



August 15, 2012

Philadelphia City Planning Commission
1515 Arch Street, 13th Floor
Philadelphia, PA 19102

VIA EMAIL

RE: Application of Master Plan to Development Proposals in the Central Delaware District

Dear Commissioners:

The Central Delaware Advocacy Group (CDAG) is excited by the influx of development proposals in the Central Delaware district. These proposals represent key steps towards the world-class waterfront Philadelphia has been working for ever since the Central Delaware planning process began: a mixed-use waterfront with new residences, new businesses, expanded industry, new jobs, and enhanced river access and recreation.

Yet these proposals will contribute positively to the waterfront only if they conform substantially to the *Master Plan for the Central Delaware Waterfront*, which the Commission unanimously adopted in March of this year.

The Plan is now official Planning Commission, and City, policy. But whether this policy becomes reality and produces facts on the ground as intended, is up to you.

At recent Commission hearings on Marina View, Pier 40 North, and Piers 34-35 South, CDAG has been heartened to see Commission staff using a checklist to track projects' conformity with the Plan, as well as developers' progress, or lack of progress, in addressing areas of non-conformity.

We also have been heartened to see you, the Commissioners, engage in spirited discussion about areas of non-conformity, and about the precedents you would be setting with your votes on these first proposals of the Master Plan era.

But we have been disturbed by how inconsistently these observations and concerns have translated into action. Marina View was given final approval despite the Commission's serious and legitimate concerns about height, massing, and first-floor uses. At "information-only" presentations, the Commission gave the developer of Pier 40 North and 34-35 South ambiguous direction, making it unclear how, to what extent – or even whether – he would need to conform to the Master Plan in order to gain approval.

Because of the Plan of Development process, you are in most cases the sole arbiters of waterfront proposals. If you express concerns but fail to take action to enforce the Plan, or if you fail to give developers sufficient direction based on the Plan, you render the Plan moot.

Delaware River City Corporation • Dickinson 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 •

Among our areas of concern:

- The burden should be on applicants to demonstrate why the 100-foot height limit should be exceeded – not on the Commission to explain why it should be obeyed.
- Site conditions that require ground floors to be raised a few feet above grade should not justify height waivers beyond that same few feet.
- The Commission also should take account of the role of height limits in preventing projects from becoming so dense that they destroy future demand for residential development elsewhere in the area.
- The claim that the waterfront cannot yet support active, commercial ground-floor uses will become a self-fulfilling prophecy if the Commission does not enforce this key principle of the Plan.
- POD review always should insist on maximum feasible public river access and waterfront setbacks.
- Staff review and Commission feedback on “information only” presentations should give applicants clear direction on the core feasibility or infeasibility of tall, dense, or otherwise nonconforming proposals.
- The Commission should state clearly what, if any, extra public benefit a project might provide in exchange for nonconformity with provisions of the Plan.
- Commission motions should include specific explanations of the basis for granting any waivers or exceptions from provisions of the Plan.

As citizen-stewards of the Plan, and as the Plan’s chief civic advocate, CDAG urges you, in the strongest possible terms, to stand more firmly and more clearly for the Plan and its provisions, as you review current and future development proposals in the Central Delaware district.

With Pier 40 North, Piers 34-35 South, and 400 N. Columbus Blvd. up for review, it is imperative that you demonstrate appropriate commitment to the Master Plan commensurate with the remarkable effort invested in the Plan by thousands of Philadelphians, and with your own unanimous adoption of the Plan.

As always, CDAG appreciates the Commission’s openness and public accountability, and looks forward to continuing to work together with you for the waterfront we all seek and deserve.

On behalf of the Board of CDAG,



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cc: Mayor Michael Nutter
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