

MAIN LINE TIMES

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Main Line Voices

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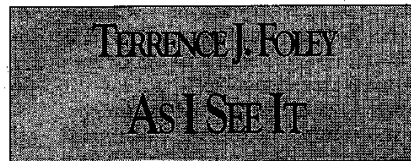
On City Ave. rezoning and unfinished comprehensive plan

In a recent letter to the *Main Line Times*, some Lower Merion Township residents expressed concern over enacting much-needed zoning changes in the City Avenue District, in the absence of a new township comprehensive plan. The letter states that "in the last several years there has been a headlong rush on the part of the Commissioners to enact radical new zoning for the City Avenue area in the absence of a current updated plan." The letter further states that "the Commissioners have engaged in a myriad of ad-hoc uncoordinated rezoning effects," including the Bryn Mawr Village District and Ardmore MUST overlay. The letter claims that "each of the zoning revisions was done in a vacuum, without regard to the impacts on the overall fabric of the township."

Nothing could be further from the truth. While the township is currently updating its comprehensive plan to establish general land use, objectives and policies over the next 10-20 years, the township's comprehensive plan will need to be consistent with the broader goals and objectives of the Montgomery County Comprehensive Plan and Vision Plan that were completed by the county in 2005 and adopted by the township in 2010. It is this countywide plan that creates a vision for the next 20 years that will set the stage for local comprehensive-planning efforts, including those of Lower Merion.

A major goal of the comprehensive plan is to ensure consistency between the county plan and local zoning ordinances. The county planning effort involved 16 public forums on the Vision Plan and 13 public forums on detailed plan elements. Major goals of the plan are to control sprawl and traffic congestion, with well-designed growth guided to logical areas, including revitalizing older boroughs and downtowns. The county comprehensive plan identifies the Bala Cynwyd/City Avenue District as a "Major Development Center." Major Development Centers are defined as "existing focal points of activity that are expected to intensify over time, with a broad mix of uses that are more transit-friendly and more convenient for pedestrians, and have improved internal and external road access." The county plan's vision for City Avenue is of "more physically integrated development, more mixed uses, more residences and a more walkable streetscape along both sides of City Avenue." The new ordinance is designed to achieve this goal. The county plan similarly identifies Ardmore as a major development center with more intense development.

There has been no headlong rush to provide



zoning incentives for the revitalization of City Avenue. Over the last five years the City Avenue District has been working with the township and abutting communities to develop a vision, and supporting government actions, to assure that the City Avenue District can fulfill the development goals outlined in the county's comprehensive plan. The Econsult Study of the potential economic impact of redevelopment of the commercial area of City Avenue, completed in 2007, noted that the City Avenue area was becoming old and tired, an underperforming asset for the township. The existing very low-density zoning that requires huge setbacks encouraged auto-dependent development with surface parking and without any pedestrian amenities and development patterns that cannot support transit use. The result is the complete antithesis of the goals of the county plan. The study identified the need for zoning changes and infrastructure improvements to transform the area into a revitalized, pedestrian-friendly mixed-use destination that would have a significant positive economic impact on Lower Merion, precisely the type of development that would be impossible under current zoning. The study forecast that more appropriate development could result in a 30-percent increase in township property-tax revenues from the City Avenue District, a district that already contributes over 6 percent of the township's property taxes.

To provide an incentive for such development, the City Avenue District began drafting a new zoning ordinance in 2007, four years ago. Presentations on the background and draft ordinance provisions were made to the supporting communities to obtain feedback. The draft ordinance was reviewed by the county planning staff and found consistent with the County Comprehensive Plan.

During 2010 and 2011 a series of public workshops and public hearings was held at the township to obtain further feedback. Many modifications were made to the ordinance in response to public comment. This extensive four-year process can hardly be defined as a "headlong rush" to enact new zoning for City Avenue.

The letter refers to the zoning ordinance permitting "multiple 300-foot-high office or

residential towers" and encouraging "massive urbanization of the northeast corner of Lower Merion." This is simply not the case. The proposed zoning ordinance permits an increase in density, but only to the level required to support pedestrian and transit-friendly development. The proposed maximum density is based on a careful evaluation of the density in other model suburban mixed-use pedestrian-oriented centers nationwide and consensus thinking of many land-use/development experts. Even then the allowed increase in density is dependent on provision of significant amenities, such as public open space, screened parking and conformance to design standards. The typical density proposed for the district is equivalent to that of the Corinthian Condominium development, a project that many Lower Merion residents praise and one that is called out in the Montgomery County Comprehensive Plan as a model development.

The new ordinance does permit widely spaced small-footprint residential buildings up to 300 feet high along City Avenue east of King's Grant Drive, but with no increase in permitted density compared to lower buildings. The option to build higher at certain locations simply provides the opportunity for a mix of higher and lower buildings that can create a more varied streetscape with more open space, landscaping and high-value residential condominiums. Our analysis had shown that no more than four such buildings could be constructed along City Avenue. Just because development is permitted does not mean it will occur. The Target parcel on the city side of the avenue had no height restrictions, but the former 22-story Adam's Mark Hotel was demolished and replaced with a two-story building. The letter refers to 3.5m additional square feet ("SF") of development. The land-use assumptions report used a generous figure of 3.4m SF as the maximum likely potential development in the Regional Center for calculating traffic impacts only. The County Planning Commission has commented that they do not believe that this amount of development is ever likely to be achieved.

The letter states that the potential traffic impacts have been studied, but the means of mitigating the negative impacts have not been determined. In fact the traffic study includes very specific recommendations for improvements at each intersection along City Avenue and surrounding roads that will be required to address both existing traffic and background growth and the relatively modest additional

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LM's City Avenue plans

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traffic (11 percent of the total) anticipated from additional development consistent with the new ordinance. New development will be required to contribute impact fees to pay for traffic improvements that are required as a result of the development. New investment in City Avenue will help generate the broader potential support required for improvements to address existing traffic conditions.

New development in the City Avenue District that could potentially result in response to the zoning changes will not only

be consistent with the County Comprehensive Plan but would create attractive mixed-used pedestrian-friendly development that can provide significant economic benefits for the township. A moratorium on zoning changes until the township comprehensive plan is completed would be unrealistic and not be in the long-term economic interests of the township or the community.

Terrence J. Foley is president and CEO of the City Avenue Special Services District.