

July 2, 2020

TO: Planning Commission Members

FROM: Jillian Dierks, Planner, Building and Planning Department

SUBJECT: TENTATIVE SKETCH PLAN – 300 E. Montgomery Avenue, Lower Merion High School - Arnold Field, Ardmore, LD# 3874, Ward 5

Proposal

The applicant, Fred Fromhold, on behalf of the Lower Merion School District, is seeking Tentative Sketch Plan approval for installation of lighting associated with the existing turf playing field/stadium. The Sketch Plan shows 12, 15-foot tall lighting poles along an existing pedestrian walkway between Montgomery Avenue and the stadium and four, 80-foot tall lighting poles around the perimeter of the existing stadium.

The proposal is illustrated on the attached two-sheet plan set dated April 2, 2020 prepared by Chester Valley Engineers, Inc. Also submitted were landscape plans prepared by Glackin Thomas Panzak Inc., dated April 2, 2020, last revised June 19, 2020 and lighting plans prepared by Snyder Hoffman Associates, Inc., dated June 19, 2020.

Property Description

The 743,133 sq. ft. (17 acre) property is commonly referred to as Arnold Field and has frontage along Church Road, Montgomery Avenue, and Fairhill Road. The property is currently improved with an artificial turf field, four grass fields, an athletic track, five tennis courts, bleachers and associated site amenities.

The property is accessed from Montgomery Avenue and Fairhill Road via pedestrian pathways. Parking for the property is provided at Lower Merion High School located across Montgomery Avenue. Limited on-street parking is available on Fairhill Road.



Project History

Arnold Field

On February 19, 2006 the applicant received Waiver Plan (W-05-10) approval for the installation of the artificial turf field. A condition of the 2006 approval (#29) required a separate land development approval for future lighting on Arnold Field. Land development approval for future lighting was required so that the Township, School District and immediate neighborhood could properly plan for and address potential off-site impacts resulting from increased use, intensity and extended hours of operation. The condition stated:

29. Any proposed lighting for the field shall be indicated on the plan. The lighting must meet all Township code restrictions and the lighting plan must be approved by the Director of Building and Planning. If lighting is not proposed at this time, a separate land development approval shall be obtained if lighting is ever proposed on Arnold Field.

In accordance with this condition, the applicant has filed a land development application. Staff notes that the addition of lighting on any property would *not* normally trigger the submission of a land development application per Subdivision and Land Development Code requirements.

Montgomery County Planning Commission (MCPC) Review

The County review letter is attached. The County's review included the following recommendations which have been incorporated into the issues below and/or as recommended conditions of approval:

- Constructing pedestrian sidewalks along the Church Road and Fairhill Road frontages to improve safe pedestrian access to the site;
- Coordinating with Township staff to determine if any additional buffer landscaping may be warranted due to the proposed change in lighting on the site.

The County review also recommended that the applicant explore whether additional parking can be incorporated on the Arnold Field site. Staff notes that parking associated with the field is provide on the High School site and staff has recommended conditions to ensure that pedestrians can safely access the site from parking areas across Montgomery Avenue and to also discourage additional parking in the neighborhood surrounding the field complex.

Environmental Advisory Council (EAC)

The EAC reviewed the proposal at their February 25, 2020 meeting and recommended that the applicant utilize 100% clean energy sources to power the proposed lighting. The EAC also stated that they support the installation of the sidewalks on both Church Road and Fairhill Road. These recommendations have been incorporated into the issues below and/or included in the recommended conditions of approval.

Zoning

Lower Merion High School and Arnold Field were recently rezoned [IE2](#) (Institutional Educational) as part of the [Township's comprehensive zoning update](#). Previous to the rezoning, Arnold Field had been permitted as public school use in a residential zoning district. The parcel was primarily zoned R3, with the area along Montgomery Avenue being zoned R4 and the area along Fairhill Road being zoned R2.

The following table details the bulk, area and setback requirements for the existing and proposed conditions.

Zoning District	IE2	Existing	Proposed
Minimum Net Lot Area (sq. ft.)	15,000 sq. ft.	743,133 sq. ft.	743,133 sq. ft.
Minimum Lot Width	100 ft.	1,219 ft.	1,219 ft.
Minimum Front Yard	40 ft.	166 ft.	166 ft.
Minimum Side Yard	50 ft. ⁽¹⁾	363 ft.	363 ft.
Minimum Rear Yard	50 ft. ⁽¹⁾	34 ft.	34 ft.
Maximum Impervious Surface ⁽¹⁾	33% max	21.2%	21.2%
Maximum Building Height	3 stories up to 45 ft. ⁽²⁾	NA	NA
Parking	NA	431 ⁽³⁾	431 ⁽³⁾

(1) Minimum 20-foot buffer required. Arnold Field is an existing non-conformity to buffer requirements.

(2) Maximum of 5 stories, up to 65 feet where setbacks are increased by an additional 50 feet for each 10 feet above the three story or 45 feet height limit. This increased setback requirement is not required along a Primary Road.

(3) Parking for the Arnold Field is located across Montgomery Avenue at the Lower Merion High School (LMHS). The LMHS is nonconforming to the parking requirements. On June 4, 2015 the Zoning Officer confirmed that the LMHS has the right to maintain a parking deficiency of 791 spaces but may not reduce the number of parking spaces on the property below 431 spaces.

The Township Zoning Officer, in response to a formal request for Zoning Determination, has determined that the proposed lighting poles are *not* accessory structures and therefore *not* regulated by accessory structure

height limits and locations. The Zoning Officer noted that IE District lighting is regulated by [155-4.4.K.1](#) & [155-3.11](#) Ambience Standards and that athletic field lighting is not specifically regulated in the zoning code. The proposed lighting would be considered as lighting for open spaces, which is regulated by [Township Code Chapter 105: Noise and Exterior Lighting](#).

Tentative Sketch Plan

The purpose of a Tentative Sketch Plan is to determine appropriate locations for buildings, driveways and parking lots and how such improvements can least impact a site's natural features. It has become practice in the Township to use the Tentative Sketch Plan phase to flesh out other issues and give applicants a program to address at the Preliminary Plan phase.

Issues

1. Use

The installation of field lighting may increase the intensity and the duration of activity on the property. Lighting may result in higher intensity sporting events such as football and soccer games extending further into the evening and may also result in increased spectator attendance at these events. As a public school facility, the sporting and recreational uses are permitted. However, externalities resulting from the increased use must be mitigated.

The focus of the staff memo and recommended conditions of approval is to identify potential externalities and to propose reasonable means to address negative off-site impacts to the surrounding residential neighborhood. Staff has received extensive communication from proximate neighbors and the Wynnewood Civic Association concerning how and when the fields will be used as a result of the installation of the lights.

The School District has provided a summary of anticipated public school activities that may utilize the lights (located at the end of this document). The list does not propose any third-party use of the fields. The list is a positive step towards helping surrounding residents become comfortable with the changing pattern of use. Staff encourages the applicant to continue to communicate with neighbors regarding increased use or potential changes to established patterns of use. From experience with other institutional education uses staff has learned that regular communication and the establishment of predictable use scheduling goes a long way towards addressing community concerns.

2. Lighting

Lighting is regulated by [Chapter 105 Noise and Exterior Lighting](#). The Township's lighting regulations are primarily oriented to mitigate off site lighting trespass. The Township's Lighting Consultant reviewed the Lighting plans submitted with the application. The following is a summary of his review:

- *The majority of the exterior lighting is exempt from the International Energy Code (IECC).* The idea behind the exemption is that the power limitations would make it infeasible to provide a level of lighting that would allow the necessary level of illumination for the visual acuity that is integral to athletic events for both participants and spectators; furthermore, the control requirements of the code would not be applicable as there is no need to require the lighting operational outside of any scheduled events.

- The total power of the pathway lighting is limited by the IECC to 600W using the prescriptive requirements of IECC 405.5.1(2); however, the designer has opted to use an approved software for the overall design, known as ComCheck, that allows the energy consumption of the overall project to be evaluated to determine if the intent of the code is being met. This is a common approach for new and existing buildings as a 97-page standard cannot possibly uniformly apply to every situation, nor can it keep up with available technology with a triennial publishing cycle. ***The intent of the exterior lighting requirements of the code are being met for this project.***
- The photometric plot calculation, which is a two-dimensional aerial perspective that projects the area of expected illumination coverage, indicates that ***there will be no light spillover past the property boundaries from the pathway lighting. The proposed stadium lighting will have spillover at the property boundaries within the tolerances established by the ordinance.*** Lighting levels will be noticeable from the adjacent residential neighborhoods and will be roughly equivalent to lighting levels at twilight.
- The site design also proposes to reinforce the existing landscape buffers by planting trees to mitigate potential spillover at the property line. While additional plantings may not be 100% effective immediately, the additional plantings will provide additional screening when fully matured.

3. Noise

Sporting or recreational activities are exempt from the Noise standards in Chapter 105 Noise and Exterior Lighting, provided that:

- (a) Such activities, do not produce sound at the property line of 10 dBA or more in excess of the sound levels set forth in §105-3; and
- (b) Such exemption shall not apply Sunday through Thursday from 10:00 p.m. to 8:00 a.m., or Friday and Saturday and federal holidays from 11:00 p.m. to 9:00 a.m.

The obvious noise concern with this application is the potential off-site impact of amplified sound associated with evening sporting events. Staff is recommending condition of approval requiring the applicant to provide information regarding the type, location, orientation and timing of amplified sound associated with the increased use. The purpose of this condition is better understand and mitigate off site noise externalities in evening hours before they become an issue.

4. Buffer and Landscaping

The property is subject to an IE2 Zoning Code requirement requiring a minimum 20' foot wide buffer to be provided along the side and rear yards of the property. ***The Zoning Officer has confirmed that Arnold field is existing nonconforming to the current buffer requirements and when a property is nonconforming to a buffer it can remain nonconforming provided no other infringements into the buffer are proposed.*** The Township may reasonably request enhancements to an established buffer area where feasible. Staff notes that the Subdivision and Land Development Code section 135.24. D.4 also permits the Board of Commissioners to impose reasonable buffer requirements when any of the following conditions may reasonably be expected to occur as a result of the proposed subdivision or land development:

- (a) Substantial changes in the level or quality of air pollutants or the number of people affected by air pollution.

(b) Substantial changes in the level of noise or vibration or the number of people affected by noise or vibration.

(c) Substantial changes in the site views from nearby premises or in the degradation of the privacy of nearby premises.

While not required as part of Tentative Sketch the applicant has submitted a landscape plan proposing 16 deciduous trees and 28 evergreen trees to be planted along the residential perimeter of the property. A condition has been recommended requiring the applicant to work with staff prior to continue to refine the landscape plan prior to the submission of the Preliminary Plan to address visual, noise and lighting impacts from the both the physical lighting and resulting from the increased intensity of use.

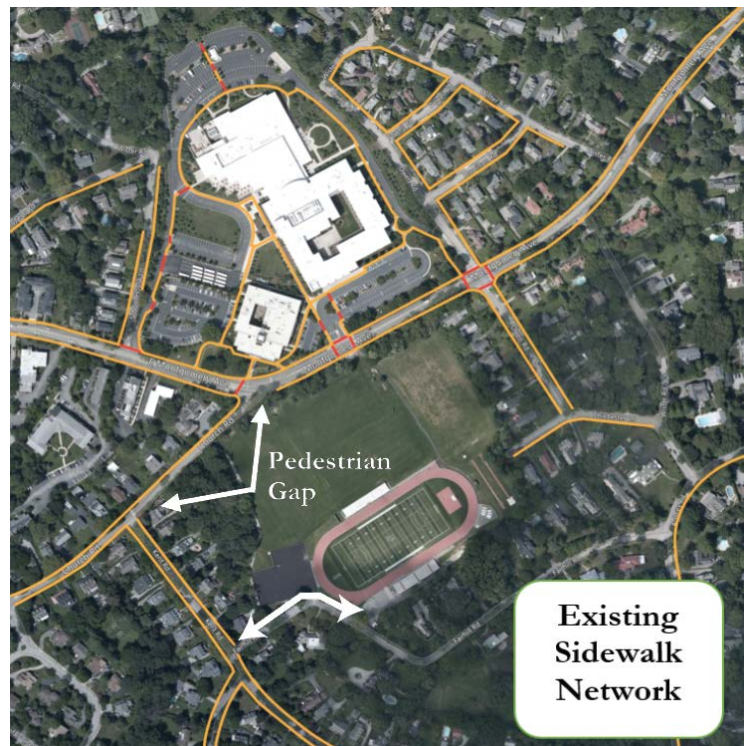
5. Pedestrian Safety and Access

[Subdivision and Land Development Code Section 135-28](#) requires sidewalks to be provided “along heavily traveled streets and at any location where the Board of Commissioners shall determine that sidewalks are necessary for public safety or convenience.” Staff notes that sidewalks are not currently provided along the property’s frontage of Church Road and Fairhill Road. Arnold Field is located in Priority 1 area on the Lower Merion Township Comprehensive Plan Prioritized Pedestrian Map. The applicant has requested relief to not install the sidewalk along either frontage. Both the Montgomery County Planning Commission and the Environmental Advisory Council recommended installation of both sidewalks.

- Church Road Sidewalk: The applicant identified the presence of mature trees and slopes as a reason for not installing sidewalk along Church Road. Additionally, there is a single property that does not contain a sidewalk on Church Road, and there for the sidewalk would not connect.

Staff has included a condition requiring the applicant to work with staff to install a multiuse path above the slope outside of the right of way in lieu of disturbing steep slopes and mature trees within the right of way. This alternative could be field located and would likely require the existing chain link fence along Church Road to be relocated.

The Township is working independently of this application to safely improve pedestrian mobility between Kent Road



and Arnold Field. Staff supports deferring installation of pedestrian improvements on Arnold Field until a connection can be made to Kent Road.

- **Fairhill Road Sidewalk:** Fairhill Road is a very active pedestrian route. Staff has included a condition requiring the applicant to install a sidewalk along the Fairhill property frontage extending from the property boundary of 225 Kent Road to the existing pedestrian entrance adjacent to the access driveway.

Pedestrian access to Arnold Field from the existing parking area across Montgomery Avenue must be safe and comfortable for pedestrians. Staff has included a condition requiring the applicant to provide a connectivity plan with the Preliminary Plan submission. Staff has also included a condition of approval requiring the applicant to provide a pedestrian study to better understand pedestrian usage and access.



Relief

The application requires relief from the following Code sections:

The applicant seeks the following relief:

- A. Subdivision and Land Development Code Section, 135-28 to not provide sidewalks on Church Road or Fairhill Road.

Staff does not support relief from this code requirement. Staff recommends that the applicant install sidewalks along the Fairhill Road frontage and work with the Township to install a multi-use path outside of the public right of way along Church Road in lieu of a traditional sidewalk. Staff supports deferral of Church Road pedestrian improvements until the time that the improvements can be reasonably extended to Kent Road.

Action

The Planning Commission must take the following action for this application:

- Provide a recommendation on the **Tentative Sketch Plan**.
- Provide a recommendation on the following relief:
 - A. Subdivision and Land Development Code Section, 135-28 to not provide sidewalks on Church Road or Fairhill Road.

**300 E. Montgomery Avenue, Lower Merion High School - Arnold Field,
Ardmore, Ward 5, LD# 3874**

Lower Merion High School

Anticipated Evening and Night Usage of Arnold Field

Football	2 Teams - V/JV 1 Scrimmage/10 Games Total Per Season 4-5 Home Night Games per season Games would start at 7:00pm
Field Hockey	3 Teams - V/JV/JVB 2 Scrimmages/18 Games Approximately 3-5 Home Night Games per season
Girls Soccer	2 Teams - V/JV 2 Scrimmages/18 Games Approximately 3-5 Home Night Games per season
Boys Soccer	3 Teams - V/JV/9th 2 Scrimmages/18 Games Approximately 3-5 Home Night Games per season
Fall Practices	Will need practice availability if there are weather issues. Practices will not go past 8:00pm
Boys Lax	2 Teams - V/JV 2 Scrimmages/18 Games Approximately 0-5 Home Night Games per season (Do not need to use in Spring)
Girls Lax	3 Teams - V/JV/JVB 2 Scrimmages/18 Games Approximately 0-5 Home Night Games per season (Do not need to use in Spring)
Spring Practices	Will need practice availability if there are weather issues. Practices will not go past 8:00pm

** The information above was provided by Jason Stroup, Director of Activities and Athletics at Lower Merion High School. It is difficult to provide a fully comprehensive and exact schedule as there are many variables such as weather, rescheduling of LMHS teams and opposing teams, field availability, and, in the fall, stacked girls soccer and field hockey Central League schedule. From the start of fall sports through September, LMHS anticipates only needing field lights for practices if there is a weather event. Lights may be needed occasionally outside of a weather event for practices from early October through mid-November due to available daylight. LMHS may need field lights for practices outside of a weather event in early March through mid-March due to available daylight. From mid-March through May, LMHS would only need the field lights for practices due to a weather event.*
