

To: Mr. Gary Berman, Royersford Holdings, LLC  
Mr. Geoffrey Grace, Upper Providence Township Director of Planning and Zoning,  
Upper Providence Township Board of Supervisors,  
Upper Providence Township Planning Commission,  
UPT Special Council Gregory Heleniak

From: Parkhouse Friends

Date: May 13, 2024

Subject: Proposed Alternative Plan for Parkhouse property

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As you are aware, the Parkhouse Friends Community Advocacy group has been intensively involved, researching and consulting with experts and stakeholders surrounding the proposed Parkhouse development plan for over 16+ months. We would like to be an asset to this process and work with the township and developer to find the best solution to this very high profile and contentious issue.

We very much appreciate the open forum at the May 1<sup>st</sup>, 2024 Planning Commission meeting to hear directly and learn more about the proposed “Parkhouse Residential Cluster Community Zoning Text Amendment”. During this session, Planning Commission Chair, Mr. Tom Wright asked for any alternative plans and suggestions during the Planning Commission meeting. In response, we formulated such a draft sketch plan and will present it to Royersford Holdings, as well as submit this presentation and plan to our BOS and Planning Commission on 05/15/2024.

First, the proposed zoning text amendment (ZTA) is significantly different from the existing OSR-2, particularly relative to the density, impervious surface and open space percentage. Frankly, it's nothing that resembles the character of the surrounding R1 neighborhoods.

This proposed ZTA will negatively impact the township significantly, as we will demonstrate below. **We urge the Planning Commission and BOS to DENY this ZTA.** A reminder that in January, the BOS denied a similar zoning amendment.

We intend to present our ideas and our proposed draft sketch plan, which we will discuss at our meeting with Royersford Holdings on 5/13/24 and would like the township to strongly consider this as another option – as we realize and recognize that development will occur. We continue to believe that 600+ units of high mixed density with townhomes, stacked townhomes, cluster carriage homes and single family homes is MUCH TOO DENSE in this area of the township and is not uniform with the character of the surrounding R1 zoned communities.

We have presented and voiced that we oppose the extremely high density of 600-880 units located where only low density R1 homes surround it. **We oppose the negative impact high density would cause to the health, safety and welfare of the community.**

However, we would support modifications to the OSR-2 text amendment if all conditions below are met. Therefore we are proposing an alternative plan idea for consideration that includes the following:

- lower density of no more than 1.5 units per gross acre (versus the 5 units per gross acre as in the text amendment),
- single family detached units,
- the dedication of 50% of open space, (which 50% is a requirement UPT zoning) with intention to keep the legislative intent of the code as noted below, to include development that allows for open space, public trails connecting the entire surrounding communities, which would be designed in the best interest of safety, welfare and quality of life of the citizens of the township.

**Parkhouse Friends proposes this in accordance with the legislative intent (highlighted areas):**

*In expansion of the community development objectives contained in Article I, § 300-2 of this chapter, it is hereby declared to be the intent of this article with respect to an open space residential community to establish reasonable standards and criteria to permit such a community in appropriate locations within the Township, based upon a specialized set of development regulations appropriate for such a development.*

- A. To allow for the donation of residentially zoned and developable land from a larger parcel in exchange for no benefit or consideration for the sole purpose of **maintaining permanent open space for use by the Township community.**
- B. To provide for such development in areas consistent with the goals of the Township's Comprehensive Plan, which would be **compatible with and protect the existing community character.**
- C. To **protect the existing vistas into and rural character of large tracts of undeveloped land in the Township.**
- D. To provide for and to preserve open space, stream valleys, agricultural land heritage, tree cover, historic buildings and other natural and man-made amenities.
- E. To allow for the preservation of extensive areas of open space and/or parkland in portions of the Township where mixed-use development is appropriate.
- F. To permanently protect areas of open space and parkland from future development and, in so doing, implement the goals and recommendations of the Township's adopted Open Space and Recreation Plan.

We encourage the developer to refine their plan by reducing the density and finding ways to improve the safety and welfare for people in the area, as well as improve and at the very least, maintain the quality of life for people who currently reside in the immediate surrounding neighborhoods.

**Parkhouse Friends proposal: Develop the northern end of the property.**

We propose a development with less density and reduced height that is built on the northern end of the property, which is close to feeder roads that are wider without line of sight constraints. The units would complement the surrounding R1 developments and be consistent with the surrounding Community character.

**PROPOSED SKETCH PLAN IDEA: See Graphic #1.**

We propose a “land preservation development” where as the proposed open space is contiguous, smaller lots to be developed. The plan would allow for 153 age-restricted Carriage homes (as already identified in the developer’s sketch) located at the northeastern quadrant of the property near the water tower. Also, this proposal would allow for 100 single family homes at the northwestern quadrant near Yeager and Old State Road.

The Rationale for this proposed modification to allow for a total of 253 homes:

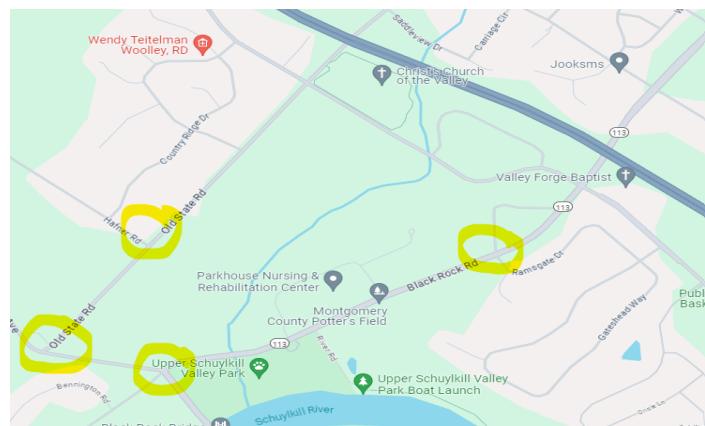
1. Single Family detached homes are consistent with the legislative intent as cited in The Code of the Township of Upper Providence, Part II [General Legislation], Chapter 300 [Zoning], Article XVII [OSR-2 Open Space Residential Community §300-308 A. "compatible with and protect the existing community character".
2. Increasing the number of single family detached homes and maintaining the current proposed 153 "age restricted homes" would lessen the burden on the school system. While people who are age 55+ may have school aged children, there would be fewer "starter townhomes" and less school aged children.
3. TRAFFIC and SURROUNDING ROADWAYS – no evidence has been provided that dispels the community's health and safety concerns of a significant increase in traffic, particularly at high risk intersections. Any traffic study presented to the township planning commission or BOS should be shared before this plan moves forward.
  - a. Roadway infrastructure is not able to safely or effectively support the density of upwards of 1200+ more vehicles at the Route 113/Second Ave/Dreibelbis Rd. intersection (mid to southern end of the property).
  - b. Emergency management – route 113 is a commuter road and an emergency route which often gets "log jammed" during high traffic timing periods.
  - c. The more than 200 residents on and off Dreibelbis Rd. have only one way out of their developments, which causes concern for emergency needs and the welfare of the residents.
  - d. Second Ave is narrow and has no shoulder, due to deep gullies due to erosion and blind curves at Old State and towards 113.
  - e. Route 113 is a narrow road without shoulders beyond the water tower area – and is one lane at the bridge with a confusing bended intersection at Second Avenue.
  - f. Hafner road is narrow, hilly and in disrepair.
  - g. Old State Road is narrow without shoulders and entering onto Second Avenue is currently highly dangerous.
  - h. If 600 homes were constructed, according to the Annual Average Daily Traffic (AADT) methodology estimates, this would increase road volume by upwards of 1100+ vehicles per weekday and does not include weekends. An increase by upwards of an average of 2686 travel events/vehicles per day (inclusive of weekends) in the corresponding roads surrounding this development.
  - i. The current plan's ingress/egresses on Second Avenue and Route 113 introduces HIGH RISK SAFETY traffic issues on heavily traveled roads.
4. Increased traffic density and development in the southern portion of the parcel, along with changes in traffic patterns and road changes to the 2nd Avenue and Black Rock (113) roadway area, will be problematic given the significant water runoff and road erosion at the southern end of the property which is closest proximity to the river basin.
5. The southeastern and southwestern portions that we are proposing to preserve offer contiguous connections to the river, serving to benefit our public park goers as well as migrating birds and wildlife by creating native meadowlands across that land.
  - It also reduces the potential for water runoff into the river.
  - Preserving this portion of the property will also benefit all township residents because it could lessen flooding risk and would permit future trail connections toward the Mingo Creek and other township-owned lands along Mingo Creek.

SEE Graphic 2 map below which highlights the areas of significant traffic congestion and risk for safety.

**GRAPHIC #1. Sketch plan - Simple DRAFT – 100 SFU (Green Highlighted) /153 CARRIAGE = 253 HOMES (Per RH Sketch plan)**



**Graphic 2 – High Risk / Safety Concern areas for traffic consideration ( in YELLOW CIRCLES)**



## RECOMMENDATIONS/REQUESTS

1. We strongly recommend the ABOVE “sketch” plan to be considered by both Royersford Holdings and the UP Planning Commission and BOS. We believe that responsible development MANDATES this plan due to the numerous issues related to SAFETY and traffic concerns.
2. To move the development to the Northern end of property closer to feeder roads (Yeager, Mennonite and 422). These roads are wider roads, they have stop signs, there are no angles which are dangerous.
3. Keep the majority of the development toward YEAGER – that is, past the rise on Old State Road, intersection at Yeager is a 4 way stop, where there are wider roads and easier access to feeder roads with stop lights, stop signs, shopping and 422.
4. There are already existing stops signs or signals at Yeager, Mennonite and Rte. 113
5. Block the entrance and exit off of South Trappe Road to 113 for safety or consider for ONE WAY ONLY.
6. Traffic remains within the property and only within 2 roadways. Use of 113 entrance(s) NOT recommended.
7. Where there are ingresses and egresses, add separate turning lanes from within the parcel’s property lines.
8. Maximum height of homes - 2 stories / 35 feet. No townhomes; no stacked townhomes.
9. Complete the traffic circle at 2nd Avenue / Rte 113 / Dreibelbis Road and any surrounding road upgrades before breaking any ground as indicated by the builder during the Planning Commission Meeting.
10. Increase setbacks on all roads, and add berms with evergreens
11. Ensure noise and light pollution are minimal and do not impact the surrounding neighborhoods.
12. Preserve viewsheds/vistas for all residents in the surrounding communities by building units no more than 2 stories high.

### **Montgomery County / Upper Providence Trail System:**

We believe strongly that Upper Providence Township and the Planning Commission have done a great job integrating trails - walkability / running/ hiking and cycling on various paths within the township. We would recommend integrating the dedicated open space to Montgomery County Upper Schuylkill Valley Park across 113 by placing it along the southeastern and southwestern end.

- a. As the builder agreed to consider at the Planning Commission Meeting, building a trail system around the entire perimeter to connect all the surrounding neighborhoods, would benefit all, as well as this supports Montgomery County’s 2040 comprehensive plan.
- b. Building a trail that will permit future trail connections toward the Mingo Creek and other township-owned lands along Mingo Creek.

## **SUMMARY**

In closing, Parkouse Friends Advocacy group believes strongly that this alternative plan would allow the developer to move forward with a “compromised plan” that maintains the fidelity of the legislative intent and enables the Township to meet its obligation of adhering to the Planning CODE of the zoning amendment to promote the health, safety and welfare of the citizens of the township. As a result, there would be less traffic impact, less EMS/ Public Safety needs, less impact on the school district, and connectivity to the Montgomery County Park system, and is in accordance with the goals of the

Montgomery County Planning Commission and Plan. It would also preserve vistas, natural river basin ecosystem including critically connected land areas for migratory bird and wildlife.

We strongly encourage you to consider this option.