



October 14, 2013

Mr. Alan Greenberger
Deputy Mayor for Planning and Commerce
Philadelphia City Planning Commission
1515 Arch Street, 13th floor
Philadelphia, PA 19102

re: Bill 130657 – Proposed Amendments
TITLE 14, ZONING AND PLANNING, CHAPTER 14-300, ADMINISTRATION AND
PROCEDURES – Registered Community Organizations and Civic Design Review

Dear Mr. Greenberger:

The Central Delaware Advocacy Group (CDAG), a coalition of 20 civic and non-profit organizations committed to implementation of the Master Plan for the Central Delaware, supports the provisions of City Council Bill 130657 that would reverse the onerous, overly prescriptive notification rules adopted by Council in 2012.

At the same time, CDAG is concerned about the provisions of Bill 130657 that would eliminate the distinction between Local and Issue-Based Registered Community Organizations (RCO). Even though CDAG would still qualify as an RCO, we believe this is the wrong approach, for two reasons.

It would undermine the neighborhood groups originally intended to be Local RCOs. Under the Bill, Issue-Based RCOs like CDAG could become RCOs with equal standing to neighborhood civic associations. This is precisely the kind of jurisdictional conflict the RCO statute was meant to avoid. It would place unwanted administrative burdens on groups like CDAG. More importantly, it would give groups like CDAG parity with neighborhood civics – a status they should not have, and, in the case of CDAG, a status we do not want. It is essential that RCO rules protect civics from the possibility of non-civics creating confusion, or trying to neutralize neighborhoods' voices in the zoning process.

It would shut out groups with legitimate interests in the development process. By limiting eligible groups' coverage areas to 3.5 square miles, the Bill would prevent many issue-oriented organizations from getting timely, systematic notification of upcoming ZBA and Civic Design Review cases and meetings. Under the current regulations, Issue-Based RCOs make no demands on the Applicant or the Local RCO beyond simple notification via an email message or mail service. In this regard, the Bill's proposed changes appear to be a solution in search of a problem.



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For these reasons, we believe it essential that the Planning Commission and Council work together to alter the Bill to retain its many positives while avoiding these unintended negative consequences.

Finally, we note one more issue. While the Bill provides welcome amendments to the previous notification rules, it seems to have removed all requirements for direct public notice of RCO meetings and Civic Design Review meetings. We feel this oversight should be remedied. There must be some requirement for the public to be informed in advance of such meetings.

The Board of CDAG thanks the Philadelphia City Planning Commission for its consideration in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matt Ruben".

Matt Ruben
Chair, CDAG

- c. Councilmember Henon
- Councilmember Greenlee
- Councilmember Tasco
- Councilmember Johnson
- Councilmember Green
- Councilmember O'Neil
- Council President Clarke