

MEMORANDUM

Department of Licenses and Inspections
City of Philadelphia

To: David Schaaf, Urban Design

From: Sarah Kaiser, Zoning Examiner

Date: September 23, 2013

Subject: Letter of Clarification, 210-220 S 25th Street (A/P No 486694)

This memo is in response to the request for clarification in the Civic Design Review letter for the subject application dated September 4, 2013 (sent September 11, 2013).

The request was to further clarify the definitions of "underground parking" and "below grade parking," particularly as they apply to the zoning bonuses received in this project.

The property is located within an RMX-3 district and within the 100-year flood zone. In accordance with Table 14-702-1, if underground accessory parking and loading is provided, the allowable Gross Floor Area, as a Percent of Lot Area, can be increased up to 100%. The parking that is provided must meet the standards of *§14-702(9)(a)(.1)-(.4)*. The clarification that was requested pertains to the second standard (*§14-702(9)(a)(.2)*) which states "All of the accessory parking constructed shall be located below grade."

The zoning code provides the following definition:

§14-202(5) - Average Ground Level.

(a) Except as otherwise expressly stated in this Zoning Code, for the purpose of measuring the height of a structure, average ground level shall be calculated as the mean (average) ground level at the four principal corners of the subject structure, or the three principal corners in case of a triangular shaped structure footprint.

(b) When a lot is located within a 100-year floodplain, any point located one foot above the regulatory flood level shall be considered to be at the average ground level of the lot.

(c) When a lot is located over an active railway right-of-way, any point located four ft. above the minimum clearance that is required to be maintained above the railway right-of-way and within 110 ft. of the outward edges of the right-of-way, shall be considered to be at the average ground level of the lot.

According to *§14-202(5)(b)*, because the lot is located within the 100-year floodplain, the average ground level on that lot is considered to be located 1 foot above the regulatory flood level.

The plans were stamped by City Planning and Identified the Flood Plain Zone as "AE" and the Floor Elevation as "12.93" CD. The plans mark this flood elevation indicate the elevation of "1 foot above flood elevation" which is 13.93 ft. All the parking is provided below this elevation and therefore the area bonus was applied to the application.

Please let me know if further clarification is required. Thank you.