

To the Attention of the Planning Commission  
of Upper Gwynedd Township,

June 26, 2023

On behalf of the Walters Group, thank you for the opportunity to present our proposed concept for 1500 Pennbrook Parkway on June 14, 2023. We have compiled our responses to the questions we received regarding the proposed development below in an effort to provide clarification about our intentions for the site:

## 1. Clearer definition of the basis used for the program of affordable housing:

Affordable housing is often thought of exclusively as a **Subsidized** program whereby residents are provided with money from the federal government to pay a portion or all of the person's rent. Some apartment communities are occupied solely by those receiving Section 8 rent subsidies. Subsidized affordable housing is NOT what we are proposing.

On the other hand, **non-subsidized** affordable housing is funded with dollars generated by federal tax credits, which are contributed to the development up front. This initial investment is used to cover a portion of development costs and therefore reduces the amount of traditional mortgage needed when construction costs are converted, enabling us to build a market-rate-quality community that is economically self-sufficient and naturally affordable.

- Our financial partners (large banks such as Wells Fargo or TD Bank), receive a dollar-for-dollar credit against their federal tax liability in return for an up-front capital investment in the community.
- Once we receive the tax credit investment up front the communities do NOT need any ongoing operational support such as what is associated with the Section 8 or Choice Housing Voucher program.

Most critically, our residents pay their own rent, and the community must be financially self-sufficient based on the ability for these rents to cover the costs associated with the development's mortgage. **The proposed project will not be subsidized** and the Tax Credit Program that will be utilized is administered by the Pennsylvania Housing and Finance Agency (PHFA). As the result of this financing structure, we can charge lower than market-rate rents so that working Americans and their families are able to live in a safe and secure home close to jobs and high-quality schools.

## 2. Anticipated tax impact on the Township and school system

We will not receive any tax exemptions from the Township and therefore we will pay the full amount of real estate and school taxes associated with the assessed value and relevant use of the completed development. While it is true that a multi-family residential development will generate fewer tax dollars than a light-industrial development with the same assessed property value, given that the rate of taxation is higher for an industrial property, the proposed site has been zoned for Light Industrial for over a decade and has been sitting vacant and underutilized. By allowing the development of our proposed multi-family community on

the subject property to move forward, the assessed value of said property will increase from its current rate since the property will no longer be vacant, which is a win for the Township monetarily.

Regarding the proposed development's impact on school enrollment, according to the North Penn School District's Enrollment Projections for 2022, the number of school-age children enrolled from Kindergarten through twelfth grade in the District was 12,657 in 2012 and 12,783 in 2021, which is **only about a 1% increase in almost a decade**, though enrollment has fluctuated annually.<sup>1</sup> Comparatively, the overall population residing within the catchment area of the North Penn School District increased by 6.4% during that time, from 98,291 in 2012<sup>2</sup> to 104,610<sup>3</sup> in 2021, indicating that **the school-age population is increasing at a rate of less than one-sixth of the overall population's growth rate, leaving room for increased enrollment without negative tax implications.**

However, a large number of school children are not expected to be added to the district as the result of this development. In fact, a recent DVRPC [report](#) concluded that **multifamily households are smaller and generate fewer school-age children than other housing types**. More specifically, the study found that, "the average single-family detached home generated 0.64 school children, while the average apartment generated 0.16." <sup>4</sup>

We own approximately 2,000 units and therefore, we know how many school age children are likely to reside in this community. Our student population is consistent with all major studies on the topic including the widely-cited [2018 Study on School-Age Children in Rental Units by Rutgers University](#).<sup>5</sup> Based on our bedroom count, we expect about 37 additional school-age children distributed evenly from kindergarten to twelfth grade. This would increase the student population by 3 tenths of one percent (.0003). This number of students will have no discernable impact on school taxes. It will certainly have less impact than 60 new single-family homes would have.

Overall, multifamily-residential developments are less burdensome on road, water, sewer, electric, and gas infrastructure than single-family residential dwellings given the ratio of utility use to utility lines/infrastructure required. It should also be noted that Walters handles all trash-service, snowplowing, and grounds maintenance for its communities through private contracts and therefore none of these services

<sup>1</sup> (2022). North Penn School District. "Enrollment Projections for 2022." Web. [https://go.boarddocs.com/pa/npenn/Board.nsf/files/CMWSTA738FBB/\\$file/2023-01-10\\_NPSD%20Final%20Presentation\\_Update%20for%202022.pdf](https://go.boarddocs.com/pa/npenn/Board.nsf/files/CMWSTA738FBB/$file/2023-01-10_NPSD%20Final%20Presentation_Update%20for%202022.pdf)

<sup>2</sup> (2012). U.S. Census Bureau. "American Community Survey 5-Year Population Estimates; North Penn School District." Web. <https://data.census.gov/table?q=dp05&g=9700000US4217280&tid=ACSDP5Y2012.DP05&moe=true>

<sup>3</sup> (2021). U.S. Census Bureau. "American Community Survey 5-Year Population Estimates; North Penn School District." Web. <https://data.census.gov/table?q=dp05&g=9700000US4217280&tid=ACSDP5Y2021.DP05>

<sup>4</sup> (2020). Delaware Valley Regional Planning Commission. "Development Matters: Understanding the Opportunities and Implications of Multifamily Development." Web. [https://www.dvrpc.org/smartgrowth/multifamily/pdf/dvrpc\\_18033\\_development\\_matters.pdf](https://www.dvrpc.org/smartgrowth/multifamily/pdf/dvrpc_18033_development_matters.pdf)

<sup>5</sup> (2018). Rutgers Center for Real Estate. "School-Age Children in Rental Units in New Jersey: Results from a Survey of Developers and Property Managers." Web. <https://realestate.business.rutgers.edu/sites/default/files/media/documents/The-School-Age-Children-Study-RCRE-July2018.pdf>

would be paid for using local tax dollars. Walters also provides adequate off-street parking at all developments to proactively prevent the problem of over-crowded street-parking.

In summary, the multi-family residential development proposed will not be a burden on the Township's property tax base.

**3. An explanation of the anticipated incidence of crime in the proposed development, if any:**

The perception that this apartment community will lead to an increase in crime and police activity is demonstrably incorrect. We perform criminal background checks and credit checks on every applicant. All applicants with a criminal record are, to the fullest extent permitted by law, excluded. We keep a monthly written record of every police visit to every community we own. We analyze that data carefully and we move quickly and diligently to remove residents who violate our rules of conduct. We have very few police visits to our communities and serious criminal activity is extremely rare. We have strong working relationships with the police departments in every town where we have a community. At our first meeting in any municipality we invite officials to contact the police department in any town where we have a development. We followed this process in Upper Gwynedd and Chief Duffy did reach out to various municipalities in order to confirm our representations. **Chief Duffy's report is attached.**

**4. Land available for future development in the Township, aside from establishing other TOD sites:**

During the 6/20/23 work meeting of the Upper Gwynedd Commissioners, Van Reiker made reference to the TOD 2 text amendment, which states that properties need to be:

- Between 4-8 acres,
- Less than 0.5 miles from Pennbrook Station
- Characterized as vacant and undeveloped land
- Van further clarified that a property that had been previously developed and had the buildings demolished would NOT qualify.

With these parameters in place, as of 6/20/23, Van stated that the only property that fits into this amendment is the subject property of our proposed development. While it is true that the Township could theoretically rezone other land in Upper Gwynedd for multi-family use in the future, there is very little land available and probably none that is suitable for multi-family use. If there is any land that could conceivably be rezoned we are confident that the Township would very carefully analyze any proposal for a zoning change, just as they have done in this case. Whether or not it is possible to rezone other land in the Township is, of course, not relevant to this rezoning request.

**5. Traffic Implications of the proposed development:**

Overall, the site's proximity to Pennbrook Station and bus stops along Church Road will provide potential residents of the development with walkable access to public transit options, therefore reducing the number of vehicular trips and parking demand.

When compared with the by-right uses of the Limited Industrial District, **the proposed multi-family residential development will generate fewer trips and less truck-traffic.** According to a traffic study<sup>6</sup> conducted for the property, during the peak morning hour, 9 entering trips and 21 exiting trips are anticipated and during the peak evening hour, 17 entering trips and 11 exiting trips are anticipated, which by definition, is not a “significant increase in traffic.” Please see Table 3 for details.

**Table 3**  
**ITE Trip Generation Comparison**

Use	Daily		AM PSH		PM PSH	
	Cars	Trucks	Cars	Trucks	Cars	Trucks
General Light Industrial (LUC 110)	352	22	55	1	35	1
Manufacturing (LUC 140)	487	39	59	3	54	3
Warehousing (LUC 150)	127	47	30	4	31	6
General Office Building (LUC 710)	1009	9	146	1	146	1
<b>Proposed Use</b>	<b>360</b>	<b>4</b>	<b>30</b>	<b>0</b>	<b>28</b>	<b>0</b>

The above table demonstrates that the proposed 60-unit income restricted multifamily housing development would generate less trips and less truck trips than other permitted uses within this district.

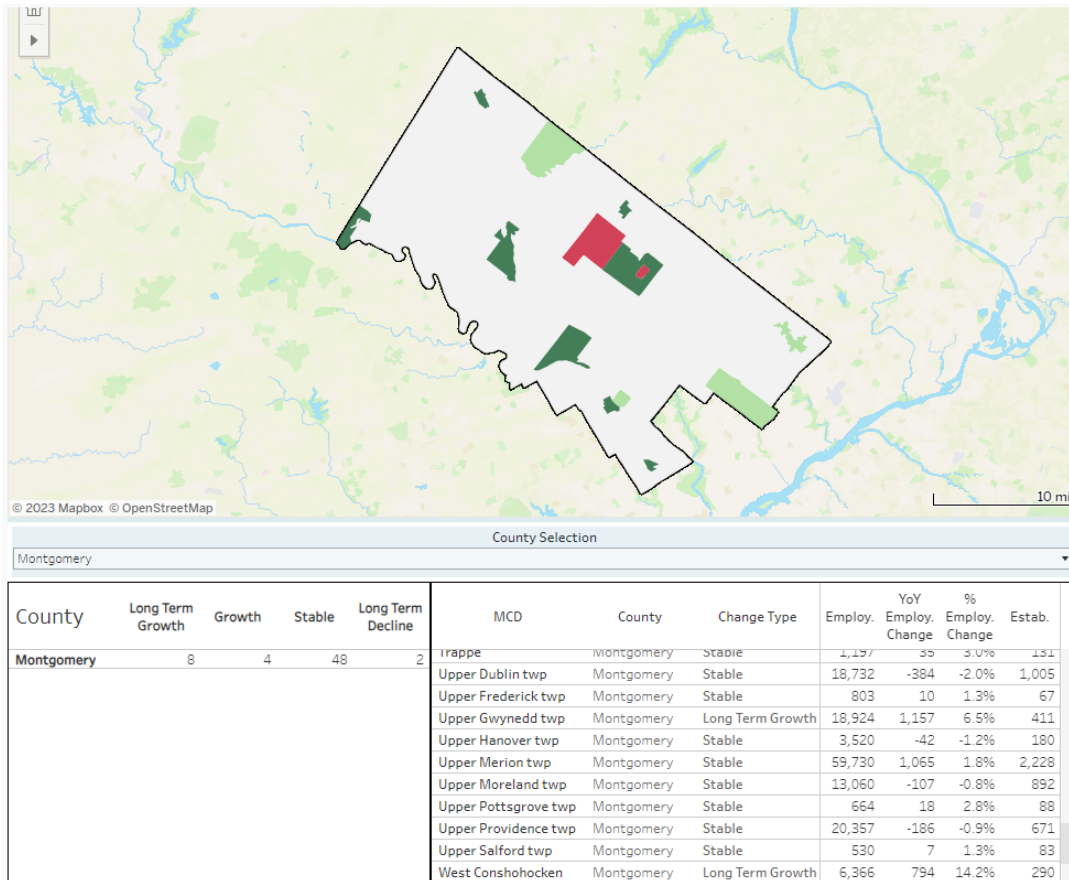
#### 6. Staffing and demand for housing in the Township:

According to Pennsylvania’s Center for Workforce Information and Analysis, Upper Gwynedd is characterized as one of only several areas of “Long Term Growth” in Montgomery County, indicating that the number of jobs in the area have been consistently increasing and are projected to continue to increase. Within the past year alone, the number of jobs in Upper Gwynedd has increased by 6.5%,<sup>7</sup> and the number of housing units must also increase to keep pace with this growth. By ensuring that employees can live locally, a circular economy is created, enabling residents to take their earned incomes and invest further in the local economy by purchasing goods and services, a positive financial multiplier that would be lost if employees lived elsewhere. Our proposed development would add 60 high-quality apartment homes to Upper Gwynedd, allowing the Township to financially benefit from the daily expenditures of future employees as the number of jobs in the Township continues to increase. A map from the Pennsylvania Center for Workforce Information and Analysis regarding job growth has been provided on the next page. More information can be found online:

<https://www.workstats.dli.pa.gov/dashboards/Pages/Areas-of-Interest.aspx> .

<sup>6</sup> (2023). Dynamic Traffic, LLC. “Multifamily Affordable Housing Development Traffic Assessment, Upper Gwynedd.” Print.

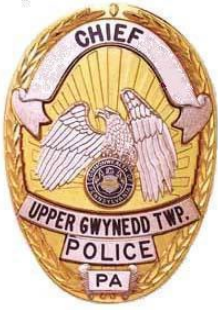
<sup>7</sup> (2023). Pennsylvania Center for Workforce Information and Analysis. “Montgomery County; Upper Gwynedd Township.” Web.  
<https://www.workstats.dli.pa.gov/dashboards/Pages/Areas-of-Interest.aspx>



**In summary**, according the aforementioned [study](#) completed by DVRPC, “When it comes to new housing, the research conducted for this study suggests that the perception that many people have of apartments may not mesh with reality. **New apartments typically do not impose greater costs on local governments.** New apartments generate less traffic congestion and parking demand than a comparable number of single-family units. **Furthermore, the traffic impacts of new apartment residents can be significantly mitigated by locating new development in walkable neighborhoods near transit.** Although the income, education, and racial characteristics of apartment residents will vary by context, **new apartments do not inherently attract residents who are less neighborly or socially engaged than their single-family peers.** The findings highlighted in this document and on the project website, [www.dvrpc.org/SmartGrowth/Multifamily](http://www.dvrpc.org/SmartGrowth/Multifamily), have several implications... **The long-term continued success of the region requires greater housing choice, more compact development, and mixed-income residences.** The communities that can meet the growing demand for this type of housing can boost their economic competitiveness while providing greater housing choices for their residents.”<sup>8</sup> More information from the Delaware Valley Regional Planning commission related to the positive impacts of multi-family housing can be found here: [www.dvrpc.org/SmartGrowth/Multifamily](http://www.dvrpc.org/SmartGrowth/Multifamily)

Thank you for the opportunity to provide you with more information about our proposed development. We are also happy to provide additional information if needed.

<sup>8</sup> (2020). Delaware Valley Regional Planning Commission. “Development Matters: Understanding the Opportunities and Implications of Multifamily Development.” Web. [https://www.dvrpc.org/smartgrowth/multifamily/pdf/dvrpc\\_18033\\_development\\_matters.pdf](https://www.dvrpc.org/smartgrowth/multifamily/pdf/dvrpc_18033_development_matters.pdf)



## MEMO

April 17, 2023

**TO:** Sandra Zadell, Township Manager

**FROM:** Chief David Duffy *DWD*

**SUBJECT:** Walters Group - police information about properties

Each of the following police departments has experience with Walters Group properties in their Townships. The details of those properties are in the presentation provided by the Walters Group that was shared at our Township meeting on April 10<sup>th</sup>.

I spoke to each person below about the properties regarding crime and calls for service, as well as their experiences with the Walters Group.

Stafford Police: *Chief Thomas Dellane* - said there are “no issues whatsoever” with their three properties. He said the experience with having three Walters Group developments in their Township has been “very positive” and Walters Group management was proficient at their job.

Barnegat Police: *Chief Keith Germain* – said there have been “no issues” with the four Walters Group properties in his Township and that the management representatives from the Walters Group are “hands down the best.”

Evesham Police: *Chief Walt Miller* – said there are “no issues” with the two Walters Group properties in his Township and that management had “good communication” with police.

Jackson Police: *Chief Matthew Kuhns* – couldn’t recall any specific issues with the Walters Group property in his Township and said that management is “engaged” in a good way.

Mt. Laurel Police: *Captain William Baskay* – said the properties are “well regulated” and there are no particular issues at them. He said property management does a good job.



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June 30, 2023  
Via Email

Walters Group  
21 East Euclid Avenue  
Suite 200  
Haddonfield, NJ 08033

Attn: Edmond C. Speitel, Jr.

**Re: Multifamily Affordable Housing Development  
Traffic Assessment  
1500 Pennbrook Parkway  
Upper Gwynedd Township, Montgomery County  
DT# 2496 23-00977**

Dear Mr. Speitel:

Dynamic Traffic has prepared the following assessment to determine the traffic impact and adequacy of access and circulation associated with the development of a site located on the western side of Pennbrook Parkway in the Upper Gwynedd Township, Montgomery County, Pennsylvania (see Figure 1). The site is currently undeveloped. Walters Group proposes to construction a 60-unit multifamily residential development. 51 units will be income restricted while the remaining 9 units will be market rate units. The site will consist of 27 one-bedroom units, 20 two-bedroom units and 13 three-bedroom units distributed over seven buildings. The proposed access will be a full movement stop-controlled driveway from Pennbrook Parkway and an emergency access from the southern parcel. The proposed development is located in the proposed Transit-Oriented Overlay District-2 (TOD-2).

This assessment documents the methodology, analyses, findings and conclusions of our study and includes:

- A detailed field inspection was conducted to obtain an inventory of existing roadway geometry, traffic control, and location and geometry of existing driveways and intersections.
- Projections of traffic to be generated by The Project were prepared utilizing trip generation data as published by the Institute of Transportation Engineers.
- The proposed site driveways and internal drive aisles were inspected for adequacy of geometric design and conformance with accepted design standards.
- The parking layout and supply were assessed based on the municipal requirements, nationally accepted design standards, and existing parking demand experienced at various similar age and income restricted apartment developments.

## Site Conditions

Pennbrook Parkway is a private roadway. In the vicinity of The Project, the roadway provides a general north/south orientation. Just south of the proposed site, there is a 40-degree horizontal curve in the roadway. The posted speed limit is 20 miles per hour and the roadway provides one travel lane in each direction. Curb is generally provided along both sides of the roadway, while sidewalk is provided intermittently, along the northwestern side of the roadway. The land uses along Pennbrook Parkway are primarily industrial and commercial office uses.

Pennbrook Parkway is a horseshoe shaped roadway with connections to Church Road opposite Wissahickon Avenue and the Station Square Shops. Southeastern Pennsylvania Transportation Authority (SEPTA) provides bus service along Church Road via Route 94 which runs between Chestnut Hill and the Montgomeryville Mall. Additionally, the Pennbrook Station is located less than a ½ mile from the site. This station provides rail transportation between Doylestown and Center City Philadelphia.

The proposed site is located on two parcels on the west side of Pennbrook Parkway. The lots are currently vacant. The site driveway is located along the curved portion of Pennbrook Parkway, about 145-feet from the northern driveway. Despite the 40-degree curve in the road, the AASHTO required sight distances will be achieved at both driveways. The following table shows the required sight distances for a posted speed limit of 25 miles per hour and longitudinal slope that is less than 3%.

**Table 1**  
**Sight Distance for the Site Driveways**

Location	Direction	Minimum Sight Distance (FT)	Required Sight Distance (FT)	Criteria Met
Site Driveway	Exiting – Looking Left	147	250	Yes
	Exiting – Looking Right	147	195	Yes
	Entering by Left Turns	147	190	Yes

The site will provide an internal layout that will allow vehicles, including single unit delivery trucks, refuse vehicles, and emergency vehicles to circulate efficiently. There is one internal “T” intersection; we would recommend the main drive aisle remain free while the southern leg be stop-controlled. The parking spaces are positioned perpendicular to the internal roadway, with the exception of 4 parallel spaces along Pennbrook Parkway. Since the proposed ordinance defines the streets within the development to be driveways, perpendicular parking spaces are acceptable. There should be at least a 50-foot clearance between Pennbrook Parkway and the first parking spot within the site, to avoid conflicts with entering vehicles. The parking quantity is discussed in a subsequent section.

## Trip Generation

Trip generation projections for The Project were made utilizing trip generation research data as published under Land Use Code (LUC) 220 – Multifamily Housing (low-rise) close to rail transit and LUC 223 – Affordable Housing – Income Limits in the Institute of Transportation Engineers’ (ITE) publication, *Trip Generation, 11<sup>th</sup> Edition*. This publication sets forth trip generation rates based on traffic counts conducted at research sites throughout the country. The following table shows the projected trip generation for The Project.



**Table 2**  
**ITE Trip Generation**

Trips	LUC	Daily	AM PSH			PM PSH		
			In	Out	Total	In	Out	Total
Passenger Vehicles	220	40	1	2	3	3	2	5
Trucks*		2	0	0	0	0	0	0
Passenger Vehicles	223	326	8	20	28	8	21	29
Trucks*		4	0	0	0	0	0	0
<b>Total</b>	<b>-</b>	<b>372</b>	<b>9</b>	<b>22</b>	<b>31</b>	<b>11</b>	<b>23</b>	<b>34</b>

\*Assumed to be approximately 1% per industry standards

As seen above, The Project is anticipated to generate a maximum of 34 peak hour trips during the critical weekday peak periods. The total trucks are expected to be minimal. Additionally, the proximity to public transit may reduce to number of new trips created by this development. In order provide a conservative analysis, multimodal trips, which would typically be deducted from new vehicular trips, were not considered.

The number of new trips falls below the industry accepted standard. Based on *Multimodal Transportation Impact Analysis for Site Development*, published by the ITE, “it is suggested that a multimodal transportation impact study be conducted whenever a proposed development will generate 50 or more added vehicle trips during the adjacent roadway’s peak hour or the development’s peak hour.” Therefore, it is not anticipated that the proposed multifamily residential development will have a perceptible impact on the traffic operation of the adjacent roadway network.

The income restricted housing development is located in the proposed overlay of the Limited Industrial district, now called the Transit Oriented district. The Limited Industrial district is intended for non-pollution industrial and office uses, as well as light manufacturing. The proposed overlay will allow for multifamily housing, not exceeding a density of 11 units per acre, to be built within a ½ mile of the Pennbrook Station.

In accordance with the zoning regulations for this district, the maximum industrial building size shall be 20% plus 2.5% per acre of the total lot size. This equates to roughly an 86,000 square foot building. The following table shows the anticipated trips associated with the other uses within the district, assuming average building size or development density.

**Table 3**  
**ITE Trip Generation Comparison**

Use	Daily		AM PSH		PM PSH	
	Cars	Trucks	Cars	Trucks	Cars	Trucks
General Light Industrial (LUC 110)	352	22	55	1	35	1
Manufacturing (LUC 140)	487	39	59	3	54	3
Warehousing (LUC 150)	127	47	30	4	31	6
General Office Building (LUC 710)	1009	9	146	1	146	1
<b>Proposed Use</b>	<b>366</b>	<b>6</b>	<b>31</b>	<b>0</b>	<b>34</b>	<b>0</b>

The above table demonstrates that the proposed multifamily housing development would generate less trips and less truck trips than other approved uses within this district.

## Parking Demand

The conceptual plan for the proposed income restricted multifamily housing development includes the installation of 128 parking spaces, which includes 4 parallel spaces along Pennbrook Parkway and 9 parking spaces that are accessed from the site to the south. The proposed Transit Oriented Development Ordinance sets forth a parking rate of 1 space per studio or one-bedroom unit and 2.4 spaces for two or more-bedroom units. The required parking is shown in the following table.

**Table 4**  
**Parking Requirements**

Bedrooms	No. of Units	Parking Rate	Required Parking Spaces
One	27	1.0	27
Two or More	33	2.4	79
Total	60	--	106

The 5<sup>th</sup> Edition of *Parking Generation* published by the Institute of Transportation Engineers (ITE) sets forth a maximum parking rate of 1.33 parking spaces per unit of Affordable Housing – Income Limits (LUC 223), and 1.31 parking spaces per unit of Multifamily Housing (low-rise) close to rail transit (LUC 220) which equates to 80 parking spaces.

Independent research completed by MidAtlantic Engineering Partners, LLC at six income restricted multifamily housing developments throughout New Jersey found the average parking demand to be 0.81 spaces per unit and the maximum demand to be 1.37 spaces per unit. These values are similar to the parking rates published by the ITE. Using the maximum parking rate, the proposed development would require 82 parking spaces.

Additional research has been completed by our office through the New Jersey and Delaware regions. Parking capacity counts at similar facilities found the maximum parking demand to be 1.35 parking spaces per unit. Based on this rate, the maximum parking demand for the proposed development will be 81 parking spaces.

The following table summarizes the various parking calculations for the proposed 60-unit income restricted multifamily housing development.

**Table 5**  
**Parking Demand for 60-Unit Income Restricted Housing**

Parking Criteria	Total Parking Demand or Requirement
Upper Gwynedd Township Ordinance	106
ITE Demand (60-units)	80
MidAtlantic Research	82
Dynamic Traffic Research	81
<b>Proposed Parking Supply</b>	<b>128</b>

The development will provide 128 parking stalls, so the parking requirement is met. Additionally, independent research and ITE rates support the proposed parking supply.

## Findings

Based upon the assessment as documented herein, the following findings are noted:

- Access to the site will be provided via two new full movement driveways along Pennbrook Parkway, generally located at opposite ends of the property frontage. The AASHTO Desirable sight distance is expected to be met.
- The site driveways and internal circulation have been designed to provide for safe and efficient movement of automobiles and the few large wheel base vehicles anticipated. The aisle widths and parking stall dimensions comply with the industry standards.
- The proposed multifamily housing development is projected to generate 372 daily trips. The peak hour trips are expected to be 9 entering trips and 22 exiting trips during the morning peak hour and 11 entering trips and 23 exiting trips during the evening peak hour, well below the industry standard threshold of a “significant increase in traffic”.
- When compared with by-right uses of the Limited Industrial district, the residential development will generate less trips. Most notably, the proposed income restricted multifamily housing development will generate less truck trips when compared with the by-right uses.
- The proposed parking supply of 128 spaces is more than sufficient for the proposed 60-unit multifamily housing development. The township ordinance requires 106 parking spaces and the 128 spaces provided exceed the parking requirement.

## Conclusion

Based upon our Trip Generation and Parking Assessment as detailed in the body of this report, it is the professional opinion of Dynamic Traffic that the adjacent street system will not experience a degradation in operating conditions with the development of the income restricted multifamily housing development. The site plan as proposed provides for good circulation throughout the site and provides parking which will accommodate The Project’s needs.

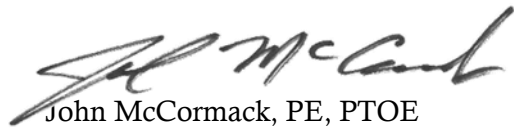
If you have any questions on the above, please do not hesitate to contact me.

Sincerely,

**Dynamic Traffic, LLC**



Corey Chase, PE  
Principal  
PA PE License 076836



John McCormack, PE, PTOE  
Principal