



November 14, 2011

Via Email

Mr. Alan Greenberger, Chairman
Philadelphia City Planning Commission
One Parkway, 13th Floor, 1515 Arch Street
Philadelphia, Pennsylvania 19102

Re: City Council Bills No 110718/110719/Sugarhouse Casino Phase II Expansion

Dear Planning Commission:

The Central Delaware Advocacy Group would like to advise the Philadelphia City Planning Commission it is opposed to:

Bill No. 110719: "To amend the Philadelphia Zoning Maps by changing the zoning designations of certain areas of land located within an area bounded by the southeasterly side of North Delaware Avenue, the centerline of former Shackamaxon Street, the Pierhead Line of the Delaware River and a line approximately parallel to the centerline of former Shackamaxon Street being a property line located on the southeasterly side of north Delaware Avenue approximately 260 feet north east of the southwesterly side of former Shackamaxon Street and extending from that point to the Pierhead Line of the Delaware River."

CDAG believes that this city council bill and the proposed expansion of the Sugarhouse Casino are contrary to the public good and the intention of the Civic Vision for the Central Delaware. We feel it is a dangerous precedent and misses an opportunity to influence and change the design to be consistent with the goals of the Central Delaware Waterfront Master Plan. Our specific issues of concern are:

Building Massing/Program Arrangement

The current proposals do not disperse the building program across Philadelphia city scale parcels or allow for through traffic within the site. The large structured parking garage and sea of surface parking create a single use of parking that dominates the site.

There is no active street frontage with ground floor retail and commercial uses to enliven Delaware Avenue. The secondary uses of the site currently cannot be accessed without passing through the primary use. Also, the addition of the garage does not appear to reduce the amount of surface parking on the site.

Delaware River City Corporation • Dickenson Narrows Civic Association • Fishtown Neighbors Association • Franklin Bridge North Neighbors • Neighbors Allied for the Best Riverfront • New Kensington Community Development Corporation • Northern Liberties Neighbors Association • Old City Civic Association • Old Swedes Court Homeowners Association • Olde Richmond Civic Association • Penn Future • Pennsport Civic Association • Pennsylvania Environmental Council • Pennsylvania Horticultural Society • Port Richmond on Patrol and Civic Association • Queen Village Neighbors Association • River's Edge Community Association • Society Hill Civic Association • Society Hill Towers Homeowners Association • South Street Headhouse District • Whitman Council •



Reconnect the city to the river's edge

The massing of the proposed designs creates a very large structure along the river, this eliminates the possibility of allowing view corridors through the site to the river and breaking up the mass. The view corridor to the river from Shackamaxon Street is completely blocked by a 95' tall parking structure.

Honor the river

Locating a loading dock along the waterfront limits the potential for further uses along the river to activate the waterfront and trail.

The large parking garage at the river's edge is not a use that takes advantage of the views out over the river. Further, the ground floor of the garage structure is not animated with retail/commercial uses that would enhance the pedestrian experience while circumnavigating the parking structure via the trail.

Design with nature

The proposals make no note of storm water management or treatment on site. There are no obvious designated areas for regenerating the sites natural ecology and re-naturalizing the river's edge.

The spirit of Philadelphia's Master Plan for the Central Delaware Waterfront is to create a world-class waterfront that will attract Philadelphians and visitors from around the world for future generations, and the Central Delaware Advocacy Group takes the Plan very seriously.

Currently CDAG believes this project does not have acceptable conformance with the Civic Vision for the Central Delaware and is a missed opportunity.

We are asking the Planning Commission to vote against this plan, in its current form, and recognize the scale does not fit in with the Civic Vision and sets a serious precedent for development along the river.

Respectfully Submitted,

The Board of the Central Delaware Advocacy Group

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