



June 2, 2011

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

Re: Master Plan

Dear Mr. Corcoran,

CDAG is excited to see the Master Plan for the area of the Central Delaware coming to the final phase as it is readied for the public unveiling on June 13th at Festival Pier. We are pleased to have been included in this important work and afforded the opportunity to advance our advocacy of Philadelphia's *Vision* for the Central Delaware.

In response to the latest version of the Plan made available to CDAG, and in advance of the public unveiling on Jun 13th, we would like to offer the following comments for consideration by the Master Planners before finalizing their presentation:

Transportation

Recommendation: Create a phased plan using buses and testing routes

The Master Plan's transportation component is not sufficiently detailed and depends entirely on light rail, when the required infrastructure funds might not be available for years. CDAG suggests a more fleshed out, phased approach, including hybrid buses or electric, trackless trolleys, deployed in trials to test routes, build ridership, and test connections to existing hubs like 2nd and Market, 2nd and Spring Garden, Market East, Suburban Station, and 30th St. Station.

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.

Massing Controls

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

It is not clear how – or if – the Master Plan will work to prevent a claustrophobic or “cavern” effect when large buildings abut the waterfront trail, setback, and cross streets. CDAG suggests that 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.

Height Limits

Recommendation: Allow CDAG to review height-exception criteria

The Master Plan allows structures in excess of the standard three, five, and eight-story district controls. Excess height limits are 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 much of the Master Plan moot. So these criteria must be very specific, legally defensible, and allow for no “wiggle room”. For this reason, CDAG would like to see these criteria, in writing, as soon as possible.

Re-Mapping

Recommendation: Re-map the Central Delaware now

Few of the parcels of the district are appropriately zoned for the uses proposed by the Master Plan. Re-mapping is essential to realize the goals of the Master Plan and minimize the need for zoning variances as development occurs. CDAG suggests that the Master Plan presented to the Commission, and the zoning component presented to Council, be accompanied by a proposed re-mapping of the district.

Immediate re-mapping also could make palatable the majority of the proposed height restrictions, or render the height controls unnecessary, if an underlying zoning classification like the new CMX-3 were assigned to most parcels where mixed-use (commercial and residential) is desired. Because of its 500% FAR, CMX-3, would help ensure a reasonable density of development.

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 would 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 (not to mention 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.

Appearance of Inequity in Investment in Far-North and Far-South Areas

Recommendation: Clarify the difference between plan detail and plan timeline; acknowledge the valuable role of community input

Despite the Consultants' good work fleshing out plans for the far north and far south portions of the Central Delaware, the perception of inequity remains among many stakeholders in those areas. This is primarily because the difference between *what* is planned for those areas, and *when* the plans can be implemented, has not been made sufficiently clear. In this vein CDAG suggests that the June 13th public presentation highlight the following points:

1. The Plan's level of detail and focus – and its diversity of proposed uses – is now similar across the entire Central Delaware, including the far north and far south.
2. The detail of the Master Plan in the far-north and far-south has been enhanced because of the concerns raised by, and the input of, those communities.
3. Of necessity, initial implementation and investment has to be focused on areas owned and controlled by the City, and most of these do not lie in the far north or far south.
4. The Plan for the far-south will take longer to implement because of the established big-box commercial uses, and the need to allow for long-standing port expansion plans.
5. The Plan for the area of the far-north will take longer to implement due to the unique property ownership issues that have prevented, and in the short term may continue to prevent, redevelopment.

Of course, we remain at your disposal to discuss any of the comments above, and hope all of our comments will be incorporated and contribute to the final product and presentation of the Master Plan.

Sincerely,



Steven Weixler,
Chairman, Central Delaware Advocacy Group

c. Sarah Thorp