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JODY L. HOLTON, AICP
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June 1, 2018

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

Re: MCPC #18-0087-001
Plan Review: Comprehensive Plan Update, DRAFT, March 2018
Borough of Conshohocken

Dear Ms. Cecco:

We have reviewed the above-referenced update to the Borough's Comprehensive Plan Update as required by Sections 301 and 304 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on April 12, 2018. We forward this letter as a report of our review.

BACKGROUND

Conshohocken Borough has recently completed a comprehensive planning process and has submitted a new plan—*Comprehensive Plan Update, DRAFT, March 2018*—for review in accordance with Section 302.A of the Pennsylvania Municipalities Planning Code. In addition to the required submission to the county planning commission, the Borough is required to submit its plan or amendments to all contiguous municipalities, and the school district for comments and shall consider these comments in its prior to adoption. The Borough's previous Comprehensive Plan (completed in 2007) served as the planning vision for growth management and development in the Borough for the past 11 years.

RECOMMENDATION

The Montgomery County Planning Commission (MCPC) commends the Borough in its efforts to complete the Comprehensive Plan Update 2018, and incorporate extensive public outreach and participation into the planning process. Our support for both the Recommendations and Future Land Use Vision of the 2018 Comprehensive Plan Update is tempered by inconsistencies with the county's MONTCO 2040 Plan's Future



Land Use Vision and Map. It appears there are changes in land use policies when comparing the Borough's proposed Future Land Use Plan and Map 2018 to the previous direction of the 2007 Future Land Use Map. We are providing you with our annotated illustrated comments on the Comprehensive Plan's Future Land Use Map (see attachment) to supplement the following comments.

- The Future Land Use Plan and Map does not recognize the regional nature of the Schuylkill Riverfront mixed use developments, and it does not address in a meaningful manner the opportunity that the Schuylkill Riverfront affords the Borough to realize many of its stated land use goals and objectives.
- The Future Land Use Plan and Map contains few concrete land use recommendations in how to direct and manage growth and preserve neighborhood character in several significant areas of the Borough. It lacks the needed specifics in the Recommendations: Future Conditions, Chapter 5 and the Action Plan, Chapter 7. These chapters are the road map for managing and directing growth and we believe they do not capture the opportunities and extensive studies which have been completed since 2007 which could build the foundation for including greater specificity in the plan's recommendations and actions.

ISSUES

Consistency with Montgomery County Comprehensive Plan, *MONTCO 2040 Plan: A Shared Vision*:

The Borough's Comprehensive Plan's Future Land Use Map (Map 7, page 83) shows several inconsistencies with the MONTCO 2040 Plan, Montgomery County's Comprehensive Plan. We believe the Borough should consider the re-designation of several areas of concern listed below where there are significant inconsistencies with the MONTCO 2040 Land Use vision for these areas.

Specific Comments – Chapter 5 – Future Conditions

- 1. Schuylkill Riverfront Public Space—Redevelopment Opportunities:** While much of the riverfront is built out we believe significant redevelopment opportunities remain that could advance many of the Plan's stated goals and objectives in several categories: Land Use, Housing and Community Facilities. The plan does not capture in a significant way the opportunity the Schuylkill Riverfront affords in leveraging redevelopment opportunities and transit oriented investments with needed improvements in the public realm. Despite the mixed results of initiatives to connect residents and workers to the Schuylkill Riverfront, we believe significant opportunities remain to create a more interesting experience for residents, workers, and other pedestrians with vibrant public spaces, walkways and plazas. We believe the plan and the community would greatly benefit from the plan incorporating a greater emphasis on leveraging the assets of the Schuylkill Riverfront, potential public space improvements and leveraging transit oriented redevelopment opportunities as a key objective-action item.
 - a. Schuylkill Riverfront—Industrial Designation:** The proposed Future Land Use designations in the plan for parcels at the western riverfront boundary with Plymouth Township, the 6.9-acre Neve property and at the eastern boundary with Whitemarsh Township (401 & 433 Washington Street), a 611-unit apartment development on 11 acres, are designated as 'Industrial'. This is a significant change from the existing conditions and from the Borough's 2007 Future Land Use plan. We do not

support the proposed 'Industrial' designation which we believe is inconsistent with its redevelopment potential to higher value land uses and with MONTCO 2040 Plan's vision for the riverfront. The Borough's vision in 2007 was for 'High-Intensity Mixed Use' and the existing Borough zoning map supports the vision with the "Special Planned District" designation. The proposed Industrial designation does not reflect either planned developments which include the approved, +/- 600 unit apartment development at 410-433 Washington Street at the Whitemarsh Township Boundary or the potential redevelopment of the Neve site. We recommend as discussed below these areas should be designated as 'Regional Mixed-Use Centers'.

b. Schuylkill Riverfront—A Regional Mixed Use Center: We consider the entire Schuylkill Riverfront as a regional significant asset given its significance as a regional employment center and potential redevelopment potential. We do not believe the proposed Future Land Use Map designation for the Riverfront area as 'Mixed-Use' reflects the significant office riverfront redevelopments which have occurred over the past two decades. It also does not reflect the proposed land developments currently under consideration or the potential redevelopment of key remaining properties. The Future Land Use Chapter does not emphasize in a meaningful way the opportunities that planned transportation infrastructure improvements can play in leveraging additional transit-oriented development and redevelopment of the remaining Schuylkill Riverfront properties. We recommend the entire Schuylkill Riverfront be designated as a Regional Mixed Use center or similar type designation.

c. Regional Mixed-Use Center for Two Areas of Proposed Development: We recommend two other significant areas should receive a 'Regional Mixed-Use Center' designation which acknowledges the transit-oriented nature of the area, their regional scale as an employment center and the scale of the development. We are attaching an annotated Map to illustrate the extent of the area we believe should have the Regional Mixed Use Center designation.

- The 'Mixed-Use' designation for the 400 West Elm Street, an 8-story office building and 10-level parking structure does not reflect the density, scale of the proposed development. We recommend that instead of 'Mixed-Use' this area receives a more appropriate designation of 'Regional Mixed Use Center'.
- A 'Regional Mixed Use Center' is appropriate designation for future land use for the approved SORO West redevelopment. The 250,000-square foot office building, with a 171-room hotel and parking structure area between Fayette Street, Elm Street, and West 1st Avenue and Oak Street is designated as Business/Commercial for Future Land Use. The high intensity and vast difference in scale of development make it a regionally significant center and unlike the commercial blocks north of it from 300-900 Fayette Street.

2. Housing Plan. The Housing Plan's states the objective of 'Promote quality, affordable housing'- and it provides a Recommended Action of -- 'review and amend SALDO as necessary to provide incentives for affordable housing through density bonuses and design flexibility.' We support the objective and believe in order to accomplish the objective additional actions are required by the Plan. It should include a discussion in the Housing Chapter explaining in greater detail the strategies that can be used to accomplish the goals of promoting quality, affordable housing. An action item that would be useful to include is: "To explore modification in the land development ordinances to permit *accessory*

dwelling types in residential districts.” Accessory dwelling units share a lot with an existing home and are smaller in size and subordinate in location to the main dwelling. This could provide residents a source of income to maintain their properties while increasing available housing options. Another affordable housing mechanism that could be included as a recommended action is to ‘explore the creation of an affordable housing trust fund’—to support the preservation, rehabilitation and new construction of affordable housing. The benefit of establishing a housing trust fund is its flexibility- it can support home ownership, fund new construction, and provide rehabilitation funding to help preserve and revitalize existing housing, helping to maintain an affordable housing stock. We recommend the Housing Chapter include more specific objectives and actions to achieve the goals of the plan.

3. Community Facilities & Services Plan - *Greenway, Trail Network & Pedestrian Improvements:* The plan recommendations both in the narrative and the ‘Implementation Strategies & Recommendations’- page 90 are generic and could be applied by other municipalities in their comprehensive plans. A great deal of work has been completed by the Borough and related stakeholders in collaboration with the Borough which could be incorporated into the Community Facilities Plan. Plans and studies which have been completed recently lay the foundation for establishing a trail network, enhancing pedestrian safety and mobility with improved sidewalks, crossings, and related improvements with specific recommendations in place for consideration in this plan. For example the plan should utilize the extensive work recently completed Riverfront Plan 2016, a joint plan completed by the Borough in collaboration with Whitemarsh Township that provides many specific improvement ideas. The Riverfront Plan has many useful and specific recommendations for a establishing a connected greenway, with an improved pedestrian network and access across the Regional Rail tracks to the Schuylkill Riverfront.

4. Transportation & Infrastructure Plan:

a. *SEPTA Regional Rail Improvements-*

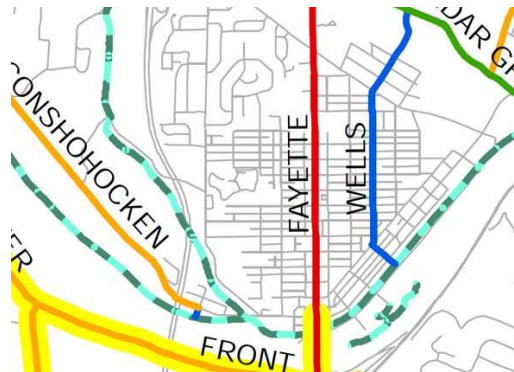
The Transportation Plan objectives could be improved by incorporating greater specifics and detail in several areas. These include the plan objectives, which should give specific support for major SEPTA initiated projects and Capital Budget Plan. The Transportation Chapter should discuss and provide support for the proposed Regional Rail Station, its high-level platforms and the associated multi-level parking garage. A stronger objective and statement of support would send a clear message from the Borough to the various stakeholders and the development community for these improvements.

SEPTA Regional Rail Service Frequency

The plan should specifically support the identified need for increased frequency of service for the Manayunk/Norristown Regional Rail that could increase ridership and help leverage and create greater value for the transit-oriented developments and infrastructure investments in the Borough. For information on SEPTA’s capital budget – page 51 of SEPTA’s 2019 capital budget mentions both the parking garage and the new station.

b. *BIKE MONTCO:* We recommend the plan include a discussion of the *BIKE MONTCO* plan, a new bike mobility plan which will enhance the county’s efforts to advance bike and pedestrian mobility. The plan will include design improvements for bike safety and improved mobility. Several corridors within the Borough are identified in the preliminary plan which is set to be finalized in late June

2018. The two principal routes for improved bike mobility in the Borough are identified north/south corridors- Fayette Street and Wells Street, connecting to the east-west Schuylkill River Trail. We recommend the Borough include these routes into the Plan and for further information on best management practices consult the website at <https://www.montcopa.org/BikeMontco>.



- c. **Other Issues:** The Transportation Chapter in both its narrative discussion and Objectives / Action Items, (pages 113-117) should reference and discuss the I-76 ICM (Integrated Corridor Management) project, where the signals along the length Fayette Street are proposed to be turned over to PennDOT as part of a pilot project to manage emergency traffic flow. The Transportation and Infrastructure 'Action Item'- provides a brief mention of traffic mitigation in a statement- "...Implement traffic mitigation strategies along Fayette Street, Elm Street and other major roadway'. In a recent conversation with the Borough Manager, great progress is being made in collaboration with PennDOT for smart technology to link signals along these roadways. The plan's action items should be more specific with providing information on CMAQ improvements.

CONCLUSION

We support the goals and intent expressed by the Comprehensive Plan Update, 2018 and recommend the Borough consider to its satisfaction the above mentioned comments and concerns prior to adoption.

Please note that the recommendations contained in this letter 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 the Comprehensive Plan we request that the Borough forward a final copy of the plan to our office files bearing the municipal seal and signatures of approval.

Sincerely,

A handwritten signature in black ink that reads "Barry W. Jeffries".

Barry W. Jeffries, ASLA, Senior Design Planner
bjeffrie@montcopa.org - 610-278-3444

Attachment: Annotated Future Land Use Map- with comments

Future Land Use

