three Bala Plaza property, if and when the amount of new development warrants additional transit service integrated into the redeveloped site. In the meantime, we feel that with the amount of development proposed, it is important to design the internal road network and/or external road frontages to accommodate potential bus transit service.

RELATIONSHIP TO CITY AVENUE DISTRICT OFFICIAL MAP

We commend the applicant for making efforts to incorporate many of the public improvements shown on the City Avenue District Official Map related to the subject properties, including several public gathering spaces, new minor roads, and multi-user pathways. However, we noted that the City Avenue District Official Map indicates the location of several public improvements on the Two Bala Plaza property, including a new minor road with a linear public gathering space, that do not appear to be proposed to be provided on the site.

ONE & THREE BALA PLAZA REVIEW COMMENTS

ZONING ORDINANCE COMMENTS

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

- A. Maximum Driveway Width. Section 155-217.D.(1)(e) of the township's former 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." It appears that all of the driveways into the site are greater than 22 feet in width, including the new, relocated driveways from Monument Road and Belmont Avenue.
- B. Greening Standards. It is our understanding that the applicant will demonstrate compliance with the greening standards, as required by §155-217.C.(7) of the township's former zoning ordinance, at the time of amended plan submission for each phase of development.

SITE LAYOUT

The applicant proposes to redevelop the site by adding thirteen new buildings with a mix of office, retail, restaurant, residential, and hotel uses; in addition to the three existing office buildings on the combined 50-acre site. This level of proposed development has the potential to significantly transform the St. Asaph's Road corridor and the City Avenue District as-a-whole.

- A. Proposed Roundabout. It is our understanding that PennDOT is proposing the construction of a roundabout at the intersection of St. Asaph's Road and Belmont Avenue (which is a State Road). We encourage the applicant to coordinate with PennDOT and the township to ensure that the proposed location and design of the roundabout is being considered in the layout of the proposed development. In particular, any impacts to the design of the public gathering space near the corner of St. Asaph's Road and Belmont Avenue and the multi-purpose path extending from this corner north along Belmont Avenue, should be taken into consideration at this time.
- B. Distribution of Uses. Currently, several mixed-use buildings (R2-A, R2-B, and R2-C) located along the rear property line and along the Monument Road side of the property are shown to include retail space on the ground floor. We feel that concentrating retail frontages in the southwestern portion of the property, such as adding retail to Building R1-C, may provide a better distribution of land uses.
- C. Stand-Alone Parking Structure. A stand-alone parking structure is shown to be located in the center of the site between the amphitheater and the existing One Bala Plaza building. We feel that the location of this structure has the potential to create both a visual and physical barrier within the site due to its placement and encourage the applicant to consider whether the parking in this parking structure could be relocated to other parts of the site. Alternatively, we encourage the applicant to incorporate additional design features into the façade design of the stand-alone parking structure to ensure it is an attractive part of the site, especially since it will serve as a backdrop to the amphitheater due to its location.

BUILDING DESIGN

- A. Retail Frontages. Several buildings are proposed to include retail frontages. Future versions of the plans should include additional information indicating the location of the retail space within the building and proposed pedestrian entrances in order to better evaluate the internal circulation within the site.
- B. Parking Structure Façade Design. Several buildings are proposed to include several building levels consisting entirely of structured parking. Additional information regarding the proposed façade treatment of that portion of buildings where the parking garage levels will be visible from the pedestrian's point of view would be beneficial in order to understand the visual impact of these structures on adjacent gathering spaces and pedestrian pathways and plazas.

PEDESTRIAN CIRCULATION

We commend the applicant for proposing a series of internal sidewalks and pedestrian pathways; however, we identified several locations where we feel additional marked pedestrian crosswalks would allow for improved connections between the site amenities. These locations are shown in Attachment B. In addition, we feel that clearly marked crosswalks should be provided on all sides of the intersections at St. Asaphs Road and Kings Grant Drive and St. Asaphs Road and Decker Boulevard to ensure convenient pedestrian paths connecting the One & Three Bala Plaza property to additional amenities and destinations along City Avenue, including several SEPTA bus routes.

TREE REMOVAL

From the information provided, it appears that dozens of mature trees are proposed to be removed in order to accommodate a reconfigured winding path through a wooded buffer area along the Belmont Avenue frontage of the site. We feel that the concentration of existing mature trees in this area of the site is an aesthetically and environmentally valuable component of the site that should be maintained to the greatest extent possible.

TWO BALA PLAZA REVIEW COMMENTS

ZONING ORDINANCE COMMENTS

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

- A. Maximum Lot Width. Section 155-217.C.(5)(c) of the township's former zoning ordinance states that "where additional development is proposed on an existing lot wider than 600 feet, new minor streets shall be constructed to conform to the requirements for a maximum frontage of 600 feet between intersections with public or private access streets." The Decker Boulevard frontage of the site currently exceeds the maximum lot width dimension of 600 feet.
- B. Maximum Driveway Width. Section 155-217.D.(1)(e) of the township's former 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 two proposed driveways on to St. Asaph’s Road, as well as the driveway on to Decker Boulevard, appear to be greater than 22 feet in width.

- C. Number of Driveways. Two access driveways are shown along the St. Asaph’s Road frontage of the site. Section 155-217.D.(1)(d) of the township’s former zoning code states that “only one curb cut/driveway is permitted on each street frontage of each lot.”
- D. Greening Standards. It is our understanding that the applicant will demonstrate compliance with the greening standards, as required by §155-217.C.(7) of the township’s former zoning ordinance, at the time of amended plan submission for each phase of development.

BUILDING & PUBLIC GATHERING SPACE DESIGN

Building R3-A is shown as an L-shaped building with frontage on St. Asaph’s Road and facing inwards towards the existing Two Bala Plaza building. Building R3-B is shown as a linear building extending perpendicular to City Avenue. We feel that this building configuration would make the multiple levels of structured parking in Building R3-B a more prominent feature visually along City Avenue, which could detract from the viewsheds into the site and the pedestrian activation of the City Avenue frontage of the site.

Overall, we recommend that special attention be given to the design of the City Avenue building frontages and the pedestrian entrance to the public gathering space from City Avenue. Additional design treatments such as distinctive pavement materials, pedestrian-scaled lighting, and wayfinding signage may help to make this important entrance into the site a more attractive and welcoming gateway into the development as-a-whole.

PEDESTRIAN CIRCULATION

A system of internal pedestrian walkways is shown; however future versions of the plans should include marked crosswalks where the pedestrian walkways cross driveways or streets. In addition, the applicant may wish to work with adjacent property owners to explore whether additional internal pedestrian connections between their site and adjacent office properties may be beneficial. For example, improving pedestrian accessibility between the sites could make it easier for workers from adjacent sites to walk to and patronize the proposed retail spaces.

CONCLUSION

We wish to reiterate that MCPC generally supports the applicant’s proposal to construct several new residential, office, and mixed use buildings; however we believe that our suggested revisions will help the development better achieve the township’s planning objectives for the City Avenue District – Regional Center Area.

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 (#19-0096-002) on any plans submitted for final recording.

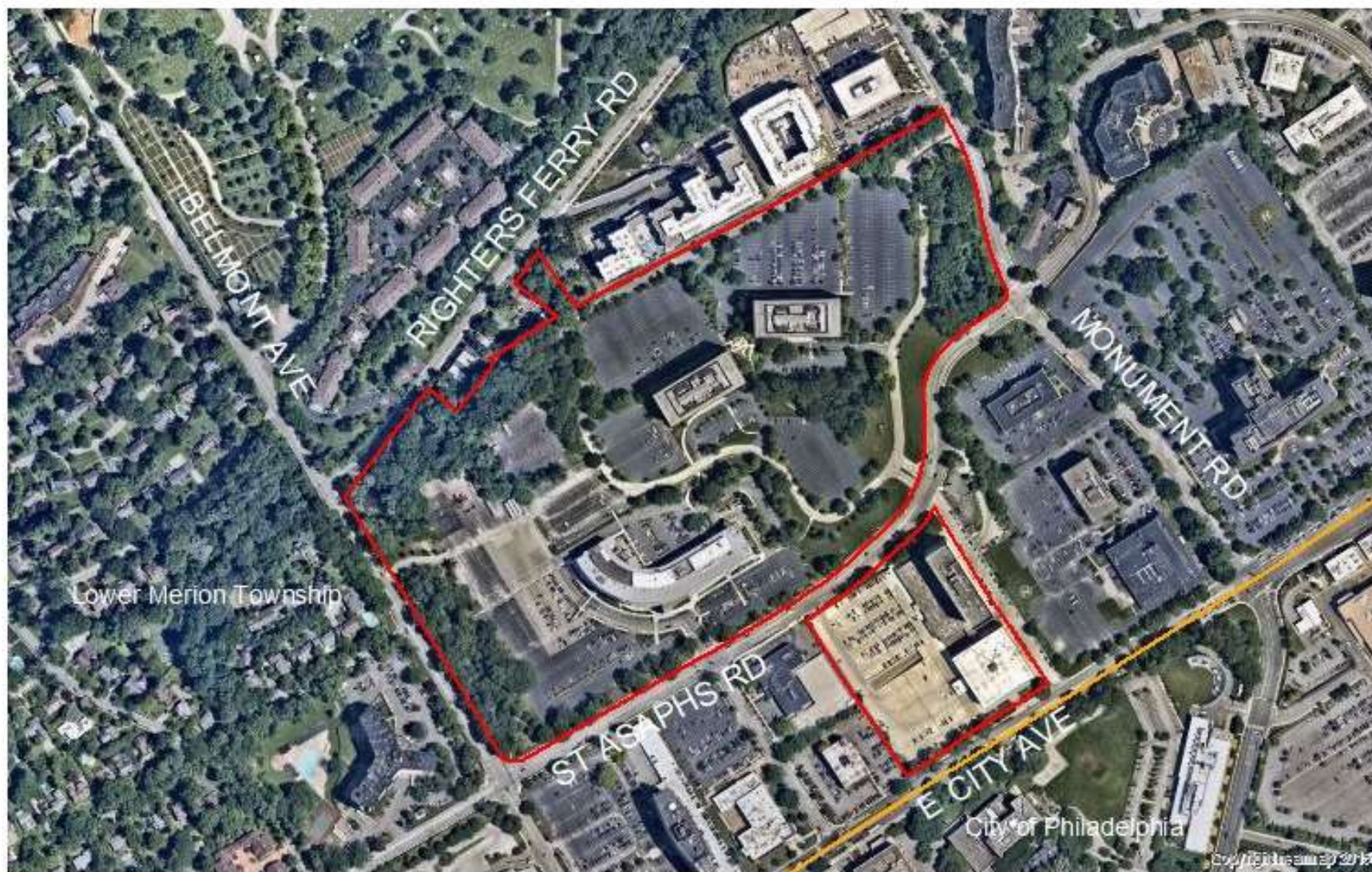
Sincerely,



Marley Bice, AICP, Principal Community Planner II
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c: Bala Plaza Property, Inc., Applicant
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Adam Thomas, Twp. Planner
Greg Prichard, Twp. Historic Preservation Planner
Holly Colello, Twp. Planning Technician
Fran Hanney, PennDOT
Mark Cassel, SEPTA

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



231 & 251 St Asaphs Road &
333 East City Avenue
MCPC #190096002

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