



August 24, 2011

Mr. Thomas P. Corcoran
President, Delaware River Waterfront Corporation
121 N. Columbus Boulevard
Philadelphia, PA 19106

Re: Master Plan for the Central Delaware

Dear Mr. Corcoran,

CDAG is encouraged by the process and main features of the Master Plan for the Central Delaware as it has evolved over the past nineteen months. We appreciate the DRWC's communication with CDAG and your responsiveness to our comments and concerns.

Continuing our participation in this important work and in response to the "Final Draft" of the Master Plan unveiled on June 13th, and Master Plan Full Report posted subsequently, we offer, and request timely feedback on, the following points, which fall into two main categories: (1) Comments on the Master Plan Final Draft; and (2) Comments on the as-yet unwritten Zoning Component that will codify the Master Plan in law.

(1) COMMENTS ON THE MASTER PLAN FINAL DRAFT

Overall Comments:

Transit Recommendations

Comment: Transit solutions are balanced, phased, and achievable

CDAG commends the multifaceted, balanced, phased, collaborative approach to the short-term and long-term transportation solutions that have been added to the Master Plan since our comments of June 2011.

Walking Trail Along Columbus Blvd./ Delaware Ave.

Comment: Trees alone are not a sufficient buffer

Trees alone are not a sufficient buffer; there needs to be a more substantial, human-scale vegetation buffer, combined with shade trees, to separate heavy vehicular traffic from pedestrian traffic, where the walking trail must be positioned adjacent to the roadway.

Urban Edge Management and Program

Comment: Commercial frontage should be focused on the street side, not the river side

Curiously, the maps in the *Implementation* section showing ground-floor activation and street-wall build-to locations seem to promote a hard urban edge on the riverfront, while not holding the hard urban/activated street line on Delaware Ave./Columbus Blvd. This seems the inverse of the principles of the Civic Vision.

CDAG recommends focusing ground floor commercial activation and a hard urban street edge on the street side rather than the river side. This allows for a staged softening of the urban fabric moving from the city towards the river, more effectively attracting people to the commercial corridor of Delaware Ave./Columbus Blvd., and then eastward to the waterfront, where we recommend allowing the river edge to be greener and softer.

Comments on Central Section:

Penns Landing Boat Basin

Comment: It is generally felt to be over-built and intensely commercialized

The Boat Basin plan suffers from an overconcentration of built program to the detriment of accessibility and the natural beauty and draw of the waterfront. CDAG recommends a reduction in the density of structures programmed, and adjustments should be made to assure a greener area.

CDAG appreciates the need to balance waterfront access and recreation on the one hand; on the other hand, development that will activate the area and generate much-needed revenue to invest in other projects along the Central Delaware. The current proposal for this area simply gets the balance wrong. The Boat Basin is the narrowest, most compressed part of the Central Delaware Waterfront and should not be overbuilt. CDAG recommends a reduction in the density of structures and increased greening.

Penn's Landing Promenade

Comment: This critical waterfront amenity should be greener and more user-friendly

The current design featuring a hardscaped, largely unshaded waterfront edge of this landmark promenade does not take advantage its inherent benefits and features. CDAG recommends it be designed to be softer and greener along the water's edge, with the hardscaped edge on the street side.

Market Street Ramp

Comment: Repurposing the Market Street ramp would reduce cost and enhance use

CDAG strongly agrees with the removal of the scissor ramps in the Market Street area. However, we feel it is unnecessary and unwise, both fiscally and programmatically, to rebuild the Market Street ramp itself as a narrow pedestrian walkway. The existing ramp serves as a street grid extension to the river. It offers tremendous potential as a ready-made linear park, pairing pedestrian river access with pedestrian-friendly destination uses such as street vending, farmers' markets, and small-scale performances.

Comments on Northern Section:

Projected Land-Use Program

Comment: *Industrial-exclusive program fails to connect with the adjacent community*

In order to fulfill the key goal of reconnecting neighborhoods to the river, usage dedicated to industrial, commercial, and large-scale entertainment should be generously interspersed with mixed residential uses. The residential component of this mixed-use approach increases the diversity of land uses and enhances the stability of the social fabric through future fluctuations in the economy.

Spring Garden Site and Connector

Comment: *Spring Garden site must be developed through a rigorous public process*

CDAG recognizes the need for the Spring Garden site to balance waterfront access and recreation with development to activate this site and raise revenue. The Master Plan has the potential to achieve this balance, but questions remain about the height and massing of mid-rise structures, and the relationship to the adjacent developed parcel to the north. Because this is the largest contiguously-owned parcel controlled by the DRWC, CDAG recommends the RFP process fully engage both CDAG and the public, to ensure the delicate balance necessary for this site is preserved in the final product.

(2) COMMENTS ON THE FUTURE ZONING COMPONENT

The Master Plan For The Central Delaware will live or die with the details of the zoning component codifying its principles. Because the zoning component has not yet been written or presented to CDAG or the public, many of our previous comments and concerns require continued emphasis:

Re-Mapping

Recommendation: *Re-map the Central Delaware now*

Few parcels of the District are properly zoned for the uses proposed by the Master Plan. Re-mapping is essential to minimize the need for zoning variances as development occurs. Variance-driven development on the waterfront would open a Pandora's Box that could spell a slow, agonizing "death by a thousand cuts" for the Master Plan, eviscerating its principles and proposals, parcel by parcel and project by project.

CDAG urges the DRWC to include a proposed re-mapping of the entire District when it presents the Master Plan to the Planning Commission, and the zoning component to City Council.

Immediate re-mapping could also make palatable the majority of the proposed height controls recommended in the Master Plan, or render the height controls unnecessary, if an appropriate underlying zoning classification such as the new CMX-2.5 were assigned to most parcels where mixed-use (commercial and residential) is desired. CMX-2.5 prescribes a 55' height limit and would ensure a maximum building height more consistent with most adjacent neighborhoods. At some parcels where taller development is appropriate, the new CMX-3 may be the most appropriate classification, due to the absence of a height limit, but with density controlled by a base F.A.R. of 500%.

To emphasize the principles of the Master Plan to make it "real Philadelphia", the underlying zoning classifications of adjacent residential neighborhoods should be extended eastward to the adjacent riverside development parcels, to continue the scale of the urban fabric to the waterfront.

Massing Controls

Recommendation: Require “step backs” adjacent to trails, access points, and view corridors

It is not clear how the Master Plan will work to prevent a claustrophobic, “cavern” effect when large buildings abut the waterfront trail, setback, and connector streets. CDAG recommends the zoning component supporting the Master Plan include massing controls in the form of a “step-back” or “wedding cake” formula to prevent structures from overwhelming the trail, setback, and river-access areas. CDAG also recommends that the *Sky Plane Controls* of the proposed new Zoning Code be employed to manage massing of taller structures and preserve view corridors along the waterfront.

Height Limits

Recommendation: Allow CDAG to review height-exception criteria

The Master Plan allows structures higher than the standard three, five, and eight-story district controls. Excess height limits are proposed to be based on certain criteria, rather than on mapping specific parcels. This is a sensible approach, but it puts tremendous pressure on the criteria, which, if not written properly, could lead every property owner to seek height exceptions or challenge the legality of the standard height limits, rendering the Master Plan moot. These criteria must be specific, legally defensible, and allow for no deviation. CDAG respectfully, but strongly, requests to see these criteria as soon as possible.

Historic Preservation

Recommendation: Make use of the new zoning code’s preservation language

The Master Plan lacks substantive language that would enable the preservation and showcasing of the Philadelphia waterfront’s rich colonial and industrial history. CDAG suggests that the zoning component of the Master Plan mimic the frequent reference to the *Historic Preservation Chapter 14-1000* of the latest version of the New Zoning Code Draft Proposals.

Nuisance Uses

Recommendation: Ensure Night Club uses do not proliferate

Because the Master Plan process pre-dates the creation of the City’s new Zoning Code, it is CDAG’s understanding that the Master Plan and Master Plan Report will not contain remapping recommendations that use the new Code’s zoning classifications. For this reason it is unclear whether, and to what extent, the Master Plan’s recommendations will allow or prevent Assembly and Live Performance uses, i.e. nightclubs, as a matter of right. Because the proliferation of such uses could undermine the entire Master Plan (and quality of life in waterfront areas), CDAG recommends that specific language be included in the zoning component supporting the Master Plan to specifically limit or disallow these uses within the district.

We appreciate having the opportunity to work together with the DRWC on the Master Plan. We remain at your disposal to discuss any of the comments above, and hope our comments will help inform the process so that the end result indeed reflects the values and concerns of neighboring communities.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Steven A. Weixler". The signature is fluid and cursive, with a large initial 'S'.

Steven A. Weixler
Chair, Central Delaware Advocacy Group

- c. Councilman Frank DiCicco
Philadelphia City Planning Commission, Mr. Alan Greenberger
Philadelphia City Planning Commission, Mr. Gary J. Jastrzab
DRWC Master Plan Manager, Ms Sarah Thorp
Mr. Mark Squilla